



FAMILY MANAGED

EMPLOYEE

HANDBOOK

(An Equal Opportunity Employer)

It is the responsibility of Gateways' employees to read and comply with policies contained in this handbook. By distributing this handbook, Gateways expressly revokes all previous policies and procedures which are inconsistent with those contained herein. Please contact Human Resources with questions.

May 2025 Edition

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Welcome New Employee:

On behalf of your colleagues, I welcome you to Gateways Community Services and wish you every success here.

We believe that each employee contributes directly to Gateways Community Services' growth and success, and we hope you will take pride in being a member of our team.

This handbook was developed to describe some of the expectations of our employees and to outline the policies, programs and benefits available to eligible employees.

Employees should familiarize themselves with the contents of the employee handbook as soon as possible, because it will answer many questions about employment with Gateways Community Services.

We hope that your experience here will be challenging, enjoyable, and rewarding.

Again, welcome!

Sincerely,

A handwritten signature in black ink that reads 'Sandra B. Pelletier'. The signature is written in a cursive style.

Sandra B. Pelletier President/CEO

MISSION STATEMENT AND EMPLOYMENT INFORMATION

Mission Statement: We believe that all people are of great value. We provide innovative, high quality, long-term services to support individuals throughout their lifetime, so they can lead meaningful lives.

Compliance with Applicable Laws

You should understand that the laws in different jurisdictions often vary. As a result, the laws of one state may differ from those in another state. Further, because states occasionally amend their laws, a statement that accurately describes the law at the time it is written may become inaccurate if a state amends its law or a court or agency interprets the law in a new or different way.

This handbook seeks to describe the policies it covers in a manner that complies with the applicable legal standards. If the law of any state or other jurisdiction changes, the Company will administer its policies and practices in a manner that conforms to the legal requirements applicable at the time. In some cases, this may require that a practice or policy be administered differently in one state or jurisdiction from the way it is administered or applied elsewhere. Gateways Community Services will do its best to identify and comply with its legal obligations and will attempt to monitor changes in the laws. Employees are encouraged to bring any special issues that exist in their state or changes in the law to the attention of the Human Resources Director so that they can be reviewed and addressed.

Employment At-Will

Company personnel are employed on an at-will basis. This means that at any time employees are free to resign, either with or without reason. It also means the Company has the very same right and can terminate an employee's employment with the Company at any time with or without cause or advance notice. Nothing in this handbook shall limit the right to terminate at-will employment. No manager, supervisor, or employee of the Company has any authority to enter into an agreement for employment for any specified period or to make an agreement for employment on other than at-will terms. Only the CEO of the Company has the authority to make any such agreement, which is binding only if it is in writing.

Employer of Record

Under Consumer Directed Services, Gateways Community Services becomes the Employer of Record for Family Managed Employees. Gateways Community Services processes employees for employment and verifies citizenship/legal alien status and conducts required background checks. Gateways Community Services is responsible for payroll and related taxes, worker's compensation, benefits, if applicable. The consumer/family/guardian/caregiver continues to direct the employees' day-to-day activities. Rates, hours, and schedule are managed by consumer/family/caregiver.

OUR PROGRAMS

Consumer Directed Services CDS

We offer home and community-based services to people who experience developmental disabilities to help them stay as independent as possible. When it comes to managing those services, everyone has different needs. Choosing the Consumer Directed option allows individuals more control over their program services if they are able to manage them responsibly. Our team will help to decide what services are needed and how to maximize usage of Medicaid funds.

Gateways Autism Center GAC

The Gateways Autism Center is a program based on the principles of Applied Behavior Analysis (ABA) that provides a combination of center and home-based programming as well as social skills for individuals with autism. The earlier an individual is diagnosed with autism and receives ABA services the less likely they are to need those services for the rest of their lives.

The Gateways Autism Center strives to provide high-quality skills training and behavior intervention for the promotion of independence and autonomy. We offer services in our center, client's homes, within the community, as well as school consultation.

Gateways Adult Day Center GADC

Gateways Adult Day Center offers a variety of benefits for participants and their care-partners. Our space has been completely renovated; allowing participants to utilize a bigger space, spend time away from the group in our new quiet room and enjoy our outdoor patio.

In addition to engaging in daily activities and exercise, participants will be served a nutritious lunch and snack. Participants will have the opportunity to socialize with each other and with Students from multiple Career and Technical Education (CTE) programs will be engaged with the Adult Day Center by assisting to set up the room before participants arrive, participating in 1-1 activities with participants, Alvirne High School Students. conducting food demonstrations, and working with our licensed nurse to learn more about caring for others while gaining hands-on experience. CTE programs offer students hands-on learning experiences that help prepare them for college or provide them with the skills needed to enter the workforce seamlessly after high school.

Adult Service Coordination

We provide person-centered planning and support to individuals who are determined eligible to receive services. Service Coordinators work with individuals and teams to develop service plans in partnership with vendors to meet shared, desired outcomes.

Choices for Independence (CFI)

CFI offers a wide range of services to individuals 18 years and older, as determined by the Department of Health and Human Services and the Bureau of Elderly and Adult Services.

We work with participants to optimize their independence at home and within the community through a person-centered approach.

In Home Supports (IHS)

In Home supports program is a Medicaid waived program for individuals that are under 22 and are still enrolled in school. Individuals must qualify for the NH developmental services system under RSA 171:A:2, He-M 503, and He-M 524, be Medicaid eligible, meet the ICF/IDD level of care, and are limited to those individuals who require long term support services at the same level as services provided in an institution. Individuals receive In-Home Residential Habilitation support to promote greater independence and skill development for children or young adults who have a developmental disability and significant medical or behavioral challenges. These supports allow them to remain living at home with their family and actively engaged with their community. These supports are inclusive of personal care in the home, and other related supports and services.

(our programs continued next page)

Early Supports and Services (ESS)

We partner with families to meet the developmental needs of the child for children birth to age 3. For those children found eligible, we offer services that include parent coaching, physical, occupational, speech and developmental therapies.

Partners in Health (PIH)

We support individuals and families from birth to 21 years who experience chronic illnesses. Our coordinators help guide, educate, and connect families to resources and financial assistance such as campership, respite, and health care needs.

The PIH Advisory Council is made up of parents of children with chronic health care needs who volunteer their time. The Council works collaboratively with Family Support Coordinators to shape the program by identifying community needs and developing innovative solutions. In turn, a stronger environment for children with chronic health care issues is established and nurtured.

Family Support

We work with individuals age 3-21 that experience a developmental disability and live with a family member. We offer support at education meetings, guide you to community resources, and help with the transition into adult life. We also help those children with intensive needs to remain in their home.

Family Support Council

Our Family Support Advisory Council is made up of families and provides an opportunity for families to make their concerns and priorities for services known. It is open to all eligible Family Support families and individuals. The Council oversees discretionary funding available for services and resources to help promote and increase independence, participate in the community, increase skills, and/or training to caregivers.

Gateways for Seniors G4S

Gateways for Seniors is a state-licensed home care program that offers a range of specialized personal care, homemaker and home health aide and Nursing for adults who are 18 years or older and seniors in Hillsborough and Rockingham counties. Since 2002, our mission has been to deliver exceptional in-home care to support adults and seniors in our community to stay at home, safe, and independent for as long as possible.

Veterans Directed Care Program (VDC)

The Veterans Directed Care Program is to help Veterans with long-term care needs remain in their own homes. VDC program is designed to empower and support qualifying Veterans to hire, train and supervise direct care employees providing home-based care to them.

NH Family Caregiver Support Services (NHFCSS)

The NH Family Caregiver Program provides grants to assist families and caregivers to care for their loved ones at home. The grants support respite care services to provide a temporary break for full time caregivers and services that complement the care the family and caregiver are providing.

DEFINITIONS

Fiscal Year: July 1st through June 30th

Grievance: Any condition of employment that an employee feels is unjust or inequitable.

Pay Period: A pay period is defined as two weeks of work, beginning on a Saturday at 12:01am and running until the second following Friday at midnight.

Family Managed Employee: An employee hired full or part-time in a co-employment situation in Consumer Directed Services where Gateways Community Services serves as the Employer of Record. Individuals are identified and supervised for employment by the consumer/family/guardian/caregiver to provide services. Pay rates, hours, schedule, and provision of care are negotiated between the Family Managed Employee and the Consumer/Family/Guardian/Caregiver. Work is performed in an in-home or community-based setting. Employee benefits follow rules for Regular full-time, regular part-time, part-time and per diem.

Personal Care Service Providers: An employee hired full-time, part-time or per diem by Gateways for Seniors and identified by the participant or assigned by Gateways for Seniors to work in an in-home or community-based setting. The client and/or guardian negotiates hours and schedule and acts as primary supervisor for provision of care. Pay rates are established by Gateways for Seniors based on skills, experience, and certifications. Employee benefits follow rules for Regular full time, regular part time, part time, per diem, seasonal, and temporary employees.

Respite Worker: An employee hired full-time or part-time by Family Support to work in an in-home or community-based setting. The client and/or guardian negotiates hours and schedule and acts as primary supervisor for provision of care. Pay rates are established by Family Support based on skills, experience, and certifications. Employee benefits follow rules for Regular full time, regular part time, part time, per diem, seasonal, and temporary employees.

Payroll Services Employees: An employee to work on an as needed basis to meet the needs of a fiscal management service offered to a participant, caregiver and/or partner organization; to provide defined services and/or support. Payroll service employees are considered per diem and will not be entitled to any earned time, insurance, holiday pay benefits, or other paid benefits unless specified under the contract agreement. These employees work for the Veterans Directed Care Program and NH Family Caregiver Support Services programs.

Employer of Record: Under Consumer Directed Services and Fiscal Management, Gateways Community Services becomes the Employer of Record for Payroll Service and Family Managed Employees. Gateways Community Services processes employees for employment and verifies citizenship/legal alien status and conducts required background checks. Gateways Community Services is responsible for payroll and related taxes, worker's compensation, benefits, if applicable. The consumer/family/guardian/caregiver continues to direct the employees' day-to-day activities. Rates, hours, and schedule are managed by consumer/family/caregiver.

Fiscal Management Services: Gateways Community Services provides services on the receipt and distribution of specific funds/budgets along with ensuring specific funds/budget program/regulation compliance.

SECTION: Human Resources

POLICY: Ethics and Code of Conduct

Everyone deserves to work in an environment where they are treated with dignity and respect. Gateways Community Services is committed to creating respectful workplaces. It brings out full potential in each of us, which, in turn, helps us provide quality support and services and achieve our missions. All talents are important, no one's talents should go to waste.

Gateways Community Services is an equal employment employer. We are committed to providing a workplace that is free from discrimination and free from all types of abusive, offensive, or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to Human Resources.

All Gateways Community Services employees are expected to perform their jobs competently and reliably. Employees should conduct themselves in a professional, ethical, and responsible manner always. We expect cooperation and teamwork among employees that are respectful of consumers, families, co-workers, volunteers, and members of the public. An employee's behavior should reflect the high-quality standards of Gateways Community Services.

All employees of Gateways Community Services are expected to know, understand, and follow the Code of Conduct and policies.

- Consumer's rights shall be always honored including not interfering with the consumer's religious, political, or ethnic views and customs.
- Harassment, for any reason, will not be tolerated, including harassment related to sex, color, race, religion, national origin, age, disability, sexual orientation, or gender identity. Gateways Community Services is an equal employment/affirmative action employer. Please refer to the organizations' Sexual and Other Harassment Policy.
- Financial misconduct involving the consumer's money, property, or benefits will not be tolerated. Misconduct includes, but is not limited to financial exploitation, borrowing money from the consumer, taking the consumer's property or money, having the consumer purchase items for the employee, forging the consumer's signature, falsifying payment record, claiming payment for hours not worked, or similar acts that are intentionally committed by the employee for his/her financial gain.
- Employees should be at work on time according to the work schedule unless illness or an urgent personal problem prevents the person from being at work. If an employee is unable to be at work, their manager must be properly notified according to Gateways Community Services policies.
- Services and support should be provided according to the consumer's service plan. Employees should be flexible as a consumer's/family's needs change.

SECTION: Human Resources

POLICY: Ethics and Code of Conduct (Continued)

- Differences of opinion, whether with a co-worker, consumer, or family member should be handled in a professional manner. (See section on communication and working collaboratively later in this policy.)
- Office staff should be notified about your whereabouts during the workday, including being in the community with consumers.
- Employees will maintain a presentable appearance at all times while working for Gateways Community Services. Clothing appropriate to an employee's duties should be worn. Attention to good grooming and neatness is mandatory.
- Employees shall not use Gateways Community Services or consumer/family equipment and supplies for personal reasons. All property of the organization, consumer, and family should be treated with respect.
- Employees should submit the required information and paperwork in a timely manner, according to policy and practices. No employee shall knowingly submit untruthful or inaccurate information.
- Employees shall not reveal confidential information about consumers, families, Gateways Community Services to unauthorized individuals.
- Reporting to work under the influence of alcohol or drugs or the unauthorized introduction, possession, or use of alcohol or drugs while at work is prohibited.
- Violence, fighting, horseplay, verbal threats, violating personal space (for example, "in your face" actions, standing too close, etc.) and other inappropriate conduct are prohibited.
- No employee shall possess firearms (licensed or unlicensed) or other weapons, including knives, while at work.
- Employees are to notify Human Resources within 24 hours of any arrest. Details will be provided in writing to arrest and charge.
- Smoking policies for Gateways Community Services and all community and government buildings shall be observed.
- Every employee shall comply with safety policies and practices.
- Blatant falsification of events or situations will not be tolerated.
- Being involved in any kind of slander or libel against any other staff member and/or client of Gateways will not be tolerated.

SECTION: Human Resources

POLICY: Ethics and Code of Conduct (Continued)

- Neglect of duty and insubordination shall not be tolerated.
- Conduct either within or outside of work which reflects poorly on the organization.

Violations of this Code of Conduct and the associated policies and practices may result in disciplinary action. The level of discipline will correspond to the gravity of the offense based on the potential effects it would have on Gateways Community Services, consumers, and families.

SECTION: Human Resources

POLICY: Conflict of Interest

Employees have a duty of care to Gateways Community Services to advance its legitimate interests. Employees must never use Gateways Community Services' property or information for personal gain, nor personally take for themselves any opportunity discovered through a position with Gateways Community Services.

The following are some examples of ways a conflict of interest could arise:

- Being employed by Gateways Community Services while also being employed by or consulting a competitor or potential competitor, supplier, or contractor. This applies to all employees. Please consult with HR regarding this issue if an immediate family member has employment with a competitor or potential competitor, supplier, or contractor.
- Direct supervision of family members or closely related people (often referred to as nepotism). Employment of family members under Consumer Directed Services, in accordance with the plan, is not considered a conflict of interest.
- Owning or having a substantial interest in a competitor, supplier, or contractor.
- Having a personal interest, financial interest or a potential gain in any Gateways Community Services transaction.
- Placing Gateways Community Services business with a firm owned or controlled by another Gateways Community Services employee or his or her family.
- Employees may accept gifts of nominal value (not to exceed \$25.00) such as cookies, flowers, gift cards, or candy if the gift would not influence or reasonably appear to others to be capable of influencing the employee's judgment or provision of services and supports.

Any actual or potential conflict of interest shall be disclosed, in writing, to Human Resources. Human Resources will review the actual or potential conflict with the President/Executive Director for appropriate follow up actions.

It is not always easy to determine whether a conflict of interest exists. Prior to any activity, transaction, or relationship that might be a conflict of interest, employees must discuss the situation with their immediate supervisor or Human Resources. If an employee has any questions about conflicts of interest, they should contact their manager or Human Resources.

SECTION: Human Resources

POLICY: Conflict of Interest (Continued)

Miscellaneous Provisions

Gateways Community Services shall not sell or lease for a term of greater than five years, purchase or convey any real estate or interest in real estate to or from an employee or close family member without the prior approval of the Board of Directors and after a finding that the transaction is fair to Gateways Community Services. However, this does not apply to a bona fide gift of an interest in real estate to Gateways Community Services by a staff member or close family member.

SECTION: Human Resources

POLICY: Cultural Competency

We embrace the following essential elements of Cultural Competency and promote them throughout our services, policies, and practices.

- Purposeful elimination of barriers to service.
- Provision of services that are sensitive to cultural differences in decision making and life events.
- Awareness of the dynamics inherent when cultures interact.
- Delivery of services in a manner relevant, meaningful and consistent with consumers language, culture and/or religious belief.
- Delivery of services by a culturally diverse staff who are culturally competent.
- Continuous Education of staff to essential elements of Cultural Competency.
- Adaptations of service delivery to reflect an understanding of cultural diversity and changing demographics.

SECTION: Human Resources

POLICY: Customer Service Pledge

Employee Standards for Excellence: *Respect, Responsiveness, and Dedicated Service*

Gateways employees are committed to:

- Perform duties above and beyond the call to service all customers' needs.
- Acknowledge all problems and complaints and attempt to solve them immediately whenever possible.
- Listen and be sensitive to the customers' needs.
- Perform all duties in a courteous and prompt manner, while displaying a professional appearance.
- Interact with fellow employees in a considerate and helpful manner that exemplifies teamwork.
- Outwardly display a positive, helpful attitude no matter how challenging or untimely requests might seem.
- Assume responsibility for maintaining a clean, safe, and attractive work environment.
- In all actions, advance the Organization's reputation for excellence.
- Assure the customer that his or her well-being is the prime concern of the organization.
- Respond within 2 business days to emails and voicemails.
- Update phone/intranet/email messages to represent present status.

SECTION: Human Resources

POLICY: Employment of Relatives

While the organization has no prohibition against hiring relatives of other employees, close family members such as parents, children, spouses, siblings, or in-laws will not be hired into, or transferred from, positions where they directly or indirectly supervise or are supervised by another close family member.

Gateways Community Services reserves the right to determine in all cases if a close enough familial relationship exists to prohibit a supervisory relationship, with the exception of Family Managed and/or Caregiver employees, who are exempt from this policy.

SECTION: Human Resources

POLICY: Fraud-Abuse Prevention

Gateways will thoroughly and quickly investigate any reported cases of suspected fraud to determine if disciplinary, or financial recovery and/or criminal action should be taken. All reports of suspected fraud will be handled under the strictest confidentiality. Gateways recognizes the need to continually update standards and procedures and to communicate these changes to employees, contractors and agents to keep them informed regarding Gateways' operations. We are committed to the following efforts:

- a. Minimize billing mistakes.
- b. Increase speed and optimize receipt of claim payments.
- c. Reduce chance of Office of Inspector General (OIG) or Centers for Medicare & Medicaid Services (CMS) audit, or audits from external funding sources.
- d. Avoid conflicts with self-referral and anti-kickback and other statutes.

Set forth below are summaries of certain laws that provide liability for false claims and statements. These summaries are not intended to identify all applicable laws but serve to outline some of the major statutory provisions.

FEDERAL LAWS-

Federal Civil False Claims Act (FCA); 31 U.S.C. §§ 3729 – 3733

Congress enacted the federal civil False Claims Act in 1982. The Act is designed to enhance the government's ability to identify and recover losses due to fraud.

Prohibitions-

The federal civil False Claims Act makes it a crime for any person or organization to knowingly make a false record or file a false claim with the federal government (Medicare, Medicaid) for payment.

"Knowingly" means-

- (1) Having actual knowledge of the information.
- (2) Acting in deliberate ignorance of the truth or falsity of the information; or
- (3) Acting in reckless disregard for whether the information is true or false. Specific intent to defraud is not required for there to be a violation of the law.

The False Claims Act is enforced by the filing and prosecution of a civil complaint. Under the Act, civil actions must be brought within six years after a violation or, if brought by the government,

SECTION: Human Resources

POLICY: Fraud-Abuse Prevention (Continued)

within three years of the date when material facts are known or should have been known by the government, but in no event more than ten years after the date on which the violation was committed.

Penalties-

A person or entity found to have violated the civil False Claims Act is subject to a civil money penalty of not less than \$5,500 and not more than \$11,000, plus three times the amount of damage the federal government sustained.

Qui-Tam and Whistleblower Protection Provisions-

The U.S. False Claims Act authorizes the U.S. Attorney General to bring legal actions alleging violations of the statute. The statute also allows private citizens to file a lawsuit in the name of the United States for false or fraudulent claims submitted by individuals or companies that do business with, or are reimbursed by, the United States (Medicare, Medicaid). Commonly known as a qui tam action, a lawsuit brought under the Act by a private citizen begins with the filing of a civil complaint in federal court. As an incentive to bring these cases, the law provides that whistleblowers who file a qui-tam action may receive a percentage of the money recouped as a reward. This reward may be reduced, however, if for example the court finds the whistleblower planned and initiates the violation. The act also provides that “whistleblowers” that prosecute clearly frivolous qui tam claims can be held liable to a defendant for its attorneys’ fees and costs.

Whistleblowers are given certain protections under the Act from retaliation, such as being discharged, demoted, or harassed, for bringing an action under the law.

The Program Fraud Civil Remedies Act of 1986-

The Program Fraud Civil Remedies Act of 1986 (PFCRA) authorizes federal agencies to investigate and assess penalties for false claims to certain federal agencies, including the Department of Health and Human Services. PFCRA was enacted to address lower dollar frauds and generally applies to claims of \$150,000 or less.

Penalties: A person or entity found to have violated the PFCRA is subject to a civil penalty of up to \$5,000 per false claim and up to twice the amount claimed.

New Hampshire False Claims Laws-

NH RSA 167:61-b states that any person or provider shall be liable to the state for a civil penalty of not less than \$5,000 and not more than \$10,000, plus three times the amount of damage that the state sustains because of the act of knowingly making a statement to get a false or fraudulent

SECTION: Human Resources

POLICY: Fraud-Abuse Prevention (Continued)

claim paid or approved, or knowingly making a false record or statement to conceal, avoid, or decrease an obligation to pay.

Also liable is any beneficiary of an inadvertent submission of a false claim who subsequently discovers the falsity of the claim and fails to disclose this within a reasonable time after discovery of the false claim.

Administrative Remedies for False Claims (Title 31 U.S.C. Chapter 38. §§3801-3812)

This federal statute allows for administrative recoveries by federal agencies including the

Department of Health and Human Services, which operates the Medicare and Medicaid Programs. The law prohibits the submission of a claim or written statement that the person knows or has reason to know is false, contains false information or omits material information. Gateways, receiving the claim, may impose a monetary penalty of up to \$5,000 per claim and damages of twice the original claim.

Unlike the False Claims Act, a violation of this law (Title 31 U.S.C. Chapter 38. §§38013812) occurs when a false claim is submitted, not when it is paid. Also, unlike the False Claims Act, the determination of whether a claim is false, and imposition of fines and penalties is made by Gateways and not by prosecution in the federal court system.

New Hampshire Whistleblower Protection Act-

NH RSA 275-E:2 protects employees reporting violations, and guarantees that no employer shall discharge, threaten, or discriminate against any employee because the employee, in good faith, reports verbally or in writing, what the employee has reasonable cause to believe is a violation of a state rule or state or federal law.

The employee should first bring the alleged violation to the attention of a supervisor and then allow the employer a reasonable opportunity to correct that violation, unless the employee had specific reason to believe that reporting the violation to his employer would not result in a prompt remedy.

SECTION: Human Resources

POLICY: Open Honest Communication

Communication-

Managers should create an open and supportive work environment so that employees feel comfortable raising issues and asking questions. Gateways Community Services benefit when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Gateways Community Services will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, they will take appropriate action. The organizations do not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Gateways Community Services complies with the State of NH Whistleblower Protection Act RSA 275-E.

Conflict Resolution-

To provide quality support and services to consumers and families, it is imperative that all employees and departments at Gateways Community Services work cooperatively and as a team. No one part of the organization “owns” the consumer or family. Both organizations share the responsibility for meeting the needs of the consumers and families that they serve.

Each part of the organization has different responsibilities and may approach these responsibilities differently. It is diversity that adds strength and value to Gateways Community Services. It is important for all employees to recognize, appreciate, and respect each other and their roles and responsibilities.

SECTION: Human Resources

POLICY: Access to Personnel Files

Personnel files are the property of Gateways Community Services. Access to the information they contain is restricted. Generally, only supervisors and management personnel who have a legitimate reason to review information in a file are allowed to do so.

Upon a written request to Human Resources, employees may review their own personnel file in the Gateways Community Services offices and in the presence of an individual appointed by Gateways Community Services to maintain the files, and within 7 business days.

If an employee disagrees with any of the information contained in such file, and the employee and employer cannot agree upon removal or correction of such information, then the employee may submit a written statement explaining the employee's version of the information together with evidence supporting the statement. This statement shall be maintained as part of the employee's personnel file and shall be included in any transmittal of the file to a third party and shall be included in any disclosure of the contested information made to a third party.

Gateways Community Services reserves the right not to release information in the personnel file of a requesting employee who is the subject of an investigation at the time of the request if disclosure of such information would prejudice law enforcement; or if it contains Information relating to a government security investigation.

Health, fitness, lifestyle, and other information obtained from employees by their employer or the employer's agents for purposes of providing employees with a health risk assessment or other wellness program shall not be considered personnel records, shall not be retained in an employee personnel file, and shall be inadmissible in any proceedings under RSA 281-A.

Gateways Community Services reserves the right to charge a reasonable fee to cover the cost of supplying documents to anyone requesting copies of their personnel file. This documentation will be provided to them within a reasonable timeframe.

Personnel files will not be shared with any third-party requestor without the express written consent of the employee.

Personnel files will be kept in accordance with state and federal laws pertaining to employer record keeping requirements.

SECTION: Human Resources

POLICY: Attendance

Punctual and regular attendance is an essential responsibility of each employee at Gateways Community Services. Employees are expected to report to work as scheduled, on time and prepared to start working. Employees also are expected to remain at work for their entire work schedule. Late arrival, early departure or other absences from scheduled hours are disruptive and must be avoided.

This policy does not apply to absences covered by the Family and Medical Leave Act (FMLA) or leave provided as a reasonable accommodation under the Americans with Disabilities Act (ADA) or approved personal leave.

Employee Absence

Employee absence is defined as the failure of an employee to report for work when he or she is scheduled to work. The two types of absences are defined below. An excused absence occurs when all the following conditions are met:

- The employee provides their supervisor sufficient notice, at least 2 hours in advance of their scheduled shift.
- The absence request is approved in advance by the employee's supervisor.
- The employee has sufficient accrued earned time off (ETO) to cover the absence.
- Employees may obtain a doctor or medical note for their absence if requested by their supervisor. Excessive documentation of excused absences is the supervisor's discretion and may lead to disciplinary procedures.

Employees must use ETO (earned time) for every absence unless otherwise allowed by company policy (e.g. bereavement, jury duty). Unpaid ETO is allowed at the supervisor's discretion.

Employees in their probationary period (first ninety (90) days of employment) are not allowed to use any of their accrued earned time off.

Unexcused absence occurs when any of the above (excused absence) conditions are not met.

An unexcused absence counts as one occurrence for the purposes of discipline under this policy.

Employees with three (3) or more consecutive days of excused absences because of illness or injury must provide proof of physician's care prior to returning to work.

Employees must work a minimum of 30 hours per week to continue receiving benefits coverage. If an employee is working 30 hours per week, they must substitute ETO for the missed absence time. This does not include employees who are on approved medical leave.

SECTION: Human Resources

POLICY: Attendance (Continued)

Tardiness and Early Departures

If it is necessary for an employee to be late for work because of an illness or an emergency, the employee must notify his or her supervisor no later than the employee's scheduled starting time on that same day. If the employee is unable to call, he or she must have someone make the call. This notification does excuse the tardiness and notifies the supervisor that a schedule change may be necessary.

Employees who must leave work before the end of their scheduled shift must notify their immediate supervisor as soon as possible.

No Call No Show

Any employee who fails to report to work for their scheduled shift without communication to their immediate supervisor will be considered a no call no show. In the event of an emergency, employees (or a designee) must contact their immediate supervisor as soon as possible. A no call no show will be reported as an unexcused absence unless communication is received from the employee or employee's designee within a 24-hour period from the start of the employees' scheduled shift.

Job Abandonment

Employees who fail to report to work and do not have communication with their immediate supervisor for 2 consecutive shifts will be considered to have abandoned the job and voluntarily terminated the employment relationship.

Disciplinary Action

Employees with excessive absenteeism, concurrent or reoccurring tardiness or early departures will be subject to disciplinary action up to and including termination of their employment with Gateways Community Services.

Excessive absenteeism is defined as two (2) or more occurrences of unexcused absence in a 30-day period and will result in disciplinary action.

Eight (8) occurrences of unexcused absence in a 12-month period will be considered grounds for termination.

SECTION: Human Resources

POLICY: Calling out Sick

If an employee is unable to work due to illness or unexpected personal matter for one or two days, it will be the employee's responsibility to call Gateways and notify their immediate manager. The employee should advise their manager if there needs to be any coverage arrangements made for canceling meetings, etc. The manager will then notify the IT department, who can note the absence appropriately on the intranet.

If an employee is out due to illness for three days or more, it will be the employee's responsibility to contact their immediate manager and to notify Human Resources. If necessary, Human Resources will notify the appropriate supervisor, initiate any return-to-work authorization (fitness for duty), Short-Term Disability, or Family Medical Leave Act forms that the employee may be required to complete.

A return-to-work authorization (fitness for duty) or a Dr's note from the employee's medical professional will be required if an employee has been out due to illness for three or more days.

SECTION: Human Resources

POLICY: Career Development

Gateways Community Services, Inc. provides an opportunity for its employees to become aware of internal job vacancies and will accept employee application requests for transfer or promotion to vacant positions. All employees who meet position qualifications, who have a satisfactory performance record, and who apply within the indicated timeline will be given due consideration of their application prior to external hiring. A notice of all agency job vacancies will be posted on the agency intranet and through online advertising.

SECTION: Human Resources

POLICY: Dress Code

Gateways Community Services employees, whether working remotely or in the office, in the community with clients, or performing other Agency-related business, reflect our Agency are expected to abide by this policy. The personal appearance of our employees affects the clients as well as the community's impression of Gateways and its commitment to professionalism and character. All employees' dress should reflect the important nature of the work that we do. Therefore, the Agency expects that all employees will be neat, clean, well-groomed and dressed in a professional manner appropriate for their positions.

Managers are responsible for monitoring and addressing issues related to employees' attire. Anyone whose attire is not appropriate may be asked to change and any lost time incurred because of this may be at the expense of the employee. There may be situations in which personal choices, such as body piercing and unconventional hair styles, become an issue for the client or family we are serving, or are outside the boundaries of what is conventionally considered professional. Managers will address these issues on a case-by-case basis. If employees have any questions about appropriate dress, they should speak with their manager or Human Resources.

Guidelines for Employees Providing Direct Care Services

Direct Care Employees include those working directly with Clients daily in the following programs: Early Supports and Services, Family Managed Employees in Consumer Directed Services and In-Home Supports, Veterans and Caregivers, Gateways for Seniors, Gateways Autism Center, and the Adult Day Program.

Because direct care duties require work in a variety of settings, such as the community, work sites, and client homes, the above list is meant to provide overall guidance. When accompanying a client to meetings, job interviews, etc., professional clothing that is appropriate for the setting is required. Likewise, when accompanying a client to a worksite, it is expected employees will adhere to the worksite's dress code policy.

Category	Non-Direct Care Employees	Direct Care Employees
Fit	Clothing should fit well, not too snugly or too loosely. At no time should undergarments be seen.	

SECTION: Human Resources

POLICY: Dress Code (Continued)

Headwear/Hair	Heads must be free of all types of hats/visors/head covers while inside any of the Gateways' buildings unless for medical, cultural or religious purposes.	Head must be free of all types of hats/visors/head covers while inside any of Gateways' buildings unless for medical, cultural or religious purposes. Baseball caps are only allowed when required by a client's behavior plan. Long hair must be pulled back or restrained.
Jewelry		Hanging jewelry, included, but not limited to necklaces, earrings, and facial jewelry, is not permitted if it is a safety hazard.

Sleeves	Long sleeve, short sleeve and sleeveless shirts/tank tops with at least 2-inch-thick straps are permitted; tube tops and spaghetti straps of any kind are not permitted.	
Skirts/Shorts	Skirts must be longer than 2 inches above the top of the knee. Capri length pants and Bermuda length shorts (ending just above the knee) are allowed.	Skirts and professional shorts must be no more than 2 inches above the top of the knee. Casual shorts are not permitted.
Form-fitting pants	Spandex, sweatpants, exercise pants or other form-fitting clothes normally reserved for exercise purposes are not permitted. Leggings are permitted when paired with a tunic length top that covers the hip and pelvic region.	Spandex, sweatpants, exercise pants or other form-fitting clothes normally reserved for exercise purposes are not permitted unless engaging in a workout activity with a client. Yoga pants and leggings are permitted when paired with a tunic length top that covers the hip and pelvic region.
Denim	Professional looking jeans are allowed. Jeans must be free of tears and fraying and should fit appropriately.	Pants, including denim, free of holes/tears/stains can be worn. Pants must sit at the waist and be secured with a belt if need be.

SECTION: Human Resources

POLICY: Dress Code (Continued)

Shoes	Shoes should be appropriate to the employee's position with a focus on safety (for example, consider wearing boots in the winter and changing into shoes after entering the building). Open-toed shoes/Sandals are permitted but MUST have a back strap. Mules and flip flops are to be worn at your own risk as we have a new Workers Comp carrier who may not compensate for an injury if it occurs while employees are wearing these items.	All shoes must be closed at both the toe and the heel. Sneakers or other closed shoes with a sturdy sole are highly recommended. Open-toed shoes/flip flops/heels/open-backed shoes are not permitted at any time. Rubber-soled shoes are required for Autism Center employees. When working in family's homes, we want to be respectful of various cultures and traditions and honor requests to remove our shoes.
Provocative Clothing/Undergarments	Sexually provocative clothing is not permitted (clothing that may be considered too revealing, too tight or exposes midriff). There should be no observable lack of undergarment or exposed undergarments, even while reaching overhead.	
Logos/Images/Text	Clothing should be free of images or language that might be considered offensive or vulgar, including pictures of music bands or people whose public image might be considered offensive or vulgar. In addition, clothing may not include any references to smoking, weapons, drugs, alcohol, sex or politics (including candidates for political office).	
Tattoos	Tattoos that may be considered offensive must be covered while at work.	

SECTION: Human Resources

POLICY: Employee Assistance Program

The EAP provides assessment and referral programs either through employee self-referral or through supervisory referral for employees who are experiencing job performance problems resulting from a variety of medical and/or emotional difficulties. This assistance is strictly professional and confidential.

All employees, their spouses and/or dependents are covered by this program during employment and up to 60 days post-termination. Any questions should be directed to Human Resources.

SECTION: Human Resources

POLICY: Field-Based Work/Alternative Work Arrangement

The Field-Based Work policy is a work alternative that is only appropriate for some employees and some positions. It is not entitlement or a company-wide benefit, and it in no way changes the terms and conditions of employment with Gateways Community Services. Due to the nature of the alternative work arrangement, employees who work from home will be held to a higher standard of compliance compared to office-based employees.

Eligibility and Protocols

Exempt status employees in positions identified as requiring an alternative work arrangement can request this arrangement. Individuals approved for the alternative work arrangement must:

- Maintain all policies and procedures under the current Remote Access Policy
- Be in good employment standing at the time of alternative work arrangement

Prior to the start of the alternative work arrangement, the employee and manager will:

- Assess the needs and work habits of the employee, compared to traits customarily recognized as appropriate for successful continuation of workflow and productivity
- Discuss the job responsibilities and determine if the job is appropriate for an alternative arrangement
- Review equipment needs and scheduling issues
- Maintain an appropriate level of communication between the employee and supervisor, which will be agreed to as part of the discussion process
- This alternative work arrangement is NOT designed to be a replacement for appropriate childcare. Although an individual employee's schedule may be modified to accommodate childcare or other work schedule needs. Prospective individuals seeking an alternative work arrangement are encouraged to discuss expectations of this work arrangement with family members prior to its start.
- The employees will establish an appropriate work environment within their home for work purposes. Gateways Community Services will not be responsible for the costs associated with the initial setting up of the employee's home office. Consistent with the organization's expectations with HIPAA compliance and information asset security for employees working at the office full-time, employees participating in an alternative work arrangement will be expected to ensure the protection of proprietary company and customer information accessible from their home office.

SECTION: Human Resources

POLICY: Field-Based Work/Alternative Work Arrangement (Continued)

- Injuries sustained by the employee while at their alternative work arrangement location, and while in conjunction with their regular work duties, are normally covered by the company's workers' compensation policy. Employees participating in an alternative work arrangement are responsible for notifying the employer of such injuries in accordance with company worker's compensation procedures. The employee is liable for any injuries sustained by visitors to their work site.
- Gateways Community Services will supply the employee with appropriate office supplies (pens, paper, etc.) for successful completion of job responsibilities. The organization will also reimburse the employee for all other business-related expenses such as postage, shipping costs, etc. that are reasonably incurred in accordance with job responsibilities.
- The availability of an alternative work arrangement for employees of Gateways Community Services can be discontinued at any time at the discretion of the employer. Every effort will be made to provide appropriate and timely notice of any change to the current schedule and other problems that may arise from such a change.

SECTION: Human Resources

POLICY: Fitness for Duty

Fitness for Duty: “Fitness for duty” means the ability to work safely, properly, and perform job functions without impairment. An impairment rendering an employee unfit for duty may be physical, mental, or substance-related, such as the use of alcohol or drugs, including the use of medication that impairs the employee’s fitness for duty.

Any employee taking prescribed or over-counter medications is responsible for consulting with their healthcare provider to learn whether the medication may interfere with safe and/or effective job performance, including safe driving if driving is part of the employee’s job responsibilities. If the medication could compromise safety, it is the employee’s responsibility to use appropriate personnel procedures (such as calling out sick, requesting a leave of absence, or notifying his/her manager/supervisor or the Human Resources Department) to avoid unsafe work practices.

Potential indications of a lack of fitness for duty include, but are not limited to:

- Inability to conduct oneself in a professional manner.
- Inability to safely and effectively perform job functions.
- Excessive anger, aggressive behavior, inappropriate language, or other inappropriate conduct.
- Being under the influence of drugs or alcohol.
- Appearing to be hung over.
- Smelling of alcohol or drugs.
- Excessive or unexcused absence or tardiness.
- Carelessness or negligence.
- Violation or neglect of safety regulations, policies, or standards; and
- Violation of other commonly accepted standards of conduct or policies.

Reporting: Any employee who feels for any reason that he or she is not fit for duty should immediately disclose this to his or her manager/supervisor or to the Human Resources Department.

In addition, to maintain a safe work environment, all employees must report to their managers/supervisors or the Human Resources Department any employee observed who may be unfit for duty. Reports will be kept confidential to the extent possible and will be made available only to those individuals with a “need-to-know,” unless required by law.

If a manager/supervisor receives a report or otherwise believes that an employee may not be fit for duty, the manager/supervisor must immediately contact the Human Resources Department.

SECTION: Human Resources

POLICY: Hiring

Any individual seeking employment with Gateways Community Services will complete an employment application. Applications are retained on file for a period of one year.

All positions will be posted internally via the company's intranet, agency email, and/or manually in the employee cafeteria area. External postings are made at the discretion of the hiring manager and Human Resources. Job postings must be in place for a minimum of 24 hours before a job offer can be extended. External applicants and internal candidates will be considered for positions based on their qualifications and ability to perform the job successfully.

Candidates must satisfy all requirements of the pre-screening process. These include criminal background, human rights registry, OIG, DCYF, motor vehicle record checks, and employment references. Proof of a valid driver's license and vehicle insurance will also be requested. If a candidate does not hold these items, an acknowledgment not to drive and/or use personal vehicles for company business will be requested.

Based on program regulations, a pre-employment physical, TB (Tuberculosis) testing, and proof of certifications may also be requested. Specific program regulations will also be followed as it relates to criminal and human rights registry background checks results.

Employment references for internal and external candidates will be conducted to ensure that individuals are well-qualified and have a strong potential to be productive and successful. A minimum of two reference checks will be performed.

Employment is contingent upon satisfactory pre-employment screening and reference results. Record and reference checks will be conducted after the job offer has been extended. We reserve the right to rescind any offer of employment based on information obtained in these screenings.

Individuals previously employed by Gateways and seeking re-employment will be considered as a new hire if termination of previous employment exceeds more than 1 year (12 months). Additional background screening checks may be required for re-employment to comply with agency and state policies.

SECTION: Human Resources

POLICY: Infection Control

Infection control is an essential component of any service delivery. Infection control measures can be as simple as hand washing and as sophisticated as high-level disinfection of work equipment and workspaces. Implementing these measures can prevent transmission of disease in human services setting and in the community.

At Gateways Community Services, infection control addresses factors related to the spread of infections within the facility, in-home and community-based setting (whether client-to-client, client to staff and from staff to clients, or among staff), including prevention via hand hygiene/hand washing, cleaning, disinfection, vaccination, and surveillance.

Gateways Community Services follows the regulations set by the Federal Occupational Safety & Health Administration (OSHA), as well as the state of New Hampshire and city of Nashua Public Health guidelines for protecting and improving the health of communities.

All staff must follow established hiring, orientation, and training practices, which include but are not limited to training on Universal Precautions/Bloodborne Pathogens and Infection Control which will provide emphasis to better understand the reporting of incidents, accidents and any contagious disease to Gateways Community Services Human Resources Department.

Gateways Community Services will provide ongoing training and awareness via email, staff meetings, and cooperation with the City of Nashua Public Health Department Health Education and Prevention services. A protocol will be established for communicating with the local public health authorities.

This policy is without prejudice to the employer's right to take whatever actions it deems necessary for the protection of employees, individuals, and the public from exposure.

SECTION: Human Resources

POLICY: Intellectual Property and Confidentiality

Confidential, Proprietary, and Other Non-public Information-

The protection of confidential information and proprietary inventions is vital to the interest and the success of the organization. Such confidential information includes but is not limited to the following:

- Consumer, Client, Participant, Guardian and/or Family Information
- Employee information
- Financial information (non-public)
- Research and development initiatives
- Pending projects and proposals
- Donor Names/Information

The disclosure of Gateways Community Services' confidential, proprietary or other non-public information, whether intentional or unintentional, will be subject to disciplinary action (up to and including possible discharge), even if the employee does not actually benefit from the disclosed information.

SECTION: Human Resources

POLICY: Modified Schedules

Gateways Community Services has developed a policy for their staff which encompasses and shows the organization's commitment to a work life balance in the changing world. This policy is designed to ensure that Gateways Community Services and their internal stakeholders are working collaboratively to support the mission of the organization.

Expectations:

Core staff who work a modified work schedule will be allowed to work outside of business operation hours (8:30A-4:30P). Modified schedules are up to the discretion of the manager to approve or deny.

Department directors will be responsible for maintaining all modified work schedules and will be responsible for ensuring that their staff members are completing all deliverables. Modified work schedules must be approved by the supervisor of the staff and the Human Resources Director.

- Employees who have been granted the ability to work a modified work schedule with their supervisor's approval should fall under either medical or personal.
- Medical reasons need to be verified by a physician's note with an end date.
- Personal reasons may be looked at on a case-by-case basis and will have an end date for review.
- Americans with Disabilities Act (ADA) accommodations will be followed per the ADA.
- Employees must be able to deliver deliverables weekly with results verified by their immediate supervisor.
- Employees must work a minimum of 60% of their scheduled time during operating hours (8:30A-4:30P).
- Schedules cannot go beyond working 10 hours per workday.
- Employees must be able to accommodate meetings and/or requests from their immediate supervisors to change their schedule.
- Employees must sign in and out of the intranet each time they are working.
- Employees working remote will be required to sign modified work schedule agreement with their scheduled days.

Eligibility:

- All core staff

SECTION: Human Resources

POLICY: Modified Schedules (Continued)

Exclusions:

- Field employees to which Gateways Community Services is the co-employer.
- Staff who are hired to work a modified work schedule due to their geographical location being a Bona Fide Occupational Qualification.

Restrictions/Exceptions:

- Staff who are disciplined or on a corrective action plan due to performance issues may be requested to work on site with a different schedule through a period to ensure support and coaching.

SECTION: Human Resources

POLICY: Orientation and Training

Orientation and training requirements have been established for all positions. All new employees will receive orientation as required by the state & federal guidelines, Gateways Community Services, as appropriate.

Training requirements for the specific position will be discussed with the new employee during orientation. Unless otherwise stated in specific program regulations, all introductory requirements should be completed within 30 days of hire.

Introductory Review will review training, initial orientation and competency development to evaluate the employee objectively on the performance of meeting the minimum skills/experience need for this position. A Personal Development Plan will also be discussed by the employee and supervisor to identify goals and performance expectations as well as outlining a plan for development.

Gateways Community Services encourages all employees to learn more. We believe that additional training will benefit you, the organization, and the people we serve. Attending training will not only increase your job skills and understanding but also make you more confident in the very important work that you do. Along with company-offered training opportunities, employees may present external training opportunities to their supervisor for approval. Requests will be evaluated based on:

- Merit of training offered and/or trainer, as evidenced in past training events
- Value to the organization and the individual
- Funding availability

Upon satisfactory completion of all training, certificates of training will be forwarded to Human Resources. This information will be entered into the employee's training record and an original certificate of completion will be given to the employee.

Employees not current with required certifications or who have not completed the required training are not eligible for salary increases or bonuses, should they be available.

SECTION: Human Resources

POLICY: Personal Data Changes

Physical residence addresses, personal mailing addresses, email addresses, home and cell telephone numbers, individuals to be contacted in the event of an emergency, educational accomplishments, and other status reports should be accurate and current at all times.

For name changes, an updated social security card will be required for such a change. If any personal data has changed, Human Resources should be notified.

SECTION: Human Resources

POLICY: Process Server

Gateways Community Services will not obstruct the legal process of serving papers to an employee at their place of work. It is an expectation that process servers meet all requirements in the state of New Hampshire to be qualified to serve papers and that they work collaboratively with Gateways personnel to ensure access and security procedures are followed. Gateways further requests that the serving process be conducted with discretion and minimal disruption to the normal business environment.

Gateways Community Services understands there can be no outright refusal to accept legal documents from a process server on behalf of an employee. Process servers should contact Human Resources prior to serving papers to determine if the person is actively employed and the best method of serving papers. We reserve the right to request papers be served to an employee at off-peak times during a business day.

Human Resources will work with the process server regarding access to the location where the employee works and scheduling assistance. Paperwork must be served in a discreet manner, avoiding unnecessary disruption to the workplace. Due to the sensitive nature of satellite work locations, it is essential that Gateways and the server collaborate to determine the best means of serving papers in each situation. It is Gateways policy that papers can only be served in the Canal Street business office.

Gateways Community Services, Inc. reserves the right to consult legal counsel at any time when a request to serve papers to an employee has been made.

Gateways will maintain a written record of the date and time the process server visited the workplace to serve papers.

Gateways will respect the privacy of the employee by not disclosing the nature of the legal matter with colleagues or supervisors unless necessary.

SECTION: Human Resources

POLICY: Provisional Period

The provisional period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets their expectations. This period is used to evaluate new employee capabilities, work habits, and overall job performance.

The period is 90 calendar days from the date of hire. During this provisional period, all employees are expected to successfully meet introductory training requirements. If at any time during this 90-day provisional period an employee's capabilities, work habits or overall performance are unsatisfactory, we reserve the right to terminate employment. If Gateways determines that the designated provisional period does not allow sufficient time to thoroughly evaluate an employee's performance, the provisional period may be extended for a specified timeframe.

Upon completion of the provisional period, a written evaluation will be completed by the employee's supervisor. An employee may ask his/her supervisor for feedback on performance at any time. Employees are encouraged to ask questions. Employees making satisfactory progress may be retained for employment.

Upon satisfactory completion of the provisional period, new hires will be considered permanent employees of Gateways Community Services, Inc.

During the introductory-review period, employees are eligible for some benefits that are required by law, such as workers' compensation insurance, social security, and health insurance coverage based on ACA guidelines. Provisional period employees may participate in the 403B plan at their discretion. After becoming permanent employees, they may also be eligible for other benefits, subject to the terms and conditions of each benefits program.

SECTION: Human Resources

POLICY: Reporting Requirements

Gateways Community Services, Inc., employees are required to report immediately any of the following types of occurrences immediately.

Work Related Accident/Illness-

If an employee is injured or becomes ill because of the performance of job requirements, the employee, or their designee must meet with Human Resources to complete the necessary workers' compensation form prior to the end of the work shift on which the injury/illness occurred and submit it to his/her supervisor. The supervisor is responsible for recommending to the employee that the injury/illness be examined by a physician and for securing any necessary transportation for the employee for such an examination. In the event the employee refuses medical treatment, the supervisor must inform the employee that he may be jeopardizing any workers' compensation benefits and potentially other benefits for such refusal. The physician who conducts the examination must be notified at the time of the examination that the condition is work related and therefore covered by workers' compensation. An employee who is absent due to work-related accident/illness is responsible for keeping his/her supervisor updated on the status of return to work and provide documentation as requested by Human Resources.

Non-Work-Related Accident/Illness-

When a work absence results from a non-work-related accident/illness an employee must report the absence to their supervisor as soon as possible.

Work Related Vehicle or Property Damage/Accident-

Employees must report any damage/accident to vehicle or property to the Program Director/Department Supervisor immediately. Prior to the end of the work shift on which the incident occurred, the employee must provide a written statement concerning the incident. The Program Director/Department Supervisor must notify the key management and must submit the written report within 24 hours of the incident. Concurrently, the employee must process any required paperwork (i.e., accident report, police report, etc.) If any injury resulted, the employee must be examined by a physician and submit documentation in accordance with the Work-Related Accident/Illness reporting procedures.

Theft of agency owned property or theft of property which belongs to individuals who receive services-

Any employee who is knowledgeable of theft of any agency or client property or who suspects that a theft has occurred must report this information to the Program Director/Department Supervisor immediately. Prior to the end of the work shift upon which the incident occurred, the

SECTION: Human Resources

POLICY: Reporting Requirements (Continued)

employee must provide a written statement concerning the incident. The Program Director/Department Supervisor will be responsible for the notification of key management. If there does not appear to be an explanation for missing property, the Program Director/Department Supervisor should report the alleged theft to the police and should conduct an internal investigation into the matter. Any information which becomes available should be reported to the police and to key management personnel.

Routine maintenance needs/repairs to agency owned property and any potential safety/health hazards-

For Gateways owned properties, employees must report routine maintenance and repairs in accordance with the established procedure (posted at each residence). All routine household maintenance as well as emergency needs which occur during business hours must be managed through the facilities coordinator. After hour emergencies should be managed in accordance with posted procedures. In case of fire, refer to evacuation procedures for notification procedures. Office employees should report any repairs to the facilities coordinator. Any potential safety and/or health concern should be reported immediately to the Operations Director or their designee.

Clients Rights violations-

Employees must report all client rights issues immediately in accordance with agency policy. All client rights issues will be addressed in accordance with the Human Rights and Protection Policy of Gateways Community Services, Inc.

SECTION: Human Resources

POLICY: Solicitation

Distribution of printed materials or literature of any nature shall be limited to non-work common areas. No literature shall be posted anywhere on the premises without the authorization of Human Resources. Solicitation and/or distribution of material on company property by people not employed by Gateways Community Services must be authorized by Human Resources.

Employees may participate in charitable solicitations and other Gateways' sponsored activities during work hours when both employees are on break and in a non-public area designated by Human Resources.

Gateways maintains various systems to communicate to all employees and to disseminate or post notices required by law. These communications systems (including bulletin boards, company intranet, electronic mail, voicemail, fax machines, payroll messages, and personal computers) are for business use only and may not be used for employee solicitation or distribution of literature.

SECTION: Human Resources

POLICY: Team Building

Gateways Community Services is committed to building relationships with employees, departmental and cross departmental. This policy will outline the structure of departmental or cross departmental team building events.

Departmental/Cross Departmental Events:

Who can attend:

Any Gateways employee (part time or full-time status) who is asked to attend a Gateway sponsored team building event

Parameters for the event:

- Staff attending a Gateways Community Service sponsored event will be paid up to 4 hours of their base hourly pay to attend
- There will be a cap for the event, determined by the CFO, if the event is scheduled during business 8:30am-4:30pm Monday-Friday
- There will be a cap for the event, determined by the CFO, if the event is scheduled outside of normal business hours, before 8:30am or after 4:30pm Monday-Friday or Saturday-Sunday
- All inquiries must be approved by the CFO for budgeting purposes before proceeding to register for the event

Events must be scheduled with and approved by the Director of the department; approval must be handed into the HR Director (via email or event registration) with the names of the persons attending the event, date, time and location.

All events held off Gateways property will be required to have a waiver of liability releasing Gateways Community Services signed by each employee attending the event. A copy of this liability waiver must be turned into HR prior to attending the event.

Approval and Registration process:

- Obtain approval from department Director
- Department Director will obtain approval from the CFO
- If approved, the director of our program may register for the event

Notify the HR Director of the event, time, date and list of names attending the event. If the event is off site of any Gateways owned properties, a waiver of liability should be handed in for each staff member attending the event.

SECTION: Human Resources

POLICY: Therapy Animal

Recognizing the positive impact that therapy animals can have on employee well-being, stress reduction, and overall morale. By outlining clear expectations, the integration of therapy animals into the office setting is beneficial for all employees while maintaining a professional and safe work environment.

- A. **Compliance with Laws:** Gateways will keep in compliance with relevant laws and regulations, such as the Americans with Disabilities Act (ADA), which requires reasonable accommodations for employees with disabilities.
 - B. **Safety and Hygiene:** Gateways will ensure all appropriate vaccinations requirements are up to date, behavior standards are being met, and designated areas for the animals are being followed.
 - C. **Employee Well-being:** Therapy animals can improve employee morale, reduce stress, and increase productivity. Gateways will ensure these benefits are managed effectively.
- 1. **Eligibility Criteria:** Therapy animals can be brought in if they:
 - 1. Have completed basic training and temperament
 - 2. Have completed therapy service training
 - 3. Have been certified by a recognized therapy animal training organization (documentation may be required)
 - 2. **Health and Hygiene:** Designated location for animals should be outside of buildings in a grassy area. Owners are responsible for picking up after their animals and ensuring it does not disrupt the workplace.
 - 3. **Workplace Environment:** Gateways will keep in compliance with laws to ensure a safe and functional workplace environment.

SECTION: Human Resources

POLICY: Verification of Employment

Gateways Community Services will respond to all reference check inquiries from other employers. Responses to such inquiries will confirm only dates of employment and position(s) held. The release of this information will only be through Human Resources.

Because of the potential liability and to protect the organization's interests, Gateways Community Services only provides specific information in response to requests for employee references. All reference requests must be referred to Human Resources. As agents of the organization, managers, supervisors or staff SHOULD NOT give out "personal" references for a former employee; doing so creates liability for the employer.

SECTION: Human Resources

POLICY: Authorization to Transport

To be authorized to drive as an employee of Gateways Community Services, employees must meet the following criteria.

- Hold a valid driver's license from the state in which they reside. In cases where the employee holds a valid license from a state other than the state in which they reside, they will be authorized to drive provided they are in the process of obtaining the appropriate license in accordance to the laws of the state of residency.

- Must have an acceptable driving record as documented through a motor vehicle background check. Employees are required to submit to and authorize a motor vehicle background check prior to being authorized to drive on agency business. An acceptable driving record is defined as:
 - Having no major driving offenses within the last three years. Examples of major violations include DWI, Hit & Run, Vehicular Homicide, Driving with a Suspended or Revoked License, Reckless Driving, Speed Contest, and Failure to Report an Accident.
 - Have no more than 3 violations and accidents combined in the last 3 years.

Gateways recommends that employees who drive as a responsibility of their job have auto insurance coverage with personal liability limits in place of at least \$100,000. Employees who are authorized to transport individuals receiving services MUST maintain liability coverage. A current certificate of insurance shall be filed with Human Resources. A certificate of automobile coverage will be requested at the time of hire and on an annual basis from that point forward. It is the responsibility of each employee to notify their insurance company that the vehicle is being used for employment purposes.

Employees are responsible for notifying their immediate supervisor and Human Resources whenever they are involved in a motor vehicle accident or receive a motor vehicle violation, regardless of whether it occurred during work hours or not. The agency may require the employee to submit to a motor vehicle record check upon being notified of the accident or violation.

SECTION: Human Resources

POLICY: Driver Safety

To ensure the safety of our employees and the individuals that we serve, Gateways Community Services has established minimum standards for any employee who drives a vehicle while conducting business must meet the following criteria.

1. Must be 18 years of age or older and hold a valid driver's license from the state in which they reside. In cases where the employee holds a valid license from a state other than the state in which they reside, they will be authorized to drive provided they are in the process of obtaining the appropriate license in accordance with the laws of the state of residency.
2. Must have an acceptable driving record as documented through a motor vehicle background check. Employees are required to submit to and authorize a motor vehicle background check prior to being authorized to drive on agency business. An acceptable driving record is defined as:
3. Have no major driving offenses. Examples of major violations include DWI, Hit & Run, Vehicular Homicide, driving with a Suspended or Revoked License, Reckless Driving, Speed Contest, and Failure to Report an Accident.
4. Employees who are authorized to transport individuals receiving services must maintain a minimum of \$100,000/\$300,000 liability coverage. A certificate of insurance shall be filed with Gateways Community Services. It is the responsibility of each employee to notify their insurance company that the vehicle is being used for employment purposes.
5. Safety belts will be used by all occupants traveling in a vehicle. Drinking, possession of intoxicating liquor or illegal drugs in vehicles or driving while under the influence of alcohol or drugs is prohibited.
6. Drivers shall observe all rules and regulations of safe driving as defined by the State of New Hampshire Department of Motor Vehicle or by the DMV whose state the vehicle is operated.
7. Employees are responsible for notifying their immediate supervisor and Human Resources whenever they are involved in a motor vehicle incident that results in their being classified in any of the categories stated in section 2(a) of this policy. The agency may require the employee to submit to a motor vehicle record check upon being notified of an accident or violation. Failure to notify Gateways Community Services of any significant change in their driving status or record may subject the employee to disciplinary action, up to and including termination.

SECTION: Human Resources

POLICY: Driver Safety (Continued)

8. Employees whose job responsibilities include regular or occasional driving will refrain from using cell phones while driving on agency business. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are required to seek out a parking lot and safely stop the vehicle before placing or accepting a call, or use hands-free equipment. In either case, employees should refrain from discussion of complicated or emotional matters and keep their eyes on the road. Special care should be taken in situations where there is traffic, inclement weather or the employee is driving in an unfamiliar area.
9. Text messaging while driving is strictly prohibited.

Employees charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions and may be subject to disciplinary actions up to and including termination.

SECTION: Human Resources

POLICY: Drug and Alcohol-Free Workplace

Overview:

This Policy applies to all employees and has been adopted as part of our commitment to maintaining a safe environment for our employees and the individuals we support, and to comply with the Drug-Free Workplace Act.

Prohibited Activities:

Employees may not possess, use, be under the influence of (or have ingested/used any amount), manufacture, distribute, dispense, or sell drugs or alcohol at any time in the workplace or in any location where they are working or otherwise representing Gateways, or at any Gateways events or activities. For the purposes of this Policy, working time includes breaks.

For purposes of this Policy, “drugs” includes any drug that is illegal under state or federal law. This includes prescription drugs that are used by in a manner (or by any person) other than as prescribed.

Marijuana remains an illegal drug under state law, except when prescribed in minimal doses for medical purposes. Employees may not possess, use, be under the influence of (or have ingested/used any amount), manufacture, distribute, dispense, or sell marijuana in the workplace, or in any location where they are working (including during breaks) or otherwise representing Gateways, or at any Gateways events or activities unless it is medically prescribed, and consumption does not impact safe and/or effective job performance. Storage and use of medically prescribed marijuana must adhere to the same guidelines as other prescribed medications in this policy.

This Policy does not prohibit the moderate consumption of alcohol at after-hours business networking events or social events hosted by Gateways where Gateways chooses to serve (or provide access to) alcohol, provided employees maintain a professional demeanor and do not act in a manner that is a negative reflection on Gateways.

Prescription and Over-the-Counter Medication:

Gateways does not prohibit the use of legally prescribed medication and over-the-counter drugs where the employee is the person for whom the drug was prescribed, and the employee is using the medication in accordance with the related prescription and/or directions. Any prescription or over-the-counter medications brought into the workplace must be kept in the employee’s personal belongings (such as in a purse, backpack, lunch box, etc.), stored in a locked/secure location and not left out in the open or in other areas easily accessible by others.

SECTION: Human Resources

POLICY: Drug and Alcohol-Free Workplace (Continued)

Any employee taking prescribed or over-counter medications is responsible for consulting with their healthcare provider to learn whether the medication may interfere with safety and/or effective

job performance, including safe driving if driving is part of the employee's job responsibilities. If the medication could compromise safety, it is the employee's responsibility to use appropriate personnel procedures (such as calling out sick, requesting a leave of absence, or notifying his/her manager/supervisor or the Human Resources Department) to avoid unsafe work practices.

Reporting Requirements:

Any employee convicted of any drug-related crime or violation, whether the incident occurred in the workplace, must notify Gateways' Human Resources Department in writing within 5 calendar days of the conviction. Gateways will act with respect to the employee that it deems appropriate, which may include termination of employment. Please also refer to the Consequences of Violating this Policy section of this Policy.

In accordance with the Drug-Free Workplace Act, Gateways must notify certain state and/or federal grant providers (funders) of the conviction within 10 calendar days of receiving notice.

In addition, every employee is responsible for reporting to a manager/supervisor or the Human Resources Department any behavior or other observations, or information learned, that suggests another employee may be under the influence of drugs or alcohol or otherwise in violation of this Policy. If a manager/supervisor receives a report or otherwise believes that an employee may be under the influence or otherwise in violation of this Policy, the manager/supervisor must immediately contact the Human Resources Department.

Drug and Alcohol Awareness Programs:

Gateways (or vendors selected by Gateways) periodically provide drug and alcohol awareness information and/or programs to educate employees about:

- The dangers of drug and alcohol abuse.
- The requirements of this Policy.
- Resources to assist employees with drug and alcohol dependency issues; and
- The penalties that may be imposed for violations of this Policy.

Voluntary Assistance for Drug and Alcohol Dependency:

We encourage employees to voluntarily seek assistance for the early resolution of drug and alcohol problems. Employees are welcome to contact the Human Resources Department for information about substance abuse treatment options in the community, and for information

SECTION: Human Resources

POLICY: Drug and Alcohol-Free Workplace (Continued)

about the application of health insurance benefits to these programs. Employees may also seek assistance through Gateways' confidential Employee Assistance Program (EAP). Employees who are granted leaves of absence to seek treatment may be required to agree to periodic and/or random testing upon their return to work.

SECTION: Human Resources

POLICY: Drug and Alcohol-Free Workplace (Continued)

Employees will not be disciplined or terminated for voluntarily seeking assistance for drug or alcohol problems. Employees who undergo voluntary counseling or treatment and who continue to work must meet all established standards of conduct and job performance. The fact that an employee is in treatment for alcohol or drug abuse does not preclude Gateways from taking disciplinary action for violation of its policies or standards of conduct. Likewise, an employee who has violated this policy cannot avoid disciplinary action, including termination, by voluntarily requesting treatment for alcohol or drug abuse.

Drug and Alcohol Testing:

All employees are subject to reasonable suspicion drug and/or alcohol testing. This means that if Gateways has a reasonable suspicion that an employee may be under the influence of drugs and/or alcohol, Gateways may require the employee to submit to drug and/or alcohol testing. Factors that may be considered in determining whether an employee may be under the influence of drugs and/or alcohol include, but are not limited to: the employee's behavior, evidence of impairment, evidence of repeated errors on the job, policy violation, or unsatisfactory attendance patterns if coupled with conduct that indicates possible impairment by reason of drug or alcohol use.

Management Approval for Testing:

Reasonable suspicion testing will not be performed without prior notice to and approval from the Human Resources Department.

Consent to Testing:

Any employee required by Gateways to submit to a drug and/or alcohol test must consent as a condition of employment. An employee who fails or refuses to submit to a required test will be subject to disciplinary action, up to and including termination of employment.

Cooperation with Testing:

Employees subject to testing may not try to subvert the test by using an adulterated or substituted specimen, or by doing anything to dilute the result or otherwise tamper or interfere with the test or test result. Failing to provide a specimen in a timely manner or otherwise tampering (or attempting to tamper) with the process will lead to disciplinary action, up to and including termination of employment.

SECTION: Human Resources

POLICY: Drug and Alcohol-Free Workplace (Continued)

Testing Site:

Drug and alcohol tests will be performed by a qualified laboratory, hospital, or other health center designated by Gateways. Gateways will provide transportation to and from the testing site for reasonable suspicion testing. Drug test results will be reviewed by a Medical Review Officer if the test result might be other than non-dilute negative.

Any employee with a drug test result of other than non-dilute negative will have the opportunity to rebut or explain the test results. Employees should be aware this opportunity is most often provided by the Medical Review Officer (or other staff connected with the testing facility) before the results are reported to Gateways, in which case the employee will not be afforded a second opportunity once the results are received by Gateways.

Confidentiality:

Test results and any related medical information will be maintained as confidential and shared only on a “need to know” basis unless otherwise permitted or required by law. Test results may also be disclosed to a substance abuse program or counselor for the purpose of evaluating or treating the employee. An employee may request a copy of his/her own test results.

Administrative Leave Pending Drug Test Results:

If drug test results for an employee are not immediately available, the employee may be placed on administrative leave pending Gateways’ receipt of the drug test results. If the drug test result is non-dilute negative, then the employee will be paid for the time spent on administrative leave. If the drug test result is anything other than non-dilute negative, then time spent on administrative leave will be unpaid (except, regarding salaried employees, if applicable wage and hour laws requirement payment regardless).

Consequences of a Positive Result:

If a test reveals that an employee has a blood/breath alcohol level of 0.02 or greater or a positive drug test result, the employee will be subject to disciplinary action, up to and including termination from employment. A “positive dilute” drug test result is the same as a positive drug test result. If a drug test result is “negative dilute,” Gateways reserves the right to require retesting.

Note also that if applicable law requires different treatment of an employee who is a legally authorized medical marijuana user who tests positive for marijuana, Gateways will follow applicable law. See below for more information regarding the consequences.

SECTION: Human Resources

POLICY: Drug and Alcohol-Free Workplace (Continued)

Investigations and Searches:

To enforce this Policy, and when consistent with applicable law, employees' vehicles, lockers or other storage areas, bags, desks, cabinets, work areas, and any other place they have access to on Gateways' property may be searched by Gateways and/or by law enforcement personnel. Failure to submit to any such search is considered a violation of this Policy.

Consequences for Violating this Policy:

As a condition of employment, all employees must abide by this Policy. Violations of this policy, and conviction of any drug-related crime or violation, whether the incident occurred in the workplace, will lead to disciplinary action, which often will be termination of employment.

In its sole discretion, Gateways may choose not to terminate an employee and to instead refer the employee to a substance abuse professional for assessment and/or to a drug and/or alcohol treatment program, requiring satisfactory completion as a condition of continued employment. The cost of the assessment, any follow up, and any treatment programs are the responsibility of

SECTION: Human Resources

POLICY: Drug and Alcohol-Free Workplace (Continued)

the employees to the extent they are not covered by medical insurance in which the employee is enrolled (if any).

Within its discretion, Gateways may suspend the employee while he or she participates in the treatment program. Employees who refuse to participate in such assessments and follow up and/or with treatment programs, or who fail to successfully complete them are subject to immediate termination.

SECTION: Human Resources

POLICY: Personal Property

While the organization does all it can to protect employee's property, it cannot be held responsible for the loss or theft of personal belongings. If employees find property missing or damaged, they should report it to their supervisor immediately. Gateways Community Services has the right to ensure the safety of all employees and adherence to all company policies and procedures.

Whenever there is probable cause of nefarious activity by an employee, the expectation of privacy is no longer applicable.

SECTION: Human Resources

POLICY: Personal Use of Cell Phones

Personal Cell Phones/Other Mobile Communication Devices-

Cell phones and other mobile communication devices shall be turned off or set to silent or vibrate mode during meetings, conferences and in other locations where incoming calls may disrupt normal workflow.

While at work employees are expected to exercise the same discretion in using cell phones and mobile communication devices as is expected for the use of company phones. Excessive personal calls during the workday, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees are encouraged to make any other personal calls on non-work time where possible and to ensure that friends and family members are aware of policy.

Gateways Community Services will not be liable for the loss of personal cellular phones or other mobile communication devices brought into the workplace – as reference in personal property policy. Safety Issues for Cellular Phone and other mobile communication device use:

All employees are expected to always follow applicable state or federal laws or regulations regarding the use of cell phones or other mobile communication devices. Employees whose job responsibilities include regular or occasional driving and who are issued a cell phone or other mobile communication devices for business use are expected to refrain from using their phone while driving – use of a cell phone or other mobile communication device while driving is not required by the company.

Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are required to pull off to the side of the road and safely stop the vehicle before placing or accepting a call or use hands-free operations, refrain from discussion of complicated or emotional matters and keep their eyes on the road. Special care should be taken in situations where there is traffic, inclement weather or the employee is driving in an unfamiliar area.

Employees who are charged with traffic violations resulting from the use of their cell phone or other mobile communication device while driving will be solely responsible for all liabilities that result from such actions.

SECTION: Human Resources

POLICY: Workplace Conduct Investigation

Gateways Community Services, Inc. is committed to ensuring that all company-initiated investigations are conducted in a fair, impartial, thorough, thoughtful manner and in compliance with all applicable state and federal laws.

The purpose of this policy is to provide guidance for conducting internal investigations of alleged unlawful discrimination, harassment and other violations of company policies, rules and standards of conduct.

Gateways Community Services prohibits retaliation including making threatening communication by verbal, written or electronic means against any individual who reports or provides any information concerning unlawful discrimination, harassment or other violations of company policies, rules and standards of conduct. Any employee found to be engaging in retaliation will be subject to disciplinary action up to and including termination.

Risk assessment-

Gateways Community Services investigator(s) will make a reasonable effort to ensure that the complainant(s) or person(s) providing information during an investigation are not exposed to any threats of violence, intimidation, or personal risk. If any such situations are identified or have occurred, Gateways Community Services will proceed with the appropriate response, as advised by the CEO and Sr Human Resources Director. Any Gateways Community Services employee found to have engaged in threatening behavior will be subject to disciplinary action up to and including termination, in accordance with Gateways Community Services workplace violence prevention policy.

Administrative leave-

Subjects of the investigation may be placed on paid administrative leave during the investigatory process as deemed appropriate by the CEO and/or Sr Human Resources Director.

Investigative timeline-

Gateways Community Services will make all reasonable efforts to initiate an investigation into the allegation(s) and conclude the investigation in a timely fashion, as appropriate.

SECTION: Human Resources

POLICY: Workplace Conduct Investigation (Continued)

Investigative tasks-

The following steps should be undertaken as appropriate for the investigation:

Step	Action
1.	Obtain verbal and written statements from all parties involved, including the complainant, and accused. Secure all publicly available reports from police or other agencies concerning the reporting (<i>if applicable</i>).
2.	Take photographs or collection of data for any injury or property damage (<i>if applicable</i>).
3.	Preserve all evidence and secure the evidence in a locked location in the office of the Sr Human Resources Director. Document all evidence obtained. The Gateways Community Services investigator will be responsible for maintaining the chain of custody for the evidence.
4.	Determine if there is a potential for risk occurrence. If there is potential, take all appropriate measures to protect employees, visitors and property.
5.	Complete an investigation report, and provide all relevant and necessary information, including findings.

Documentation of findings-

Based on the investigation, Gateways Community Services investigator(s) should determine whether the allegation(s) were founded, unfounded or inconclusive. This determination should be documented in writing and made part of the investigative report. The determinations are as follows:

- Violation found. Where a violation of Gateways Community Services policies, workplace rules or law is found to have occurred, the accused should be notified of the finding and of the specific or corrective actions to be taken. The accused employee's director/manager/supervisor will also be notified. No details about the nature or extent of disciplinary or corrective actions will be disclosed to the complainant(s) or witness(es) unless there is a compelling reason to do so.

SECTION: Human Resources

POLICY: Workplace Conduct Investigation (Continued)

- No violation found. In this situation, the complainant and the accused should be notified that Gateways Community Services investigated the allegation(s) and found that the evidence did not support the claim.
- Inconclusive investigation. In some cases, the evidence may not conclusively indicate whether the allegation(s) was founded or unfounded. If such a situation occurs, the notification to the complainant and the accused should state that Gateways Community Services completed a thorough investigation but has been unable to establish the truth or falsity of the allegation(s). Gateways Community Services will take appropriate steps to ensure that the persons involved understand the requirements of Gateways Community Services policies and applicable law, and that Gateways Community Services will monitor the situation to ensure compliance in the future.

Gateways Community Services will promptly initiate an appropriate investigation into all possible violations of law and company policy. The Human Resources Director and/or delegate will have primary responsibility for investigating complaints related to employee misconduct.

This includes reported misconduct at any Gateways Community Services operated sites. This also includes reported misconduct during any Gateways Community Services sponsored off-site events.

Whenever an officer, director, manager or supervisor of Gateways Community Services receives a complaint or other information indicating a possible violation of law or Gateways Community Services policy, Gateways Community Services will immediately investigate.

In certain investigations, legal council may be contacted; in such cases, the assigned investigator will follow counsel's instructions relating to communications and evidence to ensure that "attorney-client" and "attorney work product" privileges are preserved.

Third party (outside) investigators may be contracted to conduct specific investigations with CEO approval.

Investigators will provide a written report that includes all written/oral statements related to the investigation and any determinations made at the conclusion of the investigation. The investigation process and the retention/release of any documentation related to the investigation will follow established agency workplace conduct investigation procedures.

Situations to be investigated-

The following list, while not all-inclusive, provides examples of the types of situations that Gateways Community Services will investigate:

SECTION: Human Resources

POLICY: Workplace Conduct Investigation (Continued)

- Alleged conduct that potentially deprives a Gateways Community Services employee of rights because of race, color, religion, sex, sexual orientation, national origin, age, disability, marital status or other characteristics protected by law.
- Alleged verbal or physical conduct that potentially denigrates or shows hostile feelings toward any individual because of race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law. This includes conduct that has the purpose or effect of any of the following:
 - Creating an intimidating, hostile or offensive work environment.
 - Unreasonably interfering with an employee's work performance.
 - Affecting an individual's employment opportunity at the company.
- Alleged conduct or intentional behavior that potentially violates Gateways Community Services policy or affects the safety or well-being of fellow employees, visitors, operations, or other Gateways Community Services related activities. Such conduct includes threatening communication, physical injury or potential physical harm to another, aggressive or hostile action, intentional damage to company property, and possession of any weapon, regardless of government licensing.
- Claims relating to unfair labor practices.
- Conduct that violates Gateways Community Services rules, policies or standards of conduct or the law.

Gateways Community Services will follow agency procedures, protocols, and policies while conducting investigations and will ensure investigations comply with state and federal regulations.

Third-party investigator requirements-

The CEO will approve the retention of any third party for purposes of conducting a Gateways Community Services initiated investigation regarding employee misconduct. The third party must be professionally licensed if required by state statutory requirements and must provide evidence of professional liability insurance prior to conducting any company-initiated investigation.

Confidentiality-

Gateways Community Services investigator will inform the complainant(s) that the Gateways Community Services initiated investigation will be handled on a need-to-know basis; however, if information is learned that personnel action or legal action is required, there is a potential that disclosure of this information may occur in the process.

SECTION: Human Resources

POLICY: Workplace Conduct Investigation (Continued)

Retention of investigative records-

Unless advised otherwise by the legal department or the HR department, Gateways Community Services will retain records relative to a Gateways Community Services initiated investigation for the greater period of five years or the minimum retention period required by law.

Release of investigative records-

Gateways Community Services will not release any investigative files, including interviews and findings, unless authorized by the Sr Human Resources department or the legal department or pursuant to a court-authorized request (i.e., subpoena, court order).

Any information obtained and reported by third parties employed or engaged by Gateways-

Community Services concerning an employee's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics or mode of living will be considered to be a "consumer report" under the Fair Credit Reporting Act. Accordingly, Gateways Community Services will provide notice to the employee that such reports have been received. The employee may request and obtain a copy of the consumer report.

Notice to government agencies-

Before notifying any government agency concerning a Gateways Community Services initiated investigation, the Sr Human Resources Director will conduct a full review of the investigation and will determine what information, including documents, should be released to the government agency. Examples may include state licensing agencies or immigration officials when terminating foreign employees.

Disclosures to third parties-

No Gateways Community Services employee or agent may make any disclosure to third parties (e.g., lawyers, investigators, insurance representatives, media reporters) regarding the particulars of any Gateways Community Services initiated investigation without prior approval from the CEO.

SECTION: Human Resources

POLICY: Prevention of Workplace Violence

To maintain a violence-free workplace, Gateways Community Services has adopted a zero-tolerance policy toward workplace violence. All acts or threats of violence will be taken seriously and responded to immediately.

For purposes of clarification, a threat or act of violence shall include, but not be limited to, any act, verbalization or gesture intended to intimidate another person; any act or gesture likely to damage company property; any act, verbalization or gesture likely to leave another person injured or fearing injury.

All employees have a responsibility to help maintain a violence-free workplace. To that end, each employee is required to conduct themselves accordingly. Any employee who has a safety concern related to agency practices or job responsibilities should discuss those concerns with their supervisor. In addition, any employee experiencing an act or threat of violence is expected to immediately report such an act or threat to his/her supervisor or to Human Resources immediately.

Each act or threat of violence will be investigated, and appropriate action taken. Any such act or threat may result in employee discipline up to and including termination as well as the filing of a complaint with the appropriate law enforcement agency when warranted.

SECTION: Human Resources

POLICY: Safety

Information is provided to employees about workplace safety and health issues through regular internal communication channels, such as staff meetings, bulletin board postings, memos, and other written communications. The Safety Committee is comprised of representatives from throughout the organization, to help monitor the safety program and to facilitate effective communication between employees and management concerning workplace safety and health issues.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the work environment are encouraged to bring them to the attention of a member of the Safety Committee.

Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports may be made without fear of reprisal.

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action.

In the case of an accident that results in injury, regardless of how insignificant the injury may appear, an employee should immediately notify their immediate supervisor and Human Resources.

SECTION: Human Resources

POLICY: Smoking

The use of tobacco products is allowed in designated areas outside these facilities. Appropriate signage will be placed at entrances to the building advising employees and visitors that Gateways Community Services maintains a tobacco-free environment. This policy always relates to all work areas, including before and after normal working hours.

Due to health concerns for our consumers, employees are also prohibited from the use of tobacco products while providing transportation for consumers and while visiting or providing services within consumer residences.

SECTION: Human Resources

POLICY: Employee Grievance

If an employee has a work-related problem or complaint, they should discuss it with their immediate supervisor and attempt to resolve the issue directly at that level. It is the responsibility of the supervisor to listen to the employee, evaluate the validity of the complaint, and work with the employee to reach a resolution. If the supervisor is not in agreement that an issue or complaint exists, the supervisor will inform the employee and discuss their rationale behind that determination.

If the employee is not satisfied with the supervisor's determination, the employee has the option of using the Employee Grievance Procedure to move their concerns to the next level. The employee will submit a written grievance statement (that includes all pertinent facts) to their supervisor. The supervisor will then provide a written response that lays out their determination to the employee within five working days.

If the employee is still not satisfied with the written determination of the supervisor, the employee may file a written appeal to Human Resources. The employee must include copies of prior written statements between them and their supervisor. This appeal request must be submitted to Human Resources within five (5) business days after receiving the supervisor's written response. If not, it will be assumed the employee agrees with the determination.

Human Resources will review all relevant documentation and discuss it with parties involved. Human Resources may, at its discretion, solicit input from senior management, and/or legal counsel, if deemed appropriate. Human Resources will provide a written decision statement to the employee and the supervisor within thirty calendar days of the date the grievance appeal request was received.

The decision of Human Resources shall be considered the final decision of the agency.

Anyone wishing to initiate a grievance involving the President/CEO should submit a written statement directly to Human Resources.

SECTION: Human Resources

POLICY: Individual Staff Development Plan

Family Managed Employees and Direct Support Professionals shall participate in the writing and implementation of an individual staff development plan, also known as a performance evaluation, with their supervisor at least annually.

This evaluation shall be kept in the employee's personnel file. It shall include the following:

- An assessment of current work-related competencies; and
- Methods identified to achieve improvement in competencies. These improvements will include:
 - Education,
 - Training or re-training,
 - Any other staff supports or initiatives that have been identified.

These evaluations will be kept in the employee's personnel file.

Information contained in employee evaluations may be used in consideration of any wage increases.

SECTION: Human Resources

POLICY: Performance Review Management

Performance Review Management Process -

Performance reviews begin with the human resources department and flows to the evaluators (Director, Manager, Supervisor) of each department. This process happens annually for pre-existing employees and two times a year for new employees or employees who take on a new role (promotion or job transfer) within the company.

REVIEW TIMELINE/EVALUATORS-

90 Day Performance Review-

Upon completion of 90 days of employment in the same position, performed by the immediate supervisor for new hires, transfers and promotions.

Annual Performance Review-

Employees under 6 months at the time of annual review due date.

- 90-day performance review performed by the immediate supervisor. No annual performance review due.

Employees 6 months plus at the time of annual review due date.

- Annual performance review performed by the immediate supervisor. Annual performance review due.

Promotion/transfer of existing Gateways employees-

At the time of employee promotion/transfer.

- Supervisors will write a review to document the performance of the employee in their current position, no goals will be required on this review.

Employees under 6 months in their new position at the time of the annual review due date.

- No annual review of their new position will be due.

Employees 6 months plus in their new position at the time of annual review due date.

- Immediate supervisors of the employees in their new position will write an annual review.

SECTION: Human Resources

POLICY: Performance Review Management (Continued)

New Hire and Internal Promotion or Job Transfer- 90 Day Performance Review

1. One month prior to the due date, Human Resources will contact the evaluator via email to ensure they are aware of the performance review form due date. In addition, this email will contain the most up-to-date performance review form template on file with Human Resources.

The evaluator will schedule a time with their new employee to perform a performance review during which time they go over the performance review form.

2. The evaluator and the new employee will review and sign the 90-day performance review form.
3. The evaluator will provide the Human Resources Director with a copy of the signed 90-day performance review form to be placed in the employee file no later than the due date outlined by human resources.

Annual Employee Performance Review -

1. Human Resources will send out an email to all Gateways Community Services core staff detailing the annual review process for the current year. This email will contain the most up to date self-evaluation performance review template on file with human resources.
2. Human Resources will send out an email detailing the annual review process for the current year to all evaluators of performance reviews at a minimum of two months prior to the due date. This email will contain the most up-to-date performance review template on file with human resources.
3. All core staff will fill out their individual self-evaluation forms and return them to their evaluator no later than 2 weeks post receipt of the email sent from human resources detailing the performance review process.
4. Each evaluator will reach out to their individual staff to set up a time for their performance review.
5. Evaluators will perform individual performance reviews with each employee they are responsible for. During this meeting, the employee and the evaluator will review (1) the self-evaluation form completed by the employee, (2) the performance review form completed by the evaluator, and (3) the employees most current job description to ensure they have a complete understanding of their duties. Both the evaluator and the employee will sign the performance evaluation.
6. The evaluator will provide the Human Resources Director with a copy of the signed performance review and the employee self-evaluation to be placed in the employee file no later than the due date outlined by human resources.

Salary increases are not guaranteed and should not be anticipated; resources for annual increases are approved at the Board of Directors level. If an increase in pay should occur, it will be based on the individual performance of the staff members and subject to the approval of the CEO and CFO.

SECTION: Human Resources

POLICY: Progressive Discipline

Gateways Community Services has a process for disciplinary action including verbal warnings, written warnings, and discharge. Warnings are issued to bring a problem situation to an employee's attention, to allow an employee the opportunity to give his/her view of the situation, to discuss a method for solving the problem, and explain the future behaviors that are expected.

Discipline will take place in private and will be appropriate to the seriousness of the infraction. The normal course of action will be:

- Verbal warning
- Written warning with Support Plan
- Performance Improvement Plan
- Last Chance Agreement
- Discharge

Warnings will be placed in the employee's personnel file. The employee will be encouraged to add a written statement if they feel it is pertinent to the situation.

Gateways Community Services reserves the right to terminate an employee when deemed necessary without following the above procedures. In cases of misconduct or gross misconduct, discharge may be immediate. In cases of immediate discharge, wages will terminate on the date of dismissal and all wages owed, including unused earned time, will be paid within 72 hours.

Misconduct includes, but is not limited to:

- Insubordination
- Breach of confidentiality
- Falsification of events or situations
- Refusal to comply with agency policies and procedures after warning(s)
- Bringing weapons of any type into the workplace
- Felony Conviction
- Falsifying information to obtain employment or misrepresenting employment or medical records
- Engaging in harassing behavior towards co-workers or others
- Any other form of misconduct which would require immediate dismissal to protect effective business operations

SECTION: Human Resources

POLICY: Progressive Discipline (Continued)

Gross misconduct includes, but is not limited to:

- Vandalism-any form of willful destruction of agency property or property of another employee or consumer
- Theft- unauthorized taking of agency property or property of another employee or consumer
- Assault-any physical violence that causes bodily injury
- Substance Abuse-use or possession of alcohol or illegal drugs during working hours
- Arson or Sabotage- committing arson on sabotaging company property
- Criminal threatening-making threats of violence or other criminal acts

Any other form of gross misconduct which would require immediate dismissal to protect the consumers and employees and the effective operation and integrity of the service provision.

SECTION: Human Resources

POLICY: Benefit Eligibility

Health Insurance benefits will be available the first of the month following thirty (30) days; 403(b) Retirement Saving plan enrollment is available on the first day of hire; all other benefits may begin coverage the first of the month following ninety (90) days from date of hire.

Gateways Community Services Amendment: July 2007

If during employment with Gateways Community Services, an employee changes status from Part-time to Full-time employee, the employee will become eligible for Full-time benefits the first of the month following thirty (30) days from the status change.

- **Full-Time employees:** those employed to work on a regular basis for **35 hours or more per week**.
- **Part-Time ACA Employees:** those employed to work on a regular basis for **30-34 hours per week**.
- **Part-Time employees:** those employed to work on a regular basis for **at least 1 hour per week but less than 30 hours per week**.

Payroll service employees will not be entitled to any earned time, insurance, holiday pay benefits, or other paid benefits.

Full-Time Eligible Benefits

- Group Health Insurance (Wellness Incentive Program)
- Dental Insurance
- Vision Insurance
- Life & AD&D Insurance
- STD/LTD
- Flexible Spending Accounts (*Medical & Dependent Care*)
- Supplemental Life Insurance
- Earned Time
- Holiday Pay*
- Tuition Reimbursement
- 403(b) Retirement Savings* (*Company match after 1 year*)

403B Match Criteria-Participants must work 1,000 hours in their first 365 days to become eligible for the match. If they fail to do that, they then need to work 1000 hours in a plan year (7/1 – 6/30) to become eligible. Once they have worked that initial 1,000 hours in a year, they are eligible for the match going forward. Once an employee meets these criteria they qualify for the match, and do not need to work 1,000 hours each ongoing year to receive the company match.

SECTION: Human Resources

POLICY: Benefit Eligibility (Continued)

Part Time ACA Eligible Benefits

- Group Health Insurance (Wellness Incentive Program)
- Dental Insurance
- Flexible Spending Accounts (*Medical & Dependent Care*)
- RestoreResilience program
- 403(b)

Regular Part-Time Eligible Benefits

- 403(b) Retirement Savings* (*Company match after 1 year*)
- Earned Time (*prorated on hours worked*)
- Holiday Pay* (*prorated on hours worked*)

All Employee Benefits

- 403(b) Retirement Savings Enrollment*
- Employee Assistance Program* (EAP)
- Bereavement Time*
- E-Learning/On-line Learning*
- Direct Deposit*
- Discounts*

**Denotes eligibility upon hire. For details regarding benefits – please reference “Benefits at a Glance”*

SECTION: Human Resources

POLICY: Compensation

Compensation plans consist of base pay, benefits (medical, dental, vision, STD/LTD), 403B match, financial recognition incentives (annual bonus, retention bonus), other financial incentives received (referral bonus, new hire bonus), earned time off and holidays. These elements are regularly reviewed. The intent is to be sure that the mix and levels of the components will allow Gateways to attract, retain, motivate, and reward high-caliber team members.

Bi-weekly Pay- RSA 275:43

Gateways Community Services compensates its employees on a bi-weekly basis, every other Friday.

Changes in Compensation or Employment Classification - RSA275:49

Every employer shall at the time of hiring and prior to any changes notify his or her employees in writing as to the rate of pay or salary, whether by daily, weekly, bi-weekly, semi-monthly, or yearly, or by commissions, as well as the day and place of payment and the specific methods used to determine wages due.

Two-Hour Work Minimum/Exceptions - RSA 275:43-a

On any day an employee reports to work at an employer's request, he or she shall be paid not less than 2 hours' pay at his or her regular rate of pay.

No employer who makes a good faith effort to notify an employee not to report to work shall be liable to pay wages under this section. However, if the employee reports to work after the employer's attempt to notify him or her has been unsuccessful or if the employer is prevented from making notification for any reason, the employee shall perform whatever duties are assigned by the employer at the time the employee reports to work.

Employees who are regularly scheduled to work less than 2 hours will be paid their base hourly rate for the number of hours worked.

Family Managed Employees, Gateways for Seniors staff members, Payroll Service and Fiscal Management Employees who voluntarily make schedule changes to work less than 2 hours to meet the needs of the physically or mentally infirmed clients they serve are exempt from RSA 275:43-a: 2-hour minimum work requirement

Salary Increases (Employee Performance based)

Annual salary increase amounts are determined by internal and external wages analysis and the organizations' ability to afford the increase in base salaries. Staff salary increases consider the cost of living based on economic factors. Increase amounts are recommended by the Gateways Senior Management and the Human Resource Committee to the Board of Directors for approval. Salary increases are proposed by supervisors based on individual performance and the employee's position in their salary range.

To be eligible for a salary increase:

- An employee must be employed for one year

SECTION: Human Resources

POLICY: Compensation (Continued)

- Have completed and be current with all their mandated contractual training for the fiscal year
- Have a current employee evaluation completed and turned into HR

Salary Increases (Market Analysis based)

Salary increase amounts are determined by internal and external wages analysis and the organizations' ability to afford the increase in base salaries. Increasing amounts are recommended by the Executive Management for approval by the Human Resource Committee and the Board of Directors for approval.

Bonus

Annual bonus incentive amounts are determined by the organizations' ability to afford the bonus based on the budget. The amounts are recommended by the Gateways Senior Team for Boards of Directors for approval. Annual bonus incentive amounts are proposed by supervisors based on individual performance with consideration through the date of the payment of the annual bonus incentive and supervisory discretion.

- Employees must be clear of written and final corrective action in the notated year.
- Only employees who have submitted their resignation and are still employed at the time of the payment of the bonus on a voluntary basis in good standing will receive the annual bonus incentive. Employees must be in their regularly scheduled hours to qualify.
- Any employee who has been involuntarily terminated by Gateways on or before the payment date of the annual bonus incentive will not be eligible.

Not all employees will receive a payroll financial payout. Taxes and 403B deductions will be taken out of this annual bonus incentive.

Retention Bonus/Bonus/Other Financial Payout-

Any retention bonuses or other compensation that may be offered will be done based on financial considerations of the agency and with approval of the Board of Directors and the President/CEO and CFO.

SECTION: Human Resources

POLICY: Compensation (Continued)

403B Contribution

Gateways Community Services may from time to time have an allocation in our annual funding to provide staff with a one-time discretionary 403B contribution of up to 2% of an employee's annual gross wage. Gateways will submit a one-time lump sum deposit into eligible staff 403B accounts when there is a source of funding available. This one-time lump sum deposit must be approved by the CFO and the Gateways Board of Directors.

To be eligible for this deposit, staff must be employed by Gateways at the time of the deposit, have worked a minimum of 1,000 hours in the last 12 months and be a minimum of 21 years of age. This deposit will have a specific actively employed by beginning and end date which will change annually.

If you do not currently contribute to the 403(b) plan with BPA, an account will be created for you and the contribution will be invested in the appropriate Target Date Fund based on your estimated retirement age. You will then receive correspondence in the mail from BPA with log-in information to access your online account.

Gateways Community Services reserves the right to change the policies and procedures set forth in this document dependent on funding and the agency yearly budget

SECTION: Human Resources

POLICY: Earned Time Leave

Earned time from work is healthy, therapeutic, and a desirable part of everyone's life. Therefore, it is the policy of Gateways Community Services to encourage employees to take their earned-time leave in a timely manner. Earned time may be used for any time off the employee would like to take from their regularly scheduled working hours.

Earned time is paid leave accrued per hour worked, based on the active employee's seniority date and the number of hours worked*.

Usage of earned-time hours cannot exceed weekly regularly scheduled hours. The hours can only be used after the initial ninety-day introductory review period has been completed.

If benefit-eligible employees (30 hrs./week or more) have not satisfied their weekly regularly scheduled hours with hours worked*, Gateways will supplement their timecard with earned-time hours, if available.

*Hours worked is defined as any hours an employee is actively working for and/or being paid by Gateways Community Services including regular work hours, earned time, holiday, bereavement, volunteer hours and jury duty.

Regular Part-time employees working 20 hrs./week or more, accrue any earned time on a pro-rated basis. The percentage of earned time is calculated by dividing the hours worked per week by 40.

Per diem, caregiver or payroll services employees and those employees working less than 20 hours per week are not entitled to earned time benefits.

- Earned time runs with the calendar year, January 1 through December 31
- The maximum number of earned-time hours allowed to carry over is up to 160 hours (20 days).
- All planned earned time must be approved in advance by the employee's supervisor.

Employees do not accrue earned time while out on unpaid Family Medical Leave Act or any Short-Term Disability/Long Term Disability. Family Medical, Short-Term Disability/Long Term Disability, or Worker's Compensation leave of absences.

Gateways strongly encourages its employees to actively work their resignation period so that appropriate off boarding of job responsibilities can be provided. Employees who voluntarily resign should provide the following notification periods; management 4-week notice, all other employees 2-week notice. Any unused earned time will be paid during the next payroll cycle after the termination date. Employees who are involuntarily discharged will be paid for unused earned time within 72 hours of discharge.

SECTION: Human Resources

POLICY: Earned Time Leave (Continued)

Individuals who are rehired by Gateways will have a seniority date for Earned Time that is based on their rehire date if their termination date is greater than one year (12 months).

In the event of a status change in hours (increase or decrease), the status change date will be used for purposes of earned time accrual.

The chart below indicates the rate at which a 40-hour/week employee will accrue earned time.

Active Employment	Annual		Per Hour	Per Pay Period
	Days	Hours		
Upon hire-2 years 11 months	15	120	.057692	4.62
Upon 3rd year-4 years 11 months	20	160	.076923	6.15
Upon 5th year-9 years 11 months	22	176	.084615	6.77
Upon 10th year- 14 years 11 months	25	200	.096154	7.69
Upon 15th year	30	240	0.115385	9.23

SECTION: Human Resources

POLICY: Employee Classification

Gateways Community Services Inc. complies with all conditions established under the Fair Labor Standards Act (FLSA). This act defines three types of workers: non-exempt, exempt, and independent contractors.

- **Exempt:** A classification of positions which may be “exempt” from minimum wage and/or overtime compensation requirements of the act.
- **Non-exempt:** A classification of positions entitled to overtime compensation.
- **Independent Contractor:** A classification that denotes work performed meets the criteria established in IRS, NHES, NHDOL, and USDOL testing.

Classifications help identify which employees may be eligible for benefits.

- **Full-time:** Full-time employees continually work 35 hours or more per week. They may be eligible for all benefits provided by Gateways Community Services unless otherwise noted in the employee description section outlined below in this policy.
- **Part-time:** Part-time employees continually work under 35 hours per week. They may be eligible for insurance or other benefits listed below unless otherwise noted in the employee description section outlined in this policy.
 - Part-time employees who work on a regular basis for at least 20 hours per week but less than 35 hours per week. They may be eligible for pro-rated holiday/earned time, retirement savings plan enrollment, and EAP benefits unless otherwise noted in the employee description section outlined below in this policy. Part Time employees continually working 30 hours per week will be eligible for insurance benefits available to them under ACA guidelines.
 - Part-time employees who continually work under 20 hours per week are eligible for retirement savings plan enrollment, and EAP benefits, but are not entitled to any earned time, insurance, or holiday pay benefits.
- **Contract:** Contract employees are hired for an established period that is outlined in the contract. The number of working hours for a contract employee may vary with each contract. A contract employee included on Gateway’s payroll is considered nonexempt and qualifies for FLSA benefits.
- **Independent contractor:** An independent contractor works as a contract employee but is not on a company's payroll.

SECTION: Human Resources

POLICY: Employee Classification (Continued)

- **Temporary:** A temporary employee is hired on a short-term basis, oftentimes to cover an employee who is absent for an extended period or for seasonal business needs.
- **On-call:** On-call employees are those that respond to work needs regardless of the time or day of the week.
- **Volunteer:** Volunteer positions vary in time and do not usually offer compensation.

In addition to employee classification criteria, Gateways Community Services may limit benefit eligibility based upon established employee definition categories that are listed below.

Employee Definitions may fall under one or more classifications of employees.

- **Per Diem Employee:** Employees who work on an as-needed basis. *Per-diem employees will not be entitled to any earned time benefits, insurance, or holiday pay benefits.* Per diem staff who do not work for a period of six (6) months will be removed from payroll.
- **Companions:** Companions include a classification of employee under the Federal Fair Labor Standard Act (FSLA) that is exempt from minimum wage and overtime requirements. Unless otherwise specified in the Companionship Agreement, a companion employed is entitled to a specified stipend or compensation, workers' compensation, unemployment compensation and FICA (employer's share). *Companions will not be entitled to any other paid benefits or protections otherwise available to other employee classifications.*
- **Family Managed Employee:** An employee hired full- or part-time in a co-employment situation in Consumer Directed Services where Gateways Community Services serves as the Employer of Record. Individuals are identified and supervised for employment by the consumer/family/guardian/caregiver to provide services. Pay rates, hours, schedule, and provision of care are negotiated between the Family Managed Employee and the Consumer/Family/Guardian/Caregiver. Work is performed in an in-home or community-based setting. *Employee benefits follow rules for full and part-time, per-diem, and temporary employees.*
- **Personal Care Service Provider:** An employee hired full-time, part-time or per diem by Gateways for Seniors and identified by the participant or assigned by Gateways for Seniors to work in an in-home or community-based setting. The client and/or guardian negotiates hours and schedule and acts as primary supervisors for provision of care.

SECTION: Human Resources

POLICY: Employee Classification (Continued)

- Pay rates are established by Gateways for Seniors based on skills, experience, and certifications. *Employee benefits follow rules for full and part-time, per-diem, and temporary employees.*
- **Respite Worker:** An employee hired full-time or part-time by Family Support to work in an in-home or community-based setting. The client and/or guardian negotiates hours and schedule and acts as primary supervisors for provision of care. Pay rates are established by Family Support based on skills, experience, and certifications. *Employee benefits follow rules for full and part-time, per-diem, and temporary employees.*
- **Payroll Services Employee:** An employee working on an as needed basis to meet the needs of a fiscal management service offered to a participant, caregiver, and/or partner organization; to provide defined services and/or support. *Payroll service employees are considered per diem and will not be entitled to any earned time, insurance, holiday pay benefits, or other paid benefits unless specified in the contract agreement.*

Gateway Community Services also performs the following fiduciary services.

- **Employer of Record:** Under Consumer Directed Services and Fiscal Management, Gateways Community Services becomes the Employer of Record for Payroll Service and Family Managed Employees. Gateways Community Services processes employees for employment and verifies citizenship/legal alien status and conducts required background checks. Gateways Community Services is responsible for payroll and related taxes, worker's compensation, benefits, if applicable. The consumer/family/guardian/caregiver continues to direct the employees' day-to-day activities. Consumer/family/caregiver manages rates, hours, and schedule.
- **Fiscal Management Services:** Gateways Community Services provides services on receipt and distribution of specific funds/budgets along with ensuring specific funds/budget program/regulation compliance.

SECTION: Human Resources

POLICY: EVV Cell Phone

Gateways Community Services strives to work collaboratively with DHHS, stake holders and employees. We are committed to providing transparent and accurate information.

Personal Cell Phone Usage for EVV (Authenticare)

Gateways partnered with DHHS which uses an electronic application called Authenticare on personal cell phones for the service delivery data tracking which includes usage of Geo-Location software technology to verify service delivery location. This is for the purpose of billing the State of New Hampshire, under Medicaid laws and to reduce Medicaid fraud.

Employees who are working under specific programs at Gateways Community Services will be allowed to use their personal cell phone device to track their location while working with their clients.

Employees are responsible for all personal cell phone related costs that are incurred under this policy when their device is being used to check in or out during their work time with their client.

Gateways Community Services is not liable for the replacement of, nor repair of any personal cell phone device that is used for the purpose of this policy.

SECTION: Human Resources

POLICY: Holiday

Gateways Community Services, Inc. observes (and is closed) on 12 holidays throughout the calendar year. Holidays typically include the days listed below but this list is subject to change. The Holiday schedule is provided to employees via Gateway's intranet.

- New Year's Day
- Martin Luther King, Jr. Day
- Memorial Day
- Juneteenth
- Independence Day
- Labor Day
- Indigenous People's Day
- Veteran's Day
- Thanksgiving Day (2 days)
- Christmas Day (2 days)

Gateways Community Services' Family Managed Employees, Respite Workers, and Personal Care Service Providers are provided with seven paid holidays. They typically include the days listed below but this list is subject to change.

- New Year's Day
- Memorial Day
- Juneteenth
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

To receive holiday pay:

- Employees must be scheduled to work 20 or more hours per week.
- Work their scheduled hours prior to and after the holiday, unless they have a pre-requested and preapproved earned time leave.

New employees must be employed one full week (5 workdays) prior to the week in which the holiday falls to be paid for the holiday.

Holidays are pro-rated based on an employee's budgeted number of weekly hours. For example, a 40-hour per week employee will receive 8 hours of holiday pay. A 32-hour per week employee

SECTION: Human Resources

POLICY: Holiday (Continued)

will receive 6.4 hours of holiday pay. There will be no holiday pay for holidays which occur during periods of unpaid leave, FMLA (unless it is intermittent and employee meets all criteria listed above), or disability leave.

Payroll Service employees, companions, temporary or seasonal employees, per-diem, and other employees who work less than 20 hours per week are not eligible for holiday pay.

SECTION: Human Resources

POLICY: Mileage and Expense Reimbursement

Mileage reimbursement eligibility varies from program to program so employees should confirm with their supervisor if they are eligible. Please see Gateways Travel Pay & Rest Period policy.

Employees must maintain accurate documentation of any business-related expenses incurred on behalf of Gateways Community Services that need to be reimbursed. Receipts and detailed explanations of expenses must accompany all reimbursement requests. Mileage and expense reimbursement requests may be submitted weekly, bi-weekly, or monthly. Requests should be submitted no later than 45 days after the occurrence. If not submitted within 45 days after occurrence, mileage reimbursement will be forfeited.

Effective April 2022, Gateways Community Services will pay mileage reimbursement as follows: \$0.55 per mile.

Use of Personal Vehicle Policy-

Employees who utilize their vehicle as part of their job are required to possess a valid driver's license and carry adequate auto bodily injury, liability, and property damage insurance coverage. An employee will not be allowed to use their personal vehicle to transport consumers or travel for company business if they do not have vehicle insurance. All employees are responsible for reporting to Human Resources any accident or occurrence, loss of their driving license or discontinuation of vehicle insurance.

Updating Personal Information-

It is the responsibility of each employee to update their personal information with Gateways Community Services Human Resources departments. If an employee fails to provide proof of valid driver's license and current vehicle insurance, any mileage reimbursement request for payment will be suspended until such documentation is received by Human Resources. Once current records are verified, approved mileage reimbursements will be processed.

Deducting Daily Commute-

Employees seeking mileage reimbursement must deduct their normal daily commute from home to Gateways office location prior to submission. The employee should determine the total number of miles that they travel roundtrip between their home and the Gateways office. The employee will track the total number of miles that were traveled while performing work-related duties. Mileage reimbursement will be made at the employee's established reimbursement rate for all miles traveled in excess of the roundtrip distance between their home and the Gateways office each day. No reimbursement will be made for any day on which the total miles traveled is less than this roundtrip distance.

SECTION: Human Resources

POLICY: Mileage and Expense Reimbursement (Continued)

Example: I live in Derry, and I normally travel to Canal St, but I need to go to a client home in Concord at 8:30am. I would drive directly to Concord (I would not go all the way to Nashua first). I would calculate my distance from my house to Concord which is 34 miles $\times 2 = 68$ miles. Then I would subtract my normal daily commute from my house to Nashua 16 miles $\times 2 = 32$ miles. So, my reimbursement would be for $68 - 32$ miles = 36 miles.

No Daily Commute-

If you are an employee who permanently works out of an approved home office, every mile of travel, such as but not limited to, coming into the office for a mandatory meeting, visiting a client, or visiting a vendor, will be reimbursed at the established reimbursement rate.

Example: My home office is in Derry, I do not commute, and I need to go to a client's home in Concord at 8:30am. I would drive directly to Concord. I would calculate my distance from my house to Concord which is 34 miles $\times 2 = 68$ miles.

SECTION: Human Resources

POLICY: Pay Transparency

Pay Transparency Policy-

Gateways Community Services Inc is committed to pay transparency and equity among all employees and provides its employees with an environment where dialogue on compensation is allowed. Gateways Community Services Inc complies with Equal Employment Opportunity laws as well as federal, state, and local laws on compensation, pay transparency, and pay equity. Compensation will not be based on gender or race.

Statement of Policy-

Gateways Community Services Inc will not discipline, terminate, discriminate against, nor retaliate against employees for discussing or sharing their salary, hourly wage, or total compensation with other employees or applicants. However, employees are free to decline engaging in said discussions and are not required to disclose their compensation information with other employees or applicants if they do not wish to share. Any employee who bullies, harasses, or otherwise pressures another employee to share pay information can be subject to discipline up to and including termination.

Nondiscrimination and Anti-Retaliation-

Gateways Community Services Inc. does not tolerate discrimination or retaliation. Employees may not be discriminated against or retaliated against for discussing compensation, inquiring about compensation, or engaging in pay transparency-related activities allowed by this policy or law. Conversely, employees may not pressure other employees to share compensation information nor discriminate or retaliate against other employees for refusing to discuss compensation or engage in pay transparency-related activities.

If an employee feels subject to behavior prohibited by this policy, they should report this to the Human Resources Department.

Employees who violate this policy will be subject to discipline up to and including termination.

SECTION: Human Resources

POLICY: Timekeeping and Overtime

Timekeeping-

A “Pay Period” is defined as two weeks of work, beginning on a Saturday at 12:01 A.M. and running until the second following Friday at midnight.

The administrative/operational staff workweek is generally from Monday through Friday, with normal operating hours from 8:30am to 4:30pm, with 30 minutes for lunch.

Exempt employees note by signature work during the salary pay period and note any applicable time off (e.g., earned time, FMLA, bereavement, holiday, etc.).

Non-exempt employees document actual hours worked for each day of the payroll period and document appropriate benefited hours use (e.g., holiday, earned-time hours, etc.).

Employees with planned absences will submit their timesheet(s) prior to taking time off if it is due before the employee returns to work.

As timesheets are legal documents, corrections on paper timesheets (cross outs, mark outs, etc.) are required to be initialed by the employee. White out, pencil, or red pen are not to be used to complete a timesheet.

Overtime-

Only non-exempt employees approved for overtime will be compensated at 1 1/2 times their regular rate of pay for all hours worked, over 40 hours in a work week. Program/Department Directors must pre-approve overtime hours. Exemptions from overtime:

- Section 13(a) (1) of the FLSA provides an exemption from both minimum wage and overtime pay for employees who are employed in a bona fide:
 - Executive.
 - Administrative.
 - Professional; or
 - Outside Sales capacity.

- Certain computer employees may be exempt professionals under Section 13(a)(1) or exempt under Section 13(a)(17) of the FLSA.

SECTION: Human Resources

POLICY: Timekeeping and Overtime (Continued)

Seven Minute Rule-

The seven-minute rule refers to when the time clocked in or out is not more than 7 minutes past a quarter hour (15-minute mark). The clocked in or out time is moved backwards to the nearest quarter hour, and calculated for pay from that quarter hour mark. *For example: Sam clocks in at 6:50am. The time is 5 minutes past the quarter hour (6:45am). The time clocked in will be moved back to 6:45am and Sam's pay will be calculated as though he clocked in at 6:45am.*

SECTION: Human Resources

POLICY: Travel Pay and Rest Period

Work-related travel is assigned by the direct supervisor and/or a supervisor or director acting on their behalf. Work-related travel is typically assigned in advance. Except in emergencies, work-related travel is generally pre-approved by the supervisor. Documenting travel time may vary by department/program requirements.

An employee who travels from home to work and returns to their home at the end of the workday is engaged in ordinary home-to-work travel that is a normal occurrence of employment. Traveling from home to work and returning at the end of the workday is considered commute time, not work time and is unpaid.

If the travel time to the first work-related destination is longer than the employees drive to work, the employee can start counting their workday once their drive has exceeded the amount of time it took to drive to Gateways.

When an employee's first appointment is scheduled at a location that is closer to their home than Gateways, the employee travels directly to their first appointment. The drive home from an appointment is to be handled the same as the drive to work explained above.

In addition to travel time being considered work time for time keeping purposes, employees may also be approved for mileage reimbursement. Mileage reimbursement eligibility varies from program to program so employees should confirm with their supervisor if they are eligible. Please see Gateways Mileage and Expense Reimbursement policy. Mileage and Expense Reimbursement are paid through the Business Office.

When an employee travels between the homes of more than one client during the workday, that travel is considered normal work time and must be paid. If an employee's travel pay rate differs from the employee's regular rate of pay, it will be specified on the offer letter, travel pay letter and/or job description.

Travel Pay is when an employee has scheduled assignments from one client to another. Such time, travel time/break, must be documented as "travel time" on the employee's timesheet and will be paid as consecutive hours worked.

Travel Pay Example #1:

The employee begins the day at Client A – time from home to work is unpaid

The employee works from 8am to 10am with Client A, then drives to Client B

SECTION: Human Resources

POLICY: Travel Pay and Rest Period (Continued)

It takes the employee 15 minutes to arrive at Client B; the employee starts work at 10:15am with Client B and ends at Noon.

The employee would record: 8am-10am as 2 hours worked

15 minutes (or .25 hours) as Travel Time

10:15am-12pm as 1.75 hours worked

Travel Pay Example #2:

If an employee is scheduled with two or more clients during the day and there is a gap of reporting time with the client, the employee should report a reasonable travel time from Client A to Client B if within the same date.

The employee begins the day at Client A – time from home to work is unpaid

The employee works from 8am to 10am with Client A, but does not need to report to Client B until 2pm

The employee is free to spend their time from 10am to 2pm as they wish.

Travel time will be recorded as the reasonable time from Client A to Client B (no matter where the employee starts their journey during this gap of time). The reasonable time from Client A to Client B is 10 minutes. The employee arrives at Client B at 2pm and works until 4pm.

The employee would record: 8am-10am as 2 hours worked

10 minutes (or .25 hours) travel time

(reasonable time between Client A & B)

2pm-4pm as 2 hours worked

Travel time is considered hours worked, which means it could be subject to overtime pay. Proactive planning with your supervisor is key to maintain hours worked within the 40-hour work week and to avoid going into overtime due to travel time. Overtime (hours actively worked (that exceed 40 hours in a work week) must be approved prior to being worked.

Travel time will not be included in an employee's scheduled hours with clients and does not count towards Gateways benefits eligibility. Employees who utilize paper timesheets should utilize the "Travel Time" column on their timesheets to record travel time.

SECTION: Human Resources

POLICY: Travel Pay and Rest Period (Continued)

Recording Travel Pay in Paycom-

Those employees using Paycom electronic timecards must not record their travel time to client specific departments/cost centers, instead they should use the general admin code for the department they work in (e.g., CDS, Z60, Z62, etc.).

A Field Employee working in Consumer Directed Services and they have travel time to record.

Employees should record their travel time in Paycom using the steps below:

1. "Add Punch Pair" and enter start time and end time for travel pay, then fill in:
2. Department: CDS
3. GL Account: 5300
4. Job Code: Travel
5. Finalize this by selecting the green "Add Punch Pair" button in Paycom

SECTION: Human Resources

POLICY: Tuition Reimbursement

Employees are encouraged to pursue higher education. Gateways Community Services will provide tuition reimbursement to staff following the guidelines in this policy.

Gateways Community Services will provide pre-approved tuition reimbursement in accordance with the following guidelines:

- Availability of funds-as determined by CEO/CFO
- Employment Status-full time (35 hours/weekly) core employees
- Tenure-must be employed for one year or more.
- Grades-must show evidence of "C" or better for undergraduate or "B" or better for graduate. Non-degree programs must show certificate or other proof of completion.

Tuition will be at a maximum of \$3,000.00 per person, per fiscal year.

Eligible Programs and Courses- Programs and courses that qualify for tuition reimbursement are as follows:

- ***Degree Programs-*** Associate, Bachelor, or Graduate degree programs. Colleges/Universities must have accreditation by an agency that is recognized by the U.S. Secretary of Education. A current list is available on the U.S. Department of Education's web site.
- ***Non-Degree Programs-*** Individual classes or courses not related to degree programs will be reviewed on a case-by-case basis and are restricted to courses that are directly related to your present position or to prepare for another specific position at Gateways Community Services, Inc. Courses that meet the criteria but are not consistent with the intent of this program may be denied for reimbursement. A preparatory class intended solely to prepare the student for an examination or certification will not be covered under the tuition reimbursement program.

Pre-Approval-

It is the responsibility of the employee to have courses pre-approved in order to be eligible for reimbursement. Any tuition reimbursement request submitted after the class has started will be denied. To have your class pre- approved, send a completed Tuition Reimbursement Course Approval Request to Human Resources. You will be notified whether your request has been approved or denied, usually within ten (10) working days of receipt of your form.

SECTION: Human Resources

POLICY: Tuition Reimbursement (Continued)

Reimbursement-

Once class is completed, you must submit the following information to be reimbursed:

- Evidence of grade earned (official grade report or transcript)
- A verified statement or receipt of the cost of tuition w/class reference

Grants/Scholarships-

Grants, scholarships, or other funds which the employee does not have to repay must be disclosed when applying for Tuition Reimbursement. Gateways Community Services payments will be coordinated with these programs, so the employee does not receive more than 100% reimbursement for the tuition.

Termination-

Eligibility in the tuition reimbursement program and any agency reimbursement ends on the last day of employment.

Tax Status-

The Internal Revenue Code governs the rules of this program. As such, certain reimbursements may be subject to income taxes. The payment of any taxes due remains the responsibility of the employee. Finally, the rules of this program may be modified at any time without notice to keep the program in compliance with the Internal Revenue Code.

Decisions for reimbursement will occur twice throughout the year, once before January and once after January of each fiscal year.

NOTE: *As this practice is dependent upon availability of funds, staff should not plan on an "automatic" reimbursement upon request.*

SECTION: Human Resources

POLICY: Emergency Services

To demonstrate our commitment to ensuring employees who are first responders can fulfill that role during a state of emergency.

Gateways Community Services Inc allows employees who are members of an emergency medical services agency, fire department, or rescue squad to take time off when called to respond to state of emergencies. In advance of emergencies, employees should notify their supervisors if they are volunteer firefighters, rescue squad, or emergency medical technicians who may occasionally need time off from work to respond to emergencies. In the event of emergencies, employees must notify their supervisors, as soon as practicable, of their need to take Emergency Services Leave.

Eligibility-

Regular full-time, regular part-time and temporary employees who serve as volunteer firefighters, rescue squad, or emergency medical services technicians are eligible for Emergency Services Leave.

Notification-

When the governor or the general court declares a state of emergency under RSA 4:45, a member of a fire department, rescue squad, or emergency medical services agency who is called into service in New Hampshire, or a political subdivision shall have the right to take leave without pay from his or her place of employment to respond to the emergency.

Call to Service-

A firefighter, rescue squad member, or emergency medical services member shall be called into service of the state or a political subdivision for purposes of this subdivision when his or her services are requested in writing by the director of emergency services, communications, and management or by the head of a local organization for emergency management established under RSA 21-P:39. The request shall be directed to the chief of the member's fire department, rescue squad, or emergency medical services agency and a copy of the request shall be provided to the member's employer.

Exception-

An employer may certify to the director of emergency services, communications, and management or to the head of the local emergency management agency that the employee is essential to the employer's own emergency or disaster relief activities. Such a certification shall exempt an employee from the provisions of this subdivision.

SECTION: Human Resources

POLICY: Family Medical Leave-FMLA

The purpose of this policy is to outline the conditions under which an employee may request time off without pay for a limited period with job protection and no loss of accumulated service provided the employee returns to work.

A family and/or medical leave of absence shall be defined as an approved absence available to eligible employees for up to twelve weeks of unpaid leave per year under circumstances that are critical to the life of a family. Gateways Community Services uses a “rolling” twelve-month period method. Leave may be taken upon the birth of the employee’s child, upon the placement of a child with the employee for adoption or foster care, when the employee is needed to care for a child, spouse, or parent who has a serious health condition, or when the employee is unable to perform the functions of their position because of a serious health condition.

The provisions of this policy shall apply to all family and medical leaves of absence except to the extent that such leaves are covered under other paid employment benefit plans or policies for any part of the twelve weeks of leave to which the employee may be entitled under this policy. In other words, if an employee is entitled to paid leave under another benefit plan or policy, the employee must take the paid leave first. Furthermore, FMLA will run concurrently with any short-term, worker compensation, or other leave.

To be eligible for this leave under this policy, an employee must be **employed for at least 12 months** in total and must have worked at least **1,250 hours** during the twelve-month period preceding the commencement of the leave.

Gateways Community Services requires medical certification to support a claim for leave for an employee’s own serious illness or to care for a seriously ill child, spouse, or parent. For the employee’s own medical leave, the certification must include a statement that the employee is unable to perform the functions of his or her position. For leave to care for a seriously ill child, spouse, or parent, the certification must include an estimate of the amount of time the employee is needed to provide care. At its discretion, Gateways Community Services reserves the right to request a second medical opinion and periodic recertification at our expense. If the first and second opinions differ, at our expense, it may require the binding opinion of a third health care provider, approved jointly by the company and the employee.

If medically necessary for a serious health condition of the employee or their spouse, child, or parent, leave may be taken on an intermittent or reduced leave schedule. However, if leave is requested on this basis, the company may require the employee to transfer temporarily to an alternative position which will better accommodate recurring periods of absence or a part-time schedule, provided that the position has equivalent pay and benefits.

SECTION: Human Resources

POLICY: Family Medical Leave-FMLA (Continued)

When the need for leave is foreseeable, such as the birth or adoption of a child, or planned medical treatment, the employee must provide reasonable prior notice and make efforts to schedule leave so as not to disrupt company operations. In cases of illness, the employee will be required to report periodically on their leave status and intention to return to work.

To request Family Medical Leave, the employee must contact Human Resources to advise them of the circumstances and time being requested. Employees are encouraged to contact the Human Resource Department regarding questions or further explanation of this policy.

MILITARY FAMILY LEAVE ENTITLEMENTS-

Military Caregiver Leave: Gateways Community Services must grant an eligible employee who is a spouse, son, daughter, parent, or next of kin of a covered service member with a serious injury or illness up to a total of 26 workweeks of unpaid leave during a “single 12-month period” to care for the service member. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness. A serious injury or illness is one that was incurred by a service member in the line of duty on active duty that may render the service member medically unfit to perform the duties of his or her office, grade, rank, or rating. The “single 12-month period” for leave to care for a covered service member with a serious injury or illness begins on the first day the employee takes leave for this reason and ends 12 months later, regardless of the 12-month period established by the employer for other types of FMLA leave. An eligible employee is limited to a combined total of 26 workweeks of leave for any FMLA-qualifying reason during the “single 12-month period.” (Only 12 of the 26 weeks total may be for an FMLA-qualifying reason other than to care for a covered service member.)

Qualifying Exigency Leave: Gateways Community Services must grant an eligible employee up to a total of 12 work weeks of unpaid leave during the normal 12-month period established by the employer for FMLA leave for qualifying exigencies arising out of the fact that the employee’s spouse, son, daughter, or parent is on active duty, or has been notified of an impending call or order to active duty, in support of a contingency operation. Under the terms of the statute, qualifying exigency leave is available to a family member of a military member in the National Guard or Reserves; it does not extend to family members of military members in the Regular Armed Forces.

Qualifying exigency requirements include:

- An issue arising from a covered military member’s short notice deployment (i.e., deployment on seven or less days of notice) for a period of seven days from the date of notification.
- Military events and related activities, such as official ceremonies, programs, or events sponsored by the military or family support or assistance programs and informational briefings sponsored or promoted by the military, military service organizations, or the American Red Cross that are related to the active duty or call to active-duty status of a covered military member.

SECTION: Human Resources

POLICY: Family Medical Leave-FMLA (Continued)

- Certain childcare and related activities arising from the active duty or call to active duty status of a covered military member, such as arranging for alternative childcare, providing childcare on a non-routine, urgent, immediate need basis, enrolling or transferring a child in a new school or day care facility, and attending certain meetings at a school or a day care facility if they are necessary due to circumstances arising from the active duty or call to active duty of the covered military member;
- Making or updating financial and legal arrangements to address a covered military member's absence.
- Attending counseling provided by someone other than a health care provider for oneself, the covered military member, or the child of the covered military member, the need for which arises from the active duty or call to active-duty status of the covered military member.
- Taking up to five days of leave to spend time with a covered military member who is on short-term temporary, rest and recuperation leave during deployment.
- Attending to certain post-deployment activities, including attending arrival ceremonies, reintegration briefings and events, and other official ceremonies or programs sponsored by the military for a period of 90 days following the termination of the covered military member's active-duty status, and addressing issues arising from the death of a covered military member.
- Any other event that the employee and employer agree on is a qualifying exigency.
- Spouses employed by the same employer are limited to a combined total of 26 workweeks in a "single 12-month period" if the leave is to care for a covered service member with a serious injury or illness, and for the birth and care of a newborn child, for placement of a child for adoption or foster care, or to care for a parent who has a serious health condition.
- FMLA leave may be taken intermittently whenever medically necessary to care for a covered service member with a serious injury or illness. FMLA leave also may be taken intermittently for a qualifying exigency arising out of the active-duty status or call to active duty of a covered military member. When leave is needed for planned medical treatment, the employee must make a reasonable effort to schedule treatment so as not to unduly disrupt the employer's operation. Under certain conditions, employees or employers may choose to "substitute" (run concurrently) accrued paid leave (such as sick or vacation leave) to cover some or all of the FMLA leave. An employee's ability to substitute accrued paid leave is determined by the terms and conditions of the employer's normal leave policy.

NOTICE REQUIREMENTS

Employee Notice:

- Employees seeking to use military caregiver leave must provide 30 days' advance notice of the need to take FMLA leave for planned medical treatment for a serious injury or illness of a covered service member. If leave is foreseeable but 30 days advance notice is not practicable, the employee must provide notice as soon as practicable – generally, either the same or the

SECTION: Human Resources

POLICY: Family Medical Leave-FMLA (Continued)

next business day. An employee must provide notice of the need for foreseeable leave due to a qualifying exigency as soon as practicable.

- When an employee seeks leave due to an FMLA-qualifying reason for which the employer has previously provided the employee with FMLA-protected leave, the employee must specifically reference either the qualifying reason for leave or the need for FMLA leave.

Employer Notice:

- When an employee requests family medical leave or the employer acquires knowledge that leave may be for a FMLA purpose, the employer must notify the employee of his or her eligibility to take leave, including a reason for non-eligibility if the employee is determined not to be eligible. Such eligibility notice may be oral or written and should, generally, be given within five business days of the request for FMLA leave.
- Subsequent eligibility notices in the same 12-month leave period may be required when an employee's eligibility status changes. Gateways Community Services must inform employees of their rights and responsibilities under the FMLA, including giving specific written information on what is required of the employee.

CERTIFICATION REQUIREMENTS

Gateways Community Services will require that an employee's request for military family leave be supported by an appropriate certification. Gateways Community Services requires:

- Leave for a qualifying exigency be supported by a copy of the covered military member's active-duty orders and certification providing the appropriate facts related to the qualifying exigency for which leave is sought, including contact information if the leave involves meeting with a third party.

Leave to care for a covered service member with a serious injury or illness be supported by a certification completed by an authorized health care provider or by a copy of an Invitational Travel Order (ITO) or Invitational Travel Authorization (ITA) issued to any member of the covered service.

SECTION: Human Resources

POLICY: Leave of Absence

Family Medical Leave

The Family Medical Leave Act (FMLA) provides certain employees with up to 12 weeks of unpaid, job-protected leave per year. It also requires that their group health benefits be maintained during the leave.

FMLA is designed to help employees balance their work and family responsibilities by allowing them to take reasonable unpaid leave for certain family and medical reasons. It also seeks to accommodate the legitimate interests of employers and promote equal employment opportunity for men and women. FML leave may run concurrently with other leaves. Please refer to the Family Medical Leave Policy for detailed information.

New Hampshire Pregnancy Leave

Gateways will grant this time (of pregnancy or thereafter) to workers who can't work or are temporarily disabled due to pregnancy. Gateways will accommodate workers who need to work a reduced shift or have on-the-job accommodation due to their disability.

New Hampshire Paid Family Medical Leave

Gateways does not currently participate in New Hampshire Paid Family Medical Leave; this is voluntary leave in the state. If an employee enrolls outside of Gateways, it is our duty to work with you to provide payroll deductions.

Voting Leave

Gateways Community Services encourages employees to fulfill their civic responsibilities by participating in elections. Generally, employees can find time to vote either before or after their regular work schedule. Flexibility in the work hours will be allowed to accommodate your right to vote. Notify your supervisor prior to Election Day if you require any such accommodation.

With manager approval, any Gateways employee who wants to be assigned as a poll worker will be able to do so and be paid by Gateways for the day based on their regularly scheduled hours of work for that day. This applies to general, primary, midterm and any special elections in the employee's state of residence. The employee would need to submit proof of this poll obligation in a timely manner, to the HR Department for the compensable time to be added to their timecard.

Jury Duty

Gateways Community Services or the employee may ask to be excused from jury duty if in

SECTION: Human Resources

POLICY: Leave of Absence (Continued)

Gateways Community Services' judgment, the employee's absence would create serious operational difficulties. Gateways will pay the difference between an employee's base pay and the court reimbursement, provided that the employee supplies certification of having served as a juror.

The employee will continue to receive any benefits for the full term of the jury duty absence. The employee will continue to be responsible for payment for their portion of the monthly premium for medical, dental, and voluntary benefits. Earned leave time will continue to accrue during jury duty leave time.

Victims of Crimes

In accordance with the New Hampshire Crime Victim Employment Leave Act Section 275:61-65, Gateways Community Services will grant an employee unpaid time off from work to attend court or other legal or investigative proceedings associated with the prosecution of a crime in which the employee was the victim.

For purposes of this policy, a "victim" is any person who suffers direct or threatened physical, emotional, psychological, or financial harm because of the commission or attempted commission of the crime.

Employees may also qualify for leave under this policy if they are part of the immediate family of a homicide victim or part of the immediate family of a child under the age of 18 or an incapacitated adult who is the victim of a crime. Please refer to the Victim of Crimes Policy for detailed information.

Bereavement

Because the definition of family differs based on personal circumstances, Gateways bereavement policy is flexible. If you find yourself in the unfortunate situation where an immediate family member passes away, you can take bereavement time to attend services and fulfill other obligations for up to a maximum of 5 days.

- Up to five days of paid bereavement will be provided to employees for immediate family members. The immediate family is defined as: employee's spouse, civil union partner/domestic partner, child, mother, father, mother-in-law, father-in-law, stepparents, siblings.
- Up to three days of bereavement time will be provided for other family members. Other family members are defined as, but not limited to grandparents, grandchild, aunt, uncle, cousin.

SECTION: Human Resources

POLICY: Leave of Absence (Continued)

Paid time off under this policy is given over and above any time allowable under our Earned Time policy and it is not considered time worked for the purpose of computing overtime. Paid time off may be used for bereavement leave not included above. Gateways reserves the right to request a copy of appropriate documentation.

Employees should make their supervisor aware of their situation. In turn, the supervisor should notify Human Resources of the reason and length of the employee's absence. Proof of death and relationship to the deceased may be required.

Bereavement time will be prorated based on the employees' base hours. Bereavement pay is calculated based on the base rate at the time of absence and will not include any special forms of compensation, such as incentives or shift differentials.

Supervisors must ensure that bereavement time is noted on the employee's time sheet.

**Family Managed Employees may differ. *Payroll Services Employees are not eligible.*

Short Term/Long Term Disability

Employees must meet all eligibility requirements to qualify for Gateways STD/LTD plan benefits. For qualifying employees, eligibility for STD applies after meeting the definition of "disability" as determined by current insurance provider and the elimination period of 14 consecutive calendar days. Earned-time hours accrued will be used to cover this period and/or FMLA guidelines.

STD begins on the 15th consecutive calendar day of disability at 66 2/3% of your normal gross weekly earnings. FICA will be deducted from your STD payments. If an employee is eligible for unpaid Family Medical Leave (FMLA). FM Leave will run concurrently with STD leave and may extend up to a total of 12 weeks. Once STD ends, you will be required to use any earned-time hours you may have for the remaining FMLA leave, if applicable.

An employee does not accrue earned time or get paid for holidays during STD/LTD leave time. If enrolled in benefits that generate an employee premium, you will be required to reimburse Gateways Community Services monthly for the employee portion of premiums for health and/or dental coverage and any other monthly premiums for voluntary plans you are participating in.

Appropriate forms for STD/LTD will be reviewed and required to be completed by the employee and the employee's physician. Eligibility for Long Term Disability will be reviewed by the established insurance carrier during the period of short-term disability (after first 26 weeks).

Determination for STD and/or LTD benefits is made by the insurance provider.

SECTION: Human Resources

POLICY: Leave of Absence (Continued)

Emergency Services Leave

Gateways Community Services Inc allows employees who are members of an emergency medical services agency, fire department, or rescue squad to take time off when called to respond to state of emergencies. In advance of emergencies, employees should notify their supervisors if they are volunteer firefighters, rescue squad, or emergency medical technicians who may occasionally need time off from work to respond to emergencies. In the event of emergencies, employees must notify their supervisors, as soon as practicable, of their need to take Emergency Services Leave. Please refer to the Emergency Services Leave Policy for detailed information.

Workers' Compensation

Employees who are hurt on the job, during any Gateways event, or on the clock (being paid by the company) may be covered under Workers Compensation if approved by the insurance provider. All accidents/injuries are reported to the insurance provider who will make determination of the claim. Please refer to the Worker's Compensation Policy for detailed information.

Personal Leave

A personal leave of absence is an absence from work taken for reasons not otherwise covered by the Family Medical Leave Act (FMLA) or other protected leave policies. A personal leave of absence is not job protected. Any earned-time accruals must be used for this leave, then the remaining leave is unpaid. The granting of personal leave is at the discretion of the employer and based on the needs of the organization.

SECTION: Human Resources

POLICY: Victim of Crime

For purposes of this policy, a “victim” is any person who suffers direct or threatened physical, emotional, psychological, or financial harm because of the commission or attempted commission of the crime.

Employees may also qualify for leave under this policy if they are part of the immediate family of a homicide victim or part of the immediate family of a child under the age of 18 or an incapacitated adult who is the victim of a crime. For purposes of this policy, “immediate family” means father, mother, stepparent, child, stepchild, sibling, spouse/civil union partner, grandparent or legal guardian of the victim, or a person who is otherwise in an intimate relationship with and residing in the same household as the victim.

An employee needing time off under this policy should notify their supervisor and/or human resources as soon as possible to allow the department to arrange for the time off. The employee must submit copies of the notices of each scheduled hearing, conference, or meeting that is provided to the employee by the court or agency involved in the prosecution of the criminal to document the need for the leave and the amount of time required. Failure to do so may result in denial of the leave of absence. Any such notices or records will be maintained in confidence and will disclose them only on a need-to-know basis.

Request falling within the definitions of this policy will typically be granted unless the leave of absence will cause undue hardship to our business. An “undue hardship” for purposes of this policy means significant difficulty and expense. In determining whether an undue hardship may exist, the size of the operation, the employee’s position and role within the organization, and the need for the employee to be at work will be considered. Leave requests that are granted will be only for the period required for court or other legal or investigative proceedings, including necessary travel time.

Employees must use any accrued earned time during leave under this policy and then may take any remaining time as unpaid. Employees enrolled in company benefits will be required to reimburse Gateways Community Services monthly for your portion of premiums for health and/or dental coverage and any other monthly premiums for voluntary plans you are participating in.

Gateways Community Services will not discharge, threaten, or discriminate against an employee for taking leave under this policy and employees taking leave under this policy will not lose any seniority during this leave of absence in compliance with NH State Law.

SECTION: Human Resources

POLICY: Volunteer Time Off

Eligibility-

All active, full time regular employees are eligible to participate in this program after 90 days of employment. The employee must not be under corrective action. The employee must provide at least two weeks of notice to their manager and work demands can take priority over the VTO request. Employees can choose a 501(c)(3) non-profit organization of their choice or work together with other company members on a team volunteer activity. Some exceptions may apply for organizations that are not classified as a 501 (c)(3) non-profit (e.g., certain schools, etc.). Questions regarding appropriate organizations should be directed to Human Resources.

Employees are ineligible to participate if:

- The employee is on a Corrective Action Plan.
- The employee is on leave of absence of any kind.
- The employee is classified as part time, temporary, an unpaid intern, employed by a staffing agency, or is classified as an independent contractor/consultant.

Examples of acceptable VTO activities:

- Donating time at a food bank.
- Building a house for Habitat for Humanity.
- Cleaning up a beach, highway or park.
- Collecting items, then filling and distributing “back to school” packs.
- Participating in a multiple sclerosis bike-a-thon fundraiser.
- Organizing a cancer walk or run.
- Volunteering in a classroom or school field trip.
- Volunteering at an animal shelter.
- Volunteering for the United Way.

Examples of activities that would not qualify for VTO:

- Attending a parent/teacher conference.
- Any activity where we are not representing Gateways as a company.
- Participation in neighborhood association events.
- Coaching or playing in sporting leagues with no charitable fundraising purpose.

VTO may not be used for organizations that discriminate based on race, color, age, gender, gender identity, religious creed, veteran status, marital status, sexual orientation, pregnancy,

SECTION: Human Resources

POLICY: Volunteer Time Off (Continued)

childbirth, national origin or ancestry, physical or mental disability, medical condition or genetic information, or political affiliation.

Time Off Allotment-

Employees may receive up to one day (8 hours maximum) of paid time off in each calendar year to perform volunteer services. Volunteer Time Off (VTO) must be taken in full day increments during regular scheduled work hours with advance notice to, and approval by, the employee's manager.

VTO hours are pro-rated based on a full-time employee's budgeted number of weekly hours. For example, a 40-hour per week employee will receive 8 hours of VTO pay. A 35-hour per week employee will receive 7 hours of VTO pay.

VTO must be used in the calendar year in which it is granted. If the time is not used, it is not paid out at termination of employment and unused time may not be carried over into the next calendar year. VTO is also not classified as time worked when calculating overtime.

If an employee chooses to participate in a company sponsored volunteerism activity, the time will not be counted against their VTO time.

Workers Compensation and VTO-

As with any activities that occur outside of Gateways employment, while an employee is using VTO, Gateways is not liable for injuries incurred during VTO. Therefore, it is not necessary for the employee or manager to complete the Workers' Compensation Injury Report that would be required if the injury were work-related. In the event an employee sustains any injury at any time, employees are advised to seek medical attention appropriate to the injury.

SECTION: Human Resources

POLICY: Workers' Compensation

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action up to and including termination. All employees are covered by workers' compensation insurance, which may compensate an employee for an injury arising out of, or in the course of work. Our organization has a Safety Committee which is at least 51% represented by staff and the remainder represented by management and meets quarterly as defined in safety guidelines.

Employees must report any injury immediately to his/her supervisor and the Human Resources Director. The Director will initiate a claim with the workers compensation carrier utilizing the First Report of Injury, the carrier will notify the State of New Hampshire if the claim is a medical and/or treatable claim.

If you are not able to submit your claim within the 24-hour window of expectation, please reach out to your immediate supervisor and/or the Human Resources Director to help you initiate your claim as soon as possible.

When the injury is work-related, the employee should seek either first aid or medical attention from the approved workers' compensation provider. This location information is in the Employee Handbook, on the Gateways intranet and can be provided to you by either your supervisor or the Human Resources department. In the event of an emergency, please seek the nearest medical center/hospital for treatment.

Work related is defined as:

- incurred during paid working hours.
- on any Gateways Community Services owned, rented or leased grounds.
- at any Gateways Community Services sponsored events if represented during paid working hours.

Information regarding the Gateways workers compensation policy is readily available through your immediate supervisor and the Human Resources department.

Approval of workers' compensation claims is made by our workers' compensation carrier.

Accident/Injury Reporting

Report any work-related accident or injury to your immediate supervisor and the Human Resources Director immediately or no later than 24 hours after the event.

SECTION: Human Resources

POLICY: Workers' Compensation (Continued)

Seek first aid or medical attention at the approved workers' compensation provider or the nearest medical facility in case of emergency.

Gateways Employees Incident/Injury Report

An Accident/Injury report should be completed when the Gateways Community Services employee is involved in an incident and/or an injury has occurred.

Consumer Incident/Injury Report

Gateways employees should complete a Consumer Incident/Accident/Injury Report if there is an incident and/or injury involving a consumer of Gateways Community Services. The employee should notify their supervisor immediately.

Next Steps after an injury has occurred:

Fitness for Duty – Return to Work Authorization

When an employee accident/injury results in medical treatment or follow up is needed; a return-to-work authorization is required upon the employees next scheduled work shift to ensure that the employee is adhering to any restrictions or limitations provided by their physician. If the medical provider has not provided this to the employee, they can be sent a Fitness for Duty form available from the Human Resources department.

When the employee has been given work restrictions or limitations, our Human Resources department along with your supervisor will work with the employee and family to develop Temporary Modified Duty (as needed).

Temporary Modified Duty

Gateways Community Services is committed to providing work, when possible, for employees who have been restricted by a physician due to a work-related or off-duty injury or illness. Work will be reviewed and assigned due to the nature of the injury or illness and the limitations set forth by the treating physician. Gateways Community Services reserves the right to limit work hours and duties as it relates to physician fitness for duty documentation.

SECTION: Human Resources

POLICY: Americans Disability Act (ADA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA) prohibit discrimination against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation fringe benefits, job training and other terms, conditions, and privileges of employment. The ADA does not alter the Company's right to hire the best-qualified applicant, but it does prohibit discrimination against a qualified applicant or employee because of his or her disability, or because of a perceived disability. Most, if not all states now have similar statutes prohibiting discrimination against the disabled. As a matter of company policy, the Company prohibits discrimination of any kind against people with disabilities.

Definition of Disabled

An applicant or employee is considered disabled if he or she:

1. Has a physical or mental impairment that substantially limits one or more major life activities.
2. Has a record or history of such an impairment; or
3. Is regarded or perceived (correctly or incorrectly) as having such impairment.

A qualified employee or applicant with a disability is an individual who satisfies the skill, experience, education, and other job-related requirements of the position held or desired, and who, with or without reasonable accommodation, can perform the essential functions of that position.

Reasonable Accommodation

Qualified applicants or employees who are disabled should request reasonable accommodation from the Company to allow them to perform a particular job. If you are disabled and you wish such reasonable accommodation, contact Human Resources. On receipt of your request, we will meet with you to discuss your disability. We may ask for information from your health care provider(s) regarding the nature of your disability and the nature of your limitations or take other steps necessary to help us determine viable options for reasonable accommodation.

ADAAA

The Americans with Disabilities Act, as amended (ADAAA) is partially a job protection statute. It provides reasonable accommodation which may be a leave of absence in some cases. ADAAA only requires a leave of absence if it would allow the employee to return to work to a particular job (not a substantially equivalent job) and would not impose an undue hardship on your organization.

SECTION: Human Resources

POLICY: Criminal Background Check

Gateways Community Services must follow the guidance of the He-M 504.3 for criminal background checks in our role and responsibility of operations, unless otherwise noted in a compatible program waiver.

Following the provisions of the Fair Credit Reporting Act (15 USC at 1681-1681u) as amended, and NH Department of Safety procedures, before we can seek such reports, we must have written permission from the individual to obtain the information.

All consumer records containing criminal and motor vehicle information history will be kept confidential in the Human Resources office at Gateways Community Services. The information obtained will be kept strictly confidential and findings used to make hiring decisions by the HR Director/Manager. If additional information is requested in the background and investigation process, the HR Director/Manager will contact only the individual in which the consumer report is in question.

The findings are not to be discussed with anyone, including the applicant's family member and/or potential managing supervisor. If the individual report findings and subsequent hiring and/or placement decision is questioned, Gateways Community Services' President/CEO will be consulted.

If a criminal finding is on an individual record; the waiver process may be executed on the discretion and decision of the family in employer of record/co-employment situations. Gateways Community Services will not accept a third-party query obtained from outside vendors and/or agencies as substitute of background process.

Gateways Community Services is inclined to make an adverse decision based on the results of the background and investigation process based on the following criteria:

A misdemeanor conviction against any individual that involves:

- Physical or sexual assault.
- Violence or exploitation.
- Child pornography.
- Threatening or reckless conduct.
- Theft.
- Fraud.
- Driving under the influence of drugs or alcohol; or

SECTION: Human Resources

POLICY: Criminal Background Check (Continued)

- Any other conduct that represents evidence of behavior that could endanger the safety or well-being of an individual.
- A conviction of a felony against any individual.

Evidence that any provider or staff working directly with individuals has an illness or behavior that, as evidenced by the documentation obtained or the observations made by the department, would endanger the well-being of the individuals or impair the ability of the provider to comply with department rules, except in cases where such personnel have been reassigned and the well-being of all individuals and the provider's ability to comply with these rules are no longer at risk.

Additional factors considered in determining suitability may include, but not be limited to:

- Relevance of the crime to the position sought.
- The nature of the work and/or activity to be performed.
- Time elapsed since the conviction.
- Age of the candidate at the time of the offense.
- The number of offenses.
- Whether the individual has pending charges.
- Any relevant evidence of rehabilitation or lack thereof; or
- Any other relevant information, including information submitted by the individual or requested by the hiring authority.

Gateways Community Services will notify the individual of the pending adverse or adverse decision in a timely manner.

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POLICY: Employment at Will

Your employment with Gateways Community Services is considered “at will”, which means that either you or the company can terminate your employment at any time, with or without cause, and without advance notice.

SECTION: Human Resources

POLICY: HIPAA Breach Notification

The following steps shall be taken whenever a breach is discovered.

- 1) Report of breach is communicated from internal and/or external source immediately
- 2) Breach is reported to Privacy Officer (Senior HR Director) to implement the next steps
- 3) Research and Review events leading to and causing breach of information
 - a. Obtain all needed information.
 - b. Obtain electronic record information (i.e. email records sent).

- 4) Log information to Breach Data Record
 - a. Record intended recipient.
 - b. Record sent recipient.
 - c. Record data transmitted.
 - d. Record date of discovery.
 - e. Document any notes to breach error.

- 5) Notify individuals that breach occurred within 60 calendar days of discovery.
 - a. What was transmitted
Notice shall include:
 - Description of breach.
 - Date of breach.
 - Date of discovery.
 - Description of PHI affected.
 - Additional steps, if any, the individual should take to mitigate damage.
 - Steps Gateways Community Services is taking to investigate the breach, mitigate damage and prevent further breaches.
 - b. Sent by email
- 6) Attempt to retrieve document and Notify sent recipient of breach and make formal request to destroy all documents not intended to be sent.

- 7) Gateways Community Services will notify the media, and HHS secretary concerning the breach, as follows:
 - a. If breach involves protected health information for more than 500 individuals in any one state. Gateways Community Services shall notify media serving that state within 60 calendar days of discovery.

SECTION: Human Resources

POLICY: HIPAA Breach Notification (Continued)

- 8) Gateways Community Services shall delay notification of breach in accordance with law enforcement instruction as follows
 - b. In instruction is in writing, Gateways Community Services will delay according to written instruction
 - c. If the instruction is verbal, Gateways Community Services will document instructions, identifying the law enforcement official making instruction and delay for 30 days until written instruction is provided.

- 9) Implement corrective action steps and/or execute training to prevent future breach.

SECTION: Human Resources

POLICY: HIPAA Information Management/Need to Know

The following are examples where employees have individually identifiable “need-to-know” information to complete their assigned job functions, as well as examples where employees do not have need-to-know. These lists are intended to be examples only and are not intended to be complete representations of all situations. Per the Gateways Community Services’ policy, specific access to individually identifiable information is under the discretion of the departmental director.

Examples of appropriate uses of individually identifiable information where employees have a need-to-know:

- Rendering direct care to specific consumers (including diagnosis, service agreement, and assessment).
- Disease management and prevention activities such as immunization verification, screening for candidacy for specialized treatment programs or potential preventative interventions.
- At the request of the consumer. (Exception: Employee is not permitted access without a form signed by the consumer authorizing release of the information.)
- Administrative support activities including but not necessarily limited to appointment and scheduling coordination, complying with third party requirements, follow-up coordination, billing and collecting for services rendered to specific consumers, and maintenance of the record and/or information medium.
- Financial analysis to assess the business impact of consumer care, including but not limited to analysis of specific cases to assess impact of service/program redesign or in response to research requests (grants), and analysis of situations where it is necessary to join records from more than one system (for example, Vendor X and Vendor Y) together in order to analyze the full impact of that care.
- Performing reimbursement analysis on specific consumers.
- Performing activities during development/fund raising, strategic planning, legal defense, or follow-up on a compliance complaint.
- Educational or teaching purposes or instructional requirement criteria (Interns).
- Performing quality assurance and/or regulatory compliance activities.
- Educational material or informational resources.
- Fund-raising activities are done at the request of an employee who has knowledge of the consumer or family’s desire to donate to Gateways Community Services.

Examples specifically relevant:

- Administrative activities including enrollment, claims payment, coordination of benefits, customer service, SPEDIS reporting, data quality investigation, and quality improvement of administrative services.

SECTION: Human Resources

POLICY: HIPAA Information Management/Need to Know

- Utilization management activities for the purpose of assessing the appropriateness and efficiency of the services provided to a consumer member or group of consumer members, and for determining the contributing causes underlying certain financial results.
- Service coordination activities, including identification of members with a specific type or extent of health problems and provision of service coordination interventions.
- Grants.

Examples of inappropriate use of consumer identifiable information:

- Mass mailing fund raising solicitations to consumers with specific conditions, without the express approval of the consumer or guardian.
- Use of personal medical information in making employment decisions.
- Use of employee's personal medical information to see if the employee was out sick, had a doctor's appointment, had a worker's compensation injury, etc.

Information Management Legally Restricted Information-

The definition of "Legally Restricted Information" is individually identifiable information whose disclosure is specifically subject to additional legal requirements imposed by statute or administrative rule.

Examples of legally restricted information are:

- Substance abuse treatment records
- Sexual abuse treatment records
- Mental health treatment records,
- Certain diagnostic categories such as HIV/AIDS
- Adolescent health information related to pregnancy, birth control, and/or sexually transmitted diseases.

SECTION: Human Resources

POLICY: Immigration Law Compliance

In compliance with the Immigration Reform and Control Act of 1986 (IRCA), each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with Gateways Community Services within the past thirty days, or if their previous I-9 is no longer retained or valid. I-9 forms will be maintained for at least three years after the date of hire, or one year after the date employment ends, whichever is later.

Employees may raise questions or complaints with Human Resources, concerning immigration law compliance without fear of reprisal. Confidentiality will be maintained.

SECTION: Human Resources

POLICY: Lactation Accommodation

Employees will provide Gateways with a notice period of at least two (2) weeks prior to needing said accommodation.

Gateways will ensure the space provided is within reasonable proximity to the employees' work location, will be clean, have chairs and electrical outlets nearby; and be free from intrusion by co-workers and the public. A public rest room will never be designated space for this purpose.

A reasonable break for lactation is typically thirty (30) minutes for every three (3) hours worked. Employees should make every reasonable effort whenever possible to take these breaks contemporaneously with agency breaks and meal periods, however employees will not be required to make up time related to the use of these breaks if this does not occur.

Gateways reserves the right to deny any requests that would impose undue hardship on the help determine a reasonable alternative, if possible.

SECTION: Human Resources

POLICY: Non-Discrimination and Equity

This Policy applies to all aspects of the employment relationship including, but not limited to: recruitment, wages/compensation, benefits, promotion, demotion, training, working conditions, application of policies, corrective/disciplinary action, and termination.

Reporting Procedure:

If an employee believes he or she has experienced discrimination in violation of this Policy, the employee must report the matter to the Human Resources Department. We require reporting of any concerns of this nature so that they may be addressed promptly and appropriately.

Prohibited Retaliation:

Gateways will not tolerate retaliation against any employee who makes a good faith report of discrimination or who participates in good faith in an investigation of alleged discrimination. Any employee with any concerns regarding retaliation should report the matter to the Human Resources Department. Employees may raise concerns and present reports without fear of reprisal.

Consequences for Violating this Policy:

Any employee who has engaged in any discrimination or retaliation in violation of this Policy will be subject to disciplinary action, up to and including termination of employment.

SECTION: Human Resources

POLICY: Religious Accommodation

Gateways Community Services Inc. is committed to respecting the religious beliefs and practices of all employees and will make, upon request, accommodation for such observances when reasonable accommodation is available that does not create undue hardship to our business.

Religious Accommodation-

A reasonable religious accommodation is an adjustment to the work environment that allows an employee to practice their religion without causing undue hardship to the employer.

Here are some examples of religious accommodation:

- **Time off:** Time off for religious observances, such as the Sabbath, or for one-time rituals
- **Schedule changes:** Schedule changes to attend religious services
- **Prayer breaks:** Breaks during the day for prayer
- **Dress and grooming:** Permission to wear religious garb, such as a hijab or yarmulke, or to have religiously required facial hair

Requesting Religious Accommodation-

An employee whose religious beliefs or practices conflict with his or her job, work schedule, or with Gateway's policy or practice on dress and appearance, or with other aspects of employment, and who seeks religious accommodation must submit a written request for the accommodation to his or her immediate supervisor. The written request will include the type of religious conflict that exists and the employee's suggested accommodation.

Providing Religious Accommodation-

The immediate supervisor will evaluate the request considering whether a work conflict exists due to a sincerely held religious belief or practice and whether accommodation is available that is reasonable and that would not create an undue hardship on Gateway's business.

Accommodation may be a change in job, using paid leave or leave without pay, allowing an exception to the dress and appearance code that does not affect safety requirements, or for

SECTION: Human Resources

POLICY: Religious Accommodation (Continued)

other aspects of employment. Depending on the type of conflict and suggested accommodation, the supervisor may confer with his or her manager and with the human resource director.

The supervisor and employee will meet to discuss the request and decision on the accommodation request. If the employee accepts the proposed religious accommodation decision, the supervisor will implement the decision effective immediately. If the employee rejects the decision, he or she has the right to appeal. Appeals should be made in writing to the Human Resources Director.

SECTION: Human Resources

POLICY: Sexual and other Unlawful Harassment in the Workplace

Gateways Community Services will not tolerate sexual and other unlawful harassment or any form of illegal discrimination of or by an employee, client, vendor, or any personnel dealing with Gateways Community Services.

Harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of that person's race, skin color, religion, gender, national origin, age, or disability. Harassment can also occur if conduct is directed toward a person's relatives, friends, or associates. Harassment is considered one or more of the following:

- It has the purpose or effect of creating an intimidating, hostile, or offensive work environment
- It has the purpose or effect of unreasonably interfering with an individual's work performance
- Otherwise adversely affects an individual's employment opportunities

Sexual Harassment is defined as unwanted sexual advances or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser.

Sexual Harassment is also defined as unwelcome sexual advances (either verbal or physical), requests for sexual favors, or other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment.
- Submission or rejection of the conduct is used as a basis for making employment decisions; or
- The conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile or offensive work environment.

Harassing conduct includes, but is not limited to:

- Epithets, slurs, negative stereotyping or threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, or disability (including jokes or pranks that are hostile or demeaning with regard to race, color, religion, gender national origin, age, or disability) and
- Written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, or disability and that is displayed on walls, bulletin boards, or other locations or circulated in the workplace.

SECTION: Human Resources

POLICY: Sexual and other Unlawful Harassment in the Workplace (Continued)

Reporting Harassment-

To take appropriate action, management must be aware of any form of harassment or illegal discrimination. Therefore, anyone who believes that s/he has experienced or witnessed harassment, or discrimination should promptly report such behavior to an Immediate Supervisor or Human Resource Director.

Gateways Community Services will actively investigate all allegations of harassment and other forms of illegal discrimination.

Any supervisor who experiences, witnesses, or receives a written or oral report or complaint of harassment or illegal discrimination shall promptly report it to the Human Resources Director and/or President/CEO.

The goal is to provide all employees with confidential and reliable procedures for reporting all incidents of harassment or illegal discrimination

At any time, if an individual does not feel that their report or complaint of harassment or illegal discrimination was addressed properly, a complaint may be filed with:

NH Commission for Human Rights
2 Channel Drive
Concord, NH 03301
(603) 271-2767

Prohibited Retaliation-

Gateways Community Services prohibits retaliation against anyone who has reported or assisted in the investigation of a complaint of harassment or any other form of illegal discrimination. Retaliation, in and of itself, is a form of illegal discrimination.

Consistent with the need to conduct a prompt investigation, Gateways Community Services will try to keep complaints, the terms of their resolution and information obtained during its investigation confidential. Employees accused of harassment or other illegal discrimination shall be given sufficient information about the allegations to provide them with a reasonable opportunity to respond before any corrective action or discipline is imposed. Witnesses may also need to be informed of all the allegations. All employees are expected to be truthful, cooperative, and forthcoming in connection with a complaint investigation.

SECTION: Human Resources

POLICY: Sexual and other Unlawful Harassment in the Workplace (Continued)

There are absolutely no exceptions to Gateways Community Services' policy governing the prohibition of any harassment and illegal discrimination. If it is determined that harassment or unlawful discrimination has occurred, Gateways Community Services will take prompt and appropriate disciplinary action(s), which may include the termination of employment of all wrongdoers.

Important Note Regarding Clients-

Because of the nature of Gateways Community Services and the individuals we serve, there is a unique nature to our workplace. With that in mind, it is important for employees to recognize that Gateways Community Services provides services to individuals whose conduct and/or behavior may at times be inappropriate, including sexually inappropriate. It is generally our expectation that such conduct will be addressed through the individual's service agreement and through oral or written communication. However, if you are uncomfortable with the behaviors of the individuals we serve, we encourage you to discuss your concerns with your Supervisor/Program Director. Gateways Community Services will make all reasonable efforts to respond to your concerns. However, we recognize that there will be occasions when program guidelines and the needs of the individuals we serve will require a different level of tolerance for inappropriate behavior that would not otherwise be tolerated under this policy. If you feel that the conditions are intolerable for you, we encourage you to contact the Human Resource Director or the President/CEO to explore the possibility of reassignment or other opportunities within Gateways Community Services.

SECTION: Human Resources

POLICY: Spanish Notice of HIPAA Information Practices

Gateways Community Services cumple con la Ley de Portabilidad y Responsabilidad del Seguro Médico (HIPAA). La normativa de la HIPAA preserva la información de salud protegida (PHI).

La PHI incluye los siguientes datos de una persona:

- Salud (diagnóstico)
- Prestación de atención (servicios recibidos)
- Pago de los servicios (cómo se efectuará el pago)
- Información que identifique a la persona (nombre, dirección, seguridad social, etc.)

La PHI puede compartirse para lo siguiente:

- Tratamiento (por ejemplo, proveedores, programa de día, servicios residenciales, etc.)
- Pago (por ejemplo, facturación de servicios, etc.)
- Operaciones (por ejemplo, garantía de calidad, supervisión de programas, etc.)

En la mayoría de los casos, las personas no necesitan el consentimiento del consumidor para estos fines, a menos que compartan información sensible (por ejemplo, información sobre el VIH/SIDA, historia clínica de salud mental, etc.), que está protegida por leyes estatales especiales.

A efectos de pagos y operaciones, solo debe compartirse la información mínima necesaria. A efectos del tratamiento, el concepto de "información mínima necesaria" no debe impedir la libre circulación de la información necesaria para garantizar un tratamiento integral.

En la mayoría de las demás circunstancias, sería necesario obtener el consentimiento del consumidor o de su representante para divulgar su PHI (por ejemplo, marketing, publicidad, derivaciones a programas no relacionados con el tratamiento, como los de ocio, etc.). En estos casos, es muy importante explicar cuidadosamente a los consumidores lo que están aceptando y utilizar el formulario de autorización estándar de Gateways.

Toda persona que reciba este Aviso de prácticas de información de la HIPAA firmará un Acuse de recibo de las prácticas de información de la HIPAA.

Cada persona debe mantener y salvaguardar la confidencialidad de toda la información que haya obtenido o revelado en el curso de su empleo, proyectos especiales o trabajo voluntario. Los empleados no revelarán información confidencial excepto en la medida permitida por la política y los procedimientos de la agencia y por los estatutos vigentes.

SECTION: Human Resources

POLICY: Spanish Notice of HIPAA Information Practices (Continued)

La información confidencial debe protegerse en todo momento, tanto durante como después del empleo, el trabajo en proyectos especiales o el trabajo voluntario con Gateways Community Services. Las personas deben tener buen juicio para proteger la información confidencial y no hablar de ella en pasillos u otros lugares públicos. Además, los empleados se comprometen a proteger la confidencialidad del material en formato escrito y electrónico y, para ello, mantendrán y gestionarán esta información de forma que no corra el riesgo de ser descubierta por personas no autorizadas.

Todo lo que contenga PHI debe eliminarse de forma que la información sea ilegible (por ejemplo, utilizando una trituradora confidencial, etc.)

A continuación, se enumeran algunos ejemplos, no exhaustivos, de infracciones de la confidencialidad:

- Dejar información relacionada a los consumidores o que los identifique, abierta en un escritorio, como una agenda de citas, o material impreso en una fotocopiadora o en un fax.
- Conversar con un consumidor mientras se está de pie en un pasillo o a una distancia auditiva de otras personas.
- Hablar de un consumidor con alguien que no tiene motivos profesionales para disponer de esa información.
- Revelar que un consumidor recibe servicios a alguien que no tiene por qué saberlo.
- Dar información por teléfono cuando no se está seguro de con quién se habla.
- Dar información sobre un consumidor sin una autorización por escrito.
- Enviar información identificable que no esté incluida en un sobre o claramente marcada como "confidencial".
- Dejar abiertos o sin cerrar archivadores que contengan información confidencial.
- Proporcionar comunicación escrita o verbal a alguien sin una orden de registro, autorización o documentos legales.

SECTION: Human Resources

POLICY: Benefit Continuation (COBRA)

The Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under Gateways Community Services' health plan, for a limited period as specified by law, when a "qualifying event" would normally result in the loss of eligibility for health insurance. Some qualifying events are: resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation; and an employee's dependent child no longer meeting eligibility requirements.

COBRA continuation coverage can become available to you when you would otherwise lose your group health coverage. It can also become available to other members of your family who are covered under the Plan when they would otherwise lose their group health coverage. When key parts of the health care law take effect, you'll be able to buy coverage through the Health Insurance Marketplace. In the Marketplace, you could be eligible for a new kind of tax credit that lowers your monthly premiums right away, and you can see what your premium, deductibles, and out-of-pocket costs will be before you decide to enroll. Being eligible for COBRA does not limit your eligibility for coverage for a tax credit through the Marketplace. Additionally, you may qualify for a special enrollment opportunity for another group health plan for which you are eligible (such as a spouse's plan), even if the plan generally does not accept late enrollees, if you request enrollment within 30 days.

For additional information about your rights and obligations under the Plan and under federal law, you should review the Plan's Summary Plan Description or contact the Plan Administrator.

Under COBRA, the employee or beneficiary pays the full cost of coverage at Gateways Community Services' group rates plus a 2% administration fee. Human Resources will provide each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage.

For more information about your rights under ERISA, including COBRA, the Health Insurance Portability and Accountability Act (HIPAA), and other laws affecting group health plans, contact your human resources contact or the nearest Regional or District Office of the U.S. Department of Labor's Employee Benefits Security Administration (EBSA) in your area or visit the EBSA website at www.dol.gov/ebsa.

SECTION: Human Resources

POLICY: Termination and Severance Pay

Policy Statement-

This policy defines the distinct types of separations from employment at Gateways Community Services and the effects of separation on benefits and continuous service.

Applicability-

This policy will apply to all permanent full and/or part-time employees. Apart from the severance pay section, this policy may also apply to temporary full and/or part-time employees.

Types of Separation-

- A. Voluntary separation occurs when the employee initiates the termination. Below are examples of voluntary terminations.
 - a. Written or oral resignation.
 - b. Absence from work for 2 consecutive shifts without notifying the employee's supervisor.
 - c. Failure to return to work upon recall from furlough on a designated date.
 - d. Failure to return to work from a leave of absence at the expiration of the leave.
- B. Involuntary separation occurs when the employee does not initiate the termination. The following are examples of involuntary terminations.
 - a. Lay off for lack of work- when Gateways reduces its work for economic or other business-related needs
 - b. Release without fault-when an employee, through no fault of their own, is unsuitable for, or incapable of performing work assigned and no appropriate change of assignment is available
 - c. Discharge-when an employee, who is suitable for and capable of performing the work is terminated for such reasons as inefficiency, absenteeism, violation of rules of conduct or policy including but not limited to habitual carelessness, misconduct or gross misconduct, insubordination, theft, falsification of records, harassment or threatening behavior.
- C. Death of an employee
- D. Disability- Upon written verification by a health care provider, an employee is determined totally and permanently disabled and unable to perform the requirements of his position and thus able to qualify for disability benefits

Employees who voluntarily separate are asked to provide a minimum of two weeks' written notice of resignation. A minimum of four weeks written notice of resignation must be submitted by Senior/Operational Team Management employees. Employees are strongly encouraged to actively work their resignation period. Use of earned time during the resignation period is discouraged and requires supervisory approval. Gateways Community Services reserves the right to end employment prior to the conclusion of the notice period at their sole discretion.

SECTION: Human Resources

POLICY: Termination and Severance Pay (Continued)

Senior/Operational Team Management at Gateways Community Services includes but is not limited to: President/CEO, CFO, Vice Presidents, Senior Directors, Directors, and Managers.

Prior to an employee's voluntary departure, an exit interview will be scheduled, and benefit continuation information will be provided to them. Employees are required to turn in all keys, books, access codes/passwords and other Gateways Community Services property or proprietary information before departure or as referenced in Information Technology Resources policies.

Severance Pay-

There is no statute in New Hampshire that requires an employer to offer severance pay. To help ensure a peaceful separation, Gateways Community Services reserves the right, at its discretion, to offer certain employees a severance agreement that includes an offer of severance pay during the termination process. Severance pay is subject to appropriate deductions for income and social security taxes.

Acceptance of terms outlined in any severance agreement will be between the employee and Gateways Community Services. Employees have the right to review and discuss terms outlined in the agreement with their own legal counsel prior to executing the agreement.

Benefits -

Any continuation of company benefits will follow COBRA, earned time, and benefits policies. This includes but may not be limited to:

- Eligible employees will be offered the opportunity to continue participation in health, dental, vision, and any other benefit coverage offered under COBRA provisions, at their own expense.
- Employees who have a life insurance policy will be offered the opportunity to convert it over to an individual policy at their own expense.
- 403B retirement plans remain with the employee after termination.

Any employer contributions made towards employee benefits coverage cease at termination.

Earned Time-

Employees will be paid their remaining earned time accruals in their final paycheck.

Final Payment of Wages-

Payment of wages will be issued as follows:

- Voluntary Resignation- wages owed to the employee will be paid by the next scheduled pay date.

SECTION: Human Resources

POLICY: Termination and Severance Pay (Continued)

- Involuntary Resignation- wages owed will be paid within 72 hours of the last day actively worked.
- Severance Pay-payment will be disbursed after written acceptance of the severance agreement has been executed by the employee and Gateways Community Services, Inc.

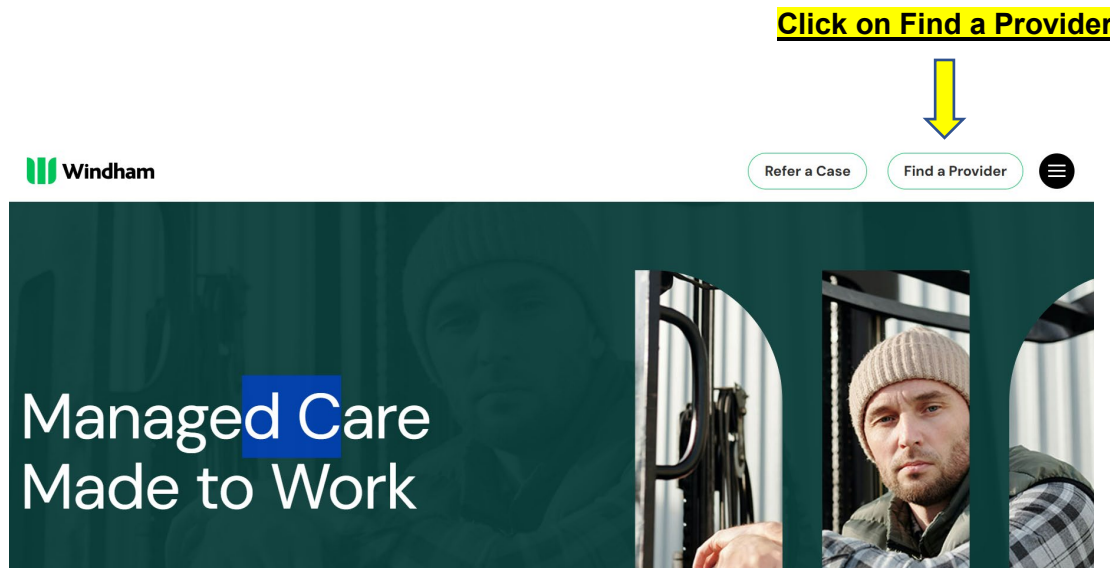
In-Network Health Care Providers for Worker Compensation Accidents and Injuries

- For life-threatening emergency care, call 911.
- Notify HR immediately.
- For non-life-threatening care, use one of these Greater Nashua area locations.
 - *Convenient MD Urgent Care, 565 Amherst Street, Nashua, NH*
 - *Concentra Urgent Care, 14 Broad Street, Suite A, Nashua, NH*

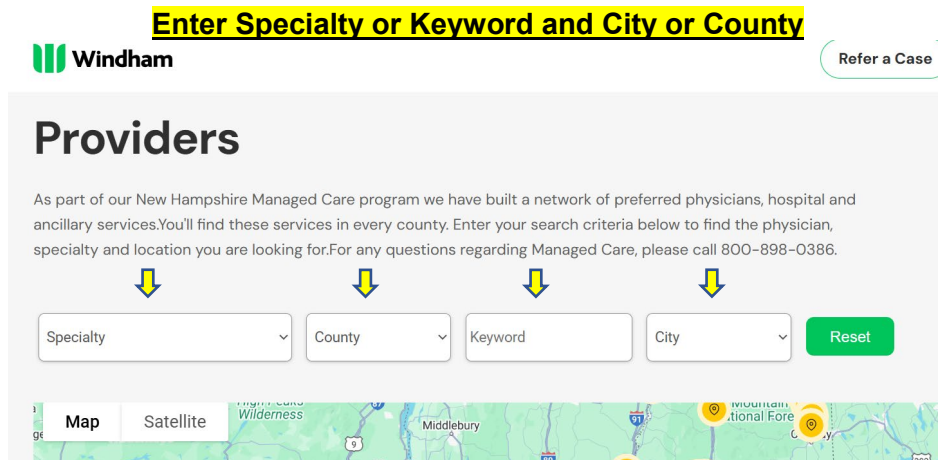
For urgent care treatment out of the Nashua area, or for follow-up care by a specialist or health care facility, use the link below and follow instructions for a listing of current in-network providers and locations.

Provider Directory: www.windhamworks.com

Click on Find a Provider



Enter Specialty or Keyword and City or County



Note: This is a managed care program. Out of network treatment may not be covered by our Worker's Compensation carrier. Employees should make every effort to use in network providers whenever possible.

Employee Handbook Acknowledgement Statement

The employee handbook describes important information about Gateways Community Services, Inc. (Gateways), and I understand that I should consult Human Resources regarding any questions not answered in the handbook. I have entered my employment relationship with Gateways voluntarily and acknowledge that there is no implied specified length of employment. **Accordingly, either I or Gateways can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.**

I understand and agree that no manager, supervisor, or representative of Gateways has any authority to enter into any agreement for employment other than at-will. Only the President/CEO has the authority to make any such agreement and then only in writing signed by the President/CEO of Gateways, or their designee on their behalf.

This manual and the policies and procedures contained herein supersede all prior practices, oral or written representations, or statements regarding the terms and conditions of your employment with Gateways. By distributing this handbook, Gateways expressly revokes all previous policies and procedures which are inconsistent with those contained herein.

I understand that, except for employment at-will status, all policies and practices may be changed at any time by Gateways, and the company reserves the right to change my hours, wages and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies.

I understand and agree that nothing in the employee handbook creates, or is intended to create, a promise or representation of continued employment and that employment at Gateways is employment at-will, which may be terminated at the will of either Gateways Community Services, Inc., or myself. Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I understand and agree that employment and compensation may be terminated with or without cause and with or without notice at any time by Gateways or myself.

I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Employee's signature

Date