

Summary of

POLICIES & PROCEDURES



VITALIVING

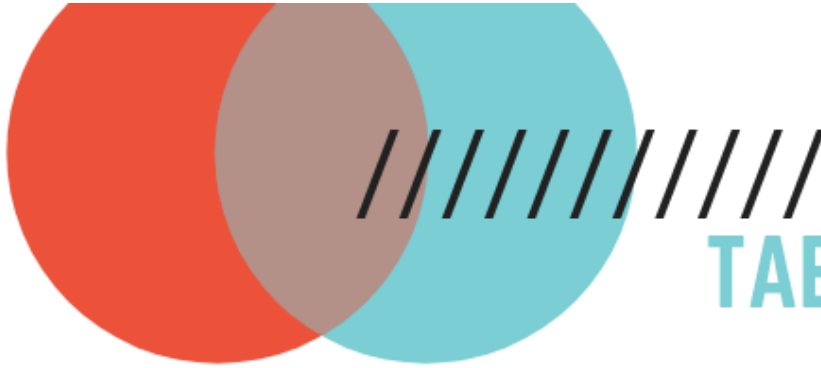


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ABOUT US

VITA LIVING

Our mission is to provide lifelong services and supports for children and adults with intellectual and developmental disabilities to promote personal growth toward a safe, satisfying, and meaningful life in their community.

Since 1982, Vita Living has offered vital programs for individuals with disabilities: group home residences in Houston-area neighborhoods, a centrally located day center, and case management services across seven counties. VLI's experienced and caring staff save lives and renew hope on a daily basis for this greatly underserved and vulnerable population.

VLI's group homes and additional services follow a "creative caring" model: staff are trained in one-on-one behavioral interventions that help to ensure a higher quality of life and social interaction while basic needs consistently are met.

Through its dedication to lifelong services based on individualized treatment plans, daily care, and supervised socialization, VLI is recognized today as a leading proponent of integrated community living and an expert in the care of individuals with complex disabilities and behavioral challenges.

OUR CORE PROGRAMS

01

RESIDENTIAL

Vita Living owns and operates 20 Houston-based group homes for adults with intellectual and developmental disabilities.

02

DAY PROGRAM

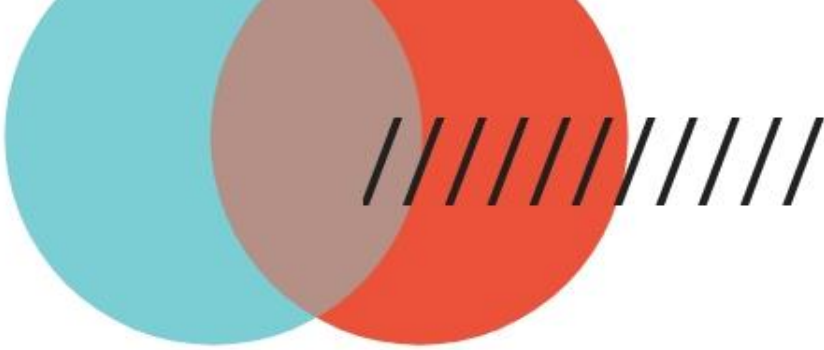
Approximately 70 of our clients attend the Vita Living Center, our centrally located day program.

03

CASE MANAGEMENT

Vita Living provides case management services to over 300 children and adults across a seven-county region in Texas.





From the CEO

Dear Staff Member,

We hope you find your work here at Vita Living interesting, challenging, and rewarding. Vita Living has established a reputation over the years for high quality services. This reputation has been developed because our employees care about the clients we serve and take their responsibilities seriously. Vita Living's management is supportive of an environment which encourages teamwork. This basis of teamwork is job satisfaction, which depends on many things. One of these things is an understanding of our policies, procedures, and benefits.

This Handbook is intended to answer many of the common questions you may have as part of your employment. For more detailed information you are encouraged to contact Human Resources to review applicable policies in their entirety and/or consult with your supervisor.

Again, thank you for your commitment to Vita Living.

Joseph Cooper, MSSW

Chief Executive Officer





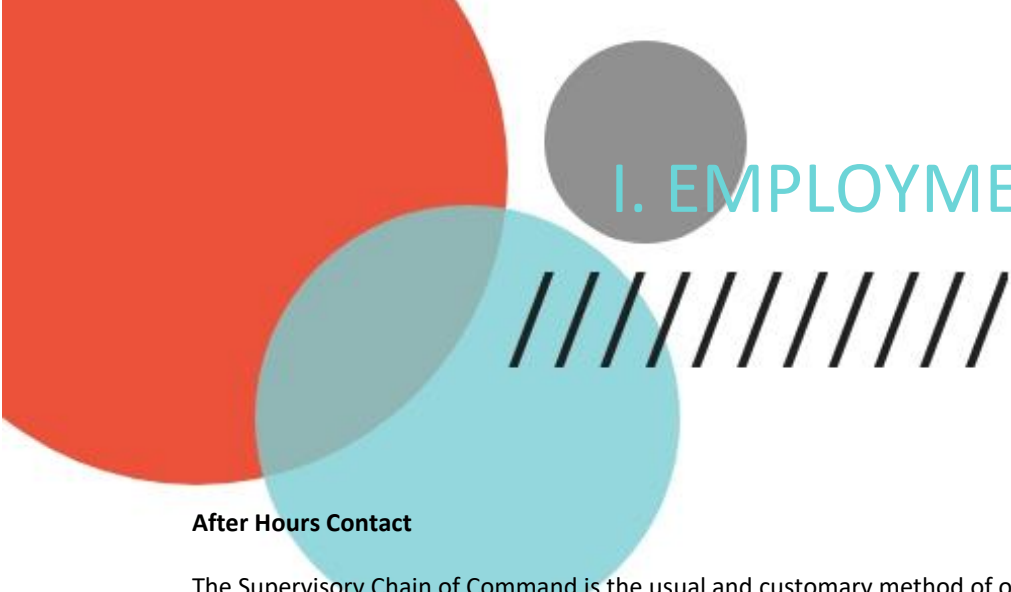
A Message from Human Resources

Human Resources is committed to developing and implementing best practices, policies, and procedures that contribute to the mission of Vita Living. We know that our employees are a valuable asset and strive to treat all employees with dignity and respect. Vita Living's management team recognizes the compassion our employees have for our clients, and so have developed career paths for employees to grow professionally within the company.

This Handbook is written for you as an employee of Vita Living. The Handbook provides information regarding general HR policies and procedures. The information contained in this Handbook is provided in summary; detailed policies and procedures related to employment are held in the Human Resources department. Employees are encouraged to visit HR to review company policies and procedures.

Policies and procedures change over time to meet the needs of the company. HR will send notices to employees to announce changes but may also revise this Handbook as it becomes necessary. Vita Living reserves the right to modify, suspend, revoke, terminate or change any or all plans, policies, or procedures in whole or in part, at any time, with or without notice.

The policies and procedures are not intended to create a contract, nor to be construed to create a contract of any kind between Vita Living and any or all of its employees; nor to guarantee employment for any period of time. If a conflict exists or develops between any practice described in this Handbook and the law, the requirements of the law will supersede the written practice.



I. EMPLOYMENT

After Hours Contact

The Supervisory Chain of Command is the usual and customary method of obtaining ongoing information and assistance. If there is a medical, fire, or police emergency the appropriate response is to dial 911 and follow directives. Non-emergency medical assistance is to be addressed by contacting the immediate supervisor. Behavior management issues are to be addressed by contacting one or more of the following: the immediate supervisor, the Chief Operating Officer. All other work-related issues should be directed to the immediate supervisor or HR.

Alternate Work Assignments

At the discretion of management, employees may be required to transfer to a temporary or permanent work location/shift. As situations arise, including position vacancies, staff call-offs, vacation coverage or any other reason which necessitates a change in work assignment, staff may be reassigned on a short-term, long-term, or permanent basis. Supervisors will inform employees of the change in as timely manner as the situation permits; and will be informed of the duration of the assignment, if foreseeable. Refusal to comply with alternate work assignments may result in disciplinary action.

Americans With Disabilities Act

It is the policy of VLI to provide equal employment opportunity (EEO) to all persons regardless of age, color, national origin, citizenship status, physical or mental disability, race, religion, creed, gender, sex, sexual orientation, gender identity and/or expression, genetic information, marital status, status with regard to public assistance, veteran status or any other characteristic protected by federal, state, or local law. In addition, VLI will provide, to the extent possible, reasonable accommodations for qualified individuals with disabilities in all phases of employment.

Attendance

To provide adequate staff coverage for all shifts and to ensure the well-being of those served, each employee has a responsibility to be at work on time for each scheduled shift. VLI recognizes that at times employees will be late or absent from work for valid reasons. However, absences and tardiness result in a hardship in scheduling of work and puts an undue workload on other employees.

Each employee will discuss any circumstances that may affect his or her attendance with his/her supervisor. Attendance and punctuality are two important items which are evaluated in an employee's performance review. Excessive absenteeism and/or tardiness may result in disciplinary action.

Company Property

Employees should be mindful that all property/equipment which they use or has been issued to them to perform their jobs is owned by VLI. It is the responsibility of the employee to ensure the safekeeping of VLI's equipment, fixed assets, intellectual property/data, and general property. VLI property may also include property belonging to individuals receiving services from the company.

The unauthorized removal of property, destruction, or deletion of any VLI property, including intellectual or data, is grounds for discipline. This includes data on computers, in the Cloud, cellphones (including Company contacts), other storage devices, and hard copies of records.

VLI may reimburse an employee if personal property is damaged due to the actions of an individual served by the Company, depending on the merits of the situation and the actions taken by the employee to limit the extent of damage.

Chain of Command

VLI management encourages open communication regarding work related issues; however, all employees, when possible, are requested to utilize their chain of command. It is understood that there may be situations when it may be necessary for an employee to circumvent the chain of command. Such situations may include times when the direct supervisor and/or program directors are not available, emergencies, or the employee is fearful of retribution.

If an employee is not satisfied with the outcome of a meeting with an immediate supervisor, the employee may request a meeting with their next level of supervision and/or HR. If the issue remains unresolved a request should be made to meet with the CEO. If the complaint involved the CEO, the employee may request to meet with HR and/or the Chairperson of the Board of Directors.

Children, Other Dependents and Guests in The Workplace

Employees should not bring a child, other dependent or guest to work without prior approval from HR. Children or other dependents or guests are never permitted in circumstances where client and/or employee privacy and/or safety may be compromised or where the child, other dependent or guest may be in harm's way.

VLI may allow children or others to attend holiday parties and other special functions on a case-by-case basis with the prior approval of HR. In the event of an emergency event such as hurricanes or other natural disasters where employees are requested to assist, VLI may allow on a case-by-case basis for employees to bring family members with them to the work location.

Company Drivers

It is the policy of VLI that designated employees may drive company vehicles or use personal vehicles for business purposes. Designated employees who have been approved to drive for company business must:

- A. Meet the requirements set by VLI's insurance carrier.
- B. Maintain a valid Texas Driver's License.
- C. Provide proof of at least the minimum liability and property damage insurance required by the state.
- D. Abide by all applicable traffic laws, rules and regulations.
- E. Maintain current defensive driver's training certification.
- F. Follow procedures for accident reporting if involved in an accident.

When driving is a necessary part of an employee's job duties, and the employee no longer meets the eligibility criteria, reassignment or termination of employment may occur.

Computer System

To ensure that all employees understand their responsibilities in maintaining confidential VLI information, the following guidelines have been established:

- A. VLI utilizes a networked IT environment, various cloud/remote systems and storages, and certain unnetworked devices, all collectively referred to the Company's IT System. The IT System is the property of VLI. All electronic files on the System are the property of VLI. VLI shall have access and the right to monitor all electronic files. VLI will limit the access to the System to authorized users only. This includes network-based systems and cloud-based systems.

- B. Employees shall comply with HIPAA and other confidential requirements when working with client and Company information.
- C. The System will require users to change their password every 90 calendar days. Users will keep their network passwords and all other such security devices confidential and shall not participate in or assist with any attempt to defeat or circumvent any security feature or restriction on the System or any computer file.
- D. Employees shall, by creating, transmitting and/or storing electronic files on the System, be deemed to waive any privacy rights he/she may have to such electronic files. Employees shall not have any right to or expectation of privacy or confidentiality with respect to their activities on or with the System or the content of any electronic files that they may have created, received, disseminated or stored by or with the System. VLI, however, does have a right of confidentiality and privacy and employees shall treat and handle all electronic files to preserve the confidentiality thereof for VLI.
- E. The e-mail features of the System should be used for the business purposes of VLI. Only e-mail messages related to VLI business may be addressed to "everyone" or other large groups. Any e-mail message, as well as any other computer file, that contains vulgar, obscene, threatening, harassing, defamatory or other inappropriate content is prohibited. The volume and content of e-mail messages may be monitored by VLI.
- F. VLI provides access to the Internet to accommodate the receipt and transmission of electronic files, including e-mail messages, and research. The internet should be used primarily for the business purposes of VLI. VLI may monitor the Internet activities of employees.
- G. Employees should take appropriate action to protect Company electronic files and data from computer viruses, spam, and other malware.
- H. VLI may monitor the content of voice mail messages.
- I. Facebook, LinkedIn, Twitter and other social networking web sites should not be used to conduct or post company business unless approved by the CEO.

Any employee who violates this policy will be subjected to disciplinary action. If necessary, VLI also reserves the right to advise appropriate legal officials of any illegal violations.

Issues and problems using computer, phone and other similar equipment shall be reported to support@vitaliving.org. When email access is unavailable to the user the problem must be reported using other available methods.

Contagious Illness

VLI realizes that employees with contagious temporary illnesses, such as influenza, colds and other viruses, need to continue with normal life activities, including working. However, we also seek to maintain a healthy workplace for our employees and clients.

Employees who demonstrate signs or symptoms of a communicable disease that may present a credible threat of transmission in the VLI workplace should report that potential infection or disease immediately to their immediate supervisor, and the Human Resources department. Employees may be instructed to adhere to certain precautions, which may include protective equipment, safety protocols, or leaving Company work sites. Employees may be required to provide written documentation from a physician to return to the worksite. Employees are asked to consider their co-workers, and plan to stay home when sick and until at least 24 hours after they no longer have a fever or other symptoms. VLI may also send employees home who are sick or exhibit signs or symptoms of sickness. Abuse of this policy will result in disciplinary action up to and including termination.

Definitions of Employee Status

Employees are categorized into the following five categories:

- A. Exempt-Salaried employees exempt from overtime pay.
- B. Non-exempt-Hourly employees eligible for overtime pay.
- C. Full-time-Employees regularly scheduled to work 40 hours per week.
- D. Part-time-Employees regularly scheduled to work less than 40 hours per week.

- E. PRN-Employees who work on an as needed basis. Employees classified as PRN must have worked for VLI for a period of 6 months and continue to work at least one (1) eight hour shift every four weeks to maintain employment.

Drug and Alcohol Policy

The illegal use, sale, or possession of prohibited substances while on the job or on VLI property is strictly prohibited. Illegal usage of prohibited substances while on the job or on VLI premises may adversely affect an employee's job performance, jeopardize the safety of clients, other employees, and the public, and is cause for disciplinary action. Employees may be subject to drug/alcohol testing if involved in an accident or incident.

Employment at Will

Employees are not employed for any definite period of time and employment can and may be terminated voluntarily by either party with or without cause at any time for any reason or for no reason at all. Written employment policies, notices, or bulletins are provided to employees only so that they may be informed of VLI's current policies with respect to their terms and conditions of employment. No written policy is a contract or other legal guarantee that VLI will continue any practice described in the written policy.

Employee-Requested Transfers and Promotions

VLI supports the efforts of employees to advance to positions for which they are qualified, and which meet their career interests. All VLI employees are encouraged to apply for open positions and will be given serious consideration during the search process. Employees seeking a transfer should submit their request to HR. HR will determine if the requested job exists and if the employee is eligible. HR will forward the request for transfer to the employee's current program director and the receiving program director. The receiving program director will make a final decision, with the approval of HR. Employees approved for a transfer will provide their current program director with a notice of two (2) weeks.

VLI will consider the following factors when determining an employee's eligibility for transfer:

- A. Requirements of the requested position.
- B. Whether employee has held their current position for at least 6 months, or a period approved by the CEO.
- C. Whether employee has a satisfactory performance record.

Pay for transferred employees will be as follows:

- A. Employees transferred to a job with the same salary range will continue to receive their existing rate of pay.
- B. Employees transferred to a job in a higher salary range will be paid at the higher rate.
- C. Employees requesting to be transferred to a job in a lower salary range will be paid at the rate of the new job.

Employee Recruitment, Hiring

VLI endeavors to be an equal opportunity employer and to hire individuals based on their qualifications. Potential employees shall be recruited utilizing all available resources and, in a manner, known to follow applicable regulatory requirements. Prospective applicants who meet the requirements of open position(s) will be invited to interview with HR. During the interview process the applicant will:

- A. Receive information about VLI, and the people served.
- B. Be informed of New Employee Orientation training requirements.
- C. Be informed of requirements to have and maintain certifications and/or licenses, to include a valid Texas driver's license.
- D. Receive work location/schedule information; wage information and benefits availability.

The prospective applicants will also be informed of the screening process that will include, but not be limited to:

- A. Texas Criminal background checks, additional states as required.
- B. Checks against state Employee Misconduct and Nurses Aid Registries.
- C. Checks against the Office of Inspector General, LEIE database.

D. Pre-employment drug screening.

Employee Separation

Ordinarily, the termination of an employment relationship with VLI will fall within one of the following categories: voluntary resignation, discharge, reduction-in-force, or death. When possible, employees are expected to provide two (2) weeks' notice of resignation. Just as an employee can terminate the employment relationship at any time for any reason, VLI reserves its right to end the employment relationship at any time for any reason.

Employment Status Verification

VLI verifies and updates INS I-9 forms for all employees. In compliance with applicable laws (including those enforced by the United States Immigration and Customs Enforcement and the United States Department of Homeland Security). It is the responsibility of the employee to provide valid documentation for eligibility to work in the United States. Employees who are not citizens of the United States are responsible for ensuring their documentation for eligibility to work does not expire and for providing VLI updated documentation of their new eligibility. Employees who do not have valid documentation will have their employment terminated.

Equal Employment Opportunity

VLI provides equal employment opportunities (EEO) to all persons regardless of age, color, national origin, citizenship status, physical or mental disability, race, religion, creed, gender, sex, sexual orientation, gender identity and/or expression, genetic information, marital status, status with regard to public assistance, veteran status or any other characteristic protected by federal, state or local law. In addition, VLI will provide reasonable accommodations in accordance with the Americans with Disabilities Act (ADA), to the extent medically necessary and reasonably feasible.

Exit Interviews

The exit interview process is an effort to allow employees leaving VLI an opportunity to express their concerns or offer constructive criticism as it related to their employment. Information received during an exit interview will be reviewed by HR and agency management.

Firearms and Weapons Prohibition

VLI explicitly prohibits employees, clients, and visitors from possessing, carrying, or using firearms and weapons on property owned by or under the control of VLI. This prohibition extends to VLI grounds and parking lots. Employees are also prohibited from carrying or possessing firearms and other weapons while acting in the course and scope of their employment, regardless of whether they are physically on VLI property. Violation of this policy may result in disciplinary action.

Gifts from Clients, Families, or Guardians, Vendors and other Related Parties

Employees are not permitted to accept gifts valued at more than three dollars (\$3) from clients. Gifts of more than \$20.00 in value may not be accepted from a client's family or legal guardian, vendors or other related parties. Employees may not accept cash gifts. Employees must notify their supervisor upon receipt of any gift.

Identifying Exclusions from Participation in State and Federal Health Care Programs

VLI ensures that all potential and current employees and contractors are screened on both state and federal lists of individuals or entities excluded from participation in federal and state health care programs. Potential employees

and contractors will be screened for exclusion prior to hiring or contracting. Employees and contractors will be screened monthly using both the state and federal online data bases:

- A. Texas Health and Human Services Commission (HHSC)
- B. United States Department of Health and Human Services
- C. Debarred Vendors List
- D. Other required databases

Exclusions found will be verified and reported as required and employment may be terminated.

Inclement and Hazardous Weather Conditions

VLI provides 24-hour service, seven days a week and will not close due to weather conditions. Residential locations, the Activity Center, and other program areas may be affected differently and will be addressed individually. To maintain appropriate staffing, employees may be reassigned on an as needed basis.

During inclement and hazardous weather, staff persons in all areas are expected to report for work at their regular and assigned time. Each employee must make their individual decision concerning the safety of traveling to and from work and must contact their supervisor if they feel they will not be able to report to their assigned location. Alternate work assignments may be offered in some cases when possible. If unable to work, a staff person will use Paid Time Off, if available, for missed time. In cases where staff are on duty and responsible for direct supervision of individuals, staff must remain on duty until appropriately relieved by oncoming staff.

When weather conditions develop program directors will determine if transporting clients is safe. If it is determined that transporting would not be safe the program directors and supervisors will be responsible for finding staff coverage for our clients where they are located.

Job-Related Illness and Injury

All work-related accidents, injuries, or illness must be immediately reported to the employee's supervisor or designee.

First aid may be administered on site, in appropriate situations. If further treatment is required, arrangements will be made to ensure prompt assistance to the injured/ill person through local medical offices or hospitals. All necessary documentation of the illness/injury is to be completed in a timely manner and can be obtained from the immediate supervisor, HR, or the VLI website at www.vitaliving.org.

For any work-related injury or illness requiring medical treatment and/or involving a time loss, the employee must present a medical release from the attending physician to HR before returning to work. VLI's operating needs may necessitate the replacement of an employee who is out on extended leave due to a job-related injury or illness. If such replacement is necessary, when the employee is released for return to work by his/her physician every effort will be made to place the employee in a comparable position either in the same department or elsewhere in VLI. Employees released by the treating physician to perform light duty will contact HR to determine if appropriate light duty is available.

VLI cannot guarantee that an opening will exist at the time the employee is released for return to work.

Leave Requests

Employees will document requests for Paid Time Off by utilizing Paycor, which must be approved by their supervisor. All approvals are subject to Company needs.

Leave Requests are limited to the amount of each employee's accrued PTO time. Any employee requesting or taking time off beyond the accrued balance may be subject to reassignment to other work locations, reclassification to PRN or termination, based on length of leave and the needs of the Company.

News Media Relations and Spokespersons

Information about any aspect of VLI, including personnel, programs, activities, and individuals receiving services will be provided to the media through an appointed spokesperson, i.e. the CEO, the Chairperson of the Board of Directors, or other representatives as directed by the afore mentioned Directors.

Directors and staff should not respond to inquiries from the media concerning matters such as personnel issues, crisis management, emergency situations, and VLI policies and fiscal operations. All such inquiries are to be immediately referred to the CEO.

Nepotism

VLI will employ the most qualified individuals for positions available. Relatives of employees applying for vacant positions must disclose the relationship and will not receive preferred treatment. In all cases, the most qualified applicant will be selected for each job. Relatives of employees may be hired or promoted only for positions where one does not directly supervise the other.

New Employee Orientation

New employees will participate in a general orientation designed to educate them to the culture, philosophy, and mission of VLI. New employees will receive important information about VLI policies and procedures, employee benefits, performance expectations, job descriptions, safety requirements and employee time keeping, etc. New employees assigned to work directly with VLI clients will receive important information about client care, medication administration, and behavior supports and plans and will also be required to complete Behavior Management Training.

Non-Solicitation

VLI is a work environment free from solicitation efforts that do not relate to VLI business or interests. While VLI actively encourages staff participation in community activities and organizations outside of work, staff may not solicit on work time (when either the staff member or the person being solicited is on work time). Additionally, solicitation or distribution of literature by any staff member for any purpose is not permitted by VLI. Staff found to be soliciting or distributing literature in violation of this policy will be subject to disciplinary action.

Open Door Policy

Any employee of VLI may discuss work-related complaints or problems and receive a carefully considered response. An employee may appeal a supervisor's or manager's decision to a higher authority without fear of retribution or prejudice.

Outside Employment

An employee is not required to obtain approval from VLI for voluntary or remunerative activities during nonscheduled VLI hours. However, involvement in those activities may not, as determined by VLI:

- A. Present a conflict of interest.
- B. Be in competition with VLI.
- C. Adversely affect the quality of the employee's work for VLI.

Performance Evaluation

VLI uses a formal system of performance evaluation to provide employees with accurate information concerning their performance; to identify performance elements in which employees do well and those elements which

require improvement; to focus on mutual goal setting by the supervisor and employee, and to follow up by reviews to adjust and assess progress toward goal attainment.

Employees will receive a written evaluation to review progress and discuss standards of performance and job responsibilities. Employees will be given the opportunity to respond to their performance evaluation in writing and will be given a copy of the evaluation. Employees will be asked to review and acknowledge the appraisal form. All written performance appraisals and employee responses will be reviewed by the Program Director and by HR.

Following are some of the factors that will influence an employee's performance appraisal. The list is not exclusive:

- A. Attendance
- B. Adherence to Policy
- C. Financial Responsibility
- D. Creative Caring Practices
- E. Innovation
- F. Consistency

Personal Appearance and Attire

VLI employees are expected to dress in a manner consistent with the nature of work performed and the people served. Employees are also expected to maintain proper habits of personal grooming and hygiene at all times to ensure no offensive odors. Employees are asked to refrain from excessive perfumes and colognes.

VLI employees working directly with individuals receiving services must wear appropriate clothing to include sturdy closed toe shoes, and only appropriate accessories (i.e., no dangling jewelry). Fingernails should be appropriate in length to ensure clients are not harmed in any way. During special events, such as picnics, swimming, cultural events, etc., employees may dress appropriately for the occasion.

Personal Electronic Devices in the Workplace

Employees must restrict the use of personal electronic devices, including business and/or personal cell phones, laptop computers, iPods, etc. in the workplace. It is the responsibility of each employee to ensure that distractions, including those due to phone calls, text messaging, emails, etc. do not interfere with performing their job duties.

To ensure client confidentiality and to comply with HIPAA requirements, electronic devices with photography/recording capabilities may not be used on any VLI property or at any agency activity without the approval of the CEO or designee.

Personnel Records

A record of employment is maintained for all employees and is the property of VLI. The record is confidential and restricted to viewing by the employee, his/her supervisor, and VLI management on a need-to-know basis.

Each employee is responsible for reporting changes in address, telephone number, emergency contact data, deductions, and any other pertinent information.

Pets at Work

VLI does not allow employees to bring pets into the workplace without prior authorization from HR. There may be times when pets are welcome and quite appropriate to the occasion and will be welcome with the a-fore mentioned authorization. This policy does not cover Service Animals which will be accommodated at the workplace as appropriate.

Position Descriptions

VLI will provide a written position description for every employment position within the organization. Each position description will define the position title, classification (exempt or nonexempt, fulltime, or part-time) the

supervisory position the position reports to, the position's primary (or "essential") duties and responsibilities. The position description will specify the skills, experience and the educational background needed, as well as the physical requirements. VLI will use position descriptions as a foundation for making hiring and position placement decisions.

Management will:

- A. Evaluate all new positions and periodically review all position descriptions to make certain they accurately reflect current conditions and position requirements.
- B. Assure all employees understand and agree on the responsibilities and scope of the position, by having a written and signed up-to-date copy in each personnel file.
- C. Assure employee position descriptions are written statements that describe the duties, responsibilities, required qualification, and reporting relationships of a position.

Employee position descriptions are based on objective information obtained through position analysis, an understanding of the competencies and skills required to accomplish needed tasks, and the needs of the organization. Each employee is responsible for communicating any physical or other limitations of performing the requirements of their position upon accepting a position and throughout employment with VLI.

Privacy

VLI respects everyone's right to privacy. VLI will not conduct activities that are unreasonable or would interfere with an employee's right to privacy. However, VLI may conduct searches of personal property on company premises, such as vehicles, purses, backpacks, etc. to deter unauthorized removal of VL and/or client property.

Proof of Insurance

VLI requires employees who utilize their personal vehicle to conduct VLI business to comply with all applicable laws, including maintaining a valid driver's license and proof of insurance.

- A. Employees must provide a valid driver's license and proof of valid automobile insurance.
- B. A copy of valid automobile insurance is to be submitted with all requests for mileage reimbursement. Requests without the required documentation will not be processed.
- C. The insurance of the employee is primary, and any damage incurred is the responsibility of the owner of the vehicle. VLI provides secondary insurance for staff that utilizes their personal vehicle to conduct VLI business.

Right of Action

An employee may elect to retain his or her common law right of action. This election must be chosen no later than five (5) days after beginning employment with VLI. The employee must notify VLI in writing of his or her wish to retain the common law right to recover damages for personal injury. If an employee elects to retain the common law right to action, the employee is not eligible to receive workers' compensation income or medical benefits in the event of a job-related illness or injury.

Safety

VLI recognizes that its employees are its most valuable asset and provides the means and management to reduce accidents to the maximum extent possible. Employees are to conduct their activities with a focus on safety.

Smoking

To protect the health of individuals receiving services and other employees, VLI limits settings in which smoking (tobacco, vapor, and other similar forms) is permitted.

- A. Smoking is not permitted inside any office, Activity Center, residence, property, or vehicle under the auspices of VLI.

- B. Each work location will have a designated smoking area that complies with applicable local and state laws. Any employee who smokes is responsible for only smoking within such designated areas and disposing of ashes, butts, and other trash in a safe and hygienic manner.
- C. Employees are not to smoke in the presence of individuals receiving services whether at a residence, the Activity Center, or involved in any other activity on or off Company premises.
- D. Employees are not to allow smoking to interfere with performing their assigned duties.

Time Clocks, Timecards, and Leave Request Forms

VLI employees are required to accurately record and document their hours worked and to properly document requests for earned leave benefits by utilizing Paycor.

- A. Employees are expected to abide by their scheduled hours and will only be paid for scheduled hours of work unless otherwise authorized by their supervisor. If there is a difference between scheduled hours and worked hours the supervisor will be required to document the difference to HR.
- B. Each employee is responsible for clocking in and clocking out. Clocking in or out for another person is considered a fraudulent action and cause for discipline, up to and including termination.
- C. Employees must complete an online Attendance Request for any necessary corrections/edits to their reported time. If the correction/edit is related to a prior pay period, the employee must complete a Missed Punch paper form, which requires additional documentation and various approvals.
- D. Any related payroll payment will be made on the next normal payroll date after accounting received the approved form.

Vehicle Accidents

VLI employees who drive agency vehicles, or personal vehicles for agency business, must immediately report any vehicle accident that occurs while on duty.

Employees involved in an automobile accident must:

- A. Call 911 to notify the police and request medical assistance, if needed.
- B. Notify your supervisor or designee as soon as possible on the same day as the incident.
- C. Exchange information with any other involved parties. Obtain their name(s), driver's license number(s), license plate numbers, and insurance information. Get the names and addresses of all involved parties, witnesses, passengers, and law enforcement officers (including badge numbers).
- D. Write down as much information as possible, location of the accident, weather conditions, what caused the accident and if there are witnesses get their statements in writing, if possible. Make certain to get all the facts before leaving the scene of the accident.
- E. Complete and submit an accident report to the administration department by the next business day.

Whistle Blower Code of Conduct

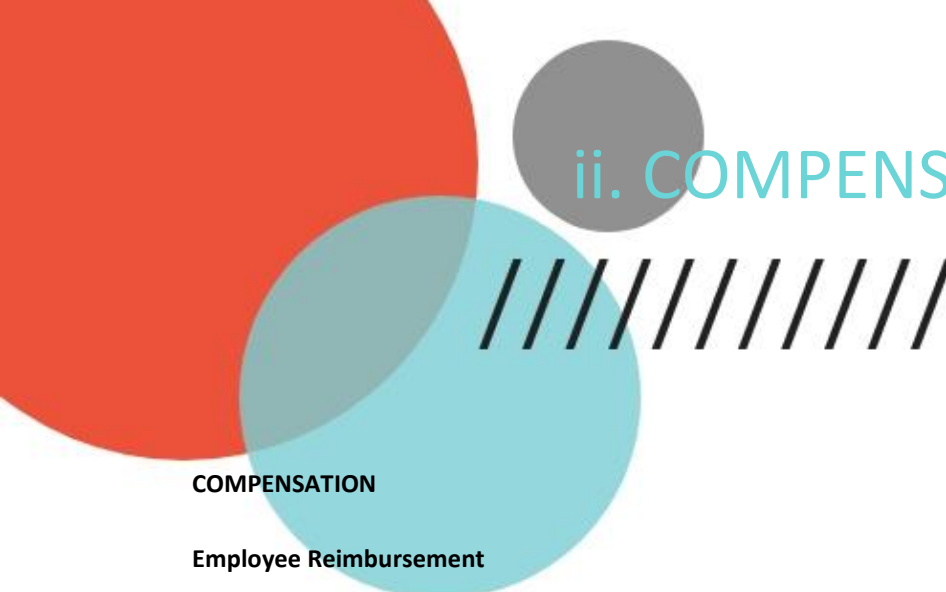
VLI strives to maintain the highest standards of conduct and ethical behavior and promotes a working environment that values respect, fairness, and integrity. Concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to HR or the CEO. To facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to the CEO or designee.

Complaints will be handled with discretion and confidentiality to the extent allowed by the circumstances and the law. The whistle-blower complaints will only be shared with those who have a need to know so that an effective investigation can be performed, and in related cases, with law enforcement personnel. Should disciplinary action be taken against a person or persons because of a whistle-blower complaint, such persons may also have the right to know the identity of the whistle-blower. No individual who, in good faith, reports possible fraudulent or dishonest behavior, shall suffer retaliation or adverse employment consequences. Whistle-blowers who believe that they have been retaliated against may file a written complaint with the CEO or Chairperson of the Board of Directors. Any complaint of retaliation will be properly investigated, and appropriate corrective measures taken if the allegations are substantiated. The protections from retaliation are not intended to prohibit supervisors from

acting, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Employees making baseless allegations may be subject to disciplinary action and or legal claims by the individuals accused of such conduct.

Workplace Violence

VLI has a zero-tolerance policy related to workplace violence. Any incidents of violence must be reported to HR immediately and will be investigated. Confirmed workplace violence will result in disciplinary action, up to and including termination, and may have legal consequences.



ii. COMPENSATION & LEAVE TIME

COMPENSATION

Employee Reimbursement

Employees traveling away from the work area for overnight trips or conferences will use a VLI credit card if one has been issued. If the employee does not have a VLI credit card they may get a cash advance with the approval of the program director. Reasonable hotel, meals, and conference fees may be covered. Employees may also pay associated costs themselves and obtain reimbursement with the appropriate receipts. All expenses must be approved by the employees' supervisor. Reimbursement normally is made during the next available payroll direct deposit.

To be reimbursed for travel expenses an Employee Expense Form must be completed with receipts attached. Approved completed documentation must be forwarded to accounting within 30 days of the conclusion of the trip. If cash was advanced and the total expenses on the Employee Expense form are less than the advance the employee is responsible for reimbursing VLI the difference. If the total is greater than the advance the employee will be paid the difference.

Fair Labor Standards Act

Hourly (nonexempt) employees are paid based on actual time worked. Salaried (exempt) employees are generally paid on the basis that the work week is 40 hours. The normal work week begins at 12:00 am Monday morning and runs through 11:59pm Sunday night. The computation of Overtime Pay will follow this weekly schedule.

Nonexempt (hourly) employees will be paid a shift differential if the employee works in two or more different jobs in a single workweek, for which different straight time hour rates of pay are established. Holiday pay, or other non-working pay will be paid at the employee's regular rate of pay, shift differentials will not be added to holiday pay. Deductions from Pay comply with the salary basis requirements of the FLSA. Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the employee will be promptly reimbursed for any improper deduction made.

Holidays

Full-time employees are eligible for seven (8) paid holidays each year. VLI holidays are:

- A. New Year's Day
- B. Martin Luther King Jr. Day
- C. Memorial Day
- D. Juneteenth National Ind. Day
- E. Independence Day (July 4th)
- F. Labor Day
- G. Thanksgiving Day
- H. Day after Thanksgiving
- I. Christmas Day

For office schedules, holidays which fall on a Saturday or Sunday shall be observed on the Friday before Saturday holidays or the Monday after Sunday Holidays. Because of the nature of VLI's operations, it is always necessary to

have employees on duty. Employees directly serving clients will be required to work holidays if on the schedule for that day. Full-time employees required and/or authorized to work on holidays will be paid eight (8) hours for the holiday in addition to being paid time-and-a-half for hours worked. Part-time employees will be paid time-and-a-half for the hours worked. To receive holiday pay, employees must work their last scheduled shift before the holiday, any scheduled holiday shifts, and their first scheduled shift after the holiday. Pre-approved Paid Time Off (PTO) for these days will meet the requirement to receive holiday pay. If an employee scheduled to work calls in on a holiday, the employee will not receive holiday pay.

Jury Duty

VLI will grant time off for an employee who is called to serve on a state or federal jury. For full time employees who have completed 90 days of employment, VLI will pay for the first day of jury duty; the employee will use their available PTO balance for any continued service. VLI complies with federal and Texas laws with respect to reinstatement when jury service is complete.

Mileage

Employees using a personal vehicle for company business will be reimbursed the approved rate per mile. All miles will be documented on a Mileage Log. Normal daily commutes are not reimbursable and only mileage in excess of each employee's normal commute is reimbursable. Mileage Logs are to be submitted monthly, along with a copy of current proof of insurance, to the supervisor for approval and forwarded to accounting for processing. Mileage Logs older than 30 days will not be reimbursed. Parking fees may also be included on the Mileage Log. Employees must maintain current Defensive Driving certification to be eligible for Mileage reimbursement. Reimbursement normally is made monthly within the mid-month payroll direct deposit.

Other work-related expenses

When an employee uses personal funds to purchase items that are work related, they can submit a Petty Cash Form with receipts and a full description of the purchase to their supervisor. Items that are not pre-authorized and deemed unnecessary by the supervisor may be denied reimbursement. Approved Petty Cash Forms with receipts will be submitted to accounting for reimbursement. Items submitted more than 30 days past the purchase date will not be reimbursed.

Paid Time Off

All full-time employees are eligible for Paid Time Off (PTO) upon the first day of employment. PTO is accrued at the following rate:

<u>Length of Service</u>	<u>PTO Leave Earned</u>
Start to 1 year	3.385 hours per pay period.
1 year to 4 years	4.615 hours per pay period.
4+ years	6.154 hours per pay period.

PTO is earned on the last day of each pay cycle. Employees must work (time worked, PTO, or Holiday Pay) 75% or more of a pay period to earn PTO for that pay cycle. Company has the option to utilize accrued PTO balances for any employee who did not work an entire pay period. Accrued PTO balances are subject to maximum cap balance. The PTO cap is 200. PTO requests are made by utilizing Paycor at least 14 days in advance.

Employee requests for PTO for extended periods of time (greater than 7 calendar days) may be approved, however, the employee's current shift/ work location may not be available when the employee returns to work. Employees who leave prior to 1 full year of employment will not be paid for accrued PTO. Employees who leave after the 1-year period must provide a two (2) week written notice, must be in good standing with the company, and the separation must not be associated with any incident of misconduct to be eligible to be paid for accrued PTO.

Pay Checks

VLI processes employee payroll every two weeks on alternating Friday's. VLI recommends direct deposit services as a convenience to all employees and requires signed documentation authorizing VLI to submit payroll to the banking institution of their choice. Employees not utilizing direct deposit will receive their paycheck via US Mail. VLI will not deduct from an employee's wages unless ordered by a court, authorized by law, or authorized for a lawful purpose in writing by the employee. Upon separation of employment all property including any funds must be returned to VLI or the value of said items may be deducted from the employee's final paycheck. If an employee is involuntarily terminated, his or her final paycheck will be distributed within six (6) calendar days from the date of termination. If an employee resigns, final payment will be disbursed according to the normal payroll schedule.

LEAVE TIME

Bereavement Leave

VLI full-time employees are eligible for 24 hours of bereavement leave after 90 days of continuous employment. Bereavement leave will be approved for immediate family members defined as spouses, children, grandchildren, parents, siblings, grandparents, and parent in-laws.

Family and Medical Leave

VLI complies with the requirements of the Family and Medical Leave Act or FMLA (29 U.S.C. §2601 and following). Eligible employees are those employed by VLI for at least twelve (12) months and for at least 1250 hours during the twelve months before leave is requested. Employees may take up to twelve (12) weeks of unpaid family or medical leave within any 12-month period (as specified by this policy) and be restored to the same or an equivalent position upon return from leave. To determine the 12-month period in which leave entitlement occurs, VLI will use a rolling 12-month period measured backward from the date an employee uses any leave under this policy.

Maternity Leave

Pregnancy is treated as any other temporary disability or illness and procedures for maternity leave are the same as those for other leaves of absence.

Military Leave

Authorized leave is provided to all employees who are required to fulfill their military obligations. Military leave will be granted in accordance with applicable state and federal laws.



III. EMPLOYEE BENEFITS & TRAINING

Defensive Driving

VLI offers partial reimbursement to employees classified as full-time and part-time for satisfactory completion of a six-hour Texas approved course. The course must be completed outside of scheduled work hours and reimbursement is limited to once every three years. To receive reimbursement, eligible employees must satisfactorily complete the course and submit certification to HR. The reimbursement will occur in the next feasible payroll payment.

Deferred Compensation Plan

Employees who normally work more than 20 hours per week have the option to participate in the 403(b) retirement plan. Eligible employees may elect to make deferrals beginning on their date of hire. Employees may be able to participate in the Plan's Company matching contributions once they have satisfied the eligibility requirements as stated in the Summary Plan Description. Some of the highlights of the plan include:

- A. Federal income taxes on contributions along with related interest, dividends, and capital gains are deferred until withdrawal.
- B. Participants can contribute as much as is allowable by law.
- C. Employees changing jobs have numerous options for rolling over or distribution of invested funds.
- D. Participants can make changes in the amount they wish to invest on a quarterly basis.
- E. Participants can allocate their contributions to the several Plan fund(s) of their choice.
- F. Beneficiary designation is available.

Dental Insurance

VLI offers dental insurance to full-time employees. Dental insurance coverage becomes active on the first day of the month following the employee's sixtieth (60th) day of employment. Employees who choose to participate in the dental insurance benefit will be responsible for the cost of the benefit. Employee premium deductions will be automatically deducted from the employee payroll check from 24 of the 26 regularly scheduled payroll periods (two per month). Spouses and dependents of employees, as defined by IRS, are also eligible to participate in dental insurance. The cost of such coverage varies depending upon who is included in the coverage.

Health Insurance

Employees who are regularly scheduled to work thirty (30) hours or more each week are eligible to participate in the group health insurance benefits. Health insurance coverage becomes active on the first day of the month following the employee's sixtieth (60th) day of employment. Employees who choose to participate in the group health insurance benefit will be responsible for a portion of the cost of the benefit. Employee premium deductions will be automatically deducted from the employee payroll check from 24 of the 26 regularly scheduled payroll periods (two per month). Spouses and dependents of employees, as defined by IRS, are also eligible to participate in VLI's group health benefit. The cost of such coverage varies depending upon who is included in the coverage.

Hepatitis B Vaccination

VLI offers all employees whose positions place them at risk of exposure to blood borne pathogens the Hepatitis B vaccine (a series of three injections). Employees will be provided with an Informed Consent/Declination to complete indicating their intention of receiving or declining the vaccination series. A record of the Hepatitis B vaccination consent or declination will be maintained for each employee.

VLI will provide location information for a Lab Service, with office address, hours of operation and contact telephone number. Employees will receive the cost of the vaccination (per dose) and will be required to return documentation from the Lab Service that the vaccination was administered. Employees will be required to follow

the dosing schedule provided by the Lab Service. Medical records of the administration of the Hepatitis B vaccination series will be maintained by the Lab Service administering the vaccination. All employees will continue to have the opportunity to receive the Hepatitis B vaccination series at any time during their employment, providing the employee still anticipates contact with blood or other potentially infectious materials, by contacting the HR department for information.

Life Insurance

VLI provides Life Insurance to full time employees as a 100% company-paid benefit. The administration of the insurance policy is subject to the terms set forth in the instruments issued by the insurance carrier. Life insurance coverage becomes active at Open Enrollment (January 1) following the employee's completion of one year of continuous full-time employment.

Vision Insurance

VLI offers Vision insurance to full-time employees. Eligibility begins on the first day of the month following the employee's sixtieth (60th) day of employment. Employees who choose to participate in vision insurance will be responsible for the cost of the benefit. Employee premium deductions will be automatically deducted from the employee payroll check from 24 of the 26 regularly scheduled payroll periods (two per month). Spouses and dependents of employees, as defined by IRS, are also eligible to participate in vision insurance. The cost of such coverage varies depending upon who is included in the coverage.

DISABILITY INSURANCES

Short-Term Disability Insurance

VLI provides short-term disability insurance coverage to full-time employees as a 100% company-paid benefit. The administration of the short-term disability insurance policy is subject to the terms set forth in the instruments issued by the insurance carrier. Eligibility occurs during Open Enrollment (January 1) after one year of continuous full-time employment.

Long-Term Disability Insurance

VLI provides long-term disability insurance coverage to full-time employees as a 100% company-paid benefit. The administration of the long-term disability insurance policy is subject to the terms set forth in the instruments issued by the insurance carrier. Eligibility occurs during Open Enrollment (January 1) after one year of continuous full-time employment.

Statutory Benefits

Social Security-All VLI employees are covered under current federal Social Security regulations.

Workers' Compensation-VLI carries workers' compensation insurance which extends to any employee injured in the course and scope of his or her employment.

Unemployment Compensation-VLI participates in the state's Unemployment Insurance Program.

COBRA (Consolidated Omnibus Budget Reconciliation Act)-VLI complies with the extension of group health plan coverage which is required by the Consolidated Omnibus Budget Reconciliation Act. This benefit applies only to those employees who are covered by VLI's group health plan.

Payroll Deductions-Deductions from payroll are required for income taxes and Social Security and may be made as authorized by the employee for insurance, deferred compensation, and reimbursement for Company property.

EMPLOYEE TRAINING

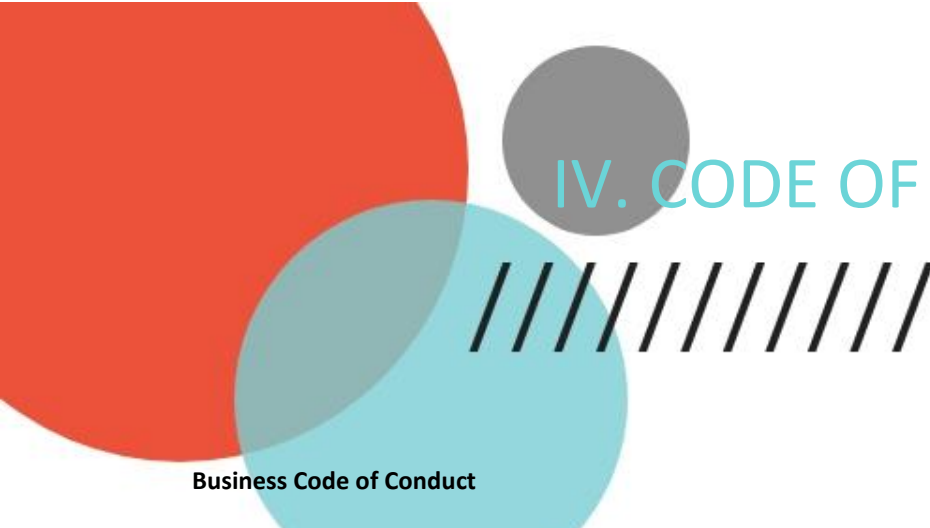
Behavior Management Training

All employees who work directly with individuals receiving services will receive training addressing behavior management, including emergency intervention procedures. Employees who successfully complete behavior management training will be certified for one year. It is the responsibility of the employee to ensure they receive recertification training prior to their expiration date to remain eligible for work. VLI does not accept outside training related to behavior management procedures.

Cardiopulmonary Resuscitation Training (CPR)

All employees who work directly with individuals receiving services are required to maintain current certification and be proficient in performing Cardiopulmonary Resuscitation (CPR). It is the responsibility of the employee to ensure they receive recertification training prior to their expiration date to remain eligible for work.

VLI offers partial reimbursement to employees for satisfactory completion of CPR certification. The course must be completed outside of scheduled work hours and reimbursement is limited to once every two years. To receive reimbursement, eligible employees must satisfactorily complete the course and submit certification to HR. The reimbursement will occur in the next feasible payroll payment.



IV. CODE OF CONDUCT

Business Code of Conduct

All employees are expected to conduct themselves in a professional manner during working hours. Employees are expected to avoid conflicts of interest and opportunities for personal gain for themselves individually, for members of their immediate families, and others which may impede their best judgment. Employees are expected to perform their assigned duties in cooperation with others, to ensure a mutually satisfying work environment. Employees shall respect co-workers, clients, and supervisors at all times. Employees must abide by all codes of conduct and professional practices developed by the applicable professional organizations which are associated with persons in service.

Conduct Between Staff and Individuals Receiving Services

All interactions between Vita Living staff and individuals served will be conducted with the utmost respect for individuals' rights, health, safety and welfare. Staff interactions with clients will be professional. All interactions will be free of abuse, neglect and exploitation. All services to individuals will be delivered in an environment with the highest ethical, legal, and professional standards. Honesty, integrity, and impartiality will be demonstrated when dealing with any client situation.

All individuals served in VLI programs are afforded all legal rights and protections. Staff are to be knowledgeable of legal and program specific rights and ensure that all individuals receiving services are aware of their rights. All information pertaining to individuals receiving services from VLI is to be shared within the legal confines of protecting their information and then only on a need to know basis. All staff are trained to respect privacy of information as well as privacy within their home and communications with others both inside and outside of their homes. Above all, staff are expected to perform assigned tasks in a responsible manner and treat individuals served with respect and dignity. Services and outcomes are intended to meet individual needs and be provided in complete concordance with applicable standards, rules, and regulations.

Confidentiality of Information

Information gained about VLI employees, clients, client families, and volunteers by virtue of employment with VLI is considered confidential. No information will be disclosed to third parties without appropriate written consent by the client and/or approval of senior management, as applicable, unless required by law or court order.

Conflict of Interest

All VLI employees have a duty to act in VLI's best interests. Employees are expected to avoid actual conflict, and perceptions of conflict, between VLI and non VLI interests.

Employee Counseling and Discipline

Where appropriate, VLI will address an employee to correct and/or improve any disciplinary or performance problems. Depending upon the facts and circumstances involved in each situation, VLI may choose to begin disciplinary action at any step. However, in certain circumstances, VLI may find it necessary to impose immediate disciplinary action, including termination of employment, without prior notice or counseling. Before any

disciplinary action is initiated, the facts of the situation leading to the need for disciplinary action will be investigated and examined. Disciplinary action may include, but is not limited to, one of the following measures:

- A. Documented discussion – documents the conversation between the supervisor and the employee, and the facts of the situation leading to the need for counseling.
- B. Written warning – The supervisor notifies the employee in writing of the problem, standards to be met, and consequences for failing to meet the standards.
- C. Suspension – An employee may be suspended without pay for up to three (3) working days as a disciplinary measure. All suspensions require approval of the program director and HR.
- D. Discharge – In cases where discharge from employment is appropriate.

An employee may appeal a supervisor's or manager's decision in accordance with the Open-Door Policy.

Harassment Prohibition

Harassment, sexual or otherwise, is prohibited by Equal Employment Opportunity Commission (EEOC) regulations and will not be tolerated by VLI. VLI strives to maintain a workplace free of harassment of any kind and from any source, management, co-workers, or visitors. VLI treats all complaints fairly and evenhandedly in order to prevent frivolous or malicious accusations. Harassment is contrary to basic standards of conduct between individuals and it therefore constitutes a violation of VLI policy for any employee to engage in any acts or behavior defined as harassment. VLI will take corrective action where an employee is determined to have violated this policy. Such action may include a range of disciplinary measures, up to and including discharge.

Investigations of Conduct

It is the policy of VLI to take immediate action during investigations by the Texas Department of Family and Protective Services or other similar agencies, internal investigations for employment related complaints or employment policy violations, or other events deemed not to be in the best interest of the agency.

- A. Based on a preliminary assessment of the reported situation the employee(s) involved in an investigation may be subject to:
 - 1. Administrative leave.
 - 2. Job reassignment
 - 3. Temporary lay-off.
 - 4. Immediate termination.
- B. Employees placed on an Administrative Leave or temporary lay-off are not eligible for Paid Time Off (PTO).
- C. After the investigation the Program Director along with HR will review the findings. Based on the outcome of the investigation the determination may include employee reinstatement, work location transfer, additional training or other disciplinary actions.
- D. To be eligible for reinstatement, employees placed on administrative leave or temporary lay-off must:
 - 1. Maintain weekly contact with HR during the investigation process.
 - 2. Be available to investigators as needed.
 - 3. Be available to return to work with short notice, or within 48 hours, as required by VLI.
 - 4. VLI cannot guarantee the employee will return to the same work location/shift as previously held.

Prevention of Client Abuse, Neglect and Exploitation

VLI is committed to providing an environment free from abuse, neglect, and exploitation of individuals with developmental disabilities, and will not tolerate any form of abuse, neglect, or exploitation of its clients. Every employee is responsible for protecting clients from harm and refraining from doing harm to clients.

VLI is required to assure that all allegations of physical, sexual, or psychological abuse, neglect, and exploitation, whether or not such allegations are ultimately determined to be real or unfounded, are properly reported within prescribed time frames. An employee must immediately report any suspicion of abuse, neglect, or exploitation in accordance with applicable State and VLI rules and regulations. Program directors are responsible for ensuring that

all employees are familiar with the State and VLI reporting procedures for the programs in which they are working. All allegations will be taken seriously and will be investigated promptly and thoroughly. Immediate action will be taken as necessary to protect individuals from harm. All employees are expected to cooperate fully with VLI investigations as well as investigations conducted by authorized protection agencies. Investigations will be handled as confidentially as possible. Non-employee violators of this policy, including volunteers and those associated by contract, will be subject to removal from VLI facilities and discontinuation of service. Furthermore, violators will be reported to the appropriate authorities for civil or criminal action.

Any employee who suspects possible abuse, neglect, or exploitation must report the allegation within one hour to the **Texas Department of Family and Protective Services at 1-800-252-5400**. Additionally, any crime against a person served will be reported to the appropriate law enforcement agency.

