
UPO EMPLOYEE HANDBOOK

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**UNITING PEOPLE
WITH OPPORTUNITIES**

UPO EMPLOYEE HANDBOOK

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1 INTRODUCTION

This United Planning Organization (“UPO”) Employee Handbook (“Handbook”) has been developed by management in order to familiarize employees with UPO and provide general information about its personnel policies. Naturally, any such compilation must be general in nature; this Handbook is not intended to be comprehensive or to address all the possible applications of or exceptions to the general policies contained in the Handbook. In addition, UPO operates a Head Start/Early Head Start program. As such, this Handbook includes some requirements unique to this program and is subject to change based on funding source requirements and amendments to the applicable laws and regulations. Employees are urged to consult management regarding questions about the Handbook or UPO’s policies and procedures.

Please understand that this policy Handbook is not an employment contract and nothing stated in this Handbook is intended to constitute a contract of employment or to guarantee any fixed terms or conditions of employment. Rather, it is a guide to organization policies and practices and is subject to modification or termination at the sole discretion of UPO.

UPO abides by all applicable local, state and federal laws and regulations affecting employment. In case of any conflict between these policies and applicable laws, applicable law will prevail.

1.1 Welcome

Welcome to UPO. UPO is pleased you have accepted a position with the organization and hopes your career with UPO will be professionally and personally rewarding. UPO is a private, non-profit charitable organization serving the residents of the District of Columbia as the city’s designated Community Action Agency. UPO provides leadership, support and advocacy for low-income residents of the District and the Greater Washington Metropolitan Area in order to help them move toward self-sufficiency and self-determination. See **Appendix 1**, UPO Organizational Chart.

1.2 History

The United Planning Organization was established on December 10, 1962, to plan and implement social services for the Greater Washington Metropolitan area. With the advent of 1965's War on Poverty, UPO became the designated community action agency for the District of Columbia and certain other localities in the area. Today, UPO is governed by a volunteer Board of Directors made up of representatives of low-income residents, representatives of elected officials, and representatives of major groups and interests.

1.3 UPO Mission Statement, Vision Statement and Promise

The following statements represent UPO’s:

Mission: Uniting People with Opportunities.

Vision: UPO’s Washington: A city of thriving communities and self-sufficient residents.

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UPO encourages all employees to embrace the following promise:

Promise: Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.

1.4 Changes in Policy

This Handbook reflects UPO's current personnel policies. These policies supersede all previous UPO personnel policies whether oral or in writing. Approved program specific personnel policies are incorporated in this Handbook.

UPO reserves the right to modify, suspend or terminate any of the policies or procedures described in this Handbook, at its sole discretion, whether with or without prior notice to employees. Although UPO will inform employees of changes to this Handbook as they occur, changes to any policies, procedures, or information may not result in the issuance of a new Handbook. In cases where a new Handbook is not distributed, it is the employee's obligation to keep track of all changes to UPO's policies and procedures.

END OF SECTION

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2 EMPLOYMENT

2.1 Employee Definition

An “employee” of UPO is a person who regularly works for UPO on a wage or salary basis.

2.2 Communications Workers of America (CWA), Local 2336, General Agreement

CWA Local 2336 is the exclusive bargaining representative for all employees, who are full-time or part-time non-professional employees and certain professional employees as indicated in the current General Agreement between CWA and UPO located at UPO’s Washington, DC locations. CWA Local 2336 is not the bargaining representative for supervisors and confidential and managerial employees as defined in the National Labor Relations Act, as amended. Additionally, temporary employees, whether full-time or part-time, are not represented by the union.

Although UPO has tried to make the provisions of this Handbook consistent with the provisions of the General Agreement with CWA Local 2336, the terms of the General Agreement will govern in the event any provisions of this Handbook are inconsistent with the General Agreement.

2.3 “At Will” Employment

All employees who are *not covered* by UPO’s General Agreement with CWA Local 2336, including all supervisors, confidential and managerial employees, as defined in the National Labor Relations Act, as amended, are, and at all times will be, “at will” employees. “At will” employment means UPO is free to terminate “at will” employees at any time, for any reason, with or without notice. Similarly, “at will” employees are free to resign for any reason at any time.

This UPO Employee Handbook does not create a contract between any employee(s) and UPO. The employment relationship of non-union employees and UPO is voluntary and “at-will.”

Early Head Start/Head Start employees do not fall into the employment-at-will policy. Involuntary termination of an Early Head Start/Head Start employee who is charging 51% or more of his or her time to the Early Head Start/Head Start grant, shall require Early Head Start/Head Start Policy Council/Committee involvement as provided in the Involuntary Termination Section.

2.4 Employment Classifications

1. Regular Full-Time Employee. A regular full-time employee is an employee hired to fill a regular position and who is normally scheduled to work 75 hours or more within a two week pay period and who may be exempt or non-exempt, and is not in a temporary status or Introductory Appointment. Regular full-time employees are eligible for all standard benefits, subject to the terms, conditions, and limitations of each benefit program.

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2. **Regular Part-Time Employee with Benefits.** A regular part-time employee with benefits is an employee is normally scheduled to work on a continuing basis at least 21 hours a week, but less than 75 hours within a two week pay period and who may be exempt or non-exempt, and is not in a temporary status or Introductory Appointment. Regular part-time employees are not eligible for UPO benefits except those legally required.
3. **Regular Part-Time Employee with Limited Benefits.** A regular part-time employee with limited benefits is an employee who is normally scheduled to work on a continuing basis less than 21 hours a week and who may be exempt or non-exempt, and is not in a temporary status or Introductory Appointment.
4. **Temporary Employee.** A temporary employee may be full-time or part-time employee who is hired to work for a limited duration, with or without benefits, under one or more of the following circumstances: a.) on an on-call basis, as needed based on the program's needs; b.) for a specific period of time but less than one (1) year; and/or, c.) for a specific program that operates for a specific period of time or season.
5. **Early Head Start/Head Start Employee.** In addition, employees in the above categories, working within the Early Head Start/Head Start program fifty-one percent (51%) or more of the time, are classified as Early Head Start/Head Start employees. These employees may work less than 12 months and are subject to additional Early Head Start/Head Start regulations and requirements.
6. **Exempt and Non-Exempt Employees.** Employees are classified as exempt or nonexempt from the overtime provisions of the Fair Labor Standards Act and the DC Wage and Hour laws.
 - a. Employees in exempt positions are:
 - paid to do the job and must meet the US Department of Labor (DOL) and District of Columbia Department of Employment Services (DOES) requirements for exemption;
 - excluded from specific provisions of Federal and state wage and hour laws; and,
 - not eligible for overtime pay.
 - b. Employees in non-exempt positions are:
 - paid on an hourly basis; and,
 - entitled to overtime pay for hours worked in excess of 37.5 (under FLSA and DC Wage and Hour laws the standard is 40 hours) in a work week.

2.5 Introductory Appointment for New Employees

All new employees receive introductory appointments for a period of six (6) months. Introductory appointments afford UPO an opportunity to evaluate the performance of the employee. Employees occupying introductory appointments are “at-will” employees. Accordingly, introductory employees may be terminated at any time during the six-month period, for any lawful reason and with or without notice, and have no right to appeal a termination decision.

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At the end of the six-month introductory appointment, if the employee has received a favorable performance evaluation, then, at UPO's sole discretion, the employee may be offered a regular appointment based upon the recommendation of his or her supervisor and the approval of management. Successful completion of the six-month introductory appointment does not guarantee a position of employment with UPO and does not guarantee any fixed employment terms or condition to an employee offered a regular employment.

2.6 Introductory Appointment for Current Employees

All employees who are either reassigned, promoted, or transferred, to a new position, will receive an introductory appointment for a period of three (3) months. Introductory appointments afford UPO an opportunity to evaluate the performance of the employee. Employees occupying introductory appointments are "at-will" employees. Accordingly, introductory appointment employees may be terminated at any time during the three-month period, for any lawful reason, and with or without notice, and have no right to appeal a termination decision.

At the end of the three-month introductory appointment, if the employee has received a favorable performance evaluation, then, at UPO's sole discretion, the employee may be offered a regular appointment based upon the recommendation of his or her supervisor and the approval of management. Successful completion of the three-month introductory appointment does not guarantee a position of employment with UPO and does not guarantee any fixed employment terms or condition to an employee offered a regular employment.

2.7 Volunteer

A volunteer is an unpaid person who assists in implementing program activities under the supervision of a staff person. See [Appendix 2](#), UPO Volunteer Guidelines.

2.8 Consultant

A person who receives compensation for professional or technical services at a fee agreed upon and paid by the Organization, who is engaged as an independent contractor (or third party contractor) for specified services and is not a UPO employee. Consultants will be informed that their compensation will be reported to the IRS and IRS Form 1099 will be issued in compliance with applicable laws and regulations.

2.9 Employment of Relatives/Nepotism

To avoid conflicts of interest and the appearance of impropriety in the work place, UPO does not hire individuals with close personal relationships (for example, best friend, business associate, a dating relationship, etc.), with employees who recommend or approve the hire or have authority to terminate, supervise or evaluate the individual, nor does UPO hire relatives of employees who recommend or approve the hire or have authority to terminate, supervise or evaluate the family member. "Relatives" are defined broadly to include spouse or partner in a civil union recognized by state law, domestic partner, parent, child, sibling, father-in-law, mother-in-law, brother-in-law, sister-in-law, grandparent, grandchild, cousin, aunt or uncle.

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Failure to disclose close personal relationships or relatives of current UPO employees at the time of application may result in disciplinary action up to and including termination of employment.

No employee shall be promoted or transferred into a position that would result in reporting to a relative or a person with whom he or she has a close personal relationship.

2.10 Equal Employment Opportunity

UPO does not discriminate in its recruitment or recruitment advertising, hiring, promotion, upgrading, demotion, transfer, layoff, return from layoff, termination, rates of pay or other compensation, selection for training, education, social and recreation programs, or any other benefits and employment procedures against any applicant for employment or employee because of actual or perceived race, religion, color, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, family responsibilities, disability, matriculation, political affiliation, veteran status, genetic information, or any other characteristic protected under Federal and District law. Any employee who willfully violates this policy will be subject to appropriate disciplinary action, up to and including termination.

See [Appendix 3](#), UPO Cultural Diversity and Competency Plan.

2.11 Recruitment and Selection

To maintain consistent procedures for recruiting and selecting applicants, UPO recruits and selects the most qualified applicants for available posted positions, in compliance with all applicable Federal and state laws and regulations and with UPO's commitment to Equal Employment Opportunity.

To be eligible to apply for a posted position, an employee must have been in his or her current position for at least 90 days. An employee who has a written record of counseling received in the last 90 days on file, or are on probation or suspension, are not eligible to apply for posted positions.

When hiring employees working for the Early Head Start/Head Start program 51% or more of the time the following procedures will be followed:

1. The Early Head Start/Head Start Policy Council/Committee shall be consulted in the decision-making process. This will be achieved by having a Policy Council/Committee member on the interview committee. The Policy Council/Committee can be called upon to give advice or information.
2. The Policy Council/Committee must approve decisions before the individual is hired and begins working.
3. The appointments of all other Early Head Start/Head Start staff, other than those listed above, are subject to the recommendation of Head Start Director of the applicable component and UPO's Early Head Start/Head Start Policy Council/Committee.
4. Current and former Early Head Start/Head Start parents must receive preference for employment vacancies for which they are qualified.

5. The appointment of the Early Head Start/Head Start program director is subject to prior approval from the President and CEO, Board of Directors and the Policy Council/Committee and funding source.

2.12 Americans with Disabilities Act and Workplace Accommodations

UPO complies with all the relevant and applicable provisions of the Americans with Disabilities Act (ADA), as amended. UPO does not discriminate against any qualified employee or job applicant because of that person's physical or mental disability. Consistent with this policy of nondiscrimination, UPO will provide reasonable accommodations to qualified individuals with disabilities (as defined by the ADA) who have made UPO aware of his or her disability, provided that such accommodation does not constitute an undue hardship on UPO.

An employee who believes he or she needs a reasonable accommodation to perform the essential functions of his or her job should contact UPO's Office of Human Resources. Upon receipt of a request for an accommodation, the Vice President of the Office of Human Resources and, as appropriate, the employee's supervisor will meet with the employee to identify the precise limitations resulting from the condition and the potential accommodation needed from UPO to help overcome the limitations and perform the job. UPO may request medical documentation to support and help identify the limitations resulting from the condition. UPO will keep medical information confidential to the fullest extent possible, but may need to share the medical information with persons involved in the accommodation decision. UPO will determine the feasibility and effectiveness of the requested accommodation, considering various factors recognized by law, and will inform the employee of UPO's decision on the accommodation. Please note that the ADA does not require UPO to accept the specific accommodation requested by its employees and permits UPO to suggest alternative accommodations in cases where it determines that an accommodation is warranted and feasible. UPO expects its employees to work with it in arriving at an accommodation that serves the needs of both the employee and UPO.

If the request is granted, UPO will inform the employee how the accommodation will be implemented. If the request is denied, the employee will be informed of his or her right to request that the decision be reviewed by the President/CEO. Typically, the employee will be asked to submit a written request for review, detailing the need for the accommodation and his or her reasons for disagreeing with the original decision.

If an employee has questions about this policy, needs a reasonable accommodation, or feels that he or she may have been discriminated against on the basis of a disability, the employee should contact the Office of Human Resources. All inquiries and complaints will be kept confidential to the fullest extent possible. Any employee who willfully violates this non-discrimination policy will be subject to appropriate disciplinary action, up to and including termination.

2.13 Immigration & Nationality Act Compliance

All offers of employment are contingent upon verification of the candidate's right to work in the United States. Every new employee will be asked to produce original documents verifying his or her right to work and, as required by Immigration and Reform and Control Act of 1986

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(IRCA) as enforced by the Department of Homeland Security, to sign Federal INS Form I-9, Employment Eligibility Verification Form .

2.14 Background Checks and Screenings

UPO will conduct a job-related background check as part of UPO's hiring process. A background check will consist of prior employment verification, reference checks, and education and professional licensure confirmation. UPO will conduct a credit check, driving record or traffic check, Child Protection Register check, criminal background check(s), and health screenings when required by District of Columbia or federal laws or regulations, a funding source, or at UPO's discretion.

An applicant or employee who provides misleading, erroneous, or deceptive information on an employment application, resume, or in an interview shall be eliminated from further consideration for employment or shall be terminated, as applicable.

In addition, an employee who provides misleading, erroneous, or deceptive information on any periodic compliance documents, or acknowledgement forms will be subject to disciplinary action, up to and including termination.

An employee whose position requires licenses and/or certifications must show the original for verification to the Office of Human Resources. A copy of the license and/or certification will be kept in the personnel file. Renewal must be made according to Federal and/or state law. It is the employee's responsibility to ensure the licenses and/or certifications are kept current and copies are submitted to the Office of Human Resources. Failure to keep required licenses and/or certifications current may result in suspension/termination.

Early Head Start/Head Start Candidates

In addition to the employment checks detailed above, the following must be performed for Early Head Start/Head Start candidates.

- a. All employees hired to positions within the Early Head Start/Head Start program are required, in accordance with the U.S. Department of Health and Human Services and the D.C. Office of Superintendent of Secondary Education guidelines, to declare all convictions related to child abuse and neglect and all convictions of violent felonies. The declaration may exclude: traffic fines of \$200.00 or less; any offense, other than any offense related to child abuse and/or child sexual abuse or violent felonies, committed before the prospective employee's 18th birthday which was finally adjudicated in a juvenile court or under a youth offender law; any conviction, the record of which, has been expunged under Federal or state law; and any conviction set aside under the Federal Youth Corrections Act or similar state authority.
- b. The Office of Human Resources shall obtain at least three personal and three employment references for an Early Head Start/Head Start applicant before an offer of employment is made.
- c. After employment has been offered, a health exam including TB screening is required for Early Head Start/Head Start staff and regular volunteers. Periodic re-examinations may also be required.

- d. A state or national criminal record check, as required by state law or administrative requirement, must be conducted.
- e. All prospective employees are required to sign applicable declaration(s) prior to employment. All current employees are required to sign applicable declaration(s) annually.
- f. The Office of Human Resources must review each application for employment in order to assess the relevancy of an arrest, a pending criminal charge, or a conviction.

2.15 New Employee Orientation

New employee orientation is conducted by UPO's Office of Human Resources. It includes an overview of UPO's mission, vision, operations, as well as an explanation of important employment policies, procedures, and benefits. In addition, further orientation will be provided by the employee's supervisor or designee for specific duties, responsibilities and protocols.

2.16 Personnel Records and Change in Personal Information

Personnel records are securely maintained in the Office of Human Resources. All medical records and health insurance claims, if any, are kept in a separate confidential file with restricted access.

Employees are required to immediately report any change in their personal data to the Office of Human Resources, including name and address changes, emergency contact telephone numbers, marital status, number of dependents, designated insurance beneficiaries, or a change in the number of tax withholding exemptions. Failure to timely notify the Office of Human Resources of changed family circumstances may adversely affect an employee's or dependent's benefits.

UPO complies with the proper handling of all private information and individually identifiable health information and outline steps in appropriate Health Insurance and Portability and Accountability Act (HIPAA) compliance.

2.17 Record Retention and Destruction

The record retention policy provides guidelines for retention of official UPO records. It applies to all UPO offices, divisions, units and all UPO employees who create, receive or maintain such records in the course of UPO business. See [Appendix 4](#), UPO Document Retention and Destruction Policy.

2.18 Security and Inspection

UPO building and property security (i.e. keys, locks, anti-theft devices, property control and building access) is assigned to the Office of Business Management (OBM) located at UPO Headquarters, 301 Rhode Island Avenue, N.W. Employees are not allowed in UPO facilities after work hours without prior authorization from their supervisor. Supervisors must notify OBM in advance and in writing of the need for an employee or customer to have building access after-hours.

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UPO has the right to access and inspect all UPO worksites. UPO has the right to search UPO worksites; any space or equipment on UPO worksites; and any personal property on the worksites, including but not limited to vehicles, purses, backpacks, lunch containers, and any other item. There is no guaranteed right of privacy.

2.19 Visitors in the Workplace

All visitors to UPO facilities must be authorized, by the employee or office to be visited, to enter the workplace. When making arrangements for visitors, employees should request that visitors enter through the work site's main reception area and sign in and sign out at the front desk or security guard station.

UPO understands that, at times, it may be necessary for employees to receive personal visitors at UPO facilities. Employees should try to avoid personal visitors during working hours, but, when necessary, employees should try to arrange for such visits to occur during their scheduled lunch breaks.

END OF SECTION

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3 PERSONNEL POLICIES & PROCEDURES

3.1 Work Schedule

The standard UPO workday is 7.5 hours in length, from 8:45 a.m. to 5:00 p.m., with a forty-five (45) minute unpaid lunch break unless operational needs dictate otherwise. The standard work week is Monday through Friday, unless operational needs dictate otherwise.

An employee's work schedule may vary due to his or her position, or may be adjusted with the approval of the employee's supervisor. Supervisors shall notify the Office of Human Resources before implementing any schedule variations to an employee's workday.

3.2 Recording Time Worked

Employees are required to maintain accurate personal bi-weekly electronic time records for all time worked. No later than noon on the Monday following the end of a pay period, employees must sign and submit time records to their supervisor for approval, signature, and submission to the Finance Office.

Non-exempt (hourly) employees scheduled to attend a meeting, training class, workshop, or seminar at the request of UPO will be paid for the hours of the meeting or seminar and the travel time to and from the work site.

Tampering or falsifying time records is not allowed and may result in disciplinary action, up to and including termination.

3.3 Punctuality, Absence and Lateness

Regular attendance and punctuality are essential conditions of employment and vital to the success of UPO's mission. Poor attendance, which includes continual or repeated absences and/or tardiness, will result in disciplinary action, up to and including termination.

From time to time, it may be necessary for an employee to be late or absent from work. UPO recognizes that emergencies, illness or pressing personal business may arise. If an employee is going to be absent or tardy, he or she must notify his or her immediate supervisor or his or her designee no later than one (1) hour before the scheduled starting time of his or her work day that he or she will be absent or late to work, unless operational needs dictate otherwise. Failure to provide the requisite notice will result in the absence being considered as an "unscheduled absence" and a violation of this policy.

3.4 Unscheduled Absence

If an employee is absent from work for three (3) consecutive work days without any contact with his or her immediate supervisor or the Office of Human Resources, the employee will be deemed to have abandoned his or her job and voluntarily resigned from UPO.

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3.5 Lunch Break

Employees will be provided with an unpaid forty-five (45) minute lunch break unless operational needs dictate otherwise. Employee lunch breaks are usually taken between the hours of 11:30 a.m. and 2:00 p.m. each workday, unless operational needs dictate otherwise. Employees must schedule their lunch breaks with their supervisor at a time compatible with both their work schedules and office staffing needs.

3.6 Weather and Emergency Closings

At times, emergencies such as severe weather or power failures can disrupt UPO operations. In the case of inclement weather conditions, UPO follows the same schedule as the District of Columbia government, unless operational needs dictate otherwise. In non-weather related emergencies, the President and Chief Executive Officer will decide whether to close and the Office of Human Resources will provide official notification to employees. See [Appendix 5](#), UPO Inclement Weather Policy.

3.7 Employee and Volunteer Conflict of Interest and Related Party Policy

UPO is committed to maintaining the highest level of integrity and the highest standards of ethical conduct in all of its activities and dealings. All UPO employees and volunteers are expected to act with honesty, integrity, and openness in all their dealings as representatives of UPO. It is important for UPO employees and volunteers to be aware that both real and apparent conflicts of interest or dualities of interest sometimes occur in the course of conducting the affairs of the organization and that the appearance of a conflict of interest can be troublesome even though there may not be a real and apparent conflict of interest.

The purpose of the Conflict of Interest and Related Party Policy is to provide guidance to UPO's employees and volunteers so that UPO can maintain the highest level of integrity and the highest standards of ethical conduct. Each employee and volunteer of UPO is required to review carefully UPO's Conflict of Interest and Related Party Policy and is required to adhere to it. Certain provisions of this Conflict of Interest and Related Party Policy, as indicated, apply only to directors, officers, and management employees.

See [Appendix 6](#), UPO Employee and Volunteer Conflict of Interest and Related Party Policy.

3.8 Political Activity

UPO recognizes that its employees may, in their *individual capacity*, participate in the political process on a national and local basis. Political activity means doing something in active support of or opposition to a political party, a candidate for partisan political office, or a partisan political group. Permissible political activities of a UPO employee include but are not limited to: holding an office in political clubs or parties so long as the duties do not involve personal solicitation, acceptance or receipt of political contributions; serving as a poll watcher, election judge, clerk or similar office; and serving as a delegate, alternate, or proxy to a state or national party convention.

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However, because UPO is a federal Community Services Block Grant and Early Head Start and Head Start grant recipient, UPO employees may not, in the name of UPO or while on UPO premises or using UPO resources:

- Participate or become actively involved in any political campaign or in any other type of political activity, or
- Provide financial support for, or make contributions to or for the benefit of any political candidate, political party, or political action committee or provide financial support for or make contributions in support of any other political objective, or
- Participate in any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election or any voter registration activity.

In general, employees of UPO may not engage in the following activities at any time or place, including off-duty hours, during leave of any type (including unpaid leave), and off UPO premises:

- Be a candidate for public office in a partisan election (including primaries);
- Use official authority or influence to interfere with or affect the results of an election or a nomination for office; or
- Directly or indirectly coerce, attempt to coerce, command or advise any employee of UPO or other Community Action or Head Start Agency to make political contributions, or request such contributions from UPO employees whom they supervise.

See [Appendix 7](#), Memo - Election Year and Political Activity.

3.9 Office of Early Learning Program Performance Standards

The Office of Early Learning within UPO operates a Head Start/Early Head Start (HS/EHS) program. In doing so, it must comply with federally mandated Program Performance Standards (PPS) issued by the United States Department of Health and Human Services (HHS), Administration for Children and Families (ACF), Office of Head Start (OHS). Currently, these PPS are located at 45 Code of Federal Regulations, Part 1304. The PPS, as may be amended, are incorporated into this Handbook by reference. Various sections of this Handbook address specific PPS requirements. The PPS require the establishment and maintenance of an organizational structure needed to support a quality HS/EHS program. The PPS address the following areas: Early Childhood Development and Health Services, Family and Community Partnerships, Program Design and Management, and Implementation and Enforcement. The Program Performance Standards set forth requirements for employment in HS/EHS programs, the necessary governance structures of HS/EHS organizations, and comprehensive child and family services that must be offered by HS/EHS programs.

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3.10 Outside Employment

UPO's policy regarding outside employment is to ensure it does not interfere with the programs or services provided at UPO. A UPO employee may hold outside employment during his or her UPO workday as long as he or she obtains prior written permission from the Executive Vice President, Vice President of Operations and Chief Operating Officer, or Director of Office of Early Learning in consultation with the Vice President of Human Resources and satisfactorily meets his or her job responsibilities with UPO. For any such employee, he or she must maintain full-time hours (37.5) in a work week and must ensure that he or she logs in and out on the timesheet (e-time) when he or she is not working at UPO. An employee cannot be paid by UPO while he or she is engaging in outside employment. UPO reserves the right to withdraw its permission if the employee's outside employment interferes or conflicts with his or her work at UPO or UPO's programs or services, or is no longer in UPO's best interest.

3.11 Confidentiality of Information

All UPO records and information relating to UPO and its customers are confidential, and employees must ensure the confidentiality of all such materials and information. The ability of UPO to effectively interact with the members of the community is highly dependent upon the community's confidence that personal information that it provides to UPO will be held in confidence and not be released to unauthorized persons or agencies. Federal and District of Columbia laws and regulations prohibit disclosure of confidential customer information without proper authorization and impose serious penalties on those who disclose such information. Accordingly, UPO programs maintain effective controls to ensure that customer identifying information such as name, address, income, or other personal data is protected from disclosure. These controls ensure that information gathered through UPO sponsored programs is used only for the purposes intended and only by those UPO employees whose job requires the use of this data. Customer or business-related information that a UPO employee receives must be maintained in confidence and appropriately secured to avoid disclosure to third-parties or other employees who do not have a need to know the information.

No UPO-related information, including, but not limited to, documents, notes, files, records, oral information, computer files or similar materials may be removed from UPO's facilities without prior authorization, except when required in the ordinary course of performing duties on behalf of UPO. Moreover, the contents of any UPO-related information may not be disclosed to anyone outside of UPO, except as required for the conduct of UPO's business. If an employee is unsure of the confidential nature of specific information, the employee must ask his or her supervisor for clarification. Any employee violating this policy will be subject to appropriate disciplinary action, up to and including termination.

If an employee leaves, the employee must surrender all information-bearing items in his or her possession, whether or not containing confidential information, including but not limited to, flash drives and any other storage media, notebooks, reports, and other information from any third party, or containing UPO confidential information.

See **Appendix 8**, UPO Housing Counseling Privacy Policy.

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3.12 Media Policy

This media policy is designed to guide staff in responding to calls or visits from the media, whether press, television, or radio.

UPO staff should treat all media inquiries with courtesy and refer the reporter to UPO's Communications & Community Relations Division. UPO staff is NOT authorized to answer specific questions, but instead should refer ALL media questions and visitors to the Communications & Community Relations Division.

3.13 Dress Code

UPO employees are expected to exercise good judgment and dress in a professional manner while conducting UPO business, whether in or out of the office. Dressing in a fashion that is clearly unprofessional, that is deemed unsafe, that is provocative or that may negatively affect UPO's reputation is unacceptable and will not be tolerated.

If an employee comes to work dressed inappropriately, his or her supervisor will counsel him or her and may request that the employee go home to change. Further dress code violations may, at management's discretion, result in discipline.

See [Appendix 9](#), UPO Dress Code Policy.

3.14 Child Abuse and Neglect Reporting Policy

As required by District of Columbia or federal law, some employees may be required to report suspected child abuse or neglect matters to applicable authorities. In addition, UPO requires an employee whose duties and responsibilities involve direct and regular contact with children to report suspected child abuse and neglect to his or her supervisor. Employees must preserve the confidentiality of all records pertaining to child abuse or neglect in accordance with applicable District of Columbia law. No employee may undertake, on his or her own, to treat cases of child abuse and neglect. Employee must cooperate fully with child protective service agencies.

3.15 No-Harassment Policy

UPO's policy prohibits all employees from engaging in harassment of any kind in the workplace, including harassment based upon race, color, sex, religion, gender, identity or expression, national origin, age, sexual orientation, disability or other status protected by Federal and district law. Consequently, harassment based upon verbal or physical conduct that denigrates or shows hostility towards an individual because of his or her race, color, sex, religion, gender, identity or expression, national origin, age, sexual orientation, disability or other protected status and that creates an intimidating, hostile, or offensive working environment, is strictly prohibited. Prohibited harassment may include, but is not limited to, epithets, slurs, jokes, or threatening, abusive, offensive, intimidating or hostile verbal or physical conduct relating to an individual's race, color, sex, religion, gender, identity or expression, national origin, age, sexual orientation, disability or any other protected status.

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UPO's policy is to provide a work environment that is free from all forms of prohibited harassment, including sexual harassment. UPO does not, and will not, permit employees to engage in prohibited sexual or other harassment (either verbal or physical). Harassment, sexual or otherwise, by any employee, supervisor, manager, or executive of UPO is strictly prohibited. Similarly, UPO will not tolerate harassment of employees by customers, vendors or suppliers. This policy also prohibits same-sex harassment.

Prohibited sexual harassment includes, but is not limited to, offensive or unwelcome jokes or other verbal or physical conduct relating to sex. The following list provides examples, but is not an exhaustive list of actions, that may be considered sexual harassment and are, therefore, prohibited in the workplace:

- Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature when (i) submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment; (ii) submission or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment;
- Unwelcome physical touching or attempts to touch;
- Unwelcome sexual statements or comments;
- Remarks of a sexual nature;
- Sexually oriented or "off color" jokes;
- Pin-up calendars;
- Pornographic materials;
- Unwelcome sexual flirtations;
- Written material of a sexual nature (i.e., cartoons, posters, pictures);
- Inquiries regarding a person's sex life;
- Unwelcome e-mails, which are sexual in nature;
- Pressuring an employee for a date;
- Verbal abuse of a sexual nature; or
- Any other conduct of an unwelcome sexual nature.

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Reporting Violations

All employees are expected to promptly report any incident of harassment to their supervisor, or if they prefer, to the Vice President of Human Resources or the Vice President of Legal Affairs/General Counsel. Employees are not required to first bring a complaint regarding harassment to their supervisor. UPO will keep all such harassment complaints confidential to the extent possible. A prompt investigation will occur and, if it is determined that prohibited harassment has occurred, UPO will take appropriate disciplinary action calculated to see that the harassment ends, up to and including termination.

All employees, including supervisors, have an obligation to both stop all forms of harassment from occurring and to report conduct which they observe or learn of that violates this policy to their supervisor, or if they prefer, to the Vice President, Human Resources or the Vice President of Legal Affairs/General Counsel.

Non-employee violators of UPO's policy will be subject to immediate expulsion from UPO's facilities or termination of a contract, as applicable.

No retaliation or other adverse action will be taken against an employee who, in good faith, either reports a complaint of harassment or provides information during an investigation of alleged harassment.

Any employee having questions concerning this policy should contact UPO's Vice President of Human Resources or the Vice President of Legal Affairs/General Counsel for a confidential discussion about this policy and any questions the employee may have.

Do not assume that UPO is aware of the problem. It is every employee's responsibility to bring complaints and concerns to UPO's attention so that UPO can help resolve them.

3.16 Violence in the Workplace Policy

UPO strives to provide a safe work place for all employees. To ensure a safe work site and reduce the risk of violence, all employees should review and understand all provisions of this workplace violence policy. UPO will respond when there is any indication of a potentially hostile or violent situation in the workplace.

Prohibited Conduct

UPO does not tolerate any type of workplace violence committed by or against employees. For the purpose of this policy, a threat or act of violence shall include, but not be limited to, any act or gesture likely to leave another person injured or fearing injury, any act or gesture likely to damage property, or any act or gesture intended to harass or intimidate another person.

Employees are prohibited from making or engaging in violent activities. The list of prohibited behaviors includes, but is not limited to, the following conduct:

- Causing physical injury to another person;

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- Making threatening remarks or gestures;
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress or intimidation;
- Intentionally damaging employer property or property of another employee; or
- Possession of a weapon while on UPO property or while conducting UPO business or threatening to bring a weapon on UPO property or while conducting UPO business.

Reporting Procedures

Any potentially dangerous situations must be reported immediately to UPO's Vice President of Human Resources, Vice President of Legal Affairs/General Counsel. Reports can be made anonymously. All reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled and the results of investigations will be discussed with them, as appropriate.

Verbal threats, threatening conduct of any kind, or any other acts of aggression or violence in the workplace will not be tolerated. Any employee determined to have committed an act violating this policy will be subject to disciplinary action, up to and including termination. Non-employees engaging in violent acts on UPO's premises or while conducting UPO business will be reported to the proper authorities.

3.17 Use of Information Technology -- Computers, Telephones, Electronic Mail, Internet and Intranet

UPO information technology (IT) and telecommunications equipment and systems, including but not limited to computers, laptops, telephones, fax machines, electronic mail, voicemail, internet and intranet (iNet) are intended to be helpful tools to enable UPO employees to perform their duties and responsibilities and to provide the community with effective and efficient services. These resources should be used primarily for conducting UPO business.

UPO IT and telecommunications equipment, resources and systems shall not be used for inappropriate or unlawful activities. Prohibited use of e-mail, internet, and iNet by employees includes, but is not limited to, sending spam, junk mail, intimidating, hostile or offensive material, or viruses, or accessing pornography and gambling web sites. Employees found to use UPO equipment and systems for inappropriate or unlawful activities will be disciplined, up to and including termination and may result in civil or criminal liability.

Incidental and occasional personal use of this equipment and systems is permitted during work hours, so long as such use does not interfere with an employee's job responsibilities or interfere or conflict with UPO business, policies or procedures. In addition, employees may use the equipment and systems to communicate regarding UPO's wages, hours, working conditions during non-working hours.

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Employees have no right to privacy when using UPO's equipment, resources or systems, including but not limited to desks, files, telephones, computers, voicemail, Internet, Intranet, or e-mail, and should not have an expectation of privacy for any information accessed or stored on UPO equipment or at UPO worksites. Any use of UPO communication's resources is made with the understanding that such use is not secure, is not private or confidential, and is not anonymous. Equipment and technology use is subject to inspection by UPO at any time, and monitoring tools may be used. UPO maintains the right, as determined by UPO, to monitor, access, retrieve, delete, or disclose information on any and all UPO IT and telecommunications equipment, resources and systems.

Any questions concerning use of UPO equipment or systems should be discussed with the employee's supervisor or manager. Unauthorized use of IT and telecommunications equipment, resources or systems could result in disciplinary action, up to and including termination and possible criminal prosecution.

See **Appendix 10**, UPO Information Technology Policy.

3.18 Software Licenses and Other Copyrighted Materials

Most information and software that is accessible on the Internet is subject to copyright or other intellectual property protection. Copyright holders are given certain exclusive rights, including the right to make and distribute copies of protected material. UPO does not authorize or condone the illegal duplication of copyrighted software. Employees are responsible for complying with all copyright laws and applicable licenses that may apply to software, files, and other information downloaded or copied from the Internet. Employees, therefore, should not copy or download protected information from the internet for use within the organization and may not agree to any licensing arrangement without the express written permission of the Office of Technology. Violations of this policy will be taken seriously and may result in disciplinary action, up to and including termination and possible criminal or civil liability.

3.19 Smoke Free Workplace

In order to promote wellness and maintain a safe, healthy, and efficient work environment, all programs and services will be conducted in a smoke-free environment. This policy applies to all persons at UPO worksites. No one may smoke anywhere on UPO worksites at any time. Employees who want to smoke during work hours must leave the premises during designated breaks.

3.20 UPO Comprehensive Alcohol and Drug Policy

UPO is committed to protecting the safety, health and well-being of all employees and other individuals in the workplace. UPO recognizes that alcohol abuse and drug use pose a significant threat to the organization's goals. UPO has established a drug-free workplace program that balances UPO's respect for individuals with the need to maintain an alcohol and drug-free environment.

- This policy recognizes that employee involvement with alcohol and other drugs can be very disruptive, adversely affect the quality of work and performance of

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employees, pose serious health risks to users and others, and have a negative impact on productivity and morale.

- UPO requires its employees to adhere to a strict policy regarding the use and possession of drugs and alcohol. The manufacture, distribution, possession, or use of any illegal drug, alcohol, or controlled substance while on UPO's premises is strictly prohibited. Violation of this policy can result in appropriate disciplinary action, up to and including termination.
- UPO encourages employees to voluntarily seek help with drug and alcohol problems and offers assistance through its Employee Assistance Plan more fully described below in Section 5.3.

See **Appendix 11**, UPO Comprehensive Alcohol & Drug Policy.

3.21 Gifts

Employees and volunteers of UPO may not accept gifts, special discounts, loans or anything of value (money, services, etc.) from UPO customers or vendors, except unsolicited gifts less than \$25.00 in value. Employees and volunteers who receive any gifts greater than \$25.00 in value must return them and report the gift to the VP of Legal Affairs/General Counsel.

Employees and volunteers also may not give unauthorized gifts to customers. Under no circumstances may UPO employees or volunteers request or accept gifts from UPO customers or vendors as a condition of such customers or vendors receiving program services or receiving orders, contracts, or other such commitments from UPO.

See **Appendix 6**, UPO Employee and Volunteer Conflict of Interest and Related Party Policy.

3.22 Solicitations and Distributions

Solicitation or distribution of non-program related literature on UPO property generally is not permitted. Exceptions may be made for UPO vendors or service providers who are authorized to distribute information about specific services, programs or resources.

Solicitation of products and services during work hours in work areas by employees and non-employees is prohibited. Employees are not permitted to distribute non-UPO literature in work areas at any time during the workday.

3.23 Performance Evaluation

UPO's performance evaluation process is designed to improve the employee's understanding of his or her job and to encourage professional development. At the time of employment, the employee's supervisor will explain the performance requirements of the position. Employees are required to perform their work at an acceptable level of quality and quantity. An employee will not be considered for promotion or a salary increase unless the employee has received a current satisfactory performance evaluation.

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Each employee's job performance will be evaluated on the basis of such factors as knowledge of the job, productivity, quality of work, dependability, judgment, and ability to work effectively with others. The performance evaluation will focus on the degree to which the employee has attained the performance objectives established for the position. The employee will participate in the evaluation and will have an opportunity to review and respond in writing to his or her performance evaluation. A copy of the employee's performance evaluation and any employee response or comments will be maintained in the employee's personnel file.

Frequency

Each employee's job performance will be reviewed and evaluated, in writing, by his or her immediate supervisor according to the following schedule:

- During the initial six-month introductory period, employees will be evaluated two times: once, after 90-days and, again, within thirty (30) days prior to the completion of the introductory period. The second review will include the supervisor's recommendation to continue employment or terminate.
- After an employee successfully completes the introductory period, the employee will be evaluated annually. Typically, employee evaluations will be completed no later than October 31, for the period ending September 30 of that year. If the employee's performance was evaluated within the six (6) month period prior to this date, the next review will occur the following year.
- During the initial 90-day period in a new position associated with staff transfers or promotions, regular employees will be evaluated once, 30 days prior to the completion of the 90 day period. The review will include the supervisor's recommendation to continue employment or terminate. If the employee's performance was evaluated within the six (6) month period prior to October 31, the next review will occur the following year.

3.24 Progressive Discipline

1. Introduction

Disciplinary action can be taken when an employee breaks a specific rule, regulation, policy, request or order. UPO has adopted a discipline system based upon the principle of progressive discipline. The severity of the employee's performance or misconduct will determine the appropriate degree of disciplinary action, up to and including termination.

Managers and supervisors are to exercise judgment when administering employee discipline and should be guided by principles of fairness and consistency. Managers also should weigh all of the circumstances, including the employee's previous record, before initiating disciplinary actions.

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While the steps described below identify the corrective actions available to supervisors, employees should understand that supervisors are not required to follow all the steps available to them in the progressive discipline process. UPO maintains the right to administer whatever level of discipline it deems appropriate under the circumstances regardless of the employee's prior disciplinary record or the nature of the employee's infraction. An employee may be placed on Administrative Leave by the Vice President of Human Resources during an investigation of the employee's performance or misconduct.

2. Verbal Warning

An employee may receive a written warning for minor violations of UPO's policies and performance standards. The verbal warning is given in an individual conference between the employee and his or her immediate supervisor. The supervisor shall document that the verbal warning occurred, the date of the warning, and shall maintain the documentation for no more than one year.

3. Written Warning

An employee may receive a written warning for minor violations of UPO's policies and performance standards. The warning is given in an individual conference between the employee and his or her immediate supervisor. The written warning shall be documented and signed by both parties in order to acknowledge that the employee has received notice of the warning, although signature by the employee is not mandatory. If an employee declines to sign the warning conference document, the supervisor should make a written notation and forward it to Human Resources.

4. Written Reprimand and Probation

Supervisors may issue a written reprimand with probation to an employee for (1) a serious infraction of UPO policy; (2) continued unsatisfactory performance following a written warning; or (3) repeated minor violations of UPO policies following a written warning. The reprimand is issued in writing to the employee, with a copy to Human Resources. Supervisors must identify the specific deficiencies in work performance and/or conduct that the employee must correct. Written reprimands should be signed by the employee, but this is not mandatory. The probationary period will be between thirty (30) to ninety (90) calendar days to correct the deficiencies identified in the reprimand. During this reprimand period, the employee is not eligible for a promotion or to use Annual Leave. At the end of the reprimand period, the employee must be informed in writing whether he or she has satisfactorily corrected the deficiencies or will be terminated from employment.

5. Suspension

Suspension is a temporarily enforced absence from duty and may not be for a period beyond fifteen (15) work days. It may be imposed as a disciplinary action, pending the outcome of an investigation, or proposed involuntary termination action. Managers must recommend all suspension actions to the VP of Human Resources for concurrence prior to HR issuing a notice of suspension.

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The employee shall be notified in writing of the suspension. The suspension notice shall specify the reason(s) for the suspension. An employee on suspension is to leave work and not to report to work until instructed to do so in writing.

An employee on suspension is on leave without pay status and may **not** use accrued annual, personal or sick leave while on suspension. (See exception in the Collective Bargaining Agreement.)

During the suspension period, management will determine whether the employee will be returned to: 1) regular status, 2) reassigned, 3) reduced in grade, 4) terminated, or 5) returned to regular status under specific conditions. Managers must recommend all actions to the VP of Human Resources for concurrence prior to HR issuing a notice to employee.

6. Involuntary Termination

An employee may be involuntarily terminated by written notification from the Vice President of Human Resources for any reason(s) that UPO concludes, at its discretion, is appropriate. The following reasons constitute cause for termination, but are merely illustrative and not to be considered as exhaustive:

- a. Unsatisfactory work performance;
- b. Violation of UPO policies and/or procedures;
- c. Misconduct affecting one's employment;
- d. Conduct which would tend to disrupt the good order and effectiveness of other employees;
- e. Conduct which compromises the integrity of UPO or is not in the best interest of UPO;
- f. Excessive and/or unauthorized absence or tardiness;
- g. Theft and/or fraud, including, but not limited to, falsification of time records or other records or information of UPO;
- h. Conviction of a felony and/or any criminal drug or alcohol statute whether the violation occurred in the work place or in the community;
- i. Insubordination;
- j. Incompetence;
- k. Unauthorized disclosure, possession, use or copying of UPO information or documents and/or information about UPO's customers; and
- l. Layoff or Reduction-in-Force resulting from changes in services, resources, reorganization, or qualification requirements for designated programs or projects.

Early Head Start/Head Start Employees

- a. In the event that unsatisfactory performance continues, prior approval for termination is required from the Early Head Start/Head Start Policy Council/Committee.
- b. In cases of severe misconduct requiring an employee's immediate removal from his or her position (suspension), the Early Head Start/Head Start Policy Council/Committee will be notified immediately/at their next regularly scheduled monthly meeting. Layoffs do not count as terminations and do not require the

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approval of the Early Head Start/Head Start Policy Council/Committee. All notifications of termination will be documented in the minutes of the meeting at which the notification was made.

- c. Employees recommended for termination will be suspended with/without pay pending the Early Head Start/Head Start Policy Council/Committee decision.
- d. The Early Head Start/Head Start Policy Council/Committee will approve or disapprove the termination at its next regularly scheduled meeting. The termination, if upheld, will be effective upon the initial notice. If termination is not upheld, the matter will be treated in accordance with the Problem Resolution procedure.

3.25 Voluntary Termination

Voluntary terminations are those initiated by the employee and include:

- Resignation
- Retirement
- Death
- Failing to return from an approved extended leave of absence
- Failing to provide notification and obtain approval for absences of three or more consecutive days

When an employee resigns his or her employment with UPO, he or she should submit a letter of resignation, stating the effective date and reason for leaving. Employees who plan to resign from UPO are requested to give at least two (2) weeks advance notice to their immediate supervisors and the Office of Human Resources. The employee is expected to work during the notice period, unless otherwise directed by UPO.

Employees who terminate voluntarily will be paid all wages due on or before the next regularly scheduled pay date following the last day of work. In addition, employees will be paid any unused annual leave earned by the employee during the year of termination up to the day of termination, as part of the employee's final pay check. However, no employee shall be paid for annual leave carried over from one year to the next, unless the carried over annual leave, up to 225 hours, was earned before March 15, 2001. All unused sick leave and personal business days are forfeited upon termination of employment.

Supervisors shall submit a completed Resignation/Termination Form, final timesheet and the employee's UPO identification card to the Office of Human Resources before the employee's last day of employment. In addition, employees must return all UPO property to their supervisor prior to their last day of employment. All outstanding debts (unpaid vouchers, petty cash, UPO property costs, etc.) will be deducted from the employee's final pay check.

The Office of Human Resources will schedule an exit interview.

The Office of Human Resources will provide the employee with information on all UPO sponsored benefits and the Retirement Plan so that the employee may exercise his or her options concerning these benefits.

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3.26 Rehire Policy

1. Rehiring Regular Employees

At its discretion, it is the policy of UPO to consider rehiring former eligible and qualified employees for approved/budgeted open positions. This policy sets forth which employees may be eligible for rehire and how the rehire impacts the employee's years of service.

2. Eligibility for Rehire

- a. Former employees must reapply and meet the minimum qualifications to be considered for reemployment.
- b. Former employees who were subject to a RIF or who voluntarily resigned and left UPO in good standing with no policy violations and with a satisfactory work record are eligible for rehire to any type of UPO employment.
- c. Former employees who were subject to a RIF or who voluntarily resigned and had a less than satisfactory work record at the time of termination will not be considered for rehire.
- d. Former employees who were involuntarily terminated who had a less than satisfactory work record or who did not successfully complete their introductory period will not be considered for rehire.
- e. Former employees who were terminated for gross misconduct and/or a violation of a UPO policy such as workplace violence, misappropriation of funds, theft, dishonesty, intentional falsification of official records, fraud, harassment, gross negligence, gross insubordination, or repeated offenses of minor violations will not be considered for rehire.
- f. Former employees who were terminated for possession or use of alcohol and/or a prohibited controlled substance during duty hours, or receiving a positive alcohol and/or drug test shall be able to seek UPO reemployment two years after the date of termination.

3. Reinstatement of Years of Service

- a. Years of service will not be reinstated if an employee's break in service is more than one year (12 months). Also, see the General Agreement between Communications Workers of America and UPO, Article 26 – Seniority.
- b. Reinstatement of years of service only applies to rehired employees with one or more years of prior service who are rehired within one year of voluntary resignation or RIF. The employee's prior years of continuous service will be reinstated to the employee to calculate years of service and for determining the annual leave rate earned up to the effective date of the voluntary resignation or RIF. The rehired employee will be eligible for participation in the UPO sponsored benefits plans on the first day of the month following the date of rehire.
- c. Rehired employees with less than one year of continuous service prior to voluntary resignation or RIF will be considered a new hire and prior service will not be considered to calculate time of service. The rehired employee will be eligible for participation in the UPO sponsored benefits plans on the first day of the month following the date of rehire.

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- d. Rehired employees with more than one year of continuous service prior to voluntary resignation or RIF and a break in service for more than one year (12 months) will be considered a new hire and prior service will not be considered to calculate time of service or for determining the annual leave rate. The rehired employee will be eligible for participation in the UPO sponsored benefits plans on the first day of the month following the date of rehire.

4. Reinstatement of Benefits

UPO sponsored benefits plans will be reinstated with no lapse in coverage only for employees who are rehired in the same calendar month of the effective date of the employee's voluntary resignation or RIF.

5. Reinstatement of Sick Leave

Sick leave will be reinstated only for employees who are rehired within one year of voluntary resignation or RIF. Accrued sick leave earned up to the effective date of voluntary resignation or RIF shall be reinstated to the employee. The employee is entitled to use accrued sick leave and accrue additional sick leave immediately upon the effective date of rehire, provided that the employee had previously been eligible to use paid sick leave (the employee had 90 calendar days of service).

6. Personal Business Days and Carryover Leave

A former employee who voluntarily resigns his or her position or are subject to a RIF and does not use his or her Personal Business Days, Carryover Flex Leave, or Carryover Leave prior to his or her departure will not have his or her Personal Business Days, Carryover Flex Leave, or Carryover Leave reinstated if rehired.

7. New Hire

- a. A rehired employee with less than one year of continuous service prior to voluntary resignation or RIF or who has a break in service that exceeds more than one year (12 months) will be considered a new hire upon rehire.
- b. A newly hired employee who is rehired into his or her previous position will serve in a three (3) month Introductory Period prior to being considered for classification as a regular employee. An employee in his or her Introductory Appointment Period may be terminated any time during the three month introductory period, for any reason and with or without notice, and have no right to appeal the termination decision.
- c. A newly hired employee who is rehired into a new position will serve in a six (6) month Introductory Period prior to being considered for classification as a regular employee. An employee in his or her Introductory Appointment Period may be terminated any time during the six month introductory period, for any reason and with or without notice, and have no right to appeal the termination decision.

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3.27 Reduction-In-Force

A Reduction-in-Force, furlough and/or layoff may be necessary due to circumstances existing inside or outside of UPO, including but not limited to, a reduction in funds and/or unavailability of funds, program changes, workload changes and/or UPO reorganization. UPO will try to provide advance notice to employees of any reduction-in-force, furlough and/or layoff unless otherwise precluded by a funding source or existing circumstances.

3.28 Safety and Accident Reporting

UPO believes that maintaining workplace safety is vitally important. UPO managers and employees strive to provide a safe work environment for all employees and UPO customers. Employees are encouraged to be mindful of their own safety and that of their fellow employees, customers, and the general public.

All employee work-related accidents, regardless of the extent of seriousness, must be reported to the immediate supervisor, Office of Human Resources and the Office of Business Management, immediately. Failure to notify the Office of Human Resources of an accident may adversely affect an employee's benefits under applicable law.

All customer or general public accidents, regardless of the extent of seriousness, must be reported by the employee with the information to their immediate supervisor and the Office of Business Management immediately.

END OF SECTION

UPO EMPLOYEE HANDBOOK

4 **COMPENSATION POLICIES**

3.1 **Payroll and Paydays**

Each employee will be paid by check or direct deposit on Friday of every other week or on Thursday, dated for Thursday, if Friday is a holiday. Paychecks are distributed bi-weekly on the Friday following the end of the pay period, unless otherwise notified. When a holiday falls on a Friday, paychecks will be distributed the day before.

3.2 **Overtime Pay**

Exempt employees are not entitled to overtime compensation.

Overtime compensation will be paid to a non-exempt employee for actual time worked in excess of 37.5 hours in a regular work week. Leave claimed during a work day does not count as hours worked for overtime purposes. A non-exempt employee who works overtime will be compensated at a rate of time and one-half of the hourly rate of pay.

Before a non-exempt employee may work in excess of 37.5 hours during a regular work week, the employee must submit an Overtime Request Form in advance to his or her supervisor for approval. All overtime must be approved *in advance* by a UPO supervisor. Any employee who works overtime without advance approval from a UPO supervisor will be subject to disciplinary action, up to and including termination from employment.

Non-exempt employees shall not work during his or her unpaid lunch break. If a non-exempt employee is unable to take an uninterrupted lunch break, the employee should notify his or her supervisor, who will assign relief so the lunch break can be taken or authorize the additional work time.

END OF SECTION

5 UPO EMPLOYEE BENEFITS

UPO sponsors a comprehensive benefits program for eligible employees, and each benefit plan has specific eligibility criteria. The following paragraphs of this Handbook contain a very general description of the benefits which eligible employees may receive. This general description is not intended to, and does not, provide employees with all of the details of these benefits. Therefore, this Handbook does not change or otherwise interpret the terms of the official plan documents. Employee eligibility and rights can be determined only by referring to the full text of the official plan documents. To the extent any of the information contained in this Handbook is inconsistent with the official plan documents, the provisions of the official plan documents will govern in all cases.

Nothing contained in this Handbook or the benefit plans described herein shall be held or construed to create a promise of employment or future benefits or a binding contract between UPO and its employees, retirees or their dependents for benefits or for any other purpose. All employees shall remain “at will” subject to discipline and termination to the same extent as if these plans had not been put into effect.

UPO reserves the right, at its sole and absolute discretion, to amend, modify or terminate, in whole or in part, any and all provisions of the benefits described herein. UPO also reserves the exclusive right and authority to administer, apply and interpret the benefits described herein and to decide all matters arising in connection with the operation and administration of such plans.

5.1 Anniversary Date

The first day an employee reports to work is his or her official anniversary date. This anniversary date is used to compute employee eligibility for benefits and various leave policies.

5.2 UPO Benefit Summary and Eligibility

The Office of Human Resources will explain UPO’s benefit plans during orientation and will provide enrollment forms and plan descriptions as required. Please consult the plan documents, however, for specific details about UPO’s benefits. The following is a brief overview of UPO’s benefits:

- A regular full-time employee is eligible for fringe benefits, including Annual Leave (or Predetermined Leave and Flexible Leave, as applicable to the position), Election Day Leave, Sick Leave, Personal Business Days, Family and Medical Leave, Bereavement Leave, Military Leave, Group Life Insurance, Retirement, Group Medical Insurance, Long Term Disability, and paid holidays.
- A part-time employee with benefits, whose scheduled weekly hours are at least twenty-one (21) hours per week and less than seventy-five (75) in a pay period, is eligible for half the amount of Annual Leave, Sick Leave and Personal Business Days and Election Day Leave to which a full-time employee is entitled. He or she is eligible to participate in the Group Life and Retirement Plans, with the amount of benefits based on his or her salary. He or she is eligible for Group Medical Insurance and Family and Medical Leave.

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- Payment for holidays and Bereavement Leave will be based upon the hours he or she is regularly scheduled to work.
- A part-time employee with limited benefits, whose scheduled weekly hours are less than twenty-one (21) hours per week, is eligible to accrue and use Sick Leave consistent with the Sick Leave Policy and is not eligible to receive any other benefits or paid time off.
- A temporary employee will be paid for holidays, but is not eligible for any other benefits.
- All premiums for Group Life Insurance coverage are paid by UPO for eligible employees. Coverage begins on the first day of employment. Coverage terminates at the end of the pay period following termination.
- The UPO Group Life Insurance Plan provides benefits equal to two and one-half (2½) times an eligible employee's annual salary, with a maximum of \$250,000. Identical but separate benefits limits apply to accidental death & dismemberment.
- UPO employees participating in UPO's Group Medical Insurance Plan will be responsible for payment of fifty percent (50%) per month of the cost of their respective premiums.
- The UPO Group Long Term Disability Plan (LTD) provides benefits equal to sixty (60) percent of an eligible employee's monthly salary, with a maximum monthly benefit of \$6,000, payable after a ninety (90) day waiting period. This insurance covers all eligible employees who work 37.5 hours or more per week.

5.3 Employee Assistance Program Policy

UPO sponsors an Employee Assistance Program (EAP) for employees who are experiencing personal problems that may adversely affect job performance. All employees may use the program beginning on the date of employment. Participation in the EAP is strictly voluntary.

An employee's job security or promotion opportunity will not be jeopardized by a request for, or participation in, counseling or other assistance from the EAP. The EAP, however, is not designed to protect employees from disciplinary action due to unsatisfactory work performance, misconduct, or absenteeism.

See [Appendix 12](#), EAP Brochure.

5.4 COBRA Notification

According to the federal Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1985, as amended, in the event of termination of employment with UPO or loss of eligibility to remain covered under UPO's group health insurance program, employees and their eligible dependents may have the right to continued coverage under UPO's group health insurance program for a limited period of time at their own expense. The Office of Human Resources will provide employees with information about their rights under COBRA.

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5.5 Cafeteria Plan-Pre-tax Payroll Deductions for Health Insurance Premiums, Medical Care Expenses, and Dependent Care Expenses

Employees participating in the UPO Group Health Insurance Plan will have their portion of Health Insurance premiums paid with pre-tax dollars as part of the UPO Cafeteria Plan. Under this plan, employees may also participate in the flexible spending account program under which reimbursement of eligible medical care and dependent care expenses are provided for by pre-tax payroll deductions. The Office of Human Resources will explain these benefits to employees during initial orientation. Employees are eligible to participate in UPO's Cafeteria Plan when hired, but consult the Cafeteria Plan documents for specific details of the plan.

5.6 Workers' Compensation

Workers' Compensation coverage is provided by UPO at no cost to employees. The coverage pays for reasonable and necessary medical care if an employee is hurt or gets sick because of an injury on the job, regardless of fault, and partial temporary compensation during the absence because of a work-related injury or illness, consistent with the District of Columbia Worker's Compensation laws.

An employee is required to notify his or her supervisor immediately regarding a work-related injury/illness. Failure to make a timely notification may adversely affect an employee's benefits. The supervisor shall notify the Office of Human Resources regarding the injury/illness and complete and submit a UPO Accident/Incident Report Form to the Office of Human Resources. In addition, the supervisor shall notify the Office of Business Management regarding any facility issues that may need to be resolved or corrected related to the injury/illness. The Office of Human Resources will report the injury to its workers compensation insurance carrier.

An employee cannot receive both a worker's compensation check from UPO's workers' compensation insurance carrier and a paycheck from UPO for the same day(s). In the event that this occurs, the employee must make UPO whole by paying UPO back the full amount paid by UPO. Once UPO is made whole, UPO will credit the employee any days of leave used during the workplace injury/illness absence.

5.7 Retirement Income Plans

An employee is eligible to participate in UPO's retirement income plan upon being hired for a regular full-time or part-time appointment.

Presently, UPO contributes, at no cost to the employee, five and one-half percent (5.5%) of each eligible employee's basic earnings for investment in UPO's retirement income plan. For regular full-time employees, this contribution begins following the employees completion of the six-month Introductory Appointment period and for regular part-time employees this contribution starts after the completion of 1000 hours worked and the six-month Introductory Appointment period. In addition, UPO will match \$1.00 for \$1.00 (on a dollar-for-dollar basis), up to an additional one percent (1%) of an employee's pre-tax contributions to the Retirement Plan following a regular full-time employee's completion of the initial six-month Introductory Appointment period and a regular part-

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time employee's completion of 1000 hours worked and the six-month Introductory Appointment period.

Upon employment, an employee must decide whether or not to make voluntary supplemental contributions to his or her retirement account. An employee may make contributions to his or her retirement account consistent with IRS laws and regulations. . If supplemental deductions are made, they will commence at the beginning of the pay period following an employee's eligibility date for retirement benefits and shall immediately vest.

UPO's contribution to the retirement income plan will cease at the time an employee's employment is terminated, whether voluntarily or involuntarily.

5.8 Short Term Disability

UPO does not offer short-term disability benefits. Short-term disability benefits may be obtained through a third-party provider.

5.9 Long Term Disability

UPO recognizes the effect of illness or injury on an employee's financial security. Therefore, UPO has purchased a long-term group disability plan with an independent insurance carrier. The plan provides 60% of an eligible full-time employee's annual salary, up to a maximum benefit of \$6,000 per month, for disability after an elimination period of 90 days.

This policy is designed to replace the loss of income resulting from an illness or injury of a protracted nature, and starts three (3) months after the onset of said illness or injury. All full-time employees of UPO are eligible for coverage under this policy. Presently, there is no cost to the employee, as the organization assumes the full cost of this policy. No annual leave or sick leave will be accrued or paid while an employee is receiving long-term disability benefits. Consult the Long Term Disability Plan for a full description of benefits.

5.10 Life Insurance

All active full-time and part-time employees, who regularly work a minimum of 21 hours a week, are eligible for group term life insurance benefits. Temporary employees are not eligible.

The amount of insurance is the lesser of 2.5 times the employee's annual salary or \$250,000. Employees age 70 or older receive 50% of this benefit.

5.11 Parking

Parking at UPO worksites is limited. An employee wishing to park at a UPO owned worksite must request and complete a UPO Parking Space Request and User Data Sheet to obtain an assigned space and a UPO Parking Permit from the Office of Business Management (OBM).

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An employee may only apply to be assigned a parking space at his or her primary worksite. This applies to ALL employees regardless of their scheduled shift.

An employee shall pay for the assigned parking space. An employee's payment is made by completion and submission of the Parking Commitment and Payroll Deduction Authorization Form, which authorizes UPO to make payroll deductions per pay period from the employee's paycheck.

Assignments will be made by OBM based on the availability of spaces. OBM may assign multiple employees to one space depending upon their shifts. OBM also reserves the right to assign employees a different space from their original assignment. Employees will be placed on a waiting list for future vacancies.

Parking spaces reserved for visitors will be marked accordingly. Employees shall not park in visitor parking spaces. In addition, all employees must follow other applicable parking restrictions, e.g., spaces restricted for persons with a disability and fire lanes. UPO reserves the right to tow vehicles, at the owner's expense, improperly parked in a UPO lot and/or parked without a UPO Parking Permit. In addition, UPO is not responsible for damages or theft of a vehicle or property in a vehicle while parked on a UPO lot. Unauthorized parking may result in ticketing and towing at the employee's expense and or disciplinary action.

This policy does not apply to facilities leased by UPO. Parking at non-owned UPO worksites is limited and may be unavailable.

5.12 Employee Training and Professional Development

UPO encourages employees who wish to take advantage of further educational opportunities to do so by taking courses offered by the various educational institutions in the metropolitan area.

An employee, with the approval of the Division Director and Office Director, may rearrange his or her daily work schedule to attend classes if he or she works a total of 7.5 hours a day and his or her new work schedule does not affect the program efficiency of the Division or Office involved.

See **Appendix 13**, UPO Employee Education and Professional Development Policy.

On occasion, employees will be required to attend courses, workshops, and seminars directly related to their work assignments. These courses can be taken during the employee's regular work hours. Pursuant to funding agency authority, fees for required courses will be paid in full by UPO. These courses will be considered as part of the employee's work assignment.

When an employee completes a course of studies or receives a work-related certificate, he or she should inform the Office of Human Resources in order for that information to be recorded in his or her personnel file.

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Upon approval by an employee's Division Director and Office Director, an employee may be granted time off with pay to attend conferences beneficial to his or her work performance.

Early Head Start/Head Start Employee

Early Head Start/Head Start staff must participate in ongoing, structured training to acquire knowledge and skills including: methods for identifying child abuse and neglect and methods for planning for successful child and family transitions to and from the Early Head Start/Head Start program.

Early Head Start/Head Start staff also may participate in ongoing, structured training to acquire knowledge and skills including: early education credit classes at a recognized accredited college; advanced degrees applicable to their jobs; and, methods for planning successful transitions.

Applicable Early Head Start/Head Start employees shall participate in training enabling them to obtain a Child Development Association (CDA) credential. In the event that the employee is not an Early Head Start/Head Start employee and not eligible for Early Head Start/Head Start classes, his or her courses may be reimbursed through the UPO Employee Education and Professional Development Policy .

Orientation will be provided to all new staff, consultants, and volunteers which includes, at a minimum: the goals and underlying philosophy of Early Head Start/Head Start and the ways in which they are implemented by the program.

END OF SECTION

UPO EMPLOYEE HANDBOOK

6 **LEAVE POLICIES**

This section of the Handbook provides a brief description of the employee leave plans currently in effect. If an employee has any questions about UPO's leave policies, please contact the Office of Human Resources. The leave programs described in this section are subject to change, either with or without notice, at the discretion of the management of UPO.

6.1 **Holiday Policy**

UPO recognizes the following holidays:

New Year's Day	Labor Day
Martin Luther King, Jr. Day	Columbus Day
Inauguration Day	Veterans Day
Presidents Day	Thanksgiving Day
Emancipation Day	Thanksgiving Friday
Memorial Day	Christmas Day
Independence Day	Business Day prior to or after Christmas Day

Eligible employees shall be paid for the above recognized holidays, except when prohibited by the funding source.

Non-exempt employees who must work on any of the above UPO recognized holidays shall be paid at the rate two times her or his normal daily rate.

If a holiday occurs on an employee's regularly scheduled day off, the employee will not be paid for the holiday.

6.2 **Predetermined Annual Leave and Flexible Leave for Applicable Office of Early Learning (OEL) Employees**

- Predetermined Annual Leave and Flexible Leave applies only to the following OEL employees: Center Directors, Teachers, Classroom Associates and Food Service Aides. The list of applicable OEL employees and or titles is subject to change with notice.
- Effective January 1, 2009, applicable OEL employees will not accrue Annual Leave. Applicable OEL employees will receive Predetermined Annual Leave and Flexible Leave as set forth below.
- The Centers will be closed for fifteen (15) predetermined days per calendar year as set by the OEL Predetermined Annual Leave calendar and shall be paid Annual Leave as follows:
 - a. OEL employees who are employed at UPO at the time of each Predetermined Annual Leave period shall be on paid leave during that time. When an employee leaves his or her employment with UPO, he or she will not be paid for any Predetermined Annual Leave days remaining in the calendar year.
 - b. The number of Predetermined Annual Leave days will be as follows: five (5) consecutive days around the Spring Break period; five (5) consecutive days in July; and five (5) days in conjunction with the Christmas holiday. The Centers will be closed during these periods.
 - c. In addition to the leave referenced in Section 3. and 3.b. above, during each calendar year, OEL employees with more than four (4) years of service will calendar year, applicable OEL employees with more than four (4) years of service will receive five (5) days and six (6)

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hours of Flexible Leave and applicable OEL employees with less than four (4) years of service will receive four and one-half (4.5) hours of Flexible Leave. Flexible Leave may be used at the employee's discretion. However, employees must submit to his or her supervisor a written request and obtain prior approval from his or her supervisor or supervisor's designee to use Flexible Leave. Unused Flexible Leave will be carried over to the next calendar year and must be used by December 31st of that year or it will be lost.

- d. OEL employees separated from their employment with UPO, except for introductory appointment employees, will be paid their Flexible Leave earned and not used during that calendar year. OEL employees will not be paid for carry-over Flexible Leave.
- e. OEL employees requesting to use Annual Leave or Flexible Leave for an emergency must call and make his or her leave request to his or her supervisor or designee not later than 5:00 am for employees responsible for opening the Centers and for other OEL employees not later than 7:00 am on the day the OEL employee wishes to be out and use Annual Leave or Flexible Leave. When an employee needs to take Annual Leave or Flexible Leave during the course of working hours, his or her supervisor's or designee's authorization must be obtained before the commencement of such leave. UPO shall not pay accrued Annual Leave to an OEL terminated employee, except as indicated in Section 3.f. below.
- f. An OEL employee hired by UPO prior to March 15, 2001, may carry-over all of his or her earned and unused hours of Annual Leave acquired and not used prior to March 15, 2001 ("Grandfathered Leave"). Such an employee may use this Grandfathered Leave for an emergency situation with his or her supervisor's or designee's prior approval. Upon termination, UPO shall pay to an OEL terminated employee up to 225 hours of Grandfathered Leave.
- g. If a UPO holiday occurs during an employee's Annual Leave, he or she will not be charged Annual Leave for that day.
- h. Any type of previously scheduled leave (e.g. Annual, Flexible, Personal Business, Sick, etc.) shall remain unchanged in the event of an unscheduled closing (Administrative Leave) of UPO or any of its Programs.
- i. UPO reserves the right to adjust employee annual leave schedules and policies.

6.3 Annual Leave for All Other Employees

- Annual Leave time is granted to all eligible employees based upon length of service. An eligible employee begins to earn Annual Leave at the beginning of the pay period following his or her date of employment. An employee becomes eligible to use Annual Leave three (3) months after his or her start date.
- Annual Leave is determined at the beginning of each calendar year in accordance with the following schedule:

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Length of Service	Days per Year	Hours per Year	Hours per Pay Period
1-4 years	15.6	117.0	4.5
More than 4 years	20.8	156.0	6.0

- Before an employee may take Annual Leave, he or she must submit a request for leave in eTime or a Request for Leave form to his or her supervisor for approval. Seniority will be the controlling factor in resolving disputes related to Annual Leave scheduling for employees covered by the collective bargaining agreement.
- Upon termination, UPO will pay a terminated employee any unused Annual Leave earned by the employee during the year of termination, up to the date of termination.
- Annual Leave earned during the current calendar year must be used during that year, except up to thirty-seven and one-half hours (37.5) of unused accrued Annual Leave from the current calendar year may be carried over to the following year and must be used by December 31st of that year or it will be lost. A terminated employee will not be paid carry over leave.
- An employee hired by UPO prior to March 15, 2001, may carry-over all of his or her earned and not used hours of Annual Leave acquired and not used prior to March 15, 2001 ("Grandfathered Leave"). Such an employee may use all of his or her Grandfathered Leave with the prior approval of his or her supervisor. Upon termination, UPO shall pay to a terminated employee up to 225 hours of Grandfathered Leave.
- If a UPO holiday occurs during an employee's Annual Leave, he or she will not be charged Annual Leave for that day.
- Any type of previously scheduled leave (e.g. Annual, Flexible, Personal Business, Sick, etc.) shall remain unchanged in the event of an unscheduled closing (Administrative Leave) of UPO or any of its Programs.
- UPO reserves the right to adjust employee annual leave schedules and policies.

6.4 Sick Leave

- UPO provides Sick Leave to eligible employees as follows:
 - a. Full-time regular employee. The employee accrues Sick Leave at a rate of 4.5 hours per pay period on the first day of the pay period following his or her date of employment. The employee may use his or her Sick Leave once it is accrued consistent with this Policy.
 - b. Part-time regular employee with benefits. The employee accrues Sick Leave at a rate of 2.25 hours per pay period on the first day of the pay period following his or her date of employment. The employee may use his or her Sick Leave once it is accrued consistent with this Policy.

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- c. Employee with limited benefits. All other UPO employees not included in “a.” or “b.” above are in this classification. The employee accrues Sick Leave on the first day of the pay period following his or her date of employment. The employee accrues Sick Leave at a rate of 2.02 hours per pay period. The employee may begin to use paid Sick Leave, consistent with this policy, after 90 days of employment with UPO.
- Sick Leave may be used by an eligible employee for any of the following reasons:
 - a. An absence resulting from an illness, injury or medical condition of the employee (Sick Leave cannot be used to cover absences due to a workplace injury or workplace illness of a UPO employee. These are covered by UPO’s worker’s compensation insurance.);
 - b. An absence resulting from obtaining professional medical diagnosis or care or preventative medical care (i.e., doctor’s appointments);
 - c. An absence for the purpose of caring for a family member who has any of the conditions or needs for diagnosis or care covered by 2a and 2b above;
 - d. An absence resulting from the employee or the employee’s family member becoming a victim of stalking, domestic violence, or sexual abuse, and the absence is directly related to seeking social, medical, or legal services pertaining to the stalking, domestic violence, or sexual abuse.
- For purposes of Sick Leave, a “family member” includes:
 - a. A spouse, including a registered domestic partner (The two individuals in the registered domestic partnership maintain a committed relationship; care for and share a mutual residence; are at least 18 years old and competent to contract; are sole domestic partners of the other individual; and are not married.);
 - b. The parents of a spouse;
 - c. Parents;
 - d. Children (including foster children and grandchildren);
 - e. A child who lives with an employee and for whom the employee permanently assumes and discharges parental responsibility;
 - f. The spouses of children;
 - g. Brothers and sisters;
 - h. The spouses of brothers and sisters; and
 - i. A person with whom the employee shares or has shared, for not less than the preceding 12 months, a mutual residence and with whom the employee maintains a committed relationship.
- If an employee’s absence for one of the above reasons continues after he or she has used up all of his or her Sick Leave, he or she will be charged for Annual Leave, Flexible Leave, or Personal Business Day Leave, as available. If an employee uses up all of his or her available leave, the employee will go on Leave Without Pay (LWOP) status.
- If a holiday occurs while an employee is on Sick Leave and he or she is eligible for paid holidays, he or she will not be charged Sick Leave for that day.

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- An employee shall make a reasonable effort to schedule Sick Leave in a manner that does not unduly disrupt the operations of the employer. Where possible, an employee should consult with his or her supervisor or the supervisor's designee regarding the date and time of the Sick Leave. If the need for Sick Leave is foreseeable, the employee must submit a request in e-Time or a Request for Leave Form at least five (5) business days in advance, or as early as possible.
- When the need to use Sick Leave is unforeseeable, an Office of Early Learning (OEL) Center employee responsible for opening a Center, must report his or her need to use Sick Leave to his or her supervisor or the supervisor's designee between close of business and 10:00pm the day before the Sick Leave day or at least two (2) hours before the Center is scheduled to open on the day the employee wants to take Sick Leave, or he or she will be charged with Annual Leave, Flexible Leave, Personal Business Days Leave or Leave Without Pay, as applicable.
- When the need to use Sick Leave is unforeseeable, all other OEL Center employees must report his or her need to use Sick Leave to his or her supervisor or the supervisor's designee between close of business and 10:00pm the day before the Sick Leave day or not later than 7:00am on the day the employee wants to take Sick Leave, or he or she will be charged with Annual Leave, Flexible Leave, Personal Business Days Leave or Leave Without Pay, as applicable.
- For all other employees needing to use Sick Leave when the need is unforeseeable, the employee must report his or her need to use Sick Leave to his or her supervisor or the supervisor's designee not later than one (1) hour prior to his or her report for duty time or he or she will be charged with Annual Leave, Flexible Leave, Personal Business Days Leave or Leave Without Pay, as applicable.
- If an emergency prevents an employee from making prior notification to his or her supervisor or the supervisor's designee of the need to use Sick Leave, the employee shall notify his or her supervisor or the supervisor's designee prior to the start of the next work shift or within twenty-four (24) hours of the onset of the emergency, whichever occurs first.
- UPO may require that Sick Leave for three (3) or more consecutive days be supported by reasonable certification. This certification may include: a signed document from a health care provider affirming that the employee or the employee's family member has been ill or seeking treatment or care (a doctor's note); a police report indicating that the employee or the employee's family member was a victim of stalking, domestic violence, or sexual abuse; or a signed statement from a victim and witness advocate or domestic violence counselor affirming that the employee or family member is involved in a legal action related to stalking, domestic violence, or sexual abuse.
- Unused Sick Leave will be carried over from year to year.
- Unused Sick Leave will not be paid to an employee when his or her employment with UPO ends.

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- An employee may terminate his or her employment on Sick Leave provided that his or her doctor attests, on a monthly basis, to the fact that the employee is too ill to return to work in the foreseeable future. The doctor's statement must be in writing and addressed to the employee's supervisor. The employee may then continue to receive his or her pay checks until such a time as his or her Sick and Annual Leave has been exhausted. His or her termination date will become effective the day he or she has used all of his or her accumulated leave.
- When there is a separation from employment with UPO and the employee is rehired within one year of separation, previously accrued unused Sick Leave will be reinstated. The employee shall be entitled to use accrued paid Sick Leave and accrue additional paid Sick Leave immediately upon the re-commencement of employment, provided, that the employee had previously been eligible to use paid Sick Leave (the employee had been employed with UPO at least 90 calendar days).
- Employees will not face retaliation for requesting or using Sick Leave or asserting their rights under this policy.
- Each employee will receive a report of the current balance of his or her Sick Leave on his or her paycheck stub each payday.

6.5 Bereavement Leave

Three days of leave with full pay will be granted to any eligible employee who suffers a death in the immediate family, upon request in eTime or a Request for Leave form to his or her Program Manager, Division Director or Office Director. Immediate family shall be defined as father, mother, husband or wife, brother, sister (including step or half), son, daughter, (including step or adopted) father-in-law, mother-in-law, daughter-in-law, son-in-law, grandparent, grandchild or anyone with a familial relationship (as determined by HR). Any additional time may be deducted from the employee's accrued Annual Leave or Flexible Leave, if available.

6.6 Jury Duty

- An employee, who is summoned to perform jury duty or subpoenaed to appear as a witness before an official body, is entitled to leave, with pay to perform such service. To secure such leave the employee must send a copy of his or her summons or subpoena to his or her supervisor, as applicable. Failure to submit the summons or subpoena before the applicable pay period may result in the loss of pay.
- Any compensation (pay for work) received by the employee for his or her services as a juror or witness must be surrendered to the UPO Office of Finance. Any money received for expenses (i.e., mileage/transportation, parking, meals) does not have to be returned to the Office of Finance.
- An employee who volunteers as a witness must do so on his or her own time. The employee is not covered by the provisions in the preceding paragraphs and shall report the time as Annual Leave, Personal Business Days, Flexible Leave, as applicable, or Leave Without Pay.

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- The day(s) on which an employee performs jury duty or appears as a witness under a subpoena is to be recorded in e-time as "Jury Duty".

6.7 Military Reserves or National Guard Leaves of Absence

Employees who serve in U.S. military organizations or state militia groups such as the National Guard may take the necessary time off to fulfill this obligation and will retain all of their legal rights for continued employment under existing law

6.8 Family and Medical Leaves of Absence (FMLA)

1. The Employer will provide eligible employees with family and medical leave consistent with the District of Columbia Family and Medical Leave Act of 1990 (DC FMLA), as amended, and the federal Family and Medical Leave Act of 1993 (federal FMLA), as amended.
2. Under DC FMLA, an eligible employee is one who has been employed by UPO for one year without a break in service and has worked at least 1,000 hours during the 12-month period immediately preceding the request for family or medical leave.
3. Under DC FMLA, an eligible employee may take sixteen (16) weeks of family leave during any twenty-four (24) month period. Such leave shall consist of unpaid leave, except that the employee may choose to use any accrued paid leave, Personal Business Days Leave, or Flexible Leave. An eligible employee may take family leave for any of the following reasons: a) the birth of the employee's child; b) the placement of a child with the employee for adoption or foster care; c) the placement of a child with the employee for whom the employee permanently assumes and discharges parental responsibility; or (d) the care of any member of the employee's family who has a serious health condition.
4. Under DC FMLA, an eligible employee may take sixteen (16) weeks of medical leave during any twenty-four (24) month period. Such leave shall consist of unpaid leave, except that the employee may choose to use any accrued paid leave, Personal Business Days Leave, or Flexible Leave. An eligible employee may take medical leave because of the employee's own serious health condition that renders the employee unable to perform the functions of her/his position.
5. If the need for family or medical leave is foreseeable, the employee must provide the Employer with reasonable notice and make reasonable effort to schedule medical treatment in a manner not to unduly disrupt the Employer's operations.
6. Under the federal FMLA, an eligible employee is one who has been employed by the Employer for at least one year and has worked at least 1,250 hours during the 12 month period immediately preceding the leave.
7. The DC FMLA leave will run concurrently with the federal FMLA leave, which allows for twelve (12) weeks of unpaid leave within a 12-month period for the following reasons: the birth of a son or daughter and to care for the newborn child; the placement with the employee of a son or daughter for adoption or foster care; to care for the employee's

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spouse, son, daughter, or parent with a serious health condition; because of a serious health condition that makes the employee unable to perform the functions of his or her job; or because of any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on active duty in support of a contingency operation.

Under the federal FMLA, qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

8. The federal FMLA also includes a military caregiver leave that permits an eligible employee who is the spouse, son, daughter, parent, or next of kin of a covered service member to take up to twenty-six (26) weeks of leave to care for the covered service member during a single 12-month period. A covered service member is: (1) 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; or (2) a veteran who was discharged or released under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible employee takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.

The federal FMLA definitions of "serious injury or illness" for current service members and veterans are distinct from the federal FMLA definition of "serious health condition."

9. UPO measures the family/medical leave entitlement periods from the date an employee uses any previous family/medical leave. Each time an employee takes family/medical leave, UPO computes the amount of leave the employee has taken during the previous 24 months under this policy (or 12 months, if leave is requested under the federal act), and subtracts it from the weeks of available family/medical leave. The balance is the amount of family/medical leave the employee is entitled to take at that time. For purposes of determining the 24-month (or 12-month, under federal FMLA) period, UPO uses the "rolling period" method (a period measured backward from the dates the employee previously used family/medical leave).
10. Upon prior written approval from the Office of Human Resources, an employee may take FMLA leave on a reduced leave or intermittent schedule for a qualifying exigency or a serious health condition involving an employee's or an immediate family member's serious health condition, when medically necessary.
11. During a period of continuous family or medical leave, employees will not accrue annual or sick leave. When family or medical leave is taken intermittently, employees will continue to accrue annual and sick leave.
12. If FMLA leave is anticipated based on an expected birth, placement, or adoption, the employee shall provide UPO with reasonable notice prior to the expected birth, adoption, or placement of a child with the employee. In such cases, UPO requests that employees provide at least thirty (30) days advance notice or as much advance notice as possible

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under the circumstances. Employees taking leave to care for a newborn, adopted or newly placed child do not have the right to take intermittent leave and can only do so with their supervisor's consent.

13. If FMLA leave is anticipated based on an employee's or immediate family member's planned medical treatment, the employee shall provide UPO with reasonable notice prior to the medical treatment or supervision, and make reasonable efforts to schedule the medical treatment or supervision, subject to the approval of the health care provider of the employee or family member, in a manner that does not adversely affect the operations of UPO. In such cases, UPO requests that employees provide at least thirty (30) days advance notice or as much advance notice as possible under the circumstances.
14. If more than one family member is employed by UPO and eligible for leave, and seeks leave in order to care for another immediate family member or for the birth, placement or adoption of a child: (a) UPO may limit to sixteen (16) workweeks during a 24-month period (or twelve workweeks during a twelve month period, whichever is greater) the aggregate or combined number of family leave workweeks to which the family members are entitled; and (b) UPO may limit to four (4) workweeks during a 24-month period the aggregate number of family leave workweeks to which the family members are entitled to take simultaneously. Family members employed by UPO can use the balance of any unused family/medical leave to care for their own serious health condition.
15. Employees who request family or medical leave must provide UPO with a written certification issued by the health care provider of the employee or the immediate family member, whichever is applicable. Such certification must be provided within fifteen (15) days of UPO's request (or the employee must provide a reasonable explanation for any further delay). Failure to provide certification may result in denial of leave and denial of reemployment rights.
16. The certification provided by the employee to UPO shall state: (a) the date on which the serious health condition commenced; (b) the probable duration of the condition; (c) the appropriate medical facts known to the health care provider that would entitle the employee to take leave under this policy due to his own or a family member's serious medical condition; and (d) an estimate of the time that the eligible employee is needed to care for the family member or an explanation of the extent to which the eligible employee is unable to perform the functions of their job.
17. UPO may require, in appropriate cases, that the employee obtain, at UPO expense, the opinion of a second health care provider, approved by UPO, in regard to information required to be certified under this policy. If the second opinion differs from the original certification provided by the employee, the employee may obtain the opinion of a third health care provider mutually agreed upon by UPO and the employee. UPO shall pay the costs related to the third health care provider's opinion, and the opinion of the third health care provider shall be final and binding on UPO and the employee. The health care provider mutually agreed upon to render a third opinion may not be retained on a regular basis by UPO or the employee, or otherwise bear a close relationship to UPO or the employee.

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18. UPO may require that the employee obtain subsequent certifications from the health care provider on a reasonable basis. In addition, UPO may require periodic certifications of the employee's intent to return to work, also on a reasonable basis.
19. UPO shall maintain the confidentiality of medical information obtained from an employee's FMLA certification.
20. Any employee who takes family or medical leave under this policy shall not lose any employment benefit or seniority accrued before the date on which the family or medical leave commenced
21. During any period in which an employee takes family or medical leave, UPO shall maintain the employee's health plan coverage at the same level and under the same conditions that coverage would have been provided if the employee had continued in employment from the date the employee commenced family or medical leave until the date the employee returns to work. UPO shall require the employee to continue to pay his or her share of premiums to a health plan that the employee would have made if the employee had not taken family or medical leave.
22. Upon return from family or medical leave, an eligible employee shall be: (a) restored to the position of employment held by the employee when the family or medical leave commenced; or (b) restored to a position of employment equivalent to the position held by the employee when the family or medical leave commenced that includes equivalent employment benefits, pay, seniority, and other terms and conditions of employment. If the employee takes leave because of his or her serious health condition, the employee may be requested to provide medical certification that he or she is fit to resume their work.
23. Unless the period of leave is extended (at the employee's request and within the time frames provided under this policy, or extended as a reasonable accommodation for the employee's disability), an employee who fails to return to work within the time approved or provided under this policy forfeits his or her reinstatement rights and is deemed to have resigned from their employment with UPO.
24. Employees who believe they have not been treated fairly in accordance with UPO's Family and Medical Leave Policy may have certain rights to administrative or civil enforcement under the provisions of the District FMLA and federal FMLA.

6.9 Personal Business Days/Parental Leave

1. An employee will be eligible to receive Personal Business Days after having been employed by UPO for six (6) months.
2. Each employee shall receive two (2) Personal Business Days during a calendar year.
3. A Personal Business Day is determined by the employee with notification to and prior approval from his or her supervisor or designee and is a work day off with pay.

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4. Personal Business Days not used by the employee by the end of the calendar year are lost. Personal Business Days cannot be carried over to the next year nor are they paid to the employee if his or her employment is terminated.

6.10 Election Day Leave

An employee will be given two hours of administrative leave to vote either during the morning or the afternoon on an official election day. The actual time will be selected in agreement with his or her supervisor so as to assure adequate staffing of the office at all times.

END OF SECTION

7 EXPENSES

The following is a brief summary of UPO expense policies and procedures.

7.1 Cell Phone Policy

1. Purpose

UPO recognizes the need for ongoing communications and access to critical employees. Such access facilitates the Mission of the organization and recognizes the need for mobility in the conduct of official duties. In addition because the business environment of some workers includes communities noted for high crime and violence, a cell phone is viewed as a workplace safety device.

This policy is intended to outline the process and procedures for the administration of payment to those authorized employee who use their personal cellular telephones while conducting business for UPO. UPO will issue taxable allowances to authorized employees who agree to maintain a personal cellular telephone account, and to accept and/or make cellular phone calls for the purpose of carrying out their UPO related job functions. This allowance will be paid in a fixed amount on a pay period basis and will be recorded as a taxable benefit.

2. Policy

UPO regular full time or part time employees whose organizational responsibilities necessitate the use of a cellular telephone may be authorized, by their Office Director, to receive a taxable cell phone allowance for the use of the employee's personal cellular telephone for UPO related business purposes. The allowance is to be used solely for the purpose of payment for personal cellular telephone charges incurred while conducting UPO business and is based upon the cost of comparable business plans.

The following are examples of criteria that may be used by Office Directors when determining whether or not to authorize a cell phone allowance for an employee:

- The employee's job duties must require frequent travel to sites, meetings and or programs;
- Job duties require significant amounts of time in a UPO vehicle performing a UPO job related function;
- Job duties require ongoing contact with UPO offices or program participants;
- Job duties necessitate work activities at times and/or places where a cellular phone is considered a safety device;
- Need to contact employee at off hours or on an immediate basis due to critical job duties.

UPO employees must practice professional, ethical and courteous behaviors when using their cellular telephone for authorized UPO business. Employees are prohibited from using cellular telephones while operating a UPO vehicle or machinery. When placing a call, employees are required to use caution and to pull off the road to a safe location.

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UPO employees receiving the allowance must give their personal cellular telephone number to their program director/manager and the Office of Human Resources. Employees must be accessible by his or her personal cellular telephone during normal UPO business hours and, based on the scope of work, within a reasonable timeframe before and after normal UPO work hours for emergency purposes. Employees who are not frequently accessible to UPO on their personal cellular telephones may have their allowance revoked at the discretion of the Office Director. The allowance will terminate upon the employee's separation including voluntary and involuntary termination from UPO.

3. Procedure

a. Allowance Authorization:

The program director/manager and the employee will complete the Cellular Telephone Allowance Request Form and sign as required.

- The Office Director will identify the amount and appropriate cost center for the monthly taxable allowance based upon a predetermined schedule; and authorize the payment of a monthly taxable allowance to be issued to the employee through the employee's bi-weekly payroll check.
- The Office Director will forward the Cellular Telephone Allowance Request Form to the Office of Finance for budget approval.
- The amount of the cell phone allowance is \$60, \$100 and \$150. Office Directors/Assistant Directors and those who must have continued telephone contact receive \$150. Positions which require 24 hours access or Division Directors who must travel to multiple locations receive \$100. Positions which require business use, those assigned field work or security detail receive \$60.
- The Office Director will approve the allowance based upon budget availability and will forward the request, along with a completed Personnel Action Form, to the Office of Human Resources. The allowance will be processed and the authorized payment will be released to the employee through their bi-weekly paycheck.

b. Allowance Termination:

- In the event an employee is out on leave for longer than 30 days the program director/manager will document the absences and inform the Office Director, who will inform the Office of Human Resources of the absence and the Human Resource Office will notify the Payroll Office to stop the original allowance request. The allowance will resume upon the employee's return to work. The Office Director will initiate the process by completing a new Cellular Telephone Allowance Request Form.
- If the employee is non-compliant with any procedure set forth in this policy their monthly allowance will be revoked.
- Should the duties of an employee change such that they are not caused to be involved in regular activity outside the workplace, and are not on regular call, their cell phone allowance will be discontinued.

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- In the event the allowance has to be revoked the Office Director will initiate the process by completing the section for allowance termination on the Cellular Telephone Allowance Request form.
- Upon the employee's separation from UPO the program director/manager will complete the HR Employee Resignation Termination Form which must be signed by the Office Director acknowledging the employees separation/termination and termination of the monthly allowance. The form is then forwarded to the Human Resource Office and the Office of Finance for final processing.

7.2 Purchasing Goods, Services and Supplies

Only authorized persons may purchase goods, services and/or supplies in the name of UPO in accordance with the UPO Purchasing System Policy located on the UPO iNet for employees use. Without a properly approved contract and purchase order, UPO is not obligated for, nor responsible for any employee purchase.

7.3 Travel Expense Reimbursement

This policy applies to all UPO Board members, employees and consultants, if the travel involves the use of federal funds and/or a required non-federal share of funds.

Like other expenditures, payments for travel by UPO are subject to audit by independent licensed public accountants and federal auditors. Expenditures for travel which fail to meet the requirements of this policy may be questioned and/or disallowed as proper charges against grant and contract funds. Each individual traveler and authorizing UPO official, therefore, will be responsible for providing the documentation needed to prove that travel expenditures were reasonable and necessary.

Additionally, grants funds and/or the required non-federal share funds may not be used to reimburse costs incurred for travel which violates any funding agency's regulation, grant or contract conditions. In this connection particular attention is directed to the limitations imposed on travel by CSA for the purpose of lobbying and using project vehicles. See 45 CFR and 1071.30 through 1071.91, respectively.

Travel Authorization

All payments by UPO for staff or board out-of-town travel must be specifically authorized in advance and must be supported by proper approved invoices covering both travel and, if applicable, hotel and per-diem rate for meals. The forms to be used for this purpose are located on UPO iNet for employee use.

Authorizing Official

The Secretary of the Board of Directors, after consultation with the Chair, shall have the authority to approve all out-of-town travel for Members of the Board.

The appropriate Office Director responsible for the employee's and consultant's travel shall have authority to approve employee and consultant out-of-town travel requests.

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Approval Criteria

UPO officials responsible for approving out-of-town travel and attendance at meetings, conferences, conventions and symposia shall apply the following guidelines when reviewing travel requests:

- Such travel and attendance is to be limited to programs where staff attendance will directly benefit UPO achieving an objective related to its mission and the objectives of the funding program.
- Such travel and attendance is not to be authorized when the primary benefit is to the individual person, rather than to the accomplishment of the organization's mission. Such travel and attendance should relate directly to the position held by the person employed or in furtherance of or in connection with UPO business.
- Such travel and attendance should not be authorized as a substitute for personnel benefits, incentives or reward for past or present performance.
- The number of authorized travelers should be limited to the minimum number required to meet program objectives.

Methods of Transportation

Regardless of the method of transportation used (e.g., airplanes, bus, subway, taxicab, car rental, organization owned or privately owned vehicle), UPO travelers should select the method of transportation that will be most economical to UPO, considering such factors as cost of per-diem, overtime and time out of the office.

First & Business Class Travel Prohibited: Except in the instances noted below, travel accommodations cannot be made at first class or business class level

First & Business Class Travel Exceptions: First/Business class travel accommodations may be used only when approved in advance and under the following limited circumstances:

- Less than first/business class accommodations would result in higher overall travel costs because of required routing, time urgency, baggage differential or other factors.
- The physical limitations of the traveler or other extenuating circumstances require the use of first/business class.

The reason(s) for traveling first/business class must be explained on the travel vouchers and/or other supporting document submitted for reimbursement.

Mileage Costs

Reimbursement of travel costs for use of privately owned automobiles shall be paid at the current federal mileage reimbursement rate.

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Submission of Out-Of-Town Travel Expense Reports

All claims for reimbursement of out-of-town expenses shall be submitted to the traveler's supervisor and/or the authorizing official no later than two weeks after completion of the travel. Supervisors must submit approved travel vouchers to the Finance Office within one week of receipt. Reports not submitted within three weeks of travel or submitted without the authorizing official's signature will result in payroll deductions for any traveler with outstanding travel advance.

Per-diem Rates and Subsistence Expenses

All out-of-town travel expenses, except as provided below, shall be reimbursed in accordance with the following methods:

Per-diem Rate Reimbursement

UPO will reimburse meals at a per-diem rate. The daily per-diem rate set by GSA for meals will apply only to travel involving 50 miles or more from the point of origin to the point of destination. Cost of lodging will be reimbursed at the actual daily room rate for a basic single- occupancy room, which must be approved in advance.

For eligible travel of less than 24 hours, when a night's lodging is not required, the per-diem rate shall be 75 percent of the applicable GSA M&IE rate for each calendar day you are in a travel status. No per-diem will be allowed for one-day travel when the travel period is ten hours or less during a given calendar day, except when the travel period is six hours or more and begins before 6 a.m. or terminates after 8 p.m.

Subject to the above, one fourth of the per-diem rate for a calendar day will be allowed for each quarter day (period of six (6) hours or fraction thereof) during which the employee is in a travel status.

Actual Subsistence Expenses

Actual subsistence expense reimbursement may be authorized or approved for specific travel assignments when it is determined that the per-diem amount or lowest cost single-occupancy room rate would be inadequate due to the unusual circumstances of the travel assignment or whenever the travel is to a high-rate geographical location.

Actual subsistence expense reimbursement shall not be authorized or approved solely on the basis of inflated lodging and/or meal costs since inflated costs are common to all travelers; some unusual circumstances of the traveler's assignment must be involved to cause the lodging and/or meal costs to be higher than those which normally would be incurred at a particular location. Travel which involves unusual circumstances may include, but is not limited to, the following situations:

The traveler attends a meeting, conference, or training session away from his official duty station where lodging is at a prearranged place and alternative lodging at a lower cost is not available or imposed undue inconvenience.

The traveler, by reason of the assignment, necessarily incurs unusually high expenses in the conduct of official business such as for superior or extraordinary accommodations

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including a suite or other quarters for which the charge is well above that which he would normally have to pay for accommodations.

The traveler necessarily incurs unusually high expenses incident to his assignment to accompany another traveler in a situation as described above.

For travel involving actual subsistence expense reimbursement, the maximum daily rate shall not exceed the amounts set by the US Office of Management and Budget.

To obtain reimbursement on an actual subsistence basis the traveler must itemize on his travel voucher the actual cost of each night's lodging supported by hotel or motel receipts. The traveler shall be reimbursed for the actual expense incurred for each day or the daily maximum, whichever is lower. If actual expenses for a given day exceed the daily maximum, the excess may not be applied to another day with actual expenses less than the daily maximum. Items eligible for such reimbursement include: lodging, tips to waiters, porters and bellboys, laundry, phone calls to reserve rooms, transportation between places of lodging or business and places where meals are taken and all prior approved expenses.

All travel involving actual subsistence expense reimbursement must be authorized by the President and Chief Executive Officer or his designee before taking such travel.

Mixed Travel

Travel may be authorized on both a per-diem basis and an actual subsistence expense basis during a single trip when travel is performed in several locations including high rate geographical areas; however, only one method of reimbursement (per-diem or actual subsistence expense) shall be authorized within the same day.

In instances of mixed travel involving both per-diem and actual subsistence expenses, or several high rate geographical areas the methods of reimbursement and authorized rate for a calendar day (beginning at 12:01 a.m.) shall be determined by the location where the lodgings are obtained for that day. For example, when a traveler travels to a high rate geographical area where he performs official duties and obtains lodging, the reimbursement would be made under the actual subsistence expense method for the entire day not to exceed the maximum rate prescribed for the high rate area where the lodgings were obtained.

The method of reimbursement for the day of return travel shall be computed at the same rate as authorized for the first day of travel. For example, if a traveler authorized actual subsistence expense reimbursement for the first day of travel, reimbursement for the day of return shall also be on actual subsistence basis; if per-diem is authorized for the first day of travel, per-diem shall also be authorized for the day of return to home or official station.

Local Travel

All local travel expenses for persons whose position requires daily or intermittent travel is to be covered by a general travel authorization granted by an appropriate authorizing official. The traveler should only be reimbursed after presentation of a local travel expense statement submitted at two-week intervals. The local travel statement shall be approved

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by the authorizing official prior to submission to the Finance Office for payment. .

Applicability of Standardized Government Travel Regulations (SGTR)

Although the SGTR do not apply to CSA grantees, CSA has determined that the regulations contained therein represent reasonable restrictions and limitations which its grantees should not exceed. UPO's travel policy implements the essential requirements of CSA. Any matters not covered by this policy related to travel or per-diem which is governed by CSA regulations shall be resolved by resorting to the applicable CSA regulations or SGTR

7.4 Vehicle Use Policy

This policy applies to UPO employees authorized to drive UPO or personal vehicles to conduct official UPO business within the District of Columbia or out-of-town travel.

1. Policy

- a. The use of UPO vehicles, including cars, vans and buses, as well as employee vehicles or cars rented for business of the organization, must adhere to the procedures and regulations set forth in this memorandum. Employees in "Driver" positions also must also adhere to the terms of their program's specific "Driver Manual". (*Drivers contact their immediate supervisor for specific driver manual.*)
- b. Like other expenditures, costs related to official vehicle use by UPO employees are subject to audit by independent licensed public accountants and federal auditors. Expenses which fail to meet the requirements of this memorandum may be questioned and/or disallowed as improper charges against grant and contract funds. Therefore, each authorizing official and individual vehicle operator will be responsible for providing the documentation needed to prove that questioned expenditures were reasonable and necessary or will be required to reimburse UPO for unauthorized and questioned expenditures through automatic payroll deduction.
- c. Official vehicle use must be approved in advance by the President and CEO (President/CEO) as defined under item 2.
- d. An Operators Manifest/Vehicle Check must be utilized for each day of official vehicle use.

2. Authorizing Official

The advance authorization required by item 1.b., above, shall be obtained in the following manner:

- a. The President/CEO shall have the authority to approve all official vehicle use by UPO employees.
- b. Pursuant to the authority contained in subparagraph 2.a. above, the Pres/CEO hereby delegates to Office Directors, the authority to approve official vehicle use for those employees falling within the organizational needs of their respective office.
- c. Individual driving privileges may be refused, revoked or suspended by the authorizing official due to loss of funding, criminal conduct or failure to adhere to

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UPO Vehicle Use Policy. Individuals violating this policy or operating an official vehicle in an illegal or improper manner may be subject to disciplinary action, up to and including termination from employment.

3. Review Criteria

The officials responsible for approving official vehicle use shall apply the following guidelines in reviewing official vehicle use requests:

- a. Vehicle use is required to meet contractual obligations as set forth in grants, contracts or UPO commitments to events, conferences or community activities.
- b. There is a direct benefit to the achievement of an objective related to UPO's mission and the objectives of the controlling legislation of the program involved.
- c. The official vehicle use costs are fully in line with budgeted costs.
- d. There should be a direct relationship between the official vehicle use, the position held by the person employed with UPO and operating the vehicle and the accomplishment of UPO's mission.
- e. The vehicle operator meets the guidelines set forth in "The United Planning Organization Procedures for Use of Company Vehicles and Non-Owned Vehicles Used for Company Business", as well as, have a valid District of Columbia, Maryland or Virginia driver's license and insurance confirmed by the Office of Business Management. (See Driver Manual)
- f. Employees regularly approved for official vehicle use must annually file a motor vehicle driving record, police clearance and a copy of current insurance card if they have one with the Office of Business Management. Employees charged with the transporting of UPO clients or staff must take and successfully complete the UPO administered road test as verified by their supervisor prior to assuming their driving duties.
- g. Employees charged with the transporting of UPO clients or staff must have the requisite valid Commercial Driver's License for the District of Columbia as verified by the Office of Business Management when driving a multi-passenger vehicle.
- h. Employees approved for official vehicle use must adhere to the standards set forth in the UPO Comprehensive Alcohol and Drug Abuse policy as verified by the UPO Office of Human Resources. See **Appendix 11**, UPO Comprehensive Alcohol and Drug Abuse Policy.
- i. All UPO employees authorized to use vehicles to conduct official UPO business must be listed as authorized drivers under UPO's vehicle insurance policies as verified by the office of UPO Office of Business Management.

4. Official Authorized Use of Vehicles

The designation of official use of UPO vehicles, private vehicles or rental cars may be issued ONLY for conducting business related to UPO's administration, program services or special events.

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5. Unauthorized Use of Vehicles

Use of an official UPO vehicle for activities other than UPO business is prohibited.

6. Use of Vehicles by Non-UPO Employees

Non-UPO employees are prohibited from operating UPO vehicles.

7. Operator Requirements

- a. All UPO authorized operators of UPO or private vehicles for the purposes of conducting official UPO business must adhere to all applicable state laws regarding the operation and parking of motor vehicles.
- b. Operators of UPO provided or authorized vehicles (including private vehicles authorized by UPO to be used for purposes of conducting official UPO business) which cause damage to other vehicles, property or harm to passengers due to their negligence, or misuse are subject to disciplinary actions such as written reprimand, temporary suspension without pay, and/or dismissal. Misuse means unauthorized use, use for improper purpose, gross negligence in the care and operation of an official UPO vehicle, or not adhering to traffic safety regulations or UPO policy and procedures.
- c. Operators of UPO provided or authorized vehicles are required to complete and submit to an immediate supervisor and the Office of Business Management completed accident report forms within 24 hours of any accident.
- d. Operators of UPO provided or authorized vehicles are required to report vehicle malfunctions, traffic citations and vehicle damage to their supervisor prior to operating the vehicle or upon return of the vehicle.
- e. In cases of passenger distress (i.e., illness, altercation), operators of UPO provided or authorized vehicles are required to pull to a safe location, remedy situations which do not pose a threat to operator's personal safety or the safety of other passengers, contact appropriate authorities as needed, provide assistance in ensuring the safety of passengers not involved and notify his or her immediate supervisor. A UPO Driver Incident Report must be submitted upon return of vehicle.
- f. Office Directors must report all traffic citations related to UPO owned vehicles by memorandum to the Office of Business Management within forty-eight (48) hours of the citation. The memorandum must include the driver's name, description of the infraction and the how the driver will plead.
- g. Operators of UPO provided vehicles disabled while in transit are required to:
 - i. Move vehicle and passengers to safest location
 - ii. Contact UPO immediate supervisor.
 - iii. File a UPO Driver Incident Report form immediately upon return to work site.
- h. Drivers/Operators of UPO vans, buses and all other UPO provided vehicles must accurately complete and sign a daily Operators Manifest/Vehicle Check form and submit it to his or her supervisor at the close of each business day.
- i. Drivers/Operators of UPO vans, buses and all other UPO provided or authorized vehicles are prohibited from the use of a handheld cellular/mobile phone while driving on duty in accordance with Section 7.1 of this Handbook.

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8. Personal Vehicle Use Reimbursement

Persons authorized to use their private vehicles for purposes of conducting official UPO business will be reimbursed for mileage in accordance with the US General Services Administration (GSA) issued Travel Regulation – Privately Owned Vehicle mileage reimbursement. Parking fees will be reimbursed at cost with the provision of original receipt and completed reimbursement form. Fees must be reasonable and incurred for the time period that official UPO business was conducted. Fees incurred beyond the official time period will be the responsibility of the authorized operator.

9. Termination of Driver Authorization

If an authorized driver of an UPO assigned vehicle is reassigned or terminated from employment, a DMV report on their assigned vehicle must be ascertained by their immediate supervisor prior to the issuance of their final paycheck. Any outstanding tickets attributable to the driver must be deducted from their UPO wages.

END OF SECTION

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8. **EMPLOYEE COMMUNICATIONS**

8.1 **Employee Suggestions**

UPO encourages all employees to bring forward their suggestions and good ideas about making UPO a better place to work and enhancing service to UPO customers. Any employee who sees an opportunity for improvement is encouraged to talk it over with his or her supervisor or write it down and place it in one of UPO's Suggestion Boxes conveniently located at all UPO facilities. The employee's supervisor can help bring ideas to the attention of the people in the organization who are able to implement them. UPO values all constructive suggestions.

8.2 **Complaint Procedure**

UPO is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging a frank and open atmosphere in which any problem or complaint will receive a timely response from UPO management.

Any employee who believes that he or she has been treated unfairly has recourse for resolution of such a complaint. Employees who feel that they have been harassed in violation of UPO's No-Harassment Policy should report any such harassment in accordance with the procedures set forth in Section 3.15 of this Handbook. Other employee complaints should be reported to the employee's immediate supervisor first, as soon as possible after the activity or incident occurs. If the employee's complaint is not satisfactorily resolved or if the employee does not feel that he or she can discuss the activity or incident with his or her immediate supervisor, the employee should next report to the UPO Division Director responsible for the work site or program. If the employee remains unsatisfied with management's response, then he or she should report to the Office Director. In the event the complaint is not resolved at the Office Director level, it should be brought to the attention of the Executive Vice President, who is responsible for final resolution of the matter.

In addition, in keeping with the policy of maintaining the highest standards of conduct and ethics, UPO will investigate complaints of suspected fraudulent or dishonest use of its resources or property by staff, board members, consultants, volunteers, interns or clients. To maintain the highest standards of service, UPO will also investigate complaints concerning its programs and services.

Employees, board members, consultants, volunteers, interns, clients, and community members are encouraged to report suspected fraudulent or dishonest conduct or problems with services provided. This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

See **Appendix 14**, UPO Whistleblower Policy.

END OF SECTION

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9 EMPLOYEE ACKNOWLEDGEMENT

I have received my copy of the UPO Employee Handbook (Handbook) and I understand that it is my responsibility to read and comply with the policies contained in it as well as any later revisions that may be made to it.

This Handbook contains important information about UPO's policies, but it is not exhaustive. I should consult my supervisor regarding any questions I may have that are not answered in the Handbook.

I have entered into my employment relationship with UPO voluntarily and acknowledge that I have not been promised a specific length of employment. I understand that my employment with UPO is at-will. Accordingly, either UPO or I can terminate the relationship for any reason, with or without notice, at any time. I also acknowledge that this policy Handbook is not a contract of employment, nor a legal document. None of the provisions of this Handbook constitute legal or contractual obligations of UPO and UPO is free to change any provisions of this Handbook at any time at its sole discretion.

Employee's Name (please print)

Title

Program/Division/Office

Employee's Signature

Date

END OF SECTION

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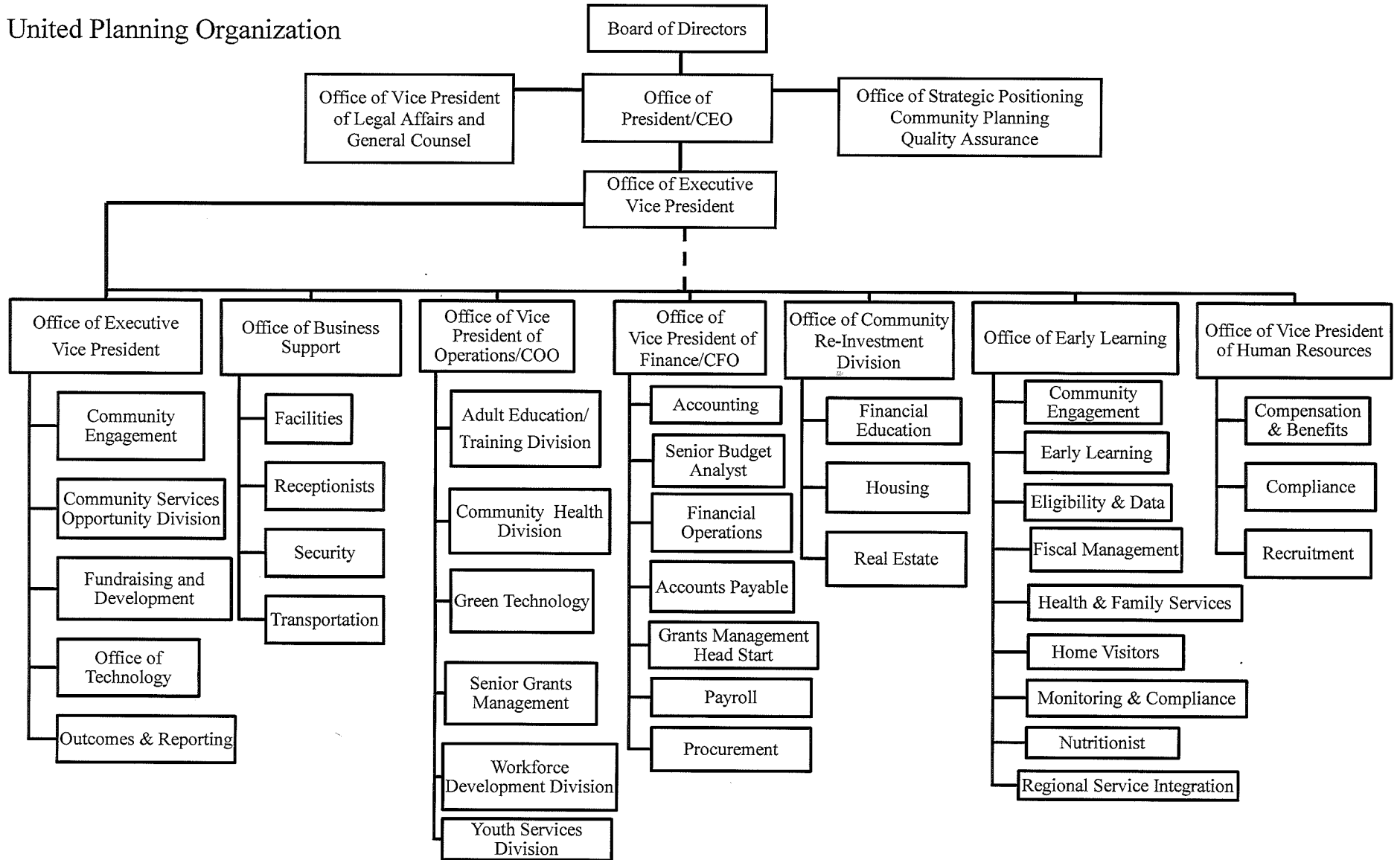
APPENDICES

1. UPO Organizational Chart
2. UPO Volunteer Guidelines
3. UPO Cultural Diversity and Competency Plan
4. UPO Record Retention and Destruction Policy
5. UPO Inclement Weather Policy
6. UPO Employee and Volunteer Conflict of Interest and Related Party Policy
7. Memo: Election Year and Political Activities
8. UPO Housing Counseling Program Privacy Policy
9. UPO Employee Dress Code Policy
10. UPO Information Technology Policy
11. UPO Comprehensive Alcohol & Drug Policy
12. UPO Employee Assistance Program Pamphlet
13. UPO Tuition Reimbursement Policy
14. UPO Whistleblower Policy

END OF SECTION



United Planning Organization





United Planning Organization

Appendix 2

Volunteer Guidelines

PURPOSE

The United Planning Organization (UPO) recognizes that volunteers are a most needed commodity and a very valuable resource. We will endeavor to provide meaningful roles in which volunteers might serve.

The information provided within those guidelines serve as direction for staff and volunteers and to reduce volunteer risk. UPO has the right to change these guidelines at any time and expect adherence. All revisions will be in writing.

VOLUNTEER

By definition, a “volunteer” is anyone who performs a service without compensation or the expectation of compensation, on behalf of UPO. A volunteer shall not be considered as an employee of UPO. Volunteers serve at the pleasure of UPO and assignments can be terminated at the discretion of UPO without notice or cause.

SPECIAL VOLUNTEERS

On occasion, UPO accepts students participating in student community service activities and accepts adults through the courts who are required to perform community hours. In either case, a *special agreement* must be in effect with the organization, school, and or court from which individuals originate.

A person under the age of eighteen may only become a volunteer with written parental consent.

FAMILY/FRIENDS/COMMUNITY MEMBERS AND CLIENTS AS VOLUNTEERS

UPO welcomes community members, clients, family and friends as volunteers. Clients may serve as volunteers as long as it does not create an obstruction or conflict with provision of services they are receiving or providing to others. Family members acting as volunteers can be placed within the same department as other members of their family who are employees, however they can not be supervised by their family member.

RESPONSIBILITIES

I. Volunteers

1. The volunteer is responsible for abiding by the rules and policies of United Planning Organization in performance of their volunteer services.
2. Volunteers are expected to perform their services without compensation to the best of their abilities and remain loyal to the goals and policies of UPO. Volunteers may be utilized in all programs and activities and serve at all levels of skill, if qualified and activities have been approved by Office and Program Director.
3. Volunteers receive no compensation for services or reimbursement for incidental expenses.
4. Volunteers are required to record their hours of services on the designated volunteer service form (daily).
5. All individuals interested in providing volunteer service to UPO, *must* complete attached UPO standard *Volunteer Application Form*. A copy will be maintained by the Office of Human Resources, Site Supervisor, and Volunteer Coordinator.
6. All individuals accepted as UPO volunteer are required to execute the UPO Volunteer guideline agreement.
7. A Criminal Background check which includes FBI, child registry and child protective clearance is required for particular volunteer assignments, and will be at the discretion of HR, and Office and Program Director. If working in a ECDC facility a negative TB screening is also required.
8. Volunteers *must* provide the Office of Human Resource and the Site Supervisor with all information relevant to allergies, medical condition(s) and physical limitations.
9. Volunteers are required to participate in a personal interview, site orientation, and a volunteer assignment training session.
10. Volunteers have the responsibility to maintain confidentiality appropriate to their assignment; be prompt, reliable and attend all meetings and training needed necessary for their assignment.
11. Volunteers must report any incidents, injuries or illness occurring at the volunteer work site, regardless of how minor, immediately to the Site Supervisor.
12. Volunteers must work within the rules of the site, and under the direction and supervision of a full time staff member.
13. Volunteers *must not* use or *possess* illegal drugs or alcohol.

RESPONSIBILITIES

II. Site Supervisor

1. Maintain individual volunteer records for each volunteer at the assigned site.
2. Maintain volunteer service form to account for the time the volunteer has been onsite providing services.
3. Volunteers must have a clearly identified supervisor who is responsible for direct management and guidance of their work.
4. Must provide each volunteer with a well defined job description of services to be rendered.
5. Create volunteer work assignments with a beginning and end date.
6. Plan short, periodic sessions with volunteer monthly and/or as needed to discuss any issues, etc.
7. Make available all information (i.e. memo, materials, etc.) relevant to their assignment
8. Acknowledge the value and contribution of your volunteer.
9. Encourage their continuing commitment to volunteer.
10. Include volunteers in your planning sessions-they too have some great ideals.
11. Provide statement informing volunteer what to do in the event of an injury.
12. Provide an appropriate work site which contains the necessary supplies and equipment to enable the volunteer to be productive and perform their assigned task.
13. Conduct periodic evaluations to review their work and maintain records of the evaluation.
14. Volunteers should dress appropriately for the conditions and site assignments according to UPO Dress code.
15. Dismiss volunteers who do not observe the rules and procedures of the site or who fail to perform their volunteer assignments. You should discuss with the volunteer your reason(s) for dismissal.
16. Provide volunteer with a copy of the Guidelines for UPO's Volunteer Program and Volunteer Agreement.
17. Maintain executed volunteer agreement and provide copy of volunteer application to Human Resource.

PLEASE READ AND INITIAL

NAME: _____

Violence in the Worksite Policy

UPO and its network of programs are committed to providing a safe workplace for its volunteers. To ensure a safe volunteer site and reduce the risk of violence, all volunteers should review and understand all provisions of UPO's volunteer site policy. UPO will respond when there is any indication of a potentially hostile or violent situation.

Prohibited Conduct

UPO does not tolerate any type of violence committed by or against volunteers. For the purpose of this policy, a threat or act of violence shall include, but not limited to, any act or gesture likely to leave another person injured or fearing injury, any act or gesture likely to damage property, or any act or gesture intended to harass or intimidate another person.

Volunteers are prohibited from making or engaging in violent activities. The list of prohibited behaviors includes, but is not limited to, the following conduct:

- Causing physical injury to another person
- Making threatening remarks
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress
- Intentionally damaging employer property or property of an employee or volunteer
- Possession of a weapon while on UPO property or while conducting UPO business

Safety and Accident Reporting

UPO believes that maintaining worksite safety is vitally important. UPO Managers and employees strive to provide a safe work environment for all those who enter a UPO site. Volunteers are encouraged to be mindful of their own safety and that of others.

All Injuries, incidents, accidents or unsafe conditions, regardless of the extent of seriousness, must be reported immediately to your Site Supervisor.

Harassment

The United Planning Organization strives to provide an environment free from all Harassment. Harassment which includes but not limited to sexual, verbal, psychological will NOT be tolerated. Moreover UPO forbids any retaliation against anyone who reports allegations of harassment or who participates in investigation of such claims.

Volunteers are expected to abide by UPO Sexual Harassment policy which includes quid pro quo and hostile environment harassment. The attached UPO Sexual Harassment Policy is comprehensive in its coverage and specific in its application.

Confidentiality

Personal information viewed by volunteers **MUST** remain confidential. Disclosure of confidential information may result in termination of a volunteer.

All UO records and information relating to UPO and its customers are confidential, and volunteers must ensure the confidentiality of all such materials and information. The ability of UPO to effectively interact with the members of the community is highly dependent upon the community's confidence that personal information that it provide to UPO will be held in confidence and not be released to unauthorized persons or agencies.

NO UPO-related information, including, but not limited to, documents, notes, files, records, oral information, computer files or similar materials may be removed from UPO's facility.

Computer and Internet Usage (attached)

I hereby acknowledge receiving information on UPO Computer and Internet Usage and agree to comply with the foregoing policy, rules, and condition governing the use of UPO's computer resources and services. I understand that violation of this policy may result in disciplinary action, including termination of volunteer services, legal actions, and criminal liability.

I have read, understand, and agree to comply with the foregoing policy, rules, and condition governing the use of UPO's policy and guidelines. I understand that violation of this policy may result in disciplinary action, including termination of volunteer services, legal actions, and criminal liability.

Volunteer Signature

Date

Volunteer Printed Name

Date

Site Supervisor's Signature

Date

Program Coordinator Signature

Date

*UPO Early Childcare and Development Center Volunteer Guidelines***329 CRIMINAL AND BACKGROUND HISTORY CHECKS**

- 329.1 The child development facility shall conform to the following requirements related to criminal background checks for applicants for volunteer service of the following requirements:
- (a) The applicant must satisfactorily complete a criminal background check, consistent with the Criminal Background Checks for the Protection of Children Act of 2004, (D.C. Law 15-353, D.C. Official Code § 4-1501.01 *et seq.*); conform to all applicable rules and any other applicable District of Columbia or federal laws; and complete a child protection register check through the District of Columbia Child and Family Services Agency, before he or she can be employed;
 - (b) Unless otherwise provided by law, the criminal background and child protection register checks must be completed or updated as appropriate within three (3) months prior to the date of employment;
 - (c) Unless otherwise provided by law, the applicant must provide to the facility certified results of the criminal background and child protection register checks, or, at the facility's discretion, with all information that will enable the facility to promptly obtain the results of the criminal background and child protection register checks of the applicant, including each state in which the applicant has resided or worked, the applicant's social security number, and all names the applicant has used;
 - (d) The facility shall ensure that background check reports provided by an applicant conform to generally accepted practices, such as background checks based upon fingerprint checks performed by the Federal Bureau of Investigation National Criminal Center.
 - (e) The applicant has the right to obtain copies of the criminal background and child protection register check reports and to challenge the accuracy and completeness of the reports;
 - (f) The facility shall review the results of the background check and child protection registers to determine the suitability of the individual. The information obtained from the criminal background check shall not create a disqualification or presumption against employment or volunteer status of an applicant unless the facility determines that the applicant poses a present danger to children or youth. In making this determination, the facility shall consider the following factors:
 - (1) The specific duties and responsibilities necessarily related to employment or volunteer duties;
 - (2) The bearing, if any, the criminal offense for which the person was previously convicted will have on his or her fitness or ability to perform one or more of such duties or responsibilities;

- (3) The length of time that has elapsed since the occurrence of the criminal offense;
 - (4) The age of the person at the time of the time of the criminal offense;
 - (5) The frequency and seriousness of the criminal offense;
 - (6) Any information produced by the person, or produced on his or her behalf, regarding his or her rehabilitation and good conduct since the occurrence of the criminal offense; and
 - (7) An applicable public policy with regard to consideration of ex-offenders for employment; provided that:
 - (A) The facility shall not employ or permit to serve as a volunteer, an applicant who has been convicted of, has pleaded nolo contendere to, is on probation before judgment, or placed on a case on the stet docket because of, or has been found not guilty by reason of insanity for any sexual offenses involving a minor, child abuse or child neglect.
 - (B) If an application is denied because the applicant presents a present danger to children or youth, the facility shall inform the applicant in writing and the applicant may appeal the denial to the Commission on Human Rights within thirty (30) days after the date of the facility's written statement.
 - (g) The facility shall not employ an applicant or accept a volunteer for services at the facility until satisfactory completion of the criminal background and child protection register checks; provided that an applicant may be employed consistent with subsection 329.5 of this chapter.
- 329.2 All records of criminal background checks and child protection register checks made available to the facility shall be confidential. This information shall be maintained by the facility, in a secured location with limited access, separate from other records.
- 329.3 The facility shall require the applicant to provide the names of and contact information for at least three (3) references, who shall be unrelated to the applicant. The facility shall check at least three (3) references for each applicant, and shall ascertain that the applicant is suitable for employment in a position of close interaction with children, prior to employment of the applicant.
- 329.4 The facility shall maintain a record of the reference checks performed for each applicant. The record shall include either: a signed and dated letter of reference received by the facility; or documentation of a reference check conducted by telephone, including the name of the facility licensee, caregiver, center director,

or designee conducting the check, the name and telephone number of the reference, the date of the check, and written comments regarding the check.

329.5 The facility may enter into a conditional employment agreement to hire an applicant for a term of three (3) months, pending the outcome of the criminal background and child protection register checks; provided that the applicant shall submit to the facility prior to employment a signed notarized statement affirming that he/she has:

- (a) No conviction for any offense that would make him/her ineligible for employment under this chapter;
- (b) No placement on a child protection register; and
- (c) Three (3) references who will confirm that the applicant is suitable for employment in a position requiring routine interaction with children.

329.6 The facility shall require an employee or volunteer to submit to periodic criminal background checks and child protection register checks while employed by or volunteering at a child development facility subject to this chapter.

United Planning Organization

CULTURAL DIVERSITY/COMPETENCY PLAN

The United Planning Organization (UPO), Inc. recognizes the importance of cultural competency. Cultural competency can be defined as the willingness and ability of a system to value the importance of cultural differences in the delivery of services to all segments of the population. It is the implementation of specific delivery of systems to specific populations-those we serve- which values differences and is responsive to diversity at all levels of an organization, i.e., policy, governance, administrative, workforce, provider(s), persons served, and consumers.

Cultural competency is developmental, persons-served specific, community focused, and family oriented. In particular, it is the promotion of quality services to those underserved and categorized by racial/ethnic groups, and through the valuing of differences and integration of cultural attitudes, beliefs, and practices into service delivery throughout the system to support the delivery of culturally relevant and competent services. It is also the development and continued promotion of skills and practices important in cross-cultural interactions, and systems practices among staff to ensure that services are delivered in a cultural and competent manner.

Description of Washington, DC -The Nation's Capital:

The nation's capital, Washington, DC is the rapidly growing city that is surrounded by large suburban counties in the states of Maryland and Virginia that make up the Washington, Metropolitan area.

Although the District's population has experienced decline since its height in the 1950's with a population of over 800,000 residents, it has been growing steadily over the past few years. See the table below reflective of the racially/ethnically diverse population of the District of Columbia.

<i>Population by Race and Ethnicity 2013</i>	<i>Percent</i>	<i>Total</i>
White Alone (1)	43.4%	281,714
Black Alone (1)	49.5%	321,310
American Indian Alone (1)	0.6%	3,895
Asian Alone (1)	3.9%	25,315
Pacific Islander Alone (1)	0.1%	649
Some Other Race Alone (1)	3.75%	24,899
Two or More Races (1)	2.6%	16,877
Hispanic Origin (Any Race) (1)	10.1%	65,560
White Alone not Hispanic or Latino	35.8%	232,382

Source: U.S. Census Bureau, Census State and County QuickFacts.

While the nation has been experiencing a rather slow and sluggish recovery from the recent recession as a whole, the District has experienced an influx of wealth that has widened the gap between the very wealthy and poor resulting in income inequality among residents. Despite the economic boom that swept the Washington, D.C., metropolitan area since the mid-1990s, the disparities between rich and poor have widened (De Vita, C., Manjarrez, C. Twombly, E., 2000). Equally important are the demographics comprising of the District residents who are classified as being poor. Data show the increase in poverty is not spread evenly across the city, as some groups have been hit harder than others, with the highest poverty rates in Wards 7 and 8, and rapidly raising in other parts of the District, namely Wards 4, 5 and 6 (DC Fiscal Policy Institute, 2011).

Although in recent years the District has enjoyed marked job growth, increases in city revenues, and a development boom, too many District residents have been excluded from this local and regional prosperity (Brookings Institute, 2007). For example, the same U.S. Census Bureau data also show that citywide median income rose over the same time period, with median income increasing from \$57,100 in 2007 to \$60,900 in 2010 (DC Fiscal Policy Institute, 2011). While incomes increase for some residents in the District, leading indicators of poverty changes, like employment and food stamp participation, are pointing to a likely rise in the number of District families living in poverty this year and years to come, which is consistent with research showing that poverty takes a long time to recover even after a recession has ended (Fiscal Policy Institute, 2011). Ultimately, closing this gap will be one of the biggest challenges faced by District officials and antipoverty advocates in the decade ahead (De Vita, C., Manjarrez, C. Twombly, E., 2000). Moreover, given the damaging significances connected with poverty, the District must maximize its efforts to ensure supports are accessible and readily available to urgently aid at transporting families from poverty and its destructiveness.

The population served by UPO is reflected in the attached Program Participant Characteristics” as reported to the District of Columbia by UPO. Given that this attachment is annual compilation, the attachment will be provided to this plan annually.

UPO will make every effort to implement Cultural Diversity/Competency activities, which include:

- development of skills through training for co-occurring psychiatric and substance abuse disorders.
- use of self-assessment for providers and systems
- implementation of objectives to ensure that governance, administrative policies, and practices are representative of this Plan. UPO is geared toward reaching cultural diversity.
- ensuring service delivery and practices are responsive to the culture and diversity within the populations served in Washington, DC Metropolitan area.
- continuous quality assurance monitoring and that the monitoring team together with Supervisors/Director are continuously looking for opportunities for improvements.

UPO will strive to:

- appoint board members from the community so that voices from all groups of people within the community participate in decisions and are aware of cultural differences amongst those we serve.
- actively recruit multiethnic and multiracial staff;
- provide ongoing job-specific staff training and support developing cultural competence;
- develop, mandate, and promote standards for culturally competent services;
- discuss the importance of cultural awareness and competency with new hires, staff, interns and volunteers;
- ensure that all staff participate in regular, in-service cultural competency training;
- promote programs that respect and incorporate cultural differences amongst those we serve;
- consider whether the facility's location, hours, and staffing are accessible and whether its physical appearance is respectful of different cultural groups;

At the Service Level, UPO will encourage staff members to:

- learn as much as they can about an individual's or family's culture, while recognizing the influence of their own background on their responses to cultural differences;
- include neighborhood and community outreach efforts and involve community cultural leaders if possible;
- work within each person's family structure, which may include grandparents, guardians, other relatives, and friends;
- understand the different expectations persons served may have about the way services are offered.
- know that, for many people, additional tangible services-such as assistance in obtaining employment, housing, clothing, and transportation or resolving a problem with a child's care-are expected, and work with other community agencies to make sure these services are provided;
- adhere to traditions relating to gender and age-specific that may play a part in certain cultures (for example, in many racial and ethnic groups, elders are highly respected).
With an awareness of how different groups show respect, providers can properly interpret the various ways people communicate.

UPO will make every effort to ensure the staff including leadership positions-management, service, and support service positions are representative of the specific cultures UPO serves. UPO is an equal opportunity employer, which will be stated on all job listings.

Total Non CSGB resources reported in Section

Total resources for FY	2,013	2,014
3	75,549	74,036
4	6,199	4,965
5	34,882	36,196
6	3,101	1,417
	50%	34,779
		0.09
		0.06
		0.4617139

- Total unduplicated number of persons about whom one or more characteristics were obtained
- Total unduplicated number of persons about whom no characteristics were obtained
- Total unduplicated number of families about whom one or more characteristics were obtained
- Total unduplicated number of families about whom no characteristics were obtained

7. GENDER FY-13 FY-14 14CASA% Diff(13-14)

Male	31,882	33,094	0.447	3.80%
Female	43,667	40,942	0.553	-6.24%
Total	74,036	74,036	1	0.00

8. AGE FY-13 FY-14 14CASA% Diff(13-14)

a. 0-5	75,549	74,036	37470	
b. 6-11	5,515	4,709	0.0636	-14.62%
c. 12-17	2,720	3,724	0.0503	36.91%
d. 18-23	1,738	4,250	0.0574	144.51%
e. 24-44	11,332	9,343	0.1262	-17.55%
f. 45-54	31,126	27,379	0.3698	-12.04%
g. 55-69	11,332	12,912	0.1744	13.94%
h. 70+	7,857	8,425	0.1138	7.23%
Total	3,929	3,295	0.0445	-16.15%
	75,549	74,036	1	-2.00%

9. Ethnicity

Hispanic/Latino	5,137	3,480	0.047	-32.27%
Non Hispanic/Latino	70,412	70,556	0.953	0.21%
Total	75,549	74,036		

II. Race

White	1,209	814	0.011	-32.63%
Black African Americ	67,088	66,632	0.9	-0.68%
American Indian/Alaska Native	227	444	0.006	95.99%
Asian	302	148	0.002	-51.00%
Native Hawaii/other Pacific Islandr	227	222	0.003	-2.00%
Other	1,587	962	0.013	-39.33%
Multi-race (any 2 or more of the at	4,911	4,812	0.065	-2.00%
Total	75,549	74,036	1	-2.00%

10. Education

0-8	9,818	5,706	0.093	-41.88%
9-12/non graduates	13,236	16,382	0.267	23.77%
High school grad/GED	22,403	26,382	0.43	17.76%
12+ some post secondary	4,719	6,135	0.1	30.01%
2 or 4 yr college graduates	4,068	6,749	0.11	65.89%
Total	54,244	61,354	1	13.11%

11. Other Characteristics

No health insurance	15,865	12,586	0.17	-20.67%
Disabled	1,769	1,249	0.01687	-29.40%
Total	74,100	61,450		
	88,196	72,787		

12. FAMILY Type

Single parent/Female	9,837	7,058	0.195	-28%
Single parent/Male	1,674	1,556	0.043	-7%
Two Parent Household	1,988	869	0.024	-56%
Single person	13,011	18,496	0.511	42%
Two Adults/No Children	767	1,412	0.039	84%
Other	7,604	6,805	0.188	-11%
Total	34,882	36,196	1	4%

13. Family Size

One	19,918	18,858	0.521	-5%
Two	8,790	10,026	0.277	14%
Three	3,314	4,362	0.1205	32%
Four	1,291	1,437	0.0397	11%
Five	837	796	0.022	-5%
Six	349	319	0.0088	-9%
Seven	279	279	0.0077	0%
Eight or more	105	119	0.0033	14%
Total	34,882	36,196	1	4%

14. Source of Family Income

Unduplicated # Families reporting one or more sources of income	31,952	32,066	0.916	0%
Unduplicated # Families reporting No income	2,930	4,130	0.084	41%
Total	34,882	36,196		4%
TANF	6,767	8,397	0.232	22%
SSI	2,163	1,774	0.049	-18%
Social Security	6,453	5,791	0.16	-10%
Pension	698	905	0.025	30%
General Assistance	244	253	0.007	4%
Unemployment Insurance	1,570	1,484	0.041	-5%
Employment + other sources	7,325	6,841	0.189	-7%
Employment only	6,628	7,601	0.21	15%
other	3,035	3,149	0.067	4%
Total	34,882	32,066	1	

15. Level of Family Income

Up to 50%	28,638	29,681	0.82	4%
51% to 75%	1,953	2,136	0.059	9%
76% to 100%	1,500	1,448	0.04	-3%
101% to 125%	1,291	1,375	0.038	7%
126% to 150%	663	724	0.02	9%
151% and 175%	209	253	0.007	21%
176% and 200%	349	290	0.008	-17%
201% and over	279	290	0.008	4%
Total	34,882	36,196	1	4%

16. Housing

Own	1,326	1,448	0.04	9%
Rent	15,976	16,542	0.457	4%
Homeless	4,081	5,067	0.14	24%
Other	13,499	13,139	0.363	-3%
Total	34,882	36,196	1	4%

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UNITED PLANNING ORGANIZATION RECORD RETENTION AND DESTRUCTION POLICY

1. Purpose.

United Planning Organization (hereafter “UPO”) retains records as required by all applicable laws and regulations or grant/contract terms and conditions and/or for a period of time period deemed to be sufficient given the content and purpose of the record; and to have a routine and orderly process for disposing of electronic and paper documents that do not need to be retained for legal or operational reasons at the proper time. This Policy provides guidelines concerning the length of time official records should be retained under ordinary business circumstances, as well as the steps that UPO should take in the event of any pending or imminent government (federal, state or local) or regulatory investigation, audit or proceeding, or any administrative, civil lawsuit or criminal proceeding involving UPO.

It is not intended to serve as authorization to destroy or otherwise dispose of unscheduled records nor is it intended to cover every possible situation in which decisions about the retention or destruction of records must occur.

This policy is intended to complement the use of approved records retention and disposition schedules. If an Office lacks an approved records retention and disposition schedule, it may not destroy or otherwise dispose of any records in its custody, whether in electronic, paper or other format (including electronic mail).

2. Policy.

This Policy represents UPO’s formal policy regarding the retention and disposal of records related to and generated in the course of UPO’s operations. It is the responsibility of each Office Director to ensure effective record retention management so that UPO records are not arbitrarily destroyed and that legal record keeping requirements are met. Each Office Director is responsible for checking contract or grant requirements to ensure that record retention requirements are met. The Office Director may delegate the record retention function to an individual within the office who shall work in conjunction with the UPO Office of Finance and the Office of General Counsel to establish retention schedules. Each office shall routinely evaluate its record retention schedules to ensure compliance with federal, state and UPO requirements. All staff who either generate and or exercise control over records should be trained in basic record retention requirements.

Caution: Office personnel should be aware that there are **no** standard record retention time frames for federal grant awards. While most federal records require a three (3) year record retention, the start of this three (3) year period is usually based on the final grant expenditure report which normally occurs several months after the end of the federal grant award term. It should also be noted that amended final expenditure reports **restart** the three (3) year period. As a result, pre-defined period of time (i.e. as of October 1) cannot be used as a record retention date. The Office of Finance maintains these critical dates and sends out semi-annual notification to offices, divisions regarding which fiscal year and which particular federal or district grant

records may be purged. Similarly, audits also suspend permission to dispose of records. Thus, close coordination with the Office of Finance as well as the Office of General Counsel is of paramount importance prior to any records being destroyed.

3. Covered Records.

This Policy applies to all records generated in the course of UPO's operations, including but not limited to:

- handwritten, typed, or printed hardcopy (i.e., paper) documents;
- electronic records and documents (e.g., e-mail, Web files, text files, PDF files);
- video or digital images;
- graphic representations;
- electronically stored information contained on network servers and/or document management systems;
- notes, drafts, calendars, personal notes; and
- recorded audio material (e.g., voicemail)

Failure to retain records as required by law could subject employees and UPO to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place UPO in contempt of court, or seriously disadvantage UPO in litigation.

UPO expects all employees and other persons who generate and access UPO records to fully comply with this policy. In addition, if an employee or other person believes or is informed by UPO, that UPO records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), then those records must be preserved until UPO's in-house or outside legal counsel determines the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records.

Retention time periods are noted in the attached Record Retention Schedule that is the maintenance, retention and disposal schedule for records of UPO unless needed for a longer period of time due to audit requirements or litigation:

4. Implementation

The UPO record retention function must include, but is not limited to the following types of activities:

- a.** Each office/division must have an officially designated person on record with the Office of Finance to act as the Office/Division's Record Retention Officer.
- b.** The President and Chief Executive Officer shall appoint a UPO Record Retention Officer/Administrator whose duty it will be to administer this Policy and implement reasonable processes and procedures concerning the Record Retention Schedule. The Records Administrator shall be authorized to (with the approval of UPO's legal counsel): (a) make modifications to the Record Retention Schedule from time to time to provide that this Policy complies with local, state and federal laws and includes the appropriate document and record categories for UPO; (b) monitor changes in local, state and federal laws affecting record retention; (c) monitor the compliance of UPO's officers and employees with this Policy; and (d) take such other action as may be authorized by UPO's Board of Directors. The Records Administrator shall annually review UPO's record retention and disposal program and shall apprise UPO's officers, directors and employees of any changes in laws relating to UPO's record retention and disposal program.
- c.** The Director of the Office of Human Resources will arrange for every officer and employee of UPO to receive and review a copy of this Policy and each officer and employee shall sign a statement that affirms that he or she has received a copy of this Policy, has read and understands it and has agreed to comply with it.
- d.** All agreements/contracts/MOU's/ must include the requirement that records shall be maintained in accordance with UPO, District or federal retention policies, whichever is more restrictive, and that failure to do so could result in penalty assessments in accordance with law or possibly in the cancellation of the grant or contract.
- e.** All agreements/contracts must include a provision allowing UPO access to persons and records.
- f.** All record Retention Officers must be familiar with this policy and coordinate with the Office of General Counsel as to the current District and federal record retention policies.
- g.** Office/Division Record Retention Officers must maintain contact with the Office of Finance and or Office of General Counsel regarding the long-term storage of documents. Consideration shall be given to cost-effective management of document storage needs and the use of alternative methods. Specific records will be permanently discarded by the UPO long-term storage vendor only upon receipt of a written authorization signed by the appropriate Office/Division Director. The Office/Division shall obtain written approval from the Office of Finance prior to giving written authorization to discard such records. See attached "Authorization to Discard Records".
- h.** Office/Division Record Retention Officers will maintain a permanent list of which record series their Office/Division have destroyed or transferred and the action date.

5. Record Storage Procedures.

a. Organization of Records. In order to facilitate administration of this Policy, where practicable, UPO's records should where practicable be organized and stored according to the general categories set forth in the attached Record Retention Schedule. Categories of records not specifically addressed in the Record Retention Schedule may be stored in a manner that best facilitates the efficient administration of UPO's operations where appropriate. Records within each category should generally be organized and stored in chronological order or by time period (e.g., by month or year).

b. Dating of Records. Categories of records not required to be retained on a permanent basis (according to the Record Retention Schedule) should be conspicuously dated to enable such records to be easily identified for destruction at the end of the record retention period recommended in the Record Retention Schedule.

c. Confidentiality of Records. Records containing confidential information should be labeled and/or stored in a manner to limit access to those employees or other individuals with authorization to view such records. Any UPO e-mail, regardless of the nature of the content, may be subject to disclosure in the course of a government investigation or litigation involving UPO. UPO provides its employees with e-mail as a tool for performing its employees' work functions.

While UPO understands that employees may occasionally use their e-mail to conduct personal business, employees should be aware that they have no expectation of privacy for any information or communications contained in work-related e-mail accounts. UPO reserves the right to review any UPO e-mail at any time.

d. Electronic Storage System. Subject to the approval of UPO's Board of Directors, the Records Administrator shall be authorized to develop and implement a system for maintaining UPO's books and records via an electronic storage system that either images hardcopy records or transfers computerized records to electronic storage media (e.g., hard drives

6. Document Destruction Procedures.

Once records have been retained for the applicable period set forth in the Record Retention Schedule, they should be prepared for destruction in the manner prescribed by the Records Administrator, unless the Records Administrator has suspended the destruction of any such records in accordance with Section 7. The Records Administrator shall develop procedures for destroying categories of records that are not listed in the Record Retention Schedule at times and in an effective manner that best facilitates the efficient administration of UPO's operations. All confidential paper documents destroyed pursuant to this Policy shall be cut by mechanical shredder. Electronic data contained on servers and hard drives shall be deleted and overwritten. Electronic data contained on all other media shall be destroyed by the physical destruction of that media.

7. Suspension of Record Disposal in Event of Litigation or Claims.

In the event any UPO employee reasonably anticipates or becomes aware of a governmental or regulatory investigation or audit concerning UPO or a claim asserted or the commencement of any litigation against or concerning UPO, such employee shall inform the Records Administrator and Vice President of Legal Affairs and General Counsel and any further disposal of relevant documents shall be suspended until such time as the Records Administrator, with the advice of the President and Chief Executive Officer and UPO's legal counsel, determines that the record hold should be lifted. The Records Administrator shall take such steps as are necessary to promptly inform affected staff of any suspension in the disposal or destruction of documents.

Potentially relevant records should be retained indefinitely (or until the Records Administrator and Vice President of Legal Affairs and General Counsel advises otherwise), whether or not this policy would otherwise provide for the destruction of such records in the ordinary course of business. In other words, records may be destroyed in accordance with this Policy only if they are not responsive to a subpoena or relevant to an imminent or pending investigation, lawsuit or claim.

Any questions regarding whether a record is responsive to a subpoena or relevant to an investigation, lawsuit or claim should be directed to the Vice President of Legal Affairs and General Counsel. Destruction of records relevant to a claim, investigation, subpoena or litigation, even if inadvertent, could seriously prejudice UPO and could subject any individual involved in such destruction and UPO to substantial criminal and civil liability, fines and penalties.

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

8. Confidentiality and Ownership.

All records are the property of UPO, and employees are expected to hold all business records in confidence and to treat them as UPO assets. Records must be safeguarded and may be disclosed to parties outside of UPO only with proper authorization. Any subpoena, court order, or other request for documents received by employees, or questions regarding the release of UPO records, must be directed to the Records Administrator and Vice President of Legal Affairs and General Counsel prior to the release of such records. Any records of UPO in possession of an employee must be returned to the employee's supervisor or the Records Administrator upon termination of employment. UPO records should never be stored in an employee's home, nor should records be removed from UPO's offices for storage except to an approved offsite storage facility.

9. E-Mail and Other Electronic Records.

Electronic records include e-mail, electronic spreadsheets, word processing files, power point presentations and other records stored or imaged on computer servers, magnetic tape, CD-ROM, hard discs, floppy disc or other electronic storage media. Electronic records are legally no different from paper records – they are subject to the same retention periods (which are based on

content, not form) and, must be produced in the case of a subpoena government or regulatory investigation, or lawsuit.

Unless responsive to a subpoena, or relevant to a government or regulatory investigation, lawsuit or claim or otherwise required for retention under this Policy and the attached record retention schedule, e-mail messages should generally be deleted as soon as practicable. E-mails located in your in-box and out-box will be automatically deleted after three (3) years. Backup copies of e-mail messages will not be retained. If an employee determines that a particular e-mail should be retained for a longer period, either for business reasons or pursuant to the attached Records Retention Schedule or because of a Record Hold, the e-mail should be placed in one of the employee's user-defined folders where such selected e-mails will be saved beyond the three (3) year limit. Employees should periodically review the e-mails saved in these user-defined folders and delete those e-mails no longer needed for business purposes which are not otherwise required to be saved in accordance with this Policy. If electronic records such as e-mail need to be stored indefinitely because of a Record Hold, employees should contact the Record Administrator and Vice President of Legal Affairs and General Counsel to arrange appropriate measures for retaining such records.

The Office of Technology has specific procedures for backup of data from UPO servers and individual computers. Backup discs are stored for a very limited period of time and then erased and over-written. **As noted above, all e-mails that are more than three (3) years old and which have not been saved in a user-defined folder will be automatically deleted from your mailbox and will not be recoverable, unless otherwise determined for a longer period of time.** Employees should never rely on the existence of routine data backups for record retention. Instead, if an electronic record should be retained for longer than it will otherwise remain on the system, the relevant employee(s) should take the steps outlined above to ensure that the record is retained as required.

E-mail – A Special Caution – All use of e-mail must be consistent with all UPO policies, including but not limited to those relating to harassment, privacy, confidentiality, copyrights, trademarks, trade secrets and other intellectual property considerations. Employees should have no expectation of privacy in e-mails sent or received on UPO e-mail servers. E-Mail may not be used for any unauthorized or unlawful purpose. When electronic mail messages or files are created they should include comments, language, images or other files that any UPO employee would not be embarrassed to have read by any person. “Private” Electronic Mail messages may easily be forwarded to a wide audience. Such messages, taken out of context, could easily be misinterpreted. All e-mail communications, therefore, should be conducted with the same care, judgment and responsibility that would be used when sending letters or memoranda written on UPO letterhead.

Additionally, employees should not:

- Save electronic records such as e-mail to their local hard drives.
- Routinely print electronic records, unless the print-outs are retained and/or destroyed in accordance with the Records Retention Schedule.

- Copy electronic records to home computers, portable devices such as laptop computers, digital assistants, portable hard drives or floppy or CD-ROM discs for the purpose of keeping them there permanently or for extended periods of time.
- Forward UPO e-mail to an external e-mail account, such as Hotmail, Yahoo or Gmail.
- Keep copies of e-mail messages in wireless or other portable e-mail devices for more than 60 days.

10. Vital Records.

Vital records are to be identified and protected so that UPO can resume operations with minimal inconvenience in the event of a disaster or crisis situation.

Vital records should be protected by either or both of the following:

- On-site protection: storing the records in a secure location, with limited access, where the records are protected from natural or other disasters, insects, mold, conditions hazardous to electronically stored documents, etc.
- Dispersal: sending duplicate copies of vital records to other locations that would not be affected by a disaster at the site where the record is normally maintained.

Vital records also should be:

- Accessible only by authorized persons.
- Placed in boxes or containers clearly identifying the contents as vital records.

11. Maintaining Records Beyond a Scheduled Retention Period.

If a Record must be held beyond its retention period, the Records Manager must be notified and valid reason must be provided. Valid reasons include a subpoena, government or regulatory investigation, lawsuit, or changes in business conditions or practices that necessitate the ongoing use of the Record.

12. Other Records

Official Grant Files

Rationale:

Federal tax laws and audit requirements largely prescribe the content of these permanently retained files. The original grant files, which are initially kept in the Office of Finance and or the Office of General Counsel and or the Office of Executive Vice President and or the Office of Development & Assessment and or the Office of Early Learning files, contain the following:

1. Original grant proposal;

2. Grant agreement and subsequent modifications, if applicable;
3. All requested IRS/grantee correspondence including determination letters and “no change” in exempt status letters;
4. Final grantee reports, both financial and narrative;
5. All evidence of returned grant funds and the disposition and allocation of principal and interest moneys related thereto;
6. All pertinent formal correspondence including opinion letters of counsel;
7. Report Assessment forms;
8. Documentation relating to grantee evidence of invoices, or matching grants that would support grantee compliance with grant agreement; and
9. Pre-grant Inquiry Forms and other documentation for expenditure responsibility grants.
10. Grantee work product produced with the grant funds.

Program Files

Rationale:

Many programs retain a set of files in their office areas that pertain to their grants and subgrantees and or contracts and subcontractors. These program files often contain a copy of the key documents retained in the official grant and or contract files—which are maintained in the above indicated Offices files—to provide ease of access to program staff. In addition, the program files may contain informal correspondence, copies of e-mail exchanges, project updates, media clippings, work product produced using the grant, invitations to events, and so forth.

Because these files are not needed to comply with legal, financial or audit requirements, UPO has adopted a retention policy for program files based solely on programmatic and administrative needs. UPOs’ policy is to regularly dispose of program files when the grants to which they relate close. This policy is flexible enough to allow program staff to retain particular documents longer if doing so would serve UPOs’ interest. For the policy to function effectively, the presumption that program files will be discarded when the grant closes is strong, allowing for longer retention only in cases that are clearly necessary and indicated in writing.

Policy and Logistics:

After completion of the final report assessment form (RAF), staff should send all program files related to the closed grant to the Office Record Retention Officer with the official file for the grant. An electronic form related to document retention is part of the final RAF. Staff should send the completed final RAF together with the accompanying files to Office Record Retention Officer within two months after the program staffs receive the official file with the final report.

The Office Record Retention Officer will forward the program files to the Office Director for review and disposal. Staff should identify on the document retention for those materials that need to be retained longer and indicate the duration they are to be retained. Retained documents may be kept for up to an additional year at which point they will be scheduled for review by the Office Director and the responsible program staff.

Further, when a program staff member (director, officer or associate) leaves employment at UPO, the files for which he or she is responsible will be assigned to another staff member. The reassignment of responsibility will be made part of UPO's regular exit interview process.

In addition,

- The UPO documentation retention policy will apply to all grants approved by the Board even if the grants are administered through an outside program office.
- Program files for grants that have already been closed will be reviewed and disposed of according to the procedures outlined above.

The Office Director will review the program files to locate any work product of the grant that should be placed with the official files and retained permanently or any formal documents that belong in the official files. All other materials will be discarded (with an effort made to save and re-use folders, binders, etc.).

Chronological Correspondence and Memo Files

Rationale:

It is common for administrative assistants/assistants to the directors to maintain chronological files of correspondence and memoranda for program and operations staff members. These files often provide an easy means of retrieving a UPO-generated document for reference. However, usefulness of these files diminish with time and, thus, the files should be discarded in a regular manner.

Policy and Logistics:

The chronological files should be retained for the current year and the prior two years. All files from prior to this period should be discarded. The Assistant to the Director in each program area and in each operations department will be responsible for the implementation of this practice.

Project or Cluster Evaluation Files

Rationale:

Because of their value as components of UPO's institutional memory, final evaluation reports are kept permanently in UPO's archives. The Compliance and Evaluation Division (C&E) keeps drafts of evaluations until the reports are in final form. At that point, the drafts are discarded.

Policy and Logistics:

The policy regarding the final evaluation report—to preserve it permanently in the archives—shall be in effect. Contractual documents (such as Program Development and Evaluation (PDE's) and scopes of work) will also be retained permanently. When the evaluation is completed and in final form, the Head, C&E will collect the documents pertaining to the evaluation from program staff and the C&E staff should discard all drafts, e-mails and other information/ correspondence pertaining to the evaluation.

13. Training.

Upon employment with UPO, each employee with access to or responsibility for UPO Records should be given a copy of this Policy. Each such employee will be required to review the policy and certify that he or she has read and understands the Policy.

There shall be a regular schedule for initial and ongoing training of such employees about their responsibilities and UPO's policies and procedures with regard to the creation, retention and disposition of records. Existing employees should periodically be reminded of their responsibilities with regard to the creation, retention and disposition of records, including any relevant changes in law, regulation or UPO policy. Each department should document the training of its employees.

14. Audit Procedures, Questions and Violations.

The Records Administrator will conduct periodic audits to review compliance with this Policy. Anyone with questions about the Policy should contact the Records Administrator. UPO personnel should report any suspected violations of this Policy to their supervisor, the Records Administrator. Any violations of this Policy will be subject to disciplinary action, up to and including termination of employment. Failure to report a suspected violation of this Policy is itself a violation of this Policy subject to disciplinary action.

CERTIFICATE OF ADOPTION

The foregoing Record Retention and Destruction Policy was adopted by the Board of Directors of the UPO on the ____ day of _____, 2015.

By: _____
Name: _____
Title: _____

RECORD RETENTION SCHEDULE

The Record Retention Schedule is organized into the following categories:

- A. Accounting and Finance
- B. Contracts
- C. Contribution and Gift Records
- D. Corporate Records
- E. Correspondence and Internal Memoranda
- F. Employee Benefit and Retirement Plan Documents
- G. Grant Records
- H. Insurance Records
- I. Legal Files and Papers
- J. Miscellaneous
- K. Payroll Documents
- L. Personnel Records
- M. Programs & Services Records
- N. Property Records
- O. Tax Records

A. ACCOUNTING AND FINANCE

Record Type	Retention Period
Accounts Payable Ledgers and Schedules	7 years from the end of the calendar year
Accounts Receivable Ledgers and Schedules	7 years from the end of the calendar year
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records (including work papers and other documents that relate to the audit)	7 years after completion of audit
Annual Plans and Budgets	3 years
Bank Statements and Canceled Checks	7 years from the end of the calendar year
Depreciation schedules	Permanent
Duplicate deposit slips	3 years
Expense analyses/expense distribution schedule	7 years from the end of the calendar year
Employee Expense Reports	7 years from the end of the calendar year

Record Type	Retention Period
Garnishments	7 years
General Ledgers	Permanent
In-kind contributions	3 years
Interim Financial Statements	7 years
Journals	Permanent
Notes Receivable Ledgers and Schedules	7 years
Internal audit reports	3 years
Internal reports	3 years
Inventories of products, materials and supplies	7 years
Invoices (to customers, from vendors)	7 years
Investment Records	7 years after sale of investment
Credit Card Records (documents showing purchaser credit card number)	3 years
Petty cash vouchers	3 years
Physical inventory tags	3 years
Purchase orders	7 years (other copies 1 year)
Bids/Vendor selection records	7 years (originals)
Receiving sheets	1 year
Retirement and pension records	Permanent
Requisitions	1 year
Sales records	7 years
Subsidiary ledgers	7 years

Record Type	Retention Period
Time records	7 years
Tax returns and worksheets, examination reports, and other documents relating to determination of income tax liability	Permanent
Travel Advance and reimbursement records	7 years

B. CONTRACTS

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

C. CONTRIBUTION AND GIFT RECORDS

Record Type	Retention Period
Donor Gift Agreements (or other documents evidencing terms of gifts)	Permanent
Records of Contributions (e.g., donor receipts)	7 years after contribution
Appraisal Documents and Related IRS Forms (e.g., IRS Form 8283)	7 years after contribution
Other Correspondence with Donors	3 years

D. CORPORATE RECORDS

Record Type	Retention Period
Corporate Records (minutes books, minutes and resolutions of the Board and	Permanent

committees, minutes and resolutions of members, if applicable, corporate seals, articles of incorporation and amendments, bylaws and amendments, annual corporate reports)	
Licenses and Permits	Permanent
State Charitable Solicitation Reports	Permanent
Letter of Tax-exempt Determination from IRS	Permanent
Tax-exemption certificates and other documentation from state(s)	Permanent

E. CORRESPONDENCE AND INTERNAL MEMORANDA

Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support, e.g., a letter pertaining to a particular contract would be retained as long as the contract is retained. Correspondence and internal memoranda that support a particular project or grant should be kept with the project/grant and take on the retention time of that particular project/grant file. Correspondence or memoranda that do not pertain to documents or projects having a prescribed retention period, or correspondence or memoranda pertaining to routine matters and having no significant lasting consequences, should be discarded within two (2) years.

F. EMPLOYEE BENEFIT AND RETIREMENT PLAN DOCUMENTS

Record Type	Retention Period
Employee Benefit Plans and Records	6 years after termination of plan
Retirement and Retention Plans	6 years after termination of plan

G. GRANT RECORDS

Record Type	Retention Period
Original Grant Proposal/Application (with	7 years after completion of grant

Record Type	Retention Period
supporting documentation and related correspondence)	period
Grant Agreement and Amendments	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
Documentation/Correspondence Concerning and Evidencing Returned Grant Funds	7 years after completion of grant period
All pertinent formal correspondence including opinion letters of counsel	7 years after completion of grant period
Opinion Letters of Counsel Concerning Grant	7 years after completion of grant period
Documentation Relating to Grantee Compliance with Grant Agreement	7 years after completion of grant period
Grantee Work Product Produced with Grant Funds	7 years after completion of grant period

H. INSURANCE RECORDS

Record Type	Retention Period
Annual Loss Summaries	10 years
Audits and Adjustments	3 years after final adjustment
Certificates Issued to UPO	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Group Insurance Plans – Active Employees	3 years after Plan is amended or terminated
Group Insurance Plans – Retirees	Permanent or until 6 years after death of last eligible participant
Inspections	3 years

Record Type	Retention Period
Insurance Policies (including expired policies)	Permanent
Journal Entry Support Data	7 years
Releases and Settlements	Permanent

I. LEGAL FILES AND PAPERS

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject matter files)	7 years after close of matter
Litigation Files	7 years after close of matter
Court Orders	7 years after close of matter
Trademark registrations and copyrights	Permanent
Correspondence of historical or legal importance	Permanent
Discrimination and Wage claims	Permanent

J. MISCELLANEOUS

Record Type	Retention Period
Compensation and Other Consultant's Reports	7 years after close of matter
Material of Historical Value (including pictures, publications)	Permanent
Policy and Procedures Manuals – Original	Current version with revision history
Policy and Procedures Manuals – Copies	Retain current version only
Annual Reports	Permanent

K. PAYROLL DOCUMENTS

Record Type	Retention Period
Employment Tax Records	4 years after due date of tax or date tax paid, whichever is later
W-2 and W-4 Forms	7 years after due date of tax or date tax paid, whichever is later
1099 and 1096 Forms	7 years after due date of tax or date tax paid, whichever is later
Employee Earnings Records (including time cards/sheets and records concerning commissions, bonuses and incentives)	3 years
Garnishments, Assignments, Attachments	7 years
Payroll Check Registers (gross and net)	3 years

L. PERSONNEL RECORDS

Record Type	Retention Period
EEO-1 /EEO-2 – Employer Information Reports	3 years after superseded or filing (whichever is longer)
Employee Handbooks and Training Manuals	Permanent – 1 copy
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	3 years
Forms I-9	3 years after hiring, or 1 year after separation if later
Employment Contracts – Individual	3 years after separation

Record Type	Retention Period
Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Records for Non-Hired Applicants (including all applications and resumes, whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, and related correspondence)	3-4 years (4 years if file contains any correspondence which might be construed as an offer) (consult state law concerning required destruction of confidential information prior to end of holding period)
Job Descriptions	3 years after superseded
Personnel Count Records	3 years
Records of Occupational Injuries and Illnesses	5 years from date of injury or illness
Records Concerning Disability Accommodations (including results of physical examinations)	3 years
Documents Pertaining to COBRA Benefits	6 years after qualifying event
Family and Medical Leave Act (FMLA) Records	3 years
Workers Compensation Records	3 years
Unemployment Security Records	4 years

M. PROGRAM AND SERVICE RECORDS

Record Type	Retention Period
Research and Publications	Permanent (1 copy)
Fiscal Sponsorship Agreements	Permanent
Joint Program Agreements	Permanent

N. PROPERTY RECORDS

Record Type	Retention Period
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Original Purchase/Sale/Lease Agreements	Permanent
Trademark Registrations and Copyrights	Permanent
Equipment Records	7 years after disposition
Property Insurance Policies	Permanent
Routine repair/maintenance orders and records	7 years

O. TAX RECORDS

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
IRS Rulings	Permanent
Excise Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns – Income, Franchise, Property	Permanent
Tax Workpaper Packages – Originals	7 years
Sales/Use Tax Records	7 years
Annual Information Returns – Federal and State	Permanent
IRS or Other Government Audit Records	Permanent

UPO INCLEMENT WEATHER POLICY AND PROCEDURES

The following is the United Planning Organization's (UPO) policy and procedures to be implemented in inclement weather conditions, i.e. snow, ice, hurricane, etc. In some circumstances, UPO may be open for business during inclement weather and in other circumstances UPO may have an altered workday (delayed opening, early dismissal or closure). UPO reserves the right to alter this Inclement Weather Policy and Procedures as necessary to operate its business, to be in compliance with funding sources, and to provide services to UPO clients. It is UPO's intent that this policy is consistent with the Collective Bargaining Agreement between UPO and the Communication Workers of America – Local 2336 and the UPO Employee Handbook.

UPO will designate some employees as essential employees. Prior designation of these employees will allow essential personnel to prepare for weather conditions, and if need be, provide alternative methods of getting to work during inclement weather conditions. Essential employees will be required to report to work on time during inclement weather to assure that offices are open to the public and services are provided.

PROGRAM VARIATIONS

In those instances that funding sources or regulatory requirements dictate specific operational procedures, UPO employees must follow those procedures applicable to inclement weather situations. Some UPO programs provide critical services to the public and generally will not stop their operations during inclement weather conditions. Employees in these programs should follow the program's emergency procedures.

- For UPO employees who work in the **UPO Office of Early Learning Centers (OEL Centers)**, if the District of Columbia Public Schools (DCPS) are closed due to inclement weather, the OEL Centers will also be closed. If DCPS announces a delayed opening, the OEL Centers will adhere to the same delayed opening. If DCPS announces an early dismissal, the OEL Centers will close for that early dismissal period and staff may leave once the children have been picked up by their parents/guardians. OEL Centers will be on administrative leave during a closure, a delayed opening or the applicable early dismissal period.
- The **Shelter Hotline program** provides critical services and transportation to homeless individuals and families. These services are of heightened importance during the winter season. UPO employees who work in the Shelter Hotline program as shift coordinators, dispatchers, outreach workers, or drivers shall report to work during inclement weather for their regularly scheduled shift as designated by the Shelter Hotline emergency procedures.
- The **UPO Comprehensive Treatment Center (CTC)** provides important daily medical treatment for its clients. CTC employees shall report to work in inclement weather conditions consistent with the CTC emergency procedures, unless the CTC has advanced notice of a closing that allows for the dispensing of medication sufficient to cover the period of the closing.

ALTERED WORKDAY

There are three basic weather situations that may result in the alteration of the standard UPO workday (8:45 am to 5:00 pm):

1. Inclement weather conditions begin after the start of UPO standard hours of operation and result in *early dismissals*;
2. Inclement weather conditions begin prior to the start of UPO standard hours of operation and result in a *delayed opening or an unscheduled leave policy*; and
3. Inclement weather conditions begin prior to the start of UPO's standard hours of operation and result in the *closure* of UPO's operations.

Except for the programs noted above, UPO will follow the District of Columbia government decisions on delayed openings, early dismissals, and closings due to inclement weather conditions. In addition, the President

and Chief Executive Officer (or designee) may declare an early dismissal, delayed opening or closure above and beyond what the District government announces.

Early Dismissal

When severe inclement weather occurs during the UPO standard workday, UPO will follow the District of Columbia government decision and the District of Columbia Public School decision (applicable to the OEL Centers) regarding early dismissal. The President and Chief Executive Officer (CEO) or designee may also decide to close UPO early due to inclement weather beyond the early dismissal of the District government. The President and CEO or designee will authorize the issuance of an all staff e-mail regarding the early dismissal. Managers (or designees) will be responsible for ensuring that their staff is informed that UPO is closing early due inclement weather.

When an early dismissal has been authorized, an employee, (except as noted above) shall be permitted to leave work prior to the end of the standard UPO workday for the early departure period of time, if he or she is working when the notice of early dismissal is received and if his or her scheduled hours of work end after the hour given as the authorized time for early departure. These employees will be on administrative leave for the early dismissal period of time.

Designated essential employees will be required to remain at work during inclement weather consistent with the program's emergency procedures. In addition, designated employees in the critical care programs must follow the program's emergency procedures and must remain at work if so directed under the program's emergency procedures.

Staff serving dependent populations (children and youth) shall implement their emergency plans and cannot leave work until those in their care are released to their parents and/or guardians. Special attention must be given to maintaining all standards regarding staff to customer ratios.

An employee who had previously scheduled leave (vacation, annual, sick, personal business) planned for the day of an early dismissal may not use administrative leave but must use the type of leave that he or she was originally scheduled to take on that day.

A non-exempt employee (an employee paid by the hour and is eligible for overtime) who requests and receives approval from his/her supervisor (or designee) to leave work before the early departure time may not use administrative leave for the additional time, but may use his or her annual leave or personal business leave to cover the time he or she is leaving before the early departure time. If the employee does not have any annual leave or personal business leave, he or she will be on leave without pay status.

Delayed Opening

In some circumstances, UPO may delay the start of services due to inclement weather or allow employees to take unscheduled leave due to inclement weather. Except as noted above, UPO will follow the District of Columbia government decision regarding delayed openings or unscheduled leave due to inclement weather. The President and Chief Executive Officer (CEO) or designee may also decide to close UPO early due to inclement weather beyond the delay issued by the District government. The President and CEO or designee will authorize the issuance of an all staff e-mail regarding the delayed opening and a message will be on the **UPO Weather Line** regarding the delayed opening or unscheduled leave policy. Staff may call **(202) 238-4650** to listen to the recorded message.

When the District government issues a delayed opening, UPO employees (except as noted above) will be on administrative leave for that period of time if they were previously scheduled to work during that period of time.

If the District government determines that an unscheduled leave policy is in effect due to inclement weather, UPO employees (except as noted above), may choose not to report to work and use their available annual leave or personal business leave without obtaining advanced approval. An employee wanting to use unscheduled leave must notify their supervisor that he or she is going to be out of the office due to the inclement weather. If

an employee does not have any annual leave or personal business leave and he or she does not want to report to work, he or she will be on leave without pay status.

Closure

Except for the programs noted above, UPO will follow the District of Columbia government decisions and DCPS decisions on closings due to inclement weather conditions. In addition, the President and Chief Executive Officer (or designee) may declare a closure above and beyond what the District government announces.

The notice issued by the District government and DCPS will serve as notice for UPO applicable employees. In addition, UPO will make every attempt to announce a closure due to inclement weather before 6:00am using area-wide news media *via* television and/or radio. UPO will also send an all staff e-mail announcing the closure and will post a voice message on the **UPO Weather Line** regarding the closure. Staff may call **(202) 238-4650** to listen to the recorded message.

Employees scheduled to work on the closure date will be on administrative leave for the day UPO is closed due to inclement weather.

Designated essential employees will be required to work during inclement weather. In addition, designated employees in the critical care programs must follow the program's emergency procedures and must report to work if so directed under the program's emergency procedures.

An employee who had previously scheduled leave (vacation, annual, sick, personal business) for the day that UPO is closed, the employee may not use administrative leave but must use the type of leave that he or she was originally scheduled to take on that day.

July 2015

UNITED PLANNING ORGANIZATION

EMPLOYEE AND VOLUNTEERS

CONFLICT OF INTEREST AND RELATED PARTY POLICY

PURPOSE / POLICY

The purpose of this conflicts of interest policy is to protect UPO interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an employee or volunteer of UPO. UPO conducts business ethically and avoids conflicts of interest including the appearance of such conflicts. This policy is intended to supplement but not replace any applicable Federal and District of Columbia laws governing conflicts of interest applicable to nonprofit and charitable organizations.

It is the policy of UPO to prohibit its staff and volunteers from engaging in any activity, practice, or conduct which conflicts with or appears to conflict with, the interests of UPO, its customers, or its vendors. All employees and volunteers owe a duty of complete loyalty to UPO and may not use their positions or knowledge gained as a result of their positions to profit personally at the expense of UPO, financially or otherwise. Employees and volunteers involved in UPO operations have an equal obligation to avoid conflicts of interest.

Conflicts of interest raise governance, tax and regulatory issues for UPO. They also raise concerns in the mind of the public and members of the media, potentially undermining UPO's reputation and good standing.

Generally speaking, a conflict of interest is a situation in which an employee or volunteer or one of his or her family members has a personal or financial interest that compromised or could compromise the employee's or volunteer's independence of judgment in excising his or her responsibilities to UPO. Employees are expected to minimize conflicts of interest, disclose ethical, legal financial and other conflicts, and remove themselves from decision-making if they would otherwise be called on to act on a conflict involving themselves, their family members or entities with which they or their family members are closely associated.

Disclosures are required for the period beginning on September 1 of the year preceding the year the employee or volunteer signs this policy.

IMPLEMENTATION

UPO's President and Chief Executive Officer is primarily responsible for implementing this policy. The policy will be distributed to all employees when hired and annually thereafter. The President and Chief Executive Officer designates the Office of Human Resources to distribute this policy and collect signed disclosure statements. The Office of Human Resources shall: review the policy with staff members upon their hire and on

an annual basis thereafter; review completed disclosure statements; and monitor implementation of this policy.

DEFINITIONS

Board of Directors (Board) – The UPO Board of Directors

Interested Person – Any employee or volunteer who has a direct or indirect financial interest is an interested person. If a person is an interested person with respect to any entity of which UPO is a part, her or she is an interested person with respect to UPO.

Interested Employee. Any employee with a conflict of interest.

Interested Volunteer. Any volunteer with a conflict of interest.

Financial Interest/Transaction – Any financial agreement or relationship, including but not limited to those involving:

- a. The sale, lease, purchase, transfer, or provision of goods, services, equipment, facilities, commission or fee, share or proceeds or rights of any kind;
- b. The provision or receipt of a loan or grant;
- c. A joint venture, partnership or collaboration; or
- d. An investment.

Closely Associated – Any individual who:

- a. Has a compensation arrangement with an entity;
- b. Has an ownership interest in an entity; or
- c. Is negotiating, applying for or considering acquiring a compensation arrangement with or ownership interest in an entity.

Compensation Arrangement is an arrangement involving direct or indirect compensation for services.

An Ownership Interest means that an individual owns at least 5% of the ownership interests (for example, shares of stock or partnership or limited liability company interests) or assets of an entity or, in the case of publically held corporation, at least 1% of the corporation's outstanding capital stock.

Conflict of Interest – A situation in which an employee or volunteer or his or her immediate family member has, directly him – or herself or indirectly through another individual or entity, a personal or financial interest that compromises or could compromise the employee's or volunteer's independence of judgment in exercising his or her responsibilities to UPO.

Examples:

- The wife of UPO's Housing Director is a residential landlord to whom UPO makes rental payments on behalf of its clients.
- UPO is considering hiring its IT Director's son to provide IT consulting services.
- The brother of the Head Start Director owns a 30% interest in a construction company UPO is considering hiring to renovate its headquarters building.
- The employee owns an 18% interest in a cleaning company UPO is considering hiring to clean UPO facilities.

Immediate Family Member includes individuals related by blood, adoption, or marriage (i.e. step family members):

- a. Spouse or partner in a civil union recognized by state law;
- b. Domestic partner or partner committed, personal relationship;
- c. Parent;
- d. Child;
- e. Sibling;
- f. Father-in-law, Mother-in-law;
- g. Brother-in-law, sister-in-law;
- h. Grandparent;
- i. Grandchild;
- j. Cousin;
- k. Aunt; or
- l. Uncle.

Related Party is an immediate family member or an entity with which the employee or volunteer or his or her immediate family member is closely associated.

Volunteer under this Policy is an unpaid individual who voluntarily assists in implementing program activities under the supervision of a UPO employee on a continuing basis for more than one day.

PROHIBITED CONFLICTS OF INTEREST

1. **Loans.** UPO is prohibited from making a loan to or guaranteeing an obligation of any of its employees or volunteers.
2. **Board Membership.** No employee or volunteer of UPO or its Head Start delegate agencies/subgrantees/slot purchase entities may be a UPO Board or Committee Member or board or committee member of any concerns of UPO or the immediate family member of a UPO Board Member. A former UPO Board Member may be hired as an employee of UPO, provided that at least two years have passed since he or she left the UPO Board of Directors.

3. **Participation in Grants or Contracts.** Employees or volunteers shall not participate in the selection, award, or administration of a grant or contract supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when an employee, any of his or her immediate family members, his or her partner, or an entity which employs or is about to employ any of the parties indicated herein, is or has a financial or other interest in the individual or firm selected for the award.
4. **Family and Work.** Employment of immediate family member is not permitted where an employee has or would have direct or indirect administrative, supervisory or decision-making authority over the related person.
5. **Employment and Outside Activities.** Employees may not accept any employment relationship with any organization that does business with or competes with UPO. This prohibition on employment includes serving as a paid advisor or consultant to any organization of that type, unless the activity is conducted as a representative of UPO. Employees and volunteers should refrain from directly or indirectly performing duties, incurring obligations, or engaging in business and professional relationships where there would appear to be a conflict of interest.
6. **Professional Services.** Employees of UPO, may not be paid, outside of their approved salary and benefits, for any professional or consulting services provided to UPO
7. **Gifts to Employees or Volunteers.** Employees and volunteers of UPO are prohibited from soliciting or accepting gifts, or any special discounts, or loans, or money, or gratuities, other than those of unsolicited nominal value, from:
 - a. persons receiving benefits or services under any UPO program;
 - b. any person or UPO performing services for or providing goods to UPO;
or
 - c. persons or organizations who are otherwise in a position to benefit from the actions of UPO employees or could potentially do business with UPO.
 - i. It is expressly understood that this prohibition does not preclude business meals or nominal entertainment on an infrequent basis.
 - ii. "Nominal value" is \$25 or less per gift and \$50 or less for all gifts from a particular individual or entity per calendar year. Acceptance of gifts of nominal value must be disclosed according to the procedures set forth in this policy. However, the prohibition on soliciting or accepting gifts does not include acceptance of token gifts of low-cost promotional items, such as pens, note pads, caps, calendars, and coffee mugs, and such gifts do not need to be disclosed. Gifts of more than nominal value should be tactfully declined or returned, to avoid any appearance or suggestion of improper influence.

8. **Offers.** Employees may not give, offer, or promise, directly or indirectly anything of value to any customer, representative of a customer, representative of a potential customer, vendor or a financial institution in connection with any transaction or business that UPO may have with that customer, potential customer, financial institution or vendor.
9. **Diversion of UPO Resources.** Employees and volunteers and their related parties are prohibited from using the name of the organization, UPO equipment, assets, or employee or volunteer time for other than activities approved by UPO and UPO purposes.

Exceptions to What Is Considered a Conflict of Interest

The situations listed below are not considered to be conflicts of interest under this Policy.

1. **Provision of Services/Benefits.** Provision of services/benefits by UPO or one of its Head Start delegate agencies/subgrantees/slot purchase vendors to the immediate family member of an employee solely because the individual is a member of a charitable class that UPO or its Head Start delegate agency/subgrantee/slot purchase vendor intends to benefit as a part of the accomplishment of its charitable purposes, provided that:
 - a. The individual meets all applicable eligibility criteria for the services/benefits, including funding source rules on the provision of services/benefits to individuals with a close connection to the organization;
 - b. The individual does not receive preferential treatment in receiving the services/benefits due to his or her connection with UPO as an immediate family member of an employee;
 - c. The services/benefits are provided on terms similar to services/benefits provided to individuals who are not immediate family members of an employee;
 - d. The employee is not involved in the decision about whether to provide or in the provision of services/benefits to the individual.
2. **Expense Reimbursements.** Expense reimbursements made by UPO to employees for reasonable, necessary and documented expenses incurred by the employee in the course of performing authorized services for UPO, provided that the reimbursements are made pursuant to UPO's Board approved expense reimbursement plan and are permitted by any applicable funding source rules. Unless required by the UPO Board or President and Chief Executive Officer in a particular circumstance, receipt of reimbursements meeting these criteria need not be disclosed under this policy.

INFORMATION THAT MUST BE DISCLOSED AND HOW SHOULD IT BE DISCLOSED

1. **Obligation to Disclose.** Each employee has a continuing obligation to disclose promptly and fully to the Vice President of Legal Affairs and General Counsel, if, after signing this policy, the employee becomes involved in, or intends to become involved in, or becomes aware of an existing, Related-Party Transaction, any activity or transaction prohibited by this Policy, or any other actual or apparent conflict of interest for evaluation. Examples of conflicts of interest are listed below (but are not limited only to these items):
 - a. An outside business interest that competes with the activities of UPO.
 - b. An outside business that is a purchaser or supplier of goods or services to UPO.
 - c. A relative or a person with a significant relationship employed by, or has a business interest in companies that compete with, sell to, or buy from UPO.
 - d. Purchase inducements (gifts, premiums, money, goods, or services) from vendors that benefit the employee personally (directly or indirectly) or are unauthorized or questionable in nature.

2. **Form and Frequency of Certification and or Disclosure.** Upon being hired and thereafter on an annual basis and at such times as conflicts of interest may arise, each employee shall sign a conflict of interest policy which affirms that such person -
 - a. Has received a copy of the conflicts of interest policy.
 - b. Has and understands the policy.
 - c. Has agreed to comply with the policy.
 - d. Understands that UPO is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purpose.

And must disclose the existence of his or her financial interest and all material facts to be considered in the determination of whether any actual or potential conflicts of interest or related party transaction exists.

All senior managers shall additionally complete and sign a Conflict of Interest Disclosure Statement, on the form attached to this policy, fully and completely disclosing the material facts about any actual or potential conflicts of interest of which he or she is aware to enable UPO to report required information on its IRS Form 990 and to enable the UPO Board of Directors and management to take steps it considers necessary or advisable to address conflicts of interest.

PROCEDURES FOR ADDRESSING THE CONFLICT OF INTEREST

Decision-Maker

1. **Situations Involving Officers.** The Board, through its *Nominating, Bylaws and Board Governance Committee*, shall address all actual and potential Conflicts of

Interest (including Transactions between UPO and a Key Staff Member or a Related Party) involving UPO's President and Chief Executive Officer, Vice President of Finance and Chief Financial Officer and any other UPO officers who are not Board Members.

2. **Situations Involving Other Senior Staff Members.** The Executive Vice President and Vice President of Legal Affairs and General Counsel or Assistant General Counsel shall address all actual and potential Conflicts of Interest (including Transactions between UPO and a Senior Staff Member or a Related Party), involving other Senior Staff Members. Individuals who are involved in a Conflict of Interest situation shall be prohibited from participating in decision-making about that situation. After due diligence, the President and Chief Executive Officer, upon advice of the Vice President of Legal Affairs and General Counsel or Assistant General Counsel shall determine whether the transaction, or arrangement or business give rise to a Conflict of Interest. In appropriate circumstances, the President and Chief Executive Officer or his or her designee shall refer a Conflict of Interest situation to the Board *Nominating, Bylaws and Governance Committee* for consideration.
3. **Situations Involving Staff Members.** The Executive Vice President and Vice President of Legal Affairs and General Counsel or Assistant General Counsel shall address all actual and potential Conflicts of Interest (including Transactions between UPO and a Staff Member or a Related Party), involving other Staff Members. Individuals who are involved in a Conflict of Interest situation shall be prohibited from participating in decision-making about that situation. After due diligence, the President and Chief Executive Officer, upon advice of the Vice President of Legal Affairs and General Counsel or Assistant General Counsel shall determine whether the transaction, or arrangement or business give rise to a Conflict of Interest

Decision. The appropriate decision-maker described above shall decide whether there is: no Conflict of Interest; a Conflict of Interest that is not prohibited; or a Conflict of Interest that is prohibited. In determining whether a Conflict of Interest exists, the fact that the situation could subject UPO to criticism, embarrassment, litigation or administrative proceedings shall be considered.

1. **No Conflict of Interest.** If the decision-maker determines that no Conflict of Interest exists, it shall inform any Staff Members involved in the situation of its determination and take any other actions it deems prudent.
2. **Conflict of Interest Not Prohibited**
 - a. **Generally.** If the decision-maker concludes that a Conflict of Interest exists and it is not prohibited, the decision-maker shall inform any Staff Members involved in the situation of the determination and take any other actions it deems prudent to address the Conflict of Interest, including excluding Staff Members from decision making as described above.

- b. Proposed Transaction. Where a Conflict of Interest is not prohibited and involves a proposed Transaction between UPO and a Staff Member or Related Party, the decision-maker shall gather and review appropriate data, including appropriate data as to comparability, to determine whether the terms of the Transaction are fair and reasonable to and in the best interests of UPO.

Examples of appropriate data as to comparability include:

- In the case of compensation, compensation levels paid by similarly situated organizations for functionally comparable positions, the availability of similar services in UPO's geographic area, and current compensation surveys compiled by independent firms; and
- In the case of property, independent appraisals and offers received as part of an open and competitive bidding process.

In the event that the proposed Transaction involves procurement, UPO's standard procurement rules, including any rules that may require competitive bidding, shall be followed.

If, after consideration of the comparability data and any other relevant factors (including, where appropriate, information on alternatives to the Transaction), the decision-maker determines that, all factors being considered, the Transaction is fair and reasonable and in the best interests of UPO, the Transaction may be approved.

3. **Prohibited Conflict of Interest**. If the decision-maker determines that a prohibited Conflict of Interest exists or that a proposed Transaction would result in a prohibited Conflict of Interest, the decision-maker shall determine the appropriate course of action (if necessary, in consultation with an attorney), consistent with legal requirements and UPO's personnel and other policies, to eliminate the prohibited conflict or conduct.

RECORDS OF PROCEEDINGS

1. The report of the Board Committee, President and Chief Executive Officer, Executive Vice President and Vice President of Legal Affairs and General Counsel or Assistant General Counsel shall contain:
 - a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the decision as to whether a conflict of interest in fact existed.
 - b. The names of the persons who were present for discussions relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement and the date of the

discussions.

CONSEQUENCES OF VIOLATING THIS POLICY

If the UPO Board of Directors or President and Chief Executive Officer has reason to believe that a Staff Member has **failed to disclose** a Conflict of Interest or otherwise violated this policy, it shall inform the Staff Member of the basis for this belief and afford him or her an opportunity to explain the alleged failure or violation.

If, after hearing the response of the interested party and making such further investigation as may be warranted in the circumstances, the Board or President and Chief Executive Officer determines that the Staff Member has in fact failed to disclose an actual or possible Conflict of Interest or otherwise violated this policy, appropriate disciplinary and corrective action, which may include termination of employment, shall be taken.

RETALIATION

UPO encourages you to report potential violations or violations of this policy. **UPO will not tolerate retaliation.** UPO will take disciplinary action if retaliation occurs.

PERIODIC REVIEWS

To ensure that UPO operates in a manner consistent with its charitable purpose and that it does not engage in activities that could jeopardize its status as an organization exempt from federal income tax, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

1. Whether compensation arrangements and benefits are reasonable and are the results of arm's length bargaining.
2. Whether partnership and joint venture arrangements and arrangements with vendors conform to written policies, are properly recorded, reflect reasonable payments for goods and services, further UPO's charitable purposes and do not result in increment or impermissible private benefit.
3. Whether agreements with employees and third party payors further UPO's charitable purposes and do not result in increment or impermissible private benefit

In conducting the periodic reviews UPO may, but need not, use outside advisors. If outside experts are used their use shall not relieve the agency of its responsibility for ensuring that periodic reviews are conducted.

Acknowledgement of Receipt of United Planning Organization Employee and Volunteers Conflict of Interest and Related Party

I acknowledge receiving, reading and understanding UPO Employee and Volunteer Conflict of Interest and Related Party Policy and agree to abide by the UPO conflicts of interest standards set forth therein.

I agree to comply with the policy and to disclose to UPO any actual or possible conflicts of interest in accordance with the procedures set forth therein.

I understand that UPO is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Printed or Typed Name

Signature of Employee

Date

Your Name:

Date:

Annual or Other Disclosure (circle one)

Conflict of Interest Disclosure Statement for Key Staff of United Planning Organization

Reason for Policy. Conflicts of Interest raise governance, tax and regulatory issues for UPO. They also raise concerns in the mind of the public and members of the media, potentially undermining UPO's reputation and good standing. For these reasons, UPO's Key Staff Members should avoid Conflicts of Interest, disclose ethical, legal, financial and other such conflicts, and remove themselves from deliberations and decision-making on matters in which they have a Conflict of Interest.

Reason for this Statement. UPO is committed to the highest ethical standards in how UPO conducts its business and operations. Completing this statement helps UPO Board and management identify and evaluate situations and relationships that could be problematic for UPO, including ones that could jeopardize its tax-exempt status or ability to obtain grants or other funding. It also assists UPO in reporting information required on its IRS Form 990.

Completing this Statement. Each Key Staff Member is required to complete and sign this statement annually and at such times as they become aware of actual or potential Conflicts of Interest. This statement should take no more than 10 to 15 minutes for most Key Staff Members to complete. It asks intentionally broad questions, with the hope of identifying all relevant actual or potential Conflicts of Interest.

Defined Terms Used in this Statement. Capitalized terms used in this statement are defined in the Conflict of Interest Policy for UPO Key Staff.

Identifying a Conflict or Relationship Does Not Necessarily Mean There Is a Problem. In some instances, you may need to reveal a conflict or relationship when responding to a question. This does not necessarily mean that you have done something improper or violated the Conflict of Interest Policy for UPO Key Staff. By identifying conflicts and relationships, you permit UPO's Board and management to make an informed judgment, further permitting them to address issues through appropriate action or safeguards. Being forthright now is the best approach.

If You Have Questions about the Policy or this Statement. If you have questions about UPO's Conflict of Interest Policy or this Statement, ask the Vice President of Legal Affairs and General Counsel Board Chair or Director Office of Human Resources.

[Continued on next page]

Your Name:

Date:

Annual or Other Disclosure (circle one)

Do any of your Immediate Family Members serve as a UPO Board Member or UPO officer?

Yes ___ No ___

If yes, please identify the Immediate Family Member, his or her position and your relationship to him or her:

To the best of your knowledge, are you or any of your Related Parties engaged in any Transactions with a UPO Board Member, with a UPO officer, or with an employee of UPO or of any of its Head Start delegate agencies/slot purchase? For this purpose, a Transaction does not include a transaction between an attorney and client, or a medical professional (including psychologist) and patient.

Yes ___ No ___

If yes, please identify the individuals or entities involved and the Transactions in which they are involved:

To the best of your knowledge, are you, any other Key Staff Members, or any Related Parties of Key Staff Members (including your own Related Parties) engaged in or considering engaging in a Transaction with UPO or any of its Head Start delegate agencies/slot purchase?

Yes ___ No ___

If yes, please identify the Key Staff Member and/or Immediate Family Member and describe the Transaction:

Your Name:

Date:

Annual or Other Disclosure (circle one)

Have you solicited or accepted gifts, gratuities, favors, or anything of monetary value (other than token gifts of low-cost promotional items, such as pens, note pads, caps, calendars, and coffee mugs) from: (a) persons receiving benefits or services under any UPO program; (b) persons or organizations performing services for or providing goods or space to UPO; or (c) persons who are otherwise in a position to benefit from the actions of a UPO employee, officer, or Board Member?

Yes___ No___

If yes, please identify the Key Staff Member, the item that was solicited or accepted, and the person or entity from whom the item was solicited or accepted:

Have you participated in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest was involved? Such a conflict would arise when you, any of your Immediate Family Members, your partner, or an organization which employs or is about to employ you, any of your Immediate Family Members, or your partner, is or has a financial or other interest in the individual or firm selected for the award.

Yes___ No___

If yes, please identify the Key Staff Member, the contract and the conflict of interest.

To the best of your knowledge, have you or any of your Related Parties used UPO equipment, facilities, assets, or staff time for non-UPO purposes?

Yes___ No___

If yes, please identify the individual or entity involved, the UPO equipment, facilities, assets or staff used, and the purpose for which it was used:

Your Name:

Date:

Annual or Other Disclosure (circle one)

To the best of your knowledge, are you aware of any other Conflicts of Interest not already disclosed above? A Conflict of Interest is a situation in which a Key Staff Member or his or her Immediate Family Member has, directly him- or herself or indirectly through another individual or entity, a personal or financial interest that compromises or could compromise the Key Staff Member's independence of judgment in exercising his/her responsibilities to UPO.

Yes___ No___

If yes, please identify the Key Staff Member and any other parties involved and describe the situation:

By signing this form, I certify that:

I have received a copy of the Conflict of Interest and Related Party Policy for UPO Employees and Volunteers , that I have read and understand it; and I agree to abide by it; and

To the best of my knowledge, my responses on this statement are accurate, true and complete.

Signature: _____

Print Name: _____

Date: _____

Please return this form to *the Director of Human Resources*

MEMORANDUM

TO: ALL UPO STAFF

FROM: Office of Human Resources
Office of General Counsel



DATE: March 6, 2014

RE: Election Year and Political Activity

As this election year begins (DC Primary Election on April 1, 2014 and General Election on November 4, 2012) please be reminded that specific Internal Revenue Code, OMB Circular A-122, Community Services Block Grant Act, Head Start Act and Hatch Act regulations and laws applicable to the United Planning Organization (a Section 501(c)(3) organization) and staff must continue to be adhered to.

To assist you in understanding and determining what activities you can participate in and what activities you are prohibited from participating in, the below UPO policy rules will serve as your **guide** and are **to be followed by all employees**:

1. PERMISSIBLE ACTIVITIES BY INDIVIDUALS

As a private citizen while on your own personal time, using your personal resources, and not representing UPO, during non-UPO work hours, off UPO premises, and without direct or indirect UPO financial support or identification you may:

- a. Register and vote as you choose;
- b. Assist in voter registration drives;
- c. Assist in providing transportation to the polls;
- d. Express opinions about candidates and issues;
- e. Participate in political campaigns;
- f. Contribute money to political organizations or attend political fund-raising functions;
- g. Wear or display political badges, buttons, stickers, or other paraphernalia;

- h. Attend political rallies and meetings;
- i. Join political clubs or parties;
- j. Be a candidate for a public office in a nonpartisan election (all employees);
- k. Sign nominating petitions; and
- l. Campaign for or against referendum questions, constitutional amendments, and municipal ordinances.

2. NON PERMISSIBLE ACTIVITIES

While on-duty at UPO, on UPO premises, or using UPO resources, UPO employees may not do any of the activities listed in 1. above.

Additionally, UPO employees may not at any time or place, including during off-duty hours, during leave of any type (including unpaid leave) and off UPO premises:

- a. Use your official position, authority, or influence to interfere with or affect the result of an election or a nomination for a party or public office.
- b. Directly or indirectly coerce, attempt to coerce, command or advise any UPO employee or any other person who is subject to these restrictions to pay, lend, or contribute anything of value or to contribute personal services to a party, committee, organization, agency, or person for political purposes.
- c. Use program funds for any political purposes or to influence any election for public or party office.
- d. Permit the use of equipment or premises purchased or leased with program funds and under the control of UPO for any political purpose or to influence the outcome of any election for public office or party office.
- e. Discriminate, or threaten or promise discrimination against or in favor of any employee or beneficiary, because of their political affiliations or beliefs, or require any applicant, employee, or beneficiary to disclose their political affiliation.
- f. Offer any person employment, promotion, or benefits under a UPO program as a reward for the support or defeat of any political party or candidate for public or party office, or threaten or create disadvantage in employment or deprivation of benefits as a penalty for such support, except that such a person may be deprived of employment or subject to lesser penalties for engaging in activities which are forbidden.

- g. While carrying out any UPO program, engage in voter registration activity or in transporting voters or prospective voters to the polls. This restriction applies to the uses of program funds, agency facilities, or equipment, as well as to the provision of services and the assignment of personnel. UPO employees may participate in voter registration during off-duty hours, so long as identification of such activities with any UPO program is avoided.
- h. Use program funds in any way to aid registration campaigns. UPO employees may conduct a citizen education program which includes, as a part of the curriculum, information about the mechanics and function of voter registration, but the program must be informational and not designed to solicit registration.
- i. Be candidates for public office in a partisan election (100% of salary paid by CSBG, Head Start or other federal funds). This restriction includes both primary and general elections.
- j. Solicit or handle political contributions from employees or sell tickets to political fund-raising functions to employees whose principal employment is with UPO or a member agency or other persons associated with or receiving substantial benefits from UPO.
- k. Off duty activities of UPO employees should be conducted so as to scrupulously maintain the separation between private political activities and actions relating to the job.
- l. Campaign for or against a candidate or slate of candidates in partisan elections, during duty hours or using UPO's name, facilities, computers, funds or other UPO resources.
- m. Make campaign speeches to elect partisan candidates, during duty hours, using UPO's name, facilities, computers, funds or other UPO resources.

Note, an election is partisan if any candidate for an elected public office is running as a representative of a political party whose presidential candidate received electoral votes in the last presidential election.

3. ACTIVITIES BY UPO

- a. UPO may not participate or intervene in a political campaign on behalf or in opposition to any candidate for public office.

- b. UPO funds may not be used to make contributions to political campaigns, political parties, or political action committees.
- c. UPO may under certain conditions conduct limited activities designed to educate, but not influence, voters, such as neutral candidate forums or voter guides, voter registration drives, and transportation to the polls, **but only if they are carried out by UPO programs or employees not funded by Community Services Block Grant or Head Start or other funding sources containing specific restrictions prohibiting such activity and receive the prior approval of UPO President and Chief Executive Officer.**

Note, recently Internal Revenue Service issued proposed regulations pertaining to tax-exempt Section 501(c)(4) organizations (social welfare organizations) political activities may be made applicable to Section 501(c)(3) organizations which will further restrict UPO's political activity conduct.

As per the examples indicated in the DC Bar Pro Bono Program Legal Alert, issued January 2014, "... under current IRS rules, Section 501(c)(3) organizations may host candidate forums, as long as all candidates for a particular office are invited to attend, and the candidates are treated in a neutral manner. However, under the proposed rules, if such event were held within 60 days of a general election or 30 days of a primary, it would constitute political activity, even if all the candidates were invited." Additionally, "these rules can be even more complicated in D.C., since they would apply not only to candidates for city council or mayor, but also to candidates for lesser offices such as Advisory Neighborhood Commissioners."

If you have any questions regarding this memorandum please contact Ms. Beckham at 202-238-4702 or Ms. McArthur at 202-238-4626.

UPO Housing Counseling Program Privacy Policy

NOTE: If you have impairment, disability, language barrier, or otherwise require an alternative means of completing this form or accessing information about housing counseling, please talk to your housing counselor about arranging alternative accommodations.

United Planning Organization Housing Counseling Agency (UPO HCA) is committed to assuring the privacy of individuals and/or families who have contacted us for assistance. We realize that the concerns you bring to us are highly personal in nature. We assure you that all personal information shared orally and/or in writing will be managed within ethical and legal considerations. Additionally, we want you to understand how we use the personal information we collect about you. Please carefully review this notice as it describes our policy regarding the collection and disclosure of your nonpublic, personal information.

What is nonpublic, personal information?

- Information that identifies an individual personally and is not otherwise publically available information, such as your Social Security Number or demographic data such as your race and ethnicity
- Includes personal financial information such as credit history, income, employment history, financial assets, bank account information and financial debts

What personal information does UPO HCA collect about you?

We collect personal information about you from the following sources:

- Information that you provide on applications, forms, email, or verbally
- Information about your transactions with us, our affiliates, or others
- Information we receive from your creditors or employment references
- Credit Reports

What categories of information do we disclose and to whom?

We may disclose the following personal information to financial service providers (such as companies providing home mortgages), Federal, State, and nonprofit partners for program review, monitoring, auditing, research, and/or oversight purposes, and/or any other pre-authorized individual and/or organization. The types of information we disclose are as follows:

- Information you provide on applications/forms or other forms of communication. This information may include your name, address, Social Security Number, employer, occupation, account numbers, assets, expenses, and income.
- Information about your transactions with us, our affiliates, or others; such as your account balance, monthly payment, payment history, and method of payment.
- Information we receive from a consumer credit reporting agency; such as your credit bureau reports, your credit and payment history, your credit scores, and/or your creditworthiness.
- We do not sell or rent your personal information to any outside entity.
- We may share anonymous, aggregated case file information; but this information may not be disclosed in a manner that would personally identify you in any way. This is done in order to evaluate our program, gather valuable research information, and/or design future programs.
- We may also disclose personal information about you to third parties as permitted by law.

How is your personal information secured?

UNITED PLANNING ORGANIZATION EMPLOYEE DRESS CODE

United Planning Organization (UPO) employees must present themselves in a manner that reflects positively on themselves and UPO. UPO is revising its dress code to ensure that employees are appropriately attired while performing their duties and serving their customers. The policy is unable to set forth a full inclusive list of do's and don'ts of attire. UPO employees are expected to exercise good judgment and dress in a professional manner. All employees shall avoid wearing unacceptable clothing and accessories that detract from the professional image of UPO, including items that are unclean, torn, faded, unsafe, offensive, or provocative. This policy applies to all employees and volunteers regardless of work location or environment.

The specific details of the UPO Employee Dress Code are divided into three sections. Section I of the Dress Code reflects the standard attire for employees who work in an office setting. Section II of the Dress Code reflects the standard attire for employees who regularly work in non-office settings, including, for example, drivers, maintenance employees, custodians, outreach workers in the Shelter Hotline program, and employees in the Early Childhood Development Centers (ECDC). Section III covers miscellaneous provisions, including exceptions, special events, enforcement and discipline.

I. Office Settings

- A. Professional Business Casual. The standard dress for employees who regularly work in an office setting is Professional Business Casual. Professional Business Casual includes suits, dresses, skirts, blouses, sweaters, dress shirts, slacks, khakis, sports jackets and other apparel reflecting the traditional business office.
- B. Casual Fridays. The dress for employees who regularly work in an office will continue to be Professional Business Casual; however, attire may be more relaxed to include jeans. The designation of Fridays as Casual Fridays is a privilege that is offered to provide a more comfortable and relaxed atmosphere, but may be revoked on an individual, office or organization-wide basis if employees are abusing the policy. Employees scheduled to meet with the public or with persons outside the Organization on Fridays must wear standard Professional Business Casual attire. Employee participation in Casual Friday is optional.
- C. Examples of appropriate Professional Business Casual dress
 - 1. Women
 - a. Suits, dresses, skirts, slacks, khakis, and Capri pants, jackets, shirts (including golf or polo shirts), non-collared dress shirts, turtlenecks, blouses, and sweaters.
 - b. Dress shoes, loafers, dress boots, flats and dressy sandals.
 - c. Clothing with discreet manufacturers' logos.

2. Men

- a. Suits, sports jackets, slacks, and khakis.
- b. Short or long-sleeved collared or button-down dress shirts with or without a tie, golf or polo shirts, non-collared dress shirts, sweaters, and turtlenecks.
- c. Loafers, dress boots, dressy casual shoes, and dressy sandals.
- d. Clothing with discreet manufacturers' logos.

D. Examples of Inappropriate Attire

1. Women

- a. Miniskirts, shorts, skorts, spandex, leggings or other form fitting pants
- b. Strapless dresses, shirts and dresses with spaghetti straps (unless worn under another blouse or jacket at all times), halter tops, tube tops, and sandals with straps that tie up the leg

2. Men and Women

- a. Shorts of any kind.
- b. Tee Shirts, tank tops (unless worn under a shirt or jacket).
- c. Midriff length tops (chest to hips must be covered at all times).
- d. Clothing that is sheer or otherwise revealing, distracting or provocative.
- e. Clothing or hats of any kind with offensive, derogatory wording, logos, pictures or slogans, or large lettering.
- f. Printed buttons with offensive, derogatory wording, logos, pictures or slogans.
- g. Printed buttons or clothing displaying solicitations, political endorsements, or religious statements.
- h. Scrubs.
- i. Clothing that would be worn to a gym or beach; tank top sports jerseys.
- j. Flip flops, sports sandals or bedroom slippers.
- k. Hats or head wraps on in the workplace unless worn as part of an official UPO uniform; or unless worn as part of religious attire, obligation or practice.

E. Examples of Acceptable Attire for Casual Fridays

1. Jeans (not torn, faded or ripped and appropriately fitting: not too tight, not too low cut, not too baggy).
2. Tee shirts (long or short sleeved) (clean, neat, and appropriately fitting; not torn or ripped).
3. Clean tennis shoes.
4. Athletic suits.
5. Sleeved sports jerseys.

II. Non-Office Settings

A. Shelter Hotline (Drivers and Outreach Workers).

1. UPO issued uniform
2. Tennis shoes, casual shoes or boots (no sandals)

B. Maintenance Technicians

1. UPO issued uniform
2. Steel toe/safety shoes or steel toe/safety boots as required by specific tasks (no sandals)

C. Custodians

1. UPO issued uniform
2. Tennis shoes, casual shoes or boots (no sandals)

D. Drivers

1. UPO issued uniform (should maintain current dress (including footwear listed in number 2) until such time a UPO uniform is issued).
2. Tennis shoes, casual shoes, boots or sandals (sandals must have heel straps, no slides or flip flops).

E. ECDC Staff

1. UPO issued uniform (should adhere to numbers 2 through 5 below until such time UPO uniform is issued).
2. Scrubs/smocks covering your daily wear.
3. Slacks, jeans (not torn, faded or ripped and appropriately fitting: not too tight, not too low cut, not too baggy), khakis.
4. Athletic suits.
5. Closed in, skid resistant shoes.

III. Miscellaneous Provisions

A. Exceptions. Reasonable accommodations will be made for employees' medical conditions or religious beliefs consistent with the laws and regulations.

B. Special Events.

1. The dress code for UPO special events (e.g. Holiday Social, All Staff Day, and Special Visitors) will be announced by Human Resources preceding the event. All staff will be expected to adhere to any changes in dress code as it relates to the UPO special event.

2. The dress for conferences, workshops and meetings outside of UPO shall be Professional Business Casual or attire appropriate for the occasion.

C. Enforcement and Discipline.

1. It will be the employee's supervisor's responsibility to determine whether or not clothing meets the standards established in this UPO Dress Code. If an employee comes to work inappropriately dressed, his or her supervisor will counsel the employee regarding proper attire and the employee will be asked not to wear the inappropriate item to work again. In addition, the supervisor may ask the employee to leave the work site to change clothing. The employee must use his or her annual leave, personal leave, or flexible leave or be on leave without pay for the amount of time he or she is away from their designated work site.
2. Progressive disciplinary action will be applied if dress code violations continue and may result in discipline, up to and including termination.



UNITED PLANNING ORGANIZATION INFORMATION TECHNOLOGY POLICY

A. Introduction

The purpose of this United Planning Organization (UPO) Information Technology Policy (ITP) is to ensure the proper use of the computer and telecommunication resources and systems by all Users, including employees, interns, volunteers, independent contractors, and all other resource and system Users. This policy applies to all UPO computer and telecommunication equipment, resources, and systems, including but not limited to host computers, file servers, application servers, mail servers, fax servers, communication servers, workstations, stand-alone computers, laptops, telephones, fax machines, software and hardware, internet, intranet (iNet), and internal or external computer and communications networks that are accessed directly or indirectly from UPO's computer facilities.

UPO encourages the use of the equipment, resources and systems to further UPO's mission and to make communication and information accessibility more efficient and effective. Users should remember that the equipment and systems are provided by UPO and are UPO's property. The equipment, resources and systems shall not be used for inappropriate or unlawful activities.

The term "User", as used in this policy, refers to UPO employees, interns, volunteers, independent contractors, and other persons or entities accessing or using UPO's computer and telecommunications resources and systems. All Users are expected to act in a responsible, ethical, and legal manner consistent with this IT Policy.

B. Office of Technology

The UPO Office of Technology (OT) is responsible for the creation and implementation of a robust, cost-effective and secured information infrastructure in which authorized Users can create and share intellectual and administrative information. The OT is the source for authentication and authorization of access to information related to the Information Technology (IT) systems. OT is also responsible for the development and implementation of information system security policies, controls, and procedures in order to protect UPO IT resources.

C. UPO Property

Users should remember that the IT and telecommunication equipment and systems are provided by UPO and is UPO's property. UPO property should be secured at all times. Users do not have the authority to dispose of the equipment without proper authorization.

D. Use

UPO is providing Users with the IT and telecommunication equipment and systems to facilitate and support UPO programs and business. Incidental and occasional personal use of this equipment, resources and systems is permitted during work hours, so long as such use does not interfere with the User's duties and responsibilities or interfere or conflict with UPO business, policies or procedures. In addition, employees may use the equipment, resources, and systems to communicate regarding UPO's wages, hours, and working conditions during non-working hours.

E. User ID/Passwords

Authorized Users are provided with a unique user account name (User ID) and initial password. Users are responsible for safeguarding their UPO accounts and passwords and should choose passwords carefully. User's passwords should not be printed or stored on-line. Users should not share their accounts and passwords with others nor utilize another User's accounts or passwords. Users are responsible for all transactions made using their passwords. Users should always lock their workstations when left unattended.

F. Monitoring

UPO has the right, but not the duty, to monitor any and all aspects of its IT systems and resources, including, but not limited to, monitoring sites visited by Users on the Internet, reviewing materials on the User's computer, reviewing materials downloaded or uploaded by Users, and reviewing e-mails sent and received by Users.

G. Privacy

Users have no right to privacy when using UPO's IT equipment and systems, including but not limited to accessing the Internet or Intranet or e-mail system. Users should not have an expectation of privacy in anything they create, store, send, or receive on UPO's computer or telecommunications systems. Any use of UPO IT resources is made with the understanding that such use is not secure, is not private or confidential, and is not anonymous.

H. E-Mail Use

E-mail services, like other means of communication, are to be used primarily to support UPO business. Incidental and occasional personal use is permitted during working hours, so long as such use does not interfere with the User's duties and responsibilities. Employees may use e-mail to communicate regarding UPO's wages, hours, and working conditions during non-working hours.

When using electronic mail:

- Users should always represent themselves as themselves and not someone else.
- Users should not share lists of UPO employees or clients.
- Users should not send or reply to chain letters of any kind.
- Users should not send e-mail so that it appears to come from someone else.
- Users should not send unsolicited advertising.
- Users should not reply to unsolicited non-business e-mail, i.e., spam or junk e-mail. Delete such e-mail without reading or responding.
- Users should not use e-mail for illegal, disruptive, unethical or unprofessional activities.
- Users should not engage in illegal activities, including but not limited to wagering or betting.
- Users should not use e-mail to engage in commercial activities for personal gain or profit.
- Users should not use e-mail for promotion of political or religious positions or activities.
- Users should not send e-mails that constitute intimidating, hostile or offensive materials on the basis of race, color, religion, sex, national origin, age, disability, veteran status, pregnancy, marital status, gender identity or expression, genetic information, sexual orientation or any other status protected by Federal, District law or regulation. UPO's policy against harassment and workplace violence applies fully to the use of e-mail, the Internet, and the Intranet.

If at any time a User receives an electronic communiqué that causes concern, places the User in peril, or leads the User to believe that a criminal act may be pending, the User should immediately report the matter to UPO

Office of Human Resources or the Office of General Counsel. Upon receipt, the complaint will be acknowledged and investigated in a timely manner.

I. Internet and Intranet Use

The Internet and Intranet are important resources for UPO and its Users. Effective use of the Internet and Intranet can provide important research and access to information. User access to and use of the Internet and Intranet is intended primarily for business-related purposes. Limited and reasonable use of the Internet and Intranet for occasional personal that does not interfere with the User's duties and responsibilities and is not illegal, unethical, or unprofessional is permitted.

Downloading information from the Internet should be done with great care. It is an extremely easy way to infect the computer system, and possibly the LAN, with viruses. Downloading executable files is prohibited by anyone other than OT personnel.

When accessing the Internet and Intranet from UPO equipment Users should:

- Adhere to the security and usage guidelines in this Policy;
- Always represent yourself as yourself;
- Not place any material on the Internet/Intranet that would be considered inappropriate, offensive, or threatening to others;
- Not access web sites that contain or distribute material that is objectionable in the workplace, including web sites that contain sexually explicit materials, advocate illegal activity, or advocate violence to others; and
- Not engage in prohibited activities set forth the E-mail Use section above.

J. Computer Software Usage

Installation of any software shall be done only by OT staff to ensure compatibility with hardware and other software. At least annually, an inventory of all software on each individual PC will be audited to ensure that no illegal or inappropriate software is installed on any equipment. OT will maintain records of software installed on a network and each machine to ensure that a license or other proof of ownership is on file. Users should not install personally owned software on UPO's equipment without first obtaining the written approval of his or her supervisor and then request OT to review the product for potential conflicts and to install the software.

K. Computer Viruses

Malicious computer code includes, but is not limited to, computer viruses, Trojans, worms, and hoaxes. Computer viruses present a threat to UPO's computing and networking environment. A virus infection may manifest itself in the loss of data, disruption of computer and server software applications, compromises to the security of the network and connected computers, disruption of network services, and loss of staff productivity.

Because UPO operates in a networked computing environment, all Users have the responsibility to take precautions to prevent the initial occurrence and subsequent spreading of computer viruses. To lessen the threat of computer viruses within the UPO environment all UPO owned computers are required to have the anti-virus software package installed and running and software virus definitions must be updated and kept current at all times. Users should immediately report any issues with malicious computer codes to OT.

L. Reporting Information Technology Security Incidents or Unusual Occurrences

Users should report any unusual IT incidents, problems, or concerns to OT. OT will be responsible for addressing the issue and will seek the assistance of the appropriate UPO personnel. Reports of system abuse

will be investigated promptly. All substantiated User violations will be referred to the appropriate authority (e.g., UPO Executive Office, Office of General Counsel, Office of Human Resources) for disciplinary action, up to an including termination.

In an emergency breach situation, the OT Director or his or her designee may direct that systems, through which intrusions are detected, be disconnected from all UPO IT resources in order to isolate the intrusion and protect other systems connected to the network until assurance can be made that the problem has been adequately resolved.

M. Loaned Computer Equipment or Other IT Equipment

UPO recognizes the value of allowing employees to borrow older computer equipment and other IT equipment, such as notebooks, iPads, hotspots, or projectors. This arrangement allows for the employee to benefit from learning the technology and software, and for UPO to benefit from increased productivity. Based on availability, Users may request to borrow computer equipment or other IT equipment. The request must be approved by the User's supervisor and Office or Division Director. The User must complete the appropriate OT form.

UPO reserves the right to request the return of this equipment at any time and for any reason. UPO retains all rights to the equipment and installed software. All UPO IT policies apply to the use of the loaned equipment. Users should take diligent care of the equipment and not to leave it unattended unless it is in a secured location. Users do not have the authority to dispose or to use the equipment for any unlawful purpose.

In case the equipment is stolen, the User is required to make a police report and provide the report to his or her supervisor and OT. If the User fails to report the theft to the police, the User will be responsible to pay UPO for the fair value of the equipment. If the employee does not pay the value of the equipment directly, UPO reserves the right to deduct the value of the equipment from the employee's paycheck, consistent with District law. For Users who are not UPO employees, UPO may seek damage in court.

At the time of separation with UPO, Users are responsible to return the equipment to OT. If the equipment is not return, UPO has the right to deduct the value of the equipment from the employee's paycheck, consistent with District law, and/or pursue damages in court.

N. Compliance with Applicable Copyright Laws and Licenses

Users must comply with all software licenses and copyrights, and with all District and federal laws governing intellectual property and on-line activities.

O. Communication of Trade Secrets, Proprietary Information and Confidential Material

Unless expressly authorized by a User's supervisor, sending, receiving or otherwise disseminating proprietary data, trade secrets, or other UPO confidential information is strictly prohibited. Unauthorized dissemination or use of this information may result in disciplinary action, up to an including termination, and may also result in civil or criminal liability.

P. All Users of UPO IT resources agree to the following:

1. No one shall knowingly or willingly interfere with the security mechanisms or integrity of UPO IT resources. Users shall not attempt to circumvent data protection procedures or exploit security loopholes.
2. No one shall knowingly create, install, execute, or distribute any malicious code (e.g., virus, Trojan Horse, worm) or another surreptitiously destructive program on any UPO IT resource.

3. No one shall modify or reconfigure the software, data, or hardware of any UPO IT resource (e.g., system/network administration, internal audit) without OT permission.
4. No one shall make nor attempt to make any unauthorized connection to the UPO network.
5. No one shall interfere with the intended use of UPO IT resources. All Users shall share computing resources (e.g., bandwidth) in an ethical and fair manner and not unduly interfere with use by other authorized Users.
6. No one shall use UPO IT resources to attempt unauthorized use, or interfere with the legitimate use by authorized Users, of other computers or networks elsewhere. Users are responsible for adhering to the policies and principles of other networks. UPO cannot and will not extend any protection to Users who violate external network policies. Abuse of networks or computers at other sites through the use of UPO IT resources will be treated as an abuse of UPO IT resource privileges.
7. No one shall use UPO IT resources for individual financial or commercial gain.
8. No one shall perform, participate in, encourage, or conceal any unauthorized use or attempts by others to engage in unauthorized use of UPO IT resources.
9. No one shall use UPO IT resources to transmit abusive, threatening, intimidating, violent, or harassing material, chain letters, spam, or communications prohibited by state or federal laws or in violation of this Policy.
10. No one shall connect any computer or network system to any of UPO's networks without employing reasonable technical and security standards - which, at a minimum, requires user identification and authentication.
11. No one shall misrepresent his or her identity or relationship to UPO for the purpose of accessing or attempting unauthorized access to UPO IT resources nor misrepresent his or her identity to other networks from UPO IT resources.
12. No User shall access (e.g., read, write, modify, delete, copy, move) another User's files or electronic mail without the owner's permission.
13. No one shall use UPO IT resources in violation of applicable patent protection and authorizations, copyrights, license agreements, other contracts, state or federal laws, or by UPO rules.
14. No one shall breach the confidentiality of information contained on UPO IT resources.

Q. Violations

Violations of the UPO Information Technology Policy may result in termination of access, disciplinary action up to and including termination, and/or legal action.

UPO COMPREHENSIVE ALCOHOL AND DRUG POLICY

UPO Employee Personnel Policy Manual – Appendix 10.3 CWA/UPO General Agreement Article 24

I. PURPOSE

The United Planning Organization (UPO) has a vital interest in providing a safe and healthy environment for its employees, volunteers, customers, and public. Drug and alcohol abuse is a serious health problem, which can endanger UPO operations and the safety of those who work and volunteer with the organization or seek its services. UPO must comply with the Drug-free Workplace Act of 1988, which stipulates that the organization agrees to undertake certain steps designed to provide a drug-free workplace as a condition of receiving contracts/grants from the Federal government. The UPO Comprehensive Alcohol and Drug Policy is subject to revision as needed and required by Federal and/or District of Columbia laws and regulations, and/or UPO funding sources. All employees shall be notified of such revisions, which will be binding upon passage by the Federal or District governments or the UPO Board of Directors.

The purpose of this policy is to provide specific guidelines for UPO employees regarding: (1) deterrence; (2) detection; (3) rehabilitation; and (4) policy enforcement.

II. POLICY

It is the policy of UPO that it maintains an alcohol and illegal drug-free environment in order to protect the health and safety of its employees, volunteers, customers, and the general public. It is UPO's policy that the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance or alcohol is prohibited in the UPO workplace. An employee shall not report to work, be subject to duty, or remain on duty while his/her ability to perform his/her duties and responsibilities is impaired due to the use of alcohol and/or controlled substances.

The Comprehensive Alcohol and Drug Policy and the procedures and standards contained herein apply to all UPO employees. UPO is responsible for communicating the policy and guidelines to all of its employees. As a condition of employment, everyone is responsible for strict adherence to the policy, procedures, and standards.

III. DEFINITIONS

For the purposes of the Comprehensive Alcohol and Drug Policy, the following definitions and terms apply.

1. Alcohol – The intoxicating agent found in beverage alcohol or other low molecular weight alcohols, no matter how the alcohol is packaged or in what form the alcohol is stored, utilized or found.

2. Alcohol Abuse - The use of alcohol by an employee in such a way that his/her life is negatively affected. Alcohol abuse may be revealed by an employee at work. For example, an employee may arrive to work with odor of alcohol on his/her breath, or consume a beverage containing alcohol while subject to duty during a coffee and/or lunch break, or be late to work or absent from work due to the consumption of alcohol and its effects.
3. Alcohol Dependence – Alcohol dependence, also called “alcoholism” is a disease or condition characterized by impaired control over drinking, preoccupation with alcohol, use of alcohol despite negative consequences, and distortions in thinking.
4. Alcohol and/or Drug Positive Test - Urine, blood, and/or breath specimens of an individual that are chemically tested (screened), and then is found the presence of alcohol and/or a controlled substance in accordance with the standards for intoxication.
5. Applicant – An individual who had filed a written application for employment with UPO or has been tentatively selected for employment.
6. Breathalyzer/Evidential Breath Testing Device (EBT) – The method for measuring the level of alcohol present in an individual.
7. Children – Individuals who are twelve (12) years of age and under.
8. Controlled Substance - Any drugs that are classified by the United States Drug Enforcement Administration of the Department of Justice (“DEA”) into the five (5) schedules or classes on the basis of their potential for abuse, accepted use and accepted safety under medical supervision. For example, controlled substances include, Phencyclidine (PCP), marijuana, cocaine, amphetamines, and morphine.
9. Conviction - A finding of guilt (including a plea of "nolo contendere") or the imposition of sentencing, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes.
10. Drug-Free Awareness Program - A UPO program for the education of employees regarding the physical and psychological health dangers of abusing alcohol and/or controlled substances.
11. Drug-Free Workplace – As defined in the Drug-Free Workplace Act of 1988, a drug-free workplace is a site for the performance of work done in connection with a specific Federal grant and/or contract given to UPO at which employees of UPO are prohibited from engaging in the unlawful manufacture, distribution, dispensation, possession or use of a controlled substance in accordance with the requirements of the Act.
12. Employee - An individual who works for UPO on a full-time, part-time, or temporary basis earning a wage or salary.

13. Illegal Drug Use - The unlawful use of a controlled substance.
14. Off Duty - The status of time when an individual is not required to report to work. This does not include breaks and meal periods during an employee's tour of duty or workday.
15. On Duty – The status of time when an individual is serving in his/her tour of duty or workday, including meal periods, breaks, on-call, or any time that an individual is acting in an official UPO capacity, or conducting business for the organization, whether on or off UPO property.
16. Pattern – An individual's standard, consistent, or usual way of behaving. Any behavior that is so routine as to become generally expected - for example - a customary arrival time; absenteeism, such as being absent the Monday following a pay day; or avoiding certain kinds of tasks following lunch break.
17. Random alcohol/drug testing – Alcohol and/or drug testing conducted on UPO employees in Safety Sensitive or Special Trust positions at an unspecified time for purposes of determining whether the employee has used drugs or alcohol and, as a result, is unable to satisfactorily perform his/her employment duties.
18. Reasonable Accommodation – Workplace modifications or adjustments which enable a qualified individual with a disability to perform the essential functions of the job. What is considered a reasonable accommodation in a particular situation depends on the circumstances.
19. Reasonable Suspicion or Probable Cause – A reasonable belief by a supervisor, manager or others that an individual is under the influence of a controlled substance or alcohol to the extent that the individual's ability to perform his/her job is impaired. For example, may include, but not limited to the following: odor of alcohol, slurred speech, obvious lethargy, changes in attendance, changes in work performance level, inattention to dress and personal hygiene, unusual need for money, unexplained possession of syringes or pills and/or capsules, scars on hands or arms, or impaired motor problems such as an inability to walk in a straight line.
20. Return to Work - The status of an employee after an absence from work when he/she is released from medical care by his/her treating physician. This may occur following a period of rehabilitation for substance abuse.
21. Safety Sensitive Position – A position at UPO that requires an employee, in the normal course of his/her employment, to drive a motor vehicle for UPO, or requires an employee to have a Commercial Driver's License ("CDL"), or requires an employee to operate hazardous equipment (i.e. ladders, power tools, and mowers) or handle chemicals.

22. Special Trust Position – A position at UPO, as determined by the Office of Human Resources, which requires an employee, in the normal course of their employment, to perform any of the following functions, roles, duties or responsibilities:
- a. security;
 - b. unrestricted access to UPO master key(s);
 - c. direct contact with children or youth, is entrusted with the direct care and custody of children or youth, and the individual's performance of his or her duties in the normal course of employment may affect the health, welfare, or safety of children or youth (including, but not limited to, all employees in the Office of Early Learning and Youth Services);
 - d. direct contact with senior citizens, is entrusted with the direct care and custody of senior citizens, and the individual's performance of his or her duties in the normal course of employment may affect the health, welfare, or safety of senior citizens;
 - e. works in a UPO substance abuse program;
 - f. prepares or has access to prepare a client's electronic benefit transfer (EBT) card;
 - g. access to a client's/customer's residence and/or meets with clients/customers in their residence; or
 - h. other responsibilities as may be added by UPO based on the development of a new program, the creation of a new position, the receipt of a new grant/contract, or a new requirement from a funding source, law or regulation.
23. Subject to Duty - The status of an employee who is scheduled to report for work at an assigned time and who has not been finally and completely released from the responsibility of performing further work that day is "subject to duty". Subject to duty also means any employee who is responsible for being available to perform work on an emergency basis when called to do so, (i.e., in an "on-call" status) if said employee receives compensation because of his/her status as being "on call". An employee who is simply responsible for responding to a call, if available, is not considered to be "subject to duty" for the purposes of this Policy.
24. Workday - The time a person is assigned to work at UPO, or time an employee is scheduled to report to work/service. For purposes of this policy, workday includes the time for breaks and meal periods during the individual's tour of duty.
25. Youth – Individuals between thirteen (13) and seventeen (17) years of age, inclusive.

IV. ELEMENTS OF UPO'S ALCOHOL AND DRUG PROGRAM

The UPO Comprehensive Alcohol and Drug Program is made up of four elements -- deterrence, detection, rehabilitation, and enforcement.

- A. **DETERRENCE**. The first element of the policy is deterrence. This means that all UPO employees and volunteers shall do everything within their power to discourage the use of illegal drugs and the abuse of alcohol. Deterrence means educating and informing all employees and volunteers that it is not in their best interest--in fact is adverse to their future--to use illegal drugs and/or an abuse alcohol. UPO, through its Drug-Free Awareness Program (DFAP) and Employee Assistance Program (EAP), shall help educate its employees regarding the dangers of alcohol and drugs. All employees shall receive a copy of the UPO Comprehensive Alcohol and Drug Policy.

- B. **DETECTION**. The second element of the policy is detection. This means that UPO, through all its employees, shall do everything appropriate to identify and detect individuals who use illegal drugs and/or abuse alcohol. There are a number of ways to detect the abuse of alcohol and drugs. The most beneficial way to detect the abuse of alcohol and drugs is through self-identification, which may lead to rehabilitation. In addition, UPO may employ other means of detection including alcohol and/or drug testing following accidents, injuries, and incidents, as set forth in Section VII of this Policy. UPO shall also conduct random alcohol and/or drug testing on employees in Safety Sensitive Positions and specific categories of employees in Special Trust Positions, as set forth in Section VII of this Policy. In accordance with applicable federal, state, and district laws, UPO also reserves the right to search all UPO owned, leased, and/or operated property.

- C. **REHABILITATION**. The third element of the policy is rehabilitation. UPO shall encourage individuals who use illegal drugs and/or abuse alcohol to seek appropriate treatment. UPO has established a Drug-Free Awareness Program (DFAP) to assist those employees who wish to seek help for alcohol and drug problems. An employee may also seek assistance through the Employee Assistance Program (EAP). There are two ways to begin rehabilitation. The first is for the employee to voluntarily seek help. The second is when UPO detects alcohol and/or illegal drug use and refers the employee to rehabilitation, as set forth in Section VIII of this Policy.

- D. **ENFORCEMENT**. The final element of the policy is enforcement. It is the responsibility of all employees to follow the policy. However, UPO management will enforce the policy through disciplinary actions when an employee violates the policy, procedures and standards as set forth in Section VIII of this Policy. Disciplinary action may include rehabilitation, suspension, probation, and termination.

V. RESPONSIBILITIES

A. Prohibited Conduct

1. An employee shall not unlawfully manufacture, distribute, dispense, possess or use alcohol and/or controlled substances in the workplace, while on duty, or subject to duty, including during breaks and meal periods.
2. An employee must not report to work, be subject to duty, or remain on duty while his/her ability to perform his/her duties and responsibilities is impaired due to the use of alcohol and/or controlled substances.
3. An employee shall not get a positive alcohol/drug test while on duty.
4. An employee shall not have their ability to work impaired as a result of either the on duty or off duty use of alcohol and/or controlled substances.
5. An employee must not report for duty or remain on duty when using any controlled substance unless used pursuant to the instructions of an authorized medical practitioner and the medical practitioner has advised the employee that the substance will not impair his/her ability to safely perform his/her duties and responsibilities.
6. An employee serving in a driver position shall not consume any alcohol within four hours prior to reporting for duty.
7. An employee serving in a driver position shall not consume any unauthorized controlled substance.
8. An employee may not bring or store any open container of alcoholic beverage on any UPO property or worksite.
9. An employee must not refuse to submit to an alcohol and/or drug test as requested under this Policy.
10. An employee must not alter or adulterate his/her specimen during the testing process. Such actions are deemed equivalent to refusing to submit to the testing and will result in termination of employment with UPO.
11. An employee shall not use alcohol or illegal drugs for eight hours following an accident or incident, or until he/she undergoes a post-accident or post-incident alcohol/drug test.

B. Management Responsibilities

1. UPO shall provide employees with educational information regarding the use and abuse of alcohol and controlled substances through the Drug-Free Awareness

Program and the Employee Assistance Program (EAP).

2. Vacancy announcements shall include a statement informing applicants that UPO maintains an alcohol and drug testing program and if that position is subject to pre-employment and/or random alcohol and/or drug testing.
3. The position descriptions for each position designated as a Safety Sensitive or Special Trust Position shall include a statement of such designation and a statement indicating if that position is subject to random alcohol and/or drug testing.
4. UPO shall notify the appropriate funding source(s) within ten (10) days after receiving notice of a criminal drug statute workplace conviction from an employee or otherwise receiving actual notice of such conviction.

C. Employee Responsibilities

1. An employee must sign an acknowledgement that he/she received a copy of the UPO Comprehensive Alcohol and Drug Policy. An employee is required to read, understand, and comply with the Policy.
2. An employee is encouraged to voluntarily seek help if he/he has a substance abuse problem.
3. An employee/applicant must submit to an alcohol and/or drug test when requested by a UPO supervisor, manager, or law enforcement personnel pursuant to this Policy and, as applicable, must sign a consent form giving consent to be tested and giving the testing vendor permission to provide UPO with the test results.
4. An employee must notify his/her supervisor when taking any medications which may interfere with the safe and effective performance of duties or operation of UPO equipment. An employee is responsible for consulting with his/her physician to determine if the employee can safely perform his/her duties while taking the prescribed medication(s). If the use of a medication could compromise the safety of the employee, fellow employees, customers, or the public, it is the employee's responsibility to use the appropriate personnel procedures (e.g. call in sick, use leave, notify supervisor) to avoid unsafe workplace practices or activities.
5. Within forty-eight (48) hours of a request by UPO, an employee must provide a current valid prescription for any controlled substances identified when a drug test is positive. The prescription must be in the employee's name.
6. Any current employee must notify UPO of any criminal drug statute conviction, which occurs while the individual is employed by UPO, including a plea of no contest, no later than five (5) days after such conviction.

VI. AMERICANS WITH DISABILITIES ACT (“ADA”)

- A. The Americans with Disabilities Act (“ADA”) prohibits employers from discriminating against an employee on the basis of the employee’s disability if the employee is a qualified individual with a disability. The term “qualified individual with a disability” means an individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the job. An individual has a disability if he/she has a physical or mental impairment that substantially limits one or more major life activities; a record of such an impairment; or is regarded as having such an impairment.
- B. According to the Equal Opportunity Commission (EEOC) alcoholism is generally considered an impairment under the ADA. The ADA provides an individual with alcoholism limited protection if the alcoholism substantially limits a major life activity and if the individual can perform the essential functions of the job with or without a reasonable accommodation.
- C. An employee who is currently engaging in the illegal use of drugs does not qualify for protection under the ADA. However, UPO may not discriminate against an employee who is addicted to drugs if he/she has been successfully rehabilitated and no longer uses illegal drugs; if the employee is currently participating in a rehabilitation program and is no longer using illegal drugs; or if the employee is regarded, erroneously, as using drugs illegally. An employee who casually used drugs in the past is not an individual with a disability and he/she is not protected under the ADA. UPO may discharge or deny employment to current illegal users of drugs, on the basis of such drug use, without fear of being held liable for disability discrimination.
- D. The ADA provides that an employer may prohibit the use of alcohol and the illegal use of drugs in the workplace; require that an employee not be under the influence of alcohol or illegal drugs in the workplace; and hold an employee with alcoholism or a drug addiction to the same qualification standards for employment or job performance and behavior as other employees. UPO may discipline, terminate or deny employment to an individual with alcoholism or a drug addiction if the use of alcohol/illegal drugs adversely affects the employee’s job performance or conduct.
- E. UPO may be required to make reasonable accommodations for an employee with alcoholism and/or drug addiction (but not currently using) if he/she can perform the essential functions of the job. For example, an employee’s work schedule may be adjusted so the employee can attend alcohol rehabilitation counseling sessions. UPO is not required to provide an accommodation that causes an “undue hardship” on the organization.

VII. ALCOHOL AND DRUG TESTING

- A. UPO will utilize services of an outside vendor (s) to administer the alcohol and drug testing and to manage the random selection process. The vendor(s) shall be certified to perform such services.

- B. Consent. All employees must complete a consent form immediately upon implementation of this Policy or upon being hired. When a specific testing situation arises, the employee will be required to complete another consent form authorizing the collection of a specimen and/or breath test and authorizing the vendor to release the test results to UPO. In the event that an employee fails to sign a consent form, the employee shall be terminated. UPO is not required to obtain a signed consent to test from an employee in a position that requires a CDL; such drivers provide consent by maintaining his/her CDL. Holders of a CDL must consent to testing and no written consent is necessary.
- C. Confidentiality. The results of any urine, blood, and other tests will be treated as confidential and only disclosed within UPO to appropriate personnel. Except as required by statute, regulation, court, or administrative body, UPO shall not disclose an employee's individual test results or medical information to a third party without obtaining the employee's specific written consent. Any employee violating UPO's confidentiality policy shall be subject to disciplinary action, including termination.
- D. Testing for controlled substances shall generally be conducted by collecting a urine sample from the individual being tested.
- E. Testing for alcohol shall generally be conducted by utilizing an evidentiary breath-testing device or EBT, commonly referred to as a "breathalyzer." A blood test may be used if the individual being tested is unable to produce sufficient breath to complete the breathalyzer.
- F. Testing Standards.
1. Alcohol
 - a. If the result of an alcohol test is under .02 it is considered a negative test.
 - b. If the result of an alcohol test is between 0.02 and 0.039, the employee shall be removed from his/her duties for twenty-four (24) hours. The employee must have a negative test (below 0.02) before returning to work and the employee will be responsible for paying the cost of the second test. If the second test is not below .02 (negative test), the employee shall be removed from his/her duties and actions shall be taken consistent with Section VIII below for a positive test.
 - c. If the result of an alcohol test is 0.04 or greater the test shall be deemed positive, the employee shall be removed from his/her duties, and actions shall be taken consistent with Section VIII below.

2. Controlled substances

- a. When a test for controlled substances results in a reading at or above the levels set forth below, the results shall be deemed positive.
- b. Generally, if the levels are below the levels set forth below, the test results will be negative. However, there are numerous results other than positive or negative that laboratories may issue and all such listing are not included here. The levels are measured by monograms per milliliter (ng/mL).

	Initial Test Level ng/mL	Confirmation Test ng/mL
Marijuana metabolites	50	15
Cocaine metabolites	150	100
Opiate		
Morphine	2000	2000
Codeine	2000	2000
Phencyclidine (PCP)	25	25
Amphetamines		
Amphetamine	500	250
Methamphetamine	500	250

G. Mandatory Testing. UPO employees and prospective employees are required to submit to alcohol/drug testing in the following situations:

1. Pre-Employment Testing (All Employees).

- a. An applicant tentatively selected for a position is required to submit to alcohol/drug testing as a condition of employment.
- b. An applicant may be offered employment contingent on receipt of a satisfactory test result, and may, at the discretion of management, begin working in a position that is not a Safety Sensitive or Special Trust Position prior to receiving the results.
- c. Pre-employment testing also applies when a current employee transfers from a non-Safety Sensitive Position or a Special Trust Position to a Safety Sensitive Position or a Special Trust Position.

2. Post-Accident or Post-Incident Testing (All Employees).

- a. An employee involved in any of the following situation(s) shall undergo alcohol/drug testing as soon as practicable:
 - i. a vehicular accident or other type of accident or incident that results in a fatality;

- ii. a vehicular accident where an employee is given a citation for a moving traffic violation;
 - iii. a vehicular accident where a vehicle is towed from the scene of the accident;
 - iv. an accident or incident where substantial damage (over \$1,000.00 in damage) to property occurs; or
 - v. an accident or incident involving physical injury resulting in the need for medical attention.
 - b. At no time will an employee be permitted to work for more than one (1) hour following such an accident or incident without taking an alcohol/drug test, even if this results in disruption of service.
 - c. An employee involved in such an accident or incident under this section shall not use alcohol for eight hours following the accident/incident, or until he/she undergoes an alcohol/drug test, whichever occurs first.
 - d. Following an alcohol/drug test in such situations, an employee shall be removed from service and placed on administrative leave until the results of the test are known to UPO and the employee.
3. Random Testing (Safety Sensitive Positions and Special Trust Positions).
- a. UPO will utilize services of an outside vendor (s) to administer and manage the random selection process.
 - b. The date of the testing will not be announced in advanced.
 - c. Random alcohol/drug testing may be administered at any time the employee is on duty.
4. Reasonable Suspicion Testing (All Employees).
- a. An employee is required to submit to an alcohol and/or drug test when a supervisor or manager requests such a test based on reasonable suspicion or probable cause.
 - b. Reasonable suspicion or probable cause means that one or more supervisors or managers reasonably believe or suspect that the employee is under the influence of alcohol and/or drugs. They cannot require testing based on a hunch or guess alone; their suspicion must be based on observations concerning the employee's appearance, behavior, patterns, speech, or smell that are usually associated with alcohol and/or drug use. The reasonable suspicion may be based on direct observation of alcohol and/or drug use or possession, physical symptoms of being under the influence of alcohol and/or drugs, a pattern of erratic behavior, work performance indicators of drug or alcohol abuse, as well as other reliable indicators.

- c. Following an alcohol/drug test in such situations, an employee shall be removed from service and placed on administrative leave until the results of the test are known to UPO and the employee.
5. Return-To-Duty Testing (All Employees).
 - a. If an employee has violated the prohibited alcohol and/or drug rules, the employee shall be required to take an alcohol/drug test before returning to work.
 - b. The results of the test must be negative in order for the employee to return to work.
6. Follow-Up Testing (All Employees).
 - a. Following an employee's return-to-duty, the employee will be subject to follow-up mandatory, random alcohol/drug tests for a period of at least six (6) months thereafter.
 - b. For employees referred to a Substance Abuse Professional (SAP), the SAP will determine how many times the employee will be tested, for how long, and for what substances.
- H. Discretionary Testing (All Employees). Supervisors and/or managers may direct that an employee submit to an alcohol/drug test after an employee is involved in any of the following situations:
 1. A physical altercation between employees or an employee and a customer/member of the public, where no medical attention is necessary.
 2. A disruptive verbal altercation between employees or an employee and a customer/member of the public.
 3. When an employee's behavior is so out of control or his/her behavior is so unusual that it warrants summoning a supervisor, manager, or police.
 4. Any accident or incident involving damages less than \$1,000.00 (See Section VII.G.2.a.iv. Post-Accident or Post-Incident Testing).
 5. When an employee's absences from work occur in a pattern such as the day after payday, or the day before or after his/her regular days off.
 6. Following an alcohol/drug test in such situations, an employee shall be removed from service and placed on administrative leave until the results of the test are known to UPO and the employee.

VIII. POST TESTING AND/OR POST VIOLATION ACTIONS

A. Applicants.

1. UPO shall not hire an applicant that refuses to take the required alcohol/drug test, in any way alters or adulterates or attempts to alter or adulterate his/her test, refuses to cooperate with any part of the testing process, or fails to produce an adequate amount of breath or urine in order to conduct the test and does not have a legitimate physiological or psychological reason.
2. UPO shall not hire an applicant that has a confirmed positive alcohol/drug test.
3. An applicant that refuses to take the required alcohol/drug test or has a positive alcohol/drug test shall not apply for a position with UPO for a period of one (1) year from the date of his/her refusal or the date of the positive alcohol/drug test.

B. Any current employee who has been convicted of any criminal drug statute while employed by UPO shall be terminated from employment/service.

C. Safety Sensitive and Special Trust Positions.

1. Following an alcohol/drug test in Post-Accident or Post-Incident Testing, Reasonable Suspicion Testing, or Discretionary Testing, an employee shall be removed from service and placed on administrative leave until the results of the test are known to UPO and the employee.
2. An employee in a Safety Sensitive Position or a Special Trust Position who refuses to sign a consent to test form, as applicable, refuses to take any requested test under this Policy, alters or adulterates (or attempts to alter or adulterate) his/her specimen, refuses to cooperate with any part of the testing process, or fails to produce an adequate amount of breath or urine in order to conduct the test and does not have a legitimate physiological or psychological reason shall be terminated from employment with UPO.
3. Negative Test. No disciplinary action or remedial action will be taken under this Policy when an alcohol/drug test is negative. However, UPO may take disciplinary action separate and apart from the negative alcohol/drug test based on the circumstances.
4. Positive Test. A scheduled, random, or requested test which results in a positive test for alcohol (including a second alcohol test not under .02 as set forth in Section VII. F. 1. b) and/or a controlled substance, which the individual does not possess a valid prescription, will result in termination of the employee in a Safety Sensitive Position or a Special Trust Position.

5. For all other violations where alcohol/drug testing was not required or necessary, disciplinary actions may be taken against the employee, up to and including termination.

D. All Other Employees.

1. Following an alcohol/drug test in Post-Accident or Post-Incident Testing, Reasonable Suspicion Testing, or Discretionary Testing, an employee shall be removed from service and placed on administrative leave until the results of the test are known to UPO and the employee.
2. An employee who refuses to sign a consent to test form, to take any requested test under this Policy, refuses to cooperate with any part of the testing process, fails to produce an adequate amount of breath or urine in order to conduct the test and does not have a legitimate physiological or psychological reason, or alters or adulterates (or attempts to alter or adulterate) his/her specimen shall be terminated from employment with UPO.
3. Negative Test. No disciplinary action or remedial action will be taken under this Policy when an alcohol/drug test is negative. However, UPO may take disciplinary action separate and apart from the negative alcohol/drug test based on the circumstances.
4. Positive Test. A positive test for alcohol (including a second alcohol test not under .02 as set forth in Section VII. F. 1. b) and/or a controlled substance, which the individual does not possess a valid prescription, will result in termination in the following situations:
 - a. Any accident or incident resulting in a fatality or significant physical injury;
 - b. Any accident, incident or physical altercation resulting in the need for medical attention;
 - c. Other grave and serious consequences (e.g. theft of money or property from UPO or customers); or
 - d. Prior positive alcohol/drug test.
5. In all other instances when the alcohol/drug test results are positive, an employee will be permitted to utilize the DFAP on a mandatory referral basis, if the employee agrees to each of the following conditions:
 - a. Satisfactory completion of an approved alcohol and/or other drug program.
 - b. The employee will remain on sick leave until released to return to work by the approved alcohol and/or other drug program. In the event the employee does not

have sick leave and/or annual leave the employee shall be placed on leave without pay.

- c. The employee must produce a negative alcohol/drug test in order to return to duty.
- d. The employee will be subject to mandatory, random alcohol and/or drug testing after return to duty for a period of six (6) months.
- e. The employee will be terminated following any subsequent, positive test for alcohol and/or other drugs.
- f. Failure of an employee to satisfactorily complete these conditions shall result in termination.



Appendix 12

your
employee
assistance
program

A confidential consultation,
counseling and referral program for
employees and their family members.



6225 Smith Avenue
Suite 203
Baltimore, MD 21209
800.327.2251 ph
410.889.7397 fx
www.bhsonline.com

CONFIDENTIAL

BHS adheres to federal and state privacy laws and holds client information in the strictest of confidence. Information about a client's problem cannot be released without the written permission of that individual.

PROGRAM COST

The EAP is a free benefit provided and paid for by your employer. All program services are therefore provided at no cost to the employee or family member.

ONLINE ACCESS

Information about your company's program as well as a wealth of health and wellness literature is available at www.bhsonline.com. Contact BHS for login information.

An EAP, or Employee Assistance Program, provides short-term counseling, resources and problem-solving techniques to help with work-life balance, wellness, work-related and personal concerns of any kind. Services are free, confidential and available to employees and their family members.

confidential assistance for problems of any kind

CONTACT US

24 hours-a-day

7 days-a-week

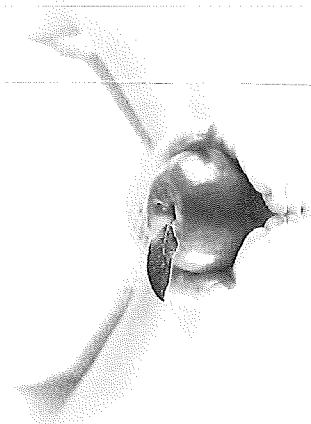
800.327.2251

ACCESS SERVICES

After calling BHS, you will be immediately connected to a Care Coordinator - a Master's level counselor. The Care Coordinator will assess the problem, assist with any emergencies and connect you to the appropriate resources. The Care Coordinator then becomes your personal point of contact and will keep in touch to ensure you are satisfied with all services provided.

PROBLEMS ADDRESSED

Work-Life Balance
Health/Wellness
Stress Management
Family Problems
Child Care/Elder Care
Substance Abuse
Marital/Relational
Legal/Financial Concerns
Grief/Loss
Work-Related Issues
Communication
And More...



NO PROBLEM IS TOO BIG OR SMALL FOR BHS. HOW CAN WE HELP YOU?
Contacting BHS is as simple as picking up the phone. Call 1.800.327.2251

UPO Employee Education and Professional Development Policy

I. Policy

- A. UPO shall offer tuition reimbursement, to the extent that funds are available to regular full-time employees who wish to pursue an undergraduate education and or professional development opportunities in areas related to their current positions or that will prepare them for more advanced positions within UPO.
- B. In order to receive tuition reimbursement/assistance, employees must be enrolled in an accredited college, university, trade, or technical school; and provide documentation of submission of a FAFSA (Free Application for Federal Student Aid) or other supplemental funding with related results.

II. Tuition Assistance Eligibility

- A. All regular full-time employees who have been employed continuously for one year or more; and who have an average or above performance evaluation for the current year are eligible to apply.
- B. Approved Programs/Courses
 - 1. UPO will only reimburse for an accredited undergraduate, trade or technical school.
 - 2. UPO will reimburse the tuition cost for no more than two (2) classes per semester/quarter/trimester or whichever is applicable.
 - 3. All programs/courses of study must be related to the employee's current position; or business related providing the employee attain skills for career mobility or advanced positions within UPO.
 - 4. Programs of study/course approval will be made in conjunction with employee's supervisor with final approval from the Office of Human Resources.
- C. Reimbursement/Assistance
 - 1. Funds for tuition assistance must be budgeted for and will be the responsibility of the Division/Office in which the employee works. Tuition assistance will be reimbursed to eligible employees to the extent that budgeted

funds are available within his/her Office and or Division. **Reimbursement/assistance is provided for the cost of tuition only**; no other costs are reimbursable, including costs for registration, books, lab fees, parking, or other incidental expenses.

2. The maximum reimbursement will be \$5,250.00 per calendar year for eligible employees.
3. Upon completion of the course(s), employees must submit to the Office of Human Resources an official legible transcript indicating the applicant's name, semester/quarter/trimester, course name(s), and satisfactory completion of the course(s). Satisfactory completion is grade "C" or higher, or its equivalent where grades are given, or a "passing" grade in a pass/fail course when pass/fail is the only grade option available for the course.
4. Employees are required to submit all grades upon completion of each course to the Office of Human Resources within 30 days of the close of the applicable semester/quarter/trimester.
5. Employees who fail to complete the course(s) with a satisfactory grade, or who withdraws from a course(s) will be required to repay UPO for the tuition assistance provided for that course(s). Similarly, if the course is cancelled, the employee is required to immediately notify the Office of Human Resources and repay the tuition to UPO.
6. If the employee receives an incomplete in a course, the employee will have until the end of the following semester/quarter/trimester in which to complete the work and have the incomplete removed. Failure to complete the work will prohibit the employee from participating in the tuition reimbursement plan and the employee is required to repay the tuition to UPO.
7. There will be a one year employment obligation assigned per each semester/quarter/trimester completed during the post semester/quarter/trimester obligation period. If the employee voluntarily terminates employment prior to the completion of any one year post semester/quarter/trimester obligation period, then the employee will be required to repay UPO the full amount of tuition reimbursement owed for the applicable semesters(s)/quarter(s)/ trimester(s).
8. If Head Start funds are used, there will be a three year employment obligation with UPO for each Head Start/Early Head Start teacher to teach or work in the

UPO Head Start program after receiving the degree or the teacher must repay the total or a prorated amount of financial assistance received based on the length of service completed after receiving the degree.

9. If an employee is involuntarily terminated by UPO, the employee will not be required to repay the tuition to UPO.

D. Application Procedure

1. Employees shall complete and submit a Request for Tuition Assistance/Reimbursement Application Form ("Form") to the Office of Human Resources. The Form shall be available on the UPO shared drive and or in the Office of Human Resources. See attached "UPO Tuition Assistance/Reimbursement Application Form".
2. The Form must be approved and signed through the employee's management chain (Supervisor, Division Director, Office Director) prior to submission to the Office of Human Resources. A copy of the registration receipt or official school documentation reflecting the per credit hour cost of tuition must be attached to the Form.
3. The application shall be reviewed and final approval shall be made by the Office of Human Resources.
4. All applications must be made and approved at least one (1) month prior to course enrollment in conjunction with this program.
5. At the discretion and approval of the Division or Office Director, an employee may rearrange his/her daily work schedule to attend class if he/she works a total of 7-1/2 hours a day, and his/her new work schedule arrangement does not affect the program efficiency of the Division or Office involved. The rearranged work schedule must be either at the beginning or end of the work day and should not exceed two (2) hours.

III. Professional Development

UPO recognizes that professional development contributes to personal job satisfaction, workplace productivity, reward and recognition. Professional development encompasses work related workshops, seminars, training programs and professional certifications. Employee participation in workshops, seminars and various training programs will be at

the discretion of and approved by the employee's supervisor and Division/Office Director.

Employee participation in professional certifications will be dictated by the requirements of the position and approved by the employee's Division/Office Director. Professional certifications recognize employees as a professional group and reflect a commitment to demonstrating high professional standards, building professional capabilities, continuous quality in work practices and optimizing career opportunities.

A. Workshops and Seminars

1. Funds for work related workshops, seminars and various other trainings will be the responsibility of the Division/Office in which the employee works. Employees are encouraged to attend work related workshops, seminars and various other trainings to the extent that funding is available.
2. Requests to attend work related workshops, seminars and various other trainings must be approved by the employee's supervisor. Once approved, the responsibility of the Division/Office will be to use the Office of Finance invoice procedures for payment.
3. No employee payment or repayment obligation is required for attending approved work related workshops, seminars and various other trainings.
4. An employee's time away from his/her normal work site to attend a work related workshop, seminar or training will be considered a regular work day and time.

B. Professional Certifications

1. In instances where professional certification is required by UPO, the associated costs will be paid by UPO.
2. Funds for professional certifications must be budgeted for and will be the responsibility of the Division/Office in which the employee works. UPO will advance the cost of the class(s) and subsequent exam(s) for continuing education credits needed to keep certification current.

3. At the discretion and approval of the Division or Office Director, an employee may rearrange his/her daily work schedule to attend class if he/she works a total of 7-1/2 hours a day, and his/her new work schedule arrangement does not affect the program efficiency of the Division or Office involved. The rearranged work schedule must be either at the beginning or end of the work day and should not exceed two (2) hours.

**United Planning Organization
Whistleblower Policy
(Approved 03/18/2010)**

General

The United Planning Organization (UPO) Conflict of Interest and Related Party Policies and Accounting and Financial Policies require directors, officers, employees, volunteers and agents to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of UPO must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the UPO Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters, fraud, waste and or abuse, corruption, unethical or illegal conduct, or dishonesty by employees, directors, officers, volunteers and agents of UPO, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints, received by UPO regarding accounting, internal controls, or auditing matters or fraud, waste and or abuse, corruption, unethical or illegal conduct, or dishonesty.
- The protection of directors, officers, employees, volunteers, and agents reporting concerns from retaliatory actions.

Reporting Responsibility

Each director, officer, employee, volunteer and agent of UPO has an obligation to comply with and to report (a) questionable or improper accounting or auditing matters, (b) violations or suspected violations of the UPO Conflict of Interest and Related Party Policies and UPO Accounting and Financial Policies Business Conduct (hereinafter collectively referred to as the Codes) (c) gross mismanagement of UPO grants or contracts relating to funds received (d) gross waste of funds (e) a substantial and specific danger to public health and safety related to the implementation or use of funds (f) an abuse of authority related to the implementation or use of funds (g) or a violation of law, rule, or regulation related to a UPO grant or contracts awarded or issued relating to funds (hereinafter collectively referred to as Concerns) in accordance with this Whistleblower Policy.

Authority of Audit Committee

All reported Concerns will be forwarded to the Chair of the Audit Committee in accordance with the procedures set forth herein. The Vice President of Legal Affairs and General Counsel will be responsible for overseeing investigations with the assistance of the Audit Committee and outside auditors, reviewers, and /or attorneys as deemed appropriate. At the end of the investigation, the Vice President of Legal Affairs and General Counsel shall prepare a report on the investigation that contains factual findings and recommendations. The Audit Committee shall be responsible for making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, officers, employees volunteers and agents to raise Concerns within UPO for investigation and appropriate action. With this goal in mind, no director, officer, employee, volunteer or agent who, in good faith reports a Concern shall be subject to harassment, retaliation or in the case of an employee, adverse employment consequences. Moreover, an employee, volunteer or agent who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment or dismissal from the volunteer position or agent position.

Reporting Concerns

Employees

Employees should first discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the employee should report the Concern to the Vice President of Legal Affairs and General Counsel. In addition, if an employee is not comfortable speaking to his or her supervisor or the supervisor is a subject of the Concern, the employee should report his or her Concern directly to the Vice President of Legal Affairs and General Counsel.

If the Concern was reported verbally to the Vice President of Legal Affairs and General Counsel, the reporting employee shall reduce the Concern in writing. The General Counsel is required to immediately report the Concern to the President and Chief Executive Officer, Vice President of Finance and Chief Financial Officer and to the Chair of the Audit Committee as indicated in the Authority of the Audit Committee section above. If the Vice President of Legal Affairs and General Counsel, for any reason, does not immediately forward the Concern to the Vice President of Finance and Chief Financial Officer or to the Chair of the Audit Committee, the

reporting employee should directly report the Concern to the Chief Financial Officer or to the Chair of the Audit Committee. Contact information for the Chair of the Audit Committee may be obtained through the Office of General Counsel. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the Vice President of Legal Affairs and General Counsel.

Directors, Other Volunteers and Agents

Directors, other volunteers and agents should report Concerns in writing directly to the Vice President of Legal Affairs and General Counsel.

Handling of Reported Concerns

The Audit Committee shall address all reported Concerns. The Chair of the Audit Committee shall immediately notify the Audit Committee and the Chair of the Board of any such report. The Chair of the Audit Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some Concerns may be resolved without the need for investigation. The amount of contact between the complainant and the person or persons investigating the Concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the Concern.

Concerns expressed anonymously will be investigated appropriately, but consideration will be given to the seriousness of the issue raised; the credibility of the concern; and the likelihood of confirming the allegation from attributable sources because appropriate follow-up questions may not be possible unless the source of the information is identified.

Reports will be promptly investigated by the General Counsel with the assistance of the Audit Committee and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and or follow-up with the complainant for complete closure of the Concern.

The Audit Committee has authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Accounting and Auditing Matters

The Audit Committee of the Board of Directors shall address all reported Concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Chair of the Audit Committee shall immediately notify the Audit Committee and Finance Committee of any such complaint and work with the Committees until the matter is resolved.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the of the Codes or other Concerns listed in “Reporting Responsibilities” above. Any good faith report is fully protected by this Whistleblower Policy, even if the report, question, or Concern is, after investigation, not substantiated.

The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position, agent position, or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

If the investigation of a Concern, that was done in good faith and investigated by UPO, is not to the Whistleblower’s satisfaction, then he or she has the right to report the Concern to the appropriate legal or investigative agency posted in the UPO Office of Human Resources.

Confidentiality

Reports of Concerns, the complainant’s identity and investigations pertaining to the Concerns shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Contact Information

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