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PRESIDENT'S LETTER**101**

Effective: September 1, 2022

Last Revision Date:

To: All Supervisors**Re: Personnel Policies**

This Manual has been prepared as a guide and reference for members of management and employees at all levels. It is approved and supported by the Corporate Management Team of LIFE, Inc.

Because of our need to standardize the management of multiple facilities and the increasingly complex legal nature of the employment relationship, we feel it is in the best interest of the organization and its employees to have written personnel policies. It is important for our employees to know our organization's objectives and expectations. It is also essential that all members of management understand the role of these policies in meeting those objectives and in limiting our legal exposure.

Any policy, however, is only as good as its implementation, and the key to the implementation of policy is the supervisor who is responsible for and in direct contact with each group of employees. We depend upon you for the successful development of a productive, legal, and harmonious working environment for all employees.

Accordingly, I request that each of you thoroughly familiarize yourself with the contents of this Manual, in order that all personnel policies of the organization may be administered fairly and effectively.

Sharon L. Raynor, President

FUNCTIONS OF THIS MANUAL**102**

Effective: April 28, 2008

Last Revision Date: June 2015

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

Implementer: All Supervisory Personnel

POLICY:

It is the policy of LIFE, Inc. that this Policy Manual be used as an outline of the basic personnel policies, practices, and procedures for the organization. The Manual, however, is not intended to alter the employment-at-will relationship in any way. In the absence of a written employment contract for a specific term, all employees are employed “at will” and may be discharged for any or no reason, with or without notice.

COMMENTS:

- 1) This Manual contains general statements of LIFE, Inc.’s policy and should not be read as including the fine details of each policy, nor as forming an express or implied contract or promise that the policies discussed in it will be applied in all cases. LIFE, Inc. may add to the policies in the Manual or revoke or modify them from time to time. LIFE, Inc. will try to keep the Manual current, but there may be times when policy will change before this material can be revised.
- 2) All Manuals are LIFE, Inc. property and are assigned to supervisors and/or facilities. They are intended to serve as a resource to all employees who work within the facility. The President is responsible for distribution of the Manuals to supervisors who, in turn, are responsible for safeguarding the materials and inserting approved changes. The President is the only person who can reassign a Manual.
- 3) The Personnel Policy Committee, which includes the Chairman of the Board, President, Executive Vice President, Director of ICF Services, Director of Contract Services, Director of Facilities, and the Director of Business Operations has been established to review and authorize changes in LIFE Inc.'s personnel policies. This committee will review policies as revisions are needed.
- 4) In recommending a change or a new policy, the employee should submit it in writing to each committee member. The current policy format should be used.
- 5) The Policy Manual updates will be sent electronically to all LIFE, Inc. employees by the Personnel Policy Committee. All updates will be accompanied by a Policy Manual Update memorandum. This memorandum will specify filing instructions for updated policies, procedures and/or forms.

The Policy Manual recipient, or his designee, shall update the manual within seventy-two (72) hours of receiving the email. The recipient, or his designee, should shred all outdated pages immediately upon removal from the policy book.

- 6) All supervisory personnel should refer to the Manual whenever questions of policy interpretation or implementation arise. They should, however, exercise caution in copying materials or showing

isolated sections of the Manual to employees. Issues needing clarification should be referred to the Personnel Policy Committee.

7) As used in the Manual:

- a) The words “shall” or “will” are to be construed as mandatory and the word “may” as permissive;
- b) The masculine gender shall be construed to include the feminine gender;
- c) “Supervisor” means an individual with the authority to assign, direct, and review the work of two or more subordinates; and
- d) “Immediate family” means the employee’s spouse, parent, child (a biological, adopted or foster child, step-child, a legal ward, or a child of a parent standing in “loco parentis”) sibling (biological or step-sibling), mother-in-law and father-in-law.

EMPLOYEE SUPERVISION**103**

Effective: April 24, 2012
Last Revision Date: March 12, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that the work of all employees be assigned, directed, and regularly reviewed by supervisory personnel. Employees ordinarily are to have only one supervisor to whom they report. These supervisory personnel will be expected to perform the functions below without discrimination regarding race, ethnicity, religion, disability, gender, sexual orientation, national origin and other protected classes.

COMMENTS:

- 1) A primary role of each supervisor is to provide an effective link between management and non-management employees. Supervisors are expected to communicate the goals and policies of management to the employees they supervise. They are expected to communicate back to management the attitudes, suggestions, and complaints of their employees.
- 2) Supervisors must, in addition to mastering the technical skills needed for their position, be able to lead and motivate their employees to do their jobs effectively and efficiently. To this end, supervisors should be prepared to:
 - a) Treat employees as individuals;
 - b) Give recognition for good performance, as well as guidance for correcting mistakes;
 - c) Explain, in advance whenever possible, when and why changes are necessary;
 - d) Recommend employees with growth potential for promotion;
 - e) Show integrity by admitting mistakes instead of shifting the blame to others;
 - f) Be impartial and let employees know the reasons for any decisions that might be interpreted as unfair;
 - g) Demonstrate a desire for good performance by setting work goals and standards for employees;
 - h) Create a feeling of teamwork and belonging among employees; and
 - i) Set good examples by holding themselves to the standards of conduct and performance that they demand of their employees.

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- j) Ensure that the agency is involved in the community with neighbors, home owner's associations and other relevant community based organizations.
- 3) Supervisors are responsible to ensure that the goals regarding employee conduct and performance established by management are achieved and that the personnel policies established by this Manual are implemented.
- Therefore, they are expected to be involved in:
- a) Recommending the hiring of personnel and overseeing job training;
 - b) Keeping employees informed of factors relating to their work assignments, work progress, and opportunities for advancement;
 - c) Evaluating the performance of introductory employees, regular employees, and employees who are being terminated;
 - d) Recommending salary adjustments, promotions, transfers, and termination of employees;
 - e) Scheduling vacations and meal breaks;
 - f) Approving employee expense reports;
 - g) Controlling absenteeism and tardiness, and approving requests for time off;
 - h) Verifying and approving employee time sheets and requesting overtime when necessary;
 - i) Recommending job elimination when appropriate;
 - j) Complying with applicable federal and state laws and regulations concerning employee safety
 - k) Maintaining neat and orderly work areas;
 - l) Implementing progressive disciplinary action procedures; and
 - m) Ensuring that all rules and regulations are observed by employees.
- 4) Nothing in this manual should be considered as a contract or promise, express or implied, to employees that supervisors will, in each case, perform any or all the activities described above, or that such activities will be performed uniformly in each case.

DIRECTOR OF HUMAN RESOURCES**104**

Effective: March 28, 2008

Last Revision Date: March 28, 2008

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that the Director of Human Resources functions as the head of the Human Resources Department and is responsible to the Chief Executive Officer.

COMMENT:

- 1) In lieu of a Director of Human Resources, a management employee as assigned by the CEO will act as operating head of the Human Resources Department.
- 2) The Director of Human Resources is responsible for handling LIFE, Inc.'s human resource functions and, in such capacity, serves as a senior consultant to top management on all matters concerning human resource management. In addition, the Director of Human Resources provides staff assistance to supervisors and department heads in developing, communicating, and carrying out the organization's personnel policies.
- 3) The Director of Human Resources' responsibilities includes the following:
 - a) Planning and formulating general personnel policies;
 - b) Ensuring compliance with all federal, state, and local employment laws and regulations;
 - c) Overseeing recruiting, interviewing, selection, placement, and orientation of new employees;
 - d) Coordinating the appraisal, transfer, promotion, lay-off, demotion, and termination of employees;
 - e) Assisting the Director of Business Operations in the administration of compensation programs for both exempt and nonexempt employees;
 - f) Assisting the Director of Business Operations in the administration of employee benefit plans and programs, and disclosure of information concerning benefits to employees;
 - g) Implementing appropriate disciplinary and complaint resolution procedures and ensuring that such policies or procedures do not alter the employment-at-will relationship or form a contract or promise that such policies or procedures will be followed in each case; and
 - h) Maintaining personnel records and evaluating personnel programs and policies.

CODE OF EMPLOYER-EMPLOYEE RELATIONS**105**

Effective: July 2001

Last Revision Date: July 2001

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to implement fair and effective personnel policies and to require all employees to serve the organization's best interests.

COMMENT:

- 1) LIFE, Inc.'s goals for employees include the following:
 - a) To provide equal employment opportunity and treatment regardless of race, religion, color, sex, sexual orientation, age, national origin, handicap, or Vietnam era veteran status;
 - b) To provide compensation and benefits commensurate with the work performed;
 - c) To establish reasonable hours of work based on LIFE, Inc.'s needs;
 - d) To monitor and comply with applicable federal, state, and local laws and regulations concerning employee safety;
 - e) To offer training opportunities for those whose needs and capabilities warrant such training;
 - f) To be receptive to constructive suggestions which relate to the job, working conditions, or personnel policies; and
 - g) To establish appropriate means for employees to discuss matters of interest or concern with their immediate supervisor or department head.
- 2) LIFE, Inc. expects all employees:
 - a) To deal with coworkers, clients and their family members, outside agencies and the general public in a professional manner;
 - b) To perform assigned tasks in an efficient manner;
 - c) To be punctual;
 - d) To demonstrate a considerate, friendly, and constructive attitude toward fellow employees and
 - e) To adhere to the policies adopted by LIFE, Inc.

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- 3) LIFE, Inc. retains the sole right to exercise all managerial functions including, but not limited to, the rights:
- a) To dismiss, assign, supervise, and discipline employees;
 - b) To determine and change starting times, quitting times, and shifts;
 - c) To transfer employees within departments, into other departments and other classifications, and to change work sites within a forty (40) mile radius;
 - d) To determine and change the size and qualifications of the work force;
 - e) To determine and change methods by which its operations are to be carried out;
 - f) To determine and change the nature, location, services rendered and the continued operation of the business; and
 - g) To assign duties to employees in accordance with LIFE, Inc.'s needs and requirements and to carry out all ordinary administrative and management functions.
- 4) Nothing in the Manual should be considered as altering the employment-at-will relationship or as creating an express or implied contract or promise concerning the policies or practices that LIFE, Inc. has implemented or will implement in the future. Accordingly, LIFE, Inc. retains the right to establish, change, and abolish its policies, practices, rules, and regulations at will, and as it sees fit.

EMPLOYMENT-AT-WILL**106**

Effective: July 2001

Last Revision Date: July 2011

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

Implementer: All Supervisory Personnel

POLICY:

It is the policy of LIFE, Inc. that all employees who do not have a written employment contract for a specific, fixed term of employment are employed-at-will, and therefore either LIFE, Inc. or the employee may terminate.

COMMENT:

- 1) Employees who do not have a separate, individual written employment contract are employed at-will and are subject to termination at any time, for any reason, with or without cause or notice. At the same time, such employees may terminate their employment at any time and for any reason.
- 2) No LIFE, Inc. representative is authorized to modify this policy for any employee or to enter into any agreement, oral or written, contrary to this policy. Supervisory and management personnel are not to make any representations to employees or applicants concerning the terms or conditions of employment with LIFE, Inc. which are not consistent with company policies. LIFE, Inc. representatives must take care not to make any statements made in pre-hire interviews or discussions, or in recruiting materials of any kind, that would alter the at-will nature of employment or imply that discharge will occur only for cause.
- 3) This policy may not be modified by any statements contained in this Manual or any other employee handbooks, employment applications, LIFE, Inc. recruiting materials, LIFE, Inc. memoranda or other materials provided to applicants or employees in connection with their employment. None of these documents, whether singly or combined are to create an express or implied contract of employment for a definite period, not an express or implied contract concerning any terms or conditions of employment. Similarly, LIFE, Inc. policies and practices with respect to any matter are not to be considered as creating any contractual obligation on LIFE, Inc.'s part or as stating in any way that termination will occur only for "just cause." Statements on specific grounds for termination set forth in the Manual or in any other LIFE, Inc. documents are examples only, not all-inclusive lists, and are not intended to restrict LIFE, Inc.'s right to terminate at-will.
- 4) During the application phase, individuals sign a written statement on the employment application acknowledging their understanding that if hired, they are employed at-will, and are subject to termination at any time, for any reason, with or without notice, and with or without cause.
- 5) Completion of any introductory period or conferral of regular status does not change an employee's status as an employee-at-will or in any way restrict LIFE, Inc.'s right to terminate such an employee or change the terms or conditions of employment.

INVESTIGATIONS**107**

Effective: May 20, 2011

Last Revision Date: May 20, 2019

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

Implementer: All Supervisory Personnel

POLICY:

It is the policy of LIFE, Inc. to cooperate voluntarily with any government, state, local or other regulatory agency investigation.

REGULATORY REFERENCE: LIFE, Inc. Company Policy

- 1) Staff receiving a notice of an investigation will notify their immediate supervisor. Supervisors will notify appropriate corporate personnel.
- 2) LIFE, Inc. will voluntarily cooperate with investigations providing information as requested.
- 3) Staff will be expected to fully cooperate with authorities and will not be retaliated against for cooperating.
- 4) Staff will be supported by LIFE, Inc. during the investigative process when actions of the Company are being audited.
- 5) Legal counsel will be utilized to defend the Company and the staff if necessary.

LEGAL ACTIONS**108**

Effective: May 20, 2011
Last Revision Date: May 20, 2011
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to respond to legal actions in a timely manner.

REGULATORY REFERENCE: LIFE, Inc. Company Policy

COMMENT:

- 1) All legal actions involving LIFE, Inc. business will be reviewed by the Executive Vice-President. He will employ counsel to proceed appropriately.

SUBPOENAS**109**

Effective: May 20, 2011
Last Revision Date: May 20, 2011
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to respond to subpoenas in a timely manner.

REGULATORY REFERENCE: LIFE, Inc. Company Policy

COMMENT:

- 1) All subpoenas involving LIFE, Inc. business will be reviewed by the Executive Vice-President. He will determine if the subpoena is proper and may consult with counsel to confirm that the subpoena is proper.
- 2) If the subpoena involves an employee, he will notify the employee of the subpoena in order to provide the individual with an opportunity to retain counsel and oppose it. If the subpoena is proper and the employee does not oppose, we will comply.
- 3) If the subpoena involves a consumer's confidential records, they and/or their parent/guardian will be notified to ensure they have the opportunity to assert their rights. If the subpoena is proper and the consumer and/or the parent/guardian does not contest it, a written authorization to release the information will be obtained. The records will be released.
- 4) If subpoena is to be contested or is not proper, counsel will be employed to proceed legally.

SEARCH WARRANTS**110**

Effective: May 20, 2011
Last Revision Date: May 20, 2011
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President
Implementer: All Staff

POLICY:

It is the policy of LIFE, Inc. to fully cooperate with law enforcement agents that are serving a search warrant.

COMMENT:

- 1) When presented with a search warrant by law enforcement agents, the employee will ask to see the warrant to verify the correct address, date, and judge's signature. **DO NOT** prevent the law enforcement agents from entering the premises even if you have not had time to verify the items above.
- 2) If the address is incorrect, notify the law enforcement agents immediately.
- 3) Staff should notify their immediate supervisor as soon as possible. Supervisors should notify their supervisor on the corporate level.
- 4) Staff should write a statement about the search. The statement should include if there was any damage to property or if any property was removed during the search.

MEDIA RELATIONS**111**

Effective: August 2014

Last Revision Date: August 2014

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. that media relations procedures and social media procedures be addressed as outlined below.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) All requests/contact from the media, attorneys, and investigators are to be directed to the Executive Vice-President unless required otherwise by Federal or State law. This includes requests made outside of normal business hours.
- 2) All press releases will be made by the Executive Vice-President.

SOCIAL MEDIA**112**

Effective: August 2017

Last Revision Date: August 2021

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to provide guidance and expectations to employees who participate in social media, social networks, blogs, message boards, or any other service that permits users to share information with others online.

REGULATORY REFERENCE: HIPAA

LIFE, Inc. Company Policy

COMMENT:

- (1) LIFE, Inc. employees should not use company resources for personal participation in social media or networks.
- (2) Personal social media and networking should never interfere with job requirements.
- (3) LIFE, Inc. emails should not be linked to personal social media or network accounts.
- (4) Under no circumstances should an employee's social media or network accounts be used to disclose LIFE, Inc. information regarding the company, employees, or individuals we serve. If approached via social media regarding LIFE, Inc. please consult the Human Resources Department immediately.
- (5) Employees should be aware that LIFE, Inc. may observe content and information made available by employees through social media.
- (6) Employees are to refrain from posting anything on social media or networks that could cause a workplace concern that may include but is not limited to postings that are confidential, defamatory, pornographic, sexist, racist, prejudice, demeaning, hostile, or derogatory.
- (7) Threats on social media or networks against LIFE, Inc. employees, individual's we serve, or the company should be reported to management immediately.

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- (8) Officers, Stockholders, and Members of the Board of Directors of LIFE, Inc. may post on LIFE, Inc. approved social media or network pages with prior approval from the President or Executive Vice President.
- (a) Each site used and post by a Director in LIFE, Inc. must be approved by the President or the Executive Vice President.
 - (b) Under no circumstances, should unapproved/unsanctioned social media and network accounts be used to disclose LIFE, Inc. information.
 - (c) Individuals in the care of LIFE, Inc. may be used in postings on social media and networks only with prior written consent from their guardian.
 - (d) Social Media advertisements or paid promotions must be approved in advance by the President or the Executive Vice President.
- (9) Failure to follow the Social Media Policy will result in disciplinary action up to and including termination.

SECTION 2**EMPLOYMENT**

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EQUAL EMPLOYMENT OPPORTUNITY**201**

Effective: March 28, 2008

Last Revision Date: March 28, 2014

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to provide equal opportunity in employment to all employees and applicants for employment. No person is to be discriminated against in employment because of race, religion, color, sex, sexual orientation, age, national origin, disability, or veteran status.

REGULATORY REFERENCE:

Title VII of the Civil Rights Act of 1965, 1991

Age Discrimination in Employment Act of 1967

Americans with Disabilities Act (ADA)

Equal Pay Act of 1963

Uniformed Services Employment and Re-Employment Rights Act of 1994 (USERRA)

Title VI

COMMENT:

- 1) This policy applies to all terms, conditions, and privileges of employment including, but not limited to hiring, introductory period, training, placement and employee development, promotion, transfer, compensation, benefits, educational assistance, layoff, termination, and retirement.
- 2) The Human Resources Department is responsible for formulating, implementing, coordinating, and monitoring all efforts in equal employment opportunity. The Human Resources Department's duties may include, but are not necessarily limited to:
 - a) Assisting management in collecting and analyzing employment data;
 - b) Developing policy statements and recruitment techniques designed to comply with the equal employment policies of LIFE, Inc.;
 - c) Complying with various statutory recordkeeping and notice requirements to ensure full compliance with all employment-related statutes and regulations;
 - d) Assisting supervisory personnel in arriving at solutions to specific personnel problems;
 - e) Serving as liaison between LIFE, Inc. and government agencies, minority and women's organizations, and other community groups; and
 - f) Keeping management informed of the latest developments in the area of equal employment opportunity.

- 3) Any communication from an applicant for employment, an employee, a government agency, or an attorney concerning an equal employment opportunity matter is to be referred to the Human Resources Department.
- 4) While overall authority for implementing this policy is assigned to the Human Resources Department, an effective equal employment opportunity program cannot be achieved without the support of supervisory personnel and employees at all levels. Any employees who feel they are the victim of discrimination have a responsibility to report this to their supervisor and/or the Human Resources Department.

PRODUCTIVE WORK ENVIRONMENT**202**

Effective: March 28, 2008

Last Revision Date: March 12, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to promote a productive work environment and not to tolerate verbal or physical conduct by any employee that harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive, or hostile environment.

REGULATORY REFERENCE:

EEOC Guidelines

Title VII of the Civil Rights Act of 1964

Civil Rights Act of 1991

American with Disabilities Act

Uniformed Services Employment and Re-Employment Rights Act of 1994
(USERRA)**FORMS MANUAL REFERENCE: 202****COMMENT:**

- 1) All LIFE, Inc. employees are expected to maintain a productive work environment that is free from harassing or disruptive activity. No form of harassment or bullying will be tolerated, including harassment for the following reasons: race, national origin, religion, disability, pregnancy, age, military or veteran status, sex or sexual orientation.
- 2) Each supervisor and manager has a responsibility to keep the workplace free from any form of harassment.
- 3) Sexually harassing or offensive conduct in the workplace, whether committed by supervisors, managers, nonsupervisory employees, or nonemployees is also prohibited. No supervisor or manager is to threaten or insinuate, either explicitly or implicitly, that an employee's refusal or willingness to submit to sexual advances will affect the employee's terms or conditions of employment.
This conduct includes:
 - a) Unwanted physical contact or conduct of any kind including sexual flirtations, touching, advances or propositions;
 - b) Verbal abuse of a sexual nature;
 - c) Demeaning, insulting, intimidating or sexually suggestive comments about an individual's dress or body;
 - d) The display in the workplace of demeaning, insulting, intimidating or sexually suggestive objects or pictures, including nude photographs;

-
- e) Demeaning, insulting, intimidating or sexually suggestive written, recorded or electronically transmitted messages.

Any of the above conduct, or other offensive conduct, directed at individuals because of their race, national origin, religion, disability, pregnancy, age, sex, sexual orientation or military status is also prohibited.

- 4) Any employee who believes that a supervisor's, manager's, other employee's or nonemployee's actions or words constitutes unwelcome harassment has a responsibility to report or complain about the situation as soon as possible. The report or complaint should be made to the employee's supervisor or to the Director of Human Resources if the complaint involves the supervisor.
- 5) Complaints of harassment are to be handled and investigated according to LIFE, Inc.'s procedure for reporting harassment. All complaints of harassment are to be investigated immediately (within 24 hours) and in as impartial and confidential a manner as possible. Employees are required to cooperate in any investigation. A timely resolution of each complaint should be reached and communicated to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.
- 6) Any employee, supervisor or manager who is found to have violated the harassment policy will be subject to appropriate disciplinary action, up to and including termination. LIFE, Inc. prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about harassment. However, if an investigation of a complaint shows that the complaint or information is false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.

HIRING**203**

Effective: October 2013
Last Revision Date: October 2013
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to be an equal opportunity employer and to hire individuals solely upon the basis of their qualifications and ability to do the job to be filled. Unless otherwise provided in writing, employment with LIFE, Inc. is considered to be at-will, so either party may terminate the relationship at any time and for any lawful reason.

REGULATORY REFERENCE:

Title VII of the Civil Rights Act of 1964
Age Discrimination in Employment Act of 1967
Civil Rights Act of 1991
Equal Pay Act
Americans with Disabilities Act
Rehabilitation Act of 1973
EEOC Guidelines
Employee Polygraph Protection Act of 1988
Immigration Reform and Control Act of 1986
Health Care Registry and Investigations Information – DFS
NC General Statute 122C-80 – Criminal History Record Check
LIFE, Inc. Policy – Motor Vehicle Record Check

FORMS MANUAL REFERENCE: 203(a), 203(b)**COMMENT:**

- 1) Supervisors who need to fill a job opening should notify their appropriate department head for approval. Supervisors who want to add a new job position must request approval from their appropriate department head.
- 2) LIFE, Inc. will normally attempt to fill job openings above entry level by promoting from within the company, if qualified applicants are known to be available internally.
- 3) If candidates from within LIFE, Inc. are to be considered for job openings, the supervisor will post the openings in accordance with the Promotion policy. Current employee candidates for the openings will be considered and processed as outlined in the Transfer policy.
- 4) If candidates from outside LIFE, Inc. are to be considered for job openings, the supervisor will be responsible for recruiting the candidates and is to utilize the recruitment methods and sources it deems appropriate to fill the openings.
- 5) During the recruitment, hiring and orientation process, no statement is to be made promising permanent or guaranteed employment; and no document should be called a contract. All

applicants and employees should be aware that employment with LIFE, Inc. is at-will and should exercise great care not to make representations otherwise.

- 6) When candidates from outside LIFE, Inc. are to be considered for job openings, the following procedures should be followed:
- a) Any candidate for employment will be researched to ensure they are eligible for rehire, even though they did not indicate they were ever employed by LIFE, Inc.
 - b) All employment applications are retained for a one-year period by the regional accounting clerk. Completed applications are kept in an “Active Status” file for thirty days, or until a decision is made on a specific position opening. Applications will be taken from the “Active Status” file and placed in the “Retained Application” file. This file should be purged at the end of each month of all applications that are over one year old. Applicants should be made aware that they are welcome to reapply after a one-year period (at the time the initial application for employment is completed). In this event, a second application for employment should be submitted.
 - c) Applicants deemed qualified for consideration for available job openings will be interviewed in accordance with established interviewing procedures.
 - d) If an applicant is still deemed qualified after the interview, the supervisor, in accordance with established policies, will initiate reference requests, criminal record checks, as well as access the Health Care Personnel Registry’s voice response system. The supervisor will accept a copy of their transcript or diploma from a high school/college/university or for their license (if applicable), but if the applicant is hired they must have an official copy sent to LIFE, Inc. within their introductory period of three months.
 - e) When the supervisor and department head determine that the applicant is technically qualified for employment, the supervisor must determine if the applicant is compatible with the work environment. The decision whether to hire the applicant is to be made by the supervisor, but must also have the approval of the department head.
 - f) When a hiring decision is made, all applicants who were interviewed, but not selected for the position, should receive a written response in accordance with established LIFE, Inc. procedures.
 - g) Following a decision to hire an applicant, the supervisor will make a conditional offer of employment which should include any contingencies or disclaimers deemed necessary. Minimally, the supervisor should make the potential employee aware of company policy regarding dress code, smoking and drug testing. If the applicant accepts the offer and a medical statement is required, it should be arranged in accordance with the established Medical Procedures policy.
 - h) If the background, medical or any other subsequent investigation discloses any misrepresentation on the application form or information indicating that the individual is not suited for employment with LIFE, Inc. the applicant will be refused employment or, if already employed, may be terminated. This especially applies to the falsification of information.

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- i) Immediately following a decision to hire and an acceptance of employment, the regional accounting clerk will submit a copy of the completed employee's I-9 to the Human Resources Administrator. The Human Resources Administrator will enter the employee's information into the E-Verify system to confirm employment eligibility. This must be done within 3 business days of the hire date. If the employee is eligible, the Human Resources Administrator will email the Case Verification Number to the regional accounting clerk. The regional accounting clerk will print the email and staple it to the back of the employee's I-9. The regional accounting clerk will complete all other start-up/payroll forms in accordance with established procedures.
 - j) The supervisor is responsible for coordinating orientation of new employees. The supervisor, department head and/or nurse are additionally responsible for any necessary job training. This should be provided in accordance with established Staff Development procedures.
- 7) A member of an employee's immediate family will be considered for employment by LIFE, Inc. provided the applicant possesses all the qualifications for employment. An immediate family member may not be hired; however, if such employment would:
- a) Create a direct supervisor/subordinate relationship with a family member; or
 - b) Create either an actual conflict of interest or the appearance of a conflict of interest.

These criteria will also be considered when assigning, transferring or promoting an employee.

- 8) Employees who marry or become members of the same household may continue employment as long as there is not:
- a) A direct supervisor/subordinate relationship between such employee; or
 - b) An actual conflict of interest or the appearance of a conflict of interest.

Should any of the above situations occur, LIFE, Inc. will attempt to find a suitable position with the company to which one of the affected employees may transfer. If accommodations of this nature are not feasible, the employees will be permitted to determine which one of them will resign.

Any deviation from a) or b) above would require written permission from the appropriate department head.

9) Rehires

Former employees who left LIFE, Inc. in good standing may be considered for re-employment. Former employees who resigned without an appropriate notice or were dismissed for cause may not be considered for re-employment. A vested employee who severs employment with LIFE, Inc. and receives a distribution of their retirement funds is not eligible for rehire for a period of one 1) year from the termination date. Former employees who have defaulted on a retirement loan are not eligible for rehire. Employees that were laid off and defaulted on their retirement loan will be eligible for rehire. A former terminated employee who is re-employed will be considered a new employee from the date of re-employment.

It is important to note that the Director of ICF/IDD Services or the Director of Contract Services or the Director of Business Operations, as appropriate, and the Director of Human Resources must give written authorization before any former employee can be considered for rehire with LIFE, Inc. Failure of any supervisor to secure this written authorization for rehire will result in disciplinary action.

Requests for rehire should be submitted on form 203(b). The supervisor should complete the appropriate sections of the form and submit it to the Human Resources Department. The Human Resources Department will complete the sections concerning eligibility for rehire, reason for termination, break in service, and retirement plan information. If the former employee's break in service is over six (6) months, a new criminal record and MVR report will be requested. If these reports are acceptable and all other necessary information has been verified, the request will be forwarded to the appropriate Corporate Director for approval.

In the event that the rehire of an employee is approved, a copy of the completed request form will be routed back to the supervisor, to be included when submitting the Payroll Transmittal, along with all other new hire paperwork, to the Corporate Office Payroll Department. A new I-9 must be completed and the same process in 6(i) above will be followed. For requests that are not approved, the completed form will be routed back to the supervisor as well, whose responsibility it will be to contact and inform the former employee of the decision.

The Human Resources Department will maintain a copy of the request form in the employee's personnel file at the Corporate Office.

EMPLOYMENT AGREEMENTS**204**

Effective: July 2001

Last Revision Date: July 2001

Last Reviewed Date: February 20, 2023

Responsibility: President

POLICY:

It is the policy of LIFE, Inc. that it may execute, as its sole discretion, written employment agreements with certain employees. Employees who do not have a written employment contract containing a specified term of employment are at-will employees.

COMMENT:

- 1) The President may, on a case by case basis and when authorized by the Board of Directors, enter into a written employment agreement on behalf of LIFE, Inc. with any employee.
- 2) Written employment agreements, when used, normally will spell out the important terms and conditions of an individual's employment. Such terms and conditions should generally include:
 - (a) The length of time that the agreement will last and how, if at all, it can be renewed;
 - (b) The job title and/or job description, reserving to LIFE, Inc. the right to change the employee's duties as the company's interest require;
 - (c) The employee's salary;
 - (d) Any other forms of compensation, such as health insurance, retirement; and
 - (e) Provisions for the termination of employment

ORIENTATION AND TRAINING**205**

Effective: August 2007

Last Revision Date: March 12, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

REGULATORY REFERENCE: LIFE, Inc. Company Policy**POLICY:**

It is the policy of LIFE, Inc. to provide orientation programs for new employees and to conduct or support training programs as deemed appropriate.

COMMENT:

- 1) Each supervisor is responsible for orientation as it applies to introducing the new employee to the specific job and department and may select a co-worker to serve as a sponsor to facilitate the new employee's transition. Specific training and orientation for direct support professionals will be in accordance with established curriculums and will be monitored by the supervisor.
- 2) Supervisors are responsible for recommending employees for special training programs, for providing on-the-job training, or for arranging on-the-job trainers. Attendance for training is mandatory and will be subject to disciplinary procedures as related to attendance to work.
- 3) Supervisors may approve employee participation in continuing education and/or training programs when such instruction is deemed beneficial or considered necessary for satisfactory job performance. In some cases, employees may be required to enroll in and complete such programs satisfactorily.
- 4) The Executive Vice-President and Director of Contract Services, Director of ICF/IDD, or Director of Business Operations must approve, upon recommendation of the appropriate department head of supervisor, employee participation in special programs, either external or in-house, dealing with supervisory, professional, or management development; cost reduction; quality improvement; or compliance with government regulations.
- 5) LIFE, Inc. may consider the feasibility of sponsoring or conducting special programs when continuing education and in-service programs are required for license, or recertification of a license. Under such circumstances, it will apply for approval by the licensing authority and will seek to comply with all requirements established by such authority. However, it may at its discretion cancel, modify, or withdraw from such certification or program.
- 6) LIFE, Inc. will provide special training programs for safety and health matters when deemed necessary, or as required by government regulation.
- 7) Company sponsored or conducted orientation and training programs may be evaluated from time to time as to the quality of the instruction, the content, and the results.

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- 8) Upon successfully completing Company approved or sponsored training and educational programs, the supervisor will assure all records, including certificates, are appropriately placed in the employee's training file.
 - 9) At the immediate conclusion of any training, employees may request one copy of any training certificate if applicable. No terminated employees will be provided copies of any training files.
 - 10) In cases when a direct support professional is hired who has current certifications in MANDT, CPR, and First Aid from other agencies, decisions as to whether or not the individual will be exempt from our training will be made on a case by case basis. A recommendation should be made by the employee's immediate supervisor and must be approved by the Qualified Professional. In some cases, an employee may be required to demonstrate proficiency in the area before a decision is made.

INTRODUCTORY PERIOD**206**

Effective: March 28, 2008

Last Revision Date: April 10, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that all new employees and all present employees transferred or promoted to a new job are to be carefully monitored and evaluated for an initial introductory period of at least three months.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) Supervisors are to carefully observe the performance of each employee in a new job position. Where appropriate, weaknesses in performance, conduct, or attitude are to be brought in a timely manner to the employee's attention for correction. Supervisors should routinely document the work performance of each employee in a new position and share this information with the employee. The employee should initial this documentation when it shared with him.
- 2) Employees will be allowed to continue in their new positions if they meet all established criterion and receive their supervisor's endorsement to continue in the job.
- 3) Supervisors may recommend that a newly hired employee be terminated at any time. Such a recommendation for termination should be submitted in writing to the Department Head for review and should include an evaluation and a listing of actions that have been taken to assist the employee. Action to terminate must have the prior approval of the appropriate Department Head. Any concerns or problems with a termination must be discussed in detail with the Director of Human Resources.
- 4) Transferred or promoted employees who are unable to perform satisfactorily in their new jobs may, at the discretion of management, be returned to their original jobs, if a vacancy exists, or may be terminated.
- 5) Newly hired employees are not eligible for any employee benefits, unless mandated by state or federal law, until their introductory period is successfully completed; they have received a satisfactory initial evaluation and have been recommended for continued employment. Transferred or promoted employees remain eligible for all benefits while demonstrating their ability to perform their new jobs.
- 6) At all times, employment with LIFE, Inc. is considered to be "at-will," and the employer/employee relationship may be terminated at any time for any lawful reason by either party.

TRANSFER**207**

Effective: May 2004

Last Revision Date: March 19, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that it may, at its discretion, initiate or approve employee job transfers from one job to another or from one location to another.

REGULATORY REFERENCE: EEOC Guidelines
LIFE, Inc. Company Policy

COMMENT:

- 1) LIFE, Inc. may require employees to make either a temporary or long-term job transfer in order to accommodate the organization's needs. LIFE, Inc. will try to limit the number and duration of temporary transfers that it requests from employees.
- 2) Employees may request a voluntary job transfer. However, to be eligible for a voluntary transfer, employees must meet the requirements of the new position and have a satisfactory performance record/work history with LIFE, Inc.
- 3) Job openings for which management seeks candidates from within LIFE, Inc. will normally be posted on the employee bulletin board, website, or using the company's electronic messaging system. From time to time management will, as it considers appropriate, fill job openings or make transfers without posting notices.
- 4) Employee requests for transfer should normally be handled as follows:
 - a) The employee should submit a written request for a transfer to his current supervisor. The request should include the reason for the transfer and the department and specific job wanted.
 - b) The supervisor should forward the request to the appropriate department head with a recommendation of approval or disapproval.
 - c) The department head should determine whether the requested job or a suitable job opening exists and whether the employee is eligible. If a job opening exists and the employee is eligible, the department head should arrange an interview between the candidate and the supervisor who has the job opening.
 - d) The supervisor with the job opening will make the final transfer decision, subject to the approval of the department head and the Human Resource Department.
 - e) Supervisors and department heads may initiate the procedure and propose employees for a position.

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- 5) Employees who want to initiate a transfer to another LIFE, Inc. facility will be handled the same as above. The employee must pay any travel expenses to the new location for job interviews.
 - 6) Transferred employees will serve in their new positions for an initial period of at least three months during which the provisions of the Introductory Period policy will apply. Neither the transfer to a new position nor the completion of the subsequent introductory employment period alters the basic employment-at-will relationship.
 - 7) Transferred employees will retain their existing job seniority until satisfactorily completing their introductory period on the job. The seniority will be transferred to the employee's new job at the successful completion of the introductory period.
 - 8) Pay for transferred employees will be handled as follows:
 - a) Employees transferred to a job within the same salary range will continue to receive their existing rate of pay;
 - b) Employees transferred to a job in a higher salary range will be paid at the higher rate, starting the first day of the pay period following promotion.
 - c) Employees transferred, at management's request; to a job in a lower salary range will usually continue to be paid at their former rate. At management discretion, however, employees may be paid at the rate of the new job; and,
 - d) Employees who are transferred for disciplinary reasons, lack of work, budgetary reasons, corporate reorganization, or at their own request to a job in a lower salary range will be paid at the lower rate commencing with the first day of the pay period following the start of the new job.
 - e) LIFE, Inc. will provide employees with notice in writing of any decrease in wages.

PROMOTION**208**

Effective: March 28, 2008
Last Revision Date: March 28, 2020
Last Reviewed Date: February 20, 2023
Responsibility: President

POLICY:

It is the policy of LIFE, Inc. to hire employees for entry level positions, to provide training and development for employees when necessary, and to offer employees promotions to higher level positions when appropriate. Management prefers to promote from within and may first consider current employees with the necessary qualifications and skills to fill vacancies above the entry level, unless outside recruitment is considered to be in LIFE, Inc.'s best interest.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy
Americans with Disabilities Act
The Family and Medical Leave Act

COMMENT:

- 1) All employees are encouraged to seek advancement opportunities and to obtain promotion and career guidance from their supervisor, department head, and/or the Human Resources Department.
- 2) An employee's basic eligibility for promotion will be determined by the requirements of the new job. Additionally, the employee must have a satisfactory work performance record.
- 3) Job openings and promotions for which management seeks candidates from within LIFE, Inc. will normally be posted on the employee bulletin board. From time to time, however, management may, as it considers appropriate, fill job openings or make promotions without posting notices. When job openings or promotion opportunities are posted:
 - a) Interested employees must initiate a written transfer request to their supervisor and Department Head within five (5) business days of posting;
 - b) Supervisors and department heads may initiate the process within the same time period and propose employees for the position; and
 - c) The supervisor may, at their discretion, solicit outside candidates during or after the posting period.
- 4) Current employee candidates for job openings and promotions will be considered for the position as outlined in the Transfer Policy. Applicants recruited from outside LIFE, Inc. will be considered for employment as outlined in the Hiring Policy.
- 5) Current employee candidates for promotion will normally be screened and selected on the basis of attendance and work records, performance appraisals and job-related qualifications. Seniority

will be considered if two or more candidates are judged to be equally qualified based on merit, work record, and other qualifications.

- 6) Promoted employees will be subject, in their new positions, to the provisions of the Introductory Period policy. The employee remains an at-will employee at all times and the employment-at-will relationship is not altered by a promotion or completion of the subsequent introductory period of employment.
- 7) Seniority and pay for promoted employees will be handled as outlined in the Transfer Policy.

HOURS OF WORK**209**

Effective: July 2001

Last Revision Date: April 10, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to establish the time and duration of working hours as required by work load, consumer needs, the efficient management of the facility or office and any applicable law.

REGULARY REFERENCE:

Fair Labor Standards Act

Wage and Hour Division of the Department of Labor Guidelines

State Wage and Hour Laws

COMMENT:

- 1) The normal workweek is Sunday through Saturday beginning and ending at midnight on Saturday, consisting of forty hours (employees who consistently work a 30-hour week or more will be considered full-time). The normal workday will consist of eight hours of work or in accordance to the Flex Schedule Policy.
- 2) The schedule of hours for employees will be determined by each supervisor. The supervisor will inform employees of their daily schedule of hours of work, including meal and/or break periods and any changes that are considered necessary or desirable by LIFE, Inc.
- 3) Supervisors may schedule overtime or extra shifts when it is deemed necessary by the QII or the appropriate Department Head. Supervisors will assign overtime to nonexempt employees (those employees who are subject to the minimum wage and overtime provisions of the Fair Labor Standards Act) in the particular job for which overtime is required. Employees are not permitted to work overtime without the prior approval of their supervisor. For the purposes of overtime compensation, only hours worked in excess of forty during a workweek will be counted (e.g., paid time off are not considered hours worked).
- 4) Employees of LIFE, Inc. are not permitted to work at home. The President may, on a case-by-case basis, make exceptions based upon consultation with appropriate management staff.
- 5) Employee attendance at meetings and training programs will be considered hours of work if attendance is required by management.
- 6) All nonexempt employees are required to complete an individual time record showing the daily hours worked. Time records cover one pay period and must be completed by the close of each workday. The following points should be considered in filling out time records:
 - a) Employees should record their starting time and quitting time for each workday. Also, the time out should not be filled in until the employee is actually leaving at the end of the shift;

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- b) Employees are not permitted to begin work before their scheduled starting time or to stop work after their scheduled quitting time without the prior approval of their supervisor;
 - c) In the event that the employee is off on a scheduled work day as a result of approved leave, the employee should enter the appropriate date and the total number of leave hours taken;
 - d) Employee time records should be checked and signed by the supervisor involved at the end of the pay period. Unworked time for which an employee is entitled to be paid (Paid Time Off or designated bereavement leave) should be properly coded, checked for accuracy and initialed by the supervisor on the time record. Authorized overtime also should be initialed by the supervisor (the supervisor should note that paid time off does not have to be counted in calculating overtime);
 - e) Unapproved absences, including tardiness, should not be considered as hours worked for pay purposes. Supervisors should inform employees if they will not be paid for certain hours of absence; and
 - f) Filling out another employee's time record or falsifying any time record is prohibited and is grounds for disciplinary action, up to and including termination.
- 7) Personnel employed in executive, administrative, professional, and supervisory capacities generally are exempt from the provisions of the Fair Labor Standards Act. These employees are required to fill out time records that account for daily attendance. In addition, exempt employees will not receive overtime compensation. Exempt employees may be granted limited time off in accordance with the incidental leave policy but should be aware that time-off is not granted on an hour-for-hour basis and is not granted every time the exempt employee works more than 40 hours in a single work week. (See Incidental Leave Policy 507)
- 8) Exempt employees will work and be paid in accordance with the Department of Labor Standards. Exempt employees are allowed, with approval from their supervisor, to work times other than their normal working times and days other than normal working days. Based upon company needs, exempt employees may be required to work hours and days other than their normal working hours or days. LIFE, Inc. defines most exempt employees' regular work day as 8:00 in the morning to 5:00 in the afternoon with a one-hour lunch break.
- 9) Half Days for Exempt Employees
Exempt employees may be allowed to work a two half days during a work week instead of one whole day on a case by case bases. Criteria that must be met for an exempt employee to work two half days are:
- Both days must be in the same work week.
 - Two half days should be reflected on the employee's schedule and approved by their manager on their weekly schedule.
 - A minimum of four working hours must be used for a half day.
6 hours one day, would still require a minimum of 4 hours on the second day.
 - One half day during a working week will still require PTO.
- Example:

8 Hours Monday- Wednesday, 12 Hours on Thursday, and 4 hours on Friday. This would still require the use of 4 hours of PTO on Friday.

- An exempt employee that request to use two half days during a work week must have enough PTO (4 hours) to cover the possibility of not being able to work the second half day.
 - Half days should not be approved at closed offices (Corporate Offices or Day Programs) without the approval of the Director of ICF, Director of Contract Services, Director of Business Operations, or the Executive Vice President's approval.
- 10) All work schedules of exempt employees must be developed in accordance with policy 508:1 – Flexed Schedule. Each exempt employee must secure prior approval from his supervisor for his work schedule on a weekly basis. The proposed work schedule should be submitted to the employee's supervisor and approved before the work week begins.

OUTSIDE EMPLOYEEMENT**210**

Effective: April 13, 2009

Last Revision Date: April 13, 2019

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY: It is the policy of LIFE, Inc. to allow its employees to engage in outside work or hold other jobs, subject to certain restrictions as outlined below.

REGULATORY REFERENCE: LIFE, Inc. Company Policy

FORMS MANUAL REFERENCE: 210(a)

- 1) LIFE, Inc. requires that employees' activities and conduct away from the job must not compete or conflict with or compromise its interests, or adversely affect job performance and the ability to fulfill all responsibilities to LIFE, Inc. Employees are not to solicit or conduct any outside business during paid working time.
- 2) Non-exempt, non-supervisory full and part-time employees must obtain prior approval from the appropriate department head before any outside employment or other work activity is undertaken. Failure to do so may result in disciplinary action. When approval is requested, permission will not be unreasonably withheld.
- 3) Officers and certain designated managers and professionals, including all salaried employees, are prohibited from accepting any paid outside positions in a health-related field unless prior written approval is secured from the company president. Failure to secure prior written approval may result in disciplinary action.
- 4) Employees are cautioned to consider carefully the demands that additional work activity will create before requesting permission to seek or accept outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or different hours. If outside work activity does cause or contribute to job-related problems, it must be discontinued; and if necessary, normal disciplinary procedures will be followed to deal with the specific problems.
- 5) Employee requests for permission to accept outside employment, including self-employment should be submitted in writing on a LIFE, Inc. "Request for Outside Employment" form 210(a).

TEMPORARY AND PART-TIME EMPLOYEES**211**

Effective: March 28, 2008

Last Revision Date: April 3, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to supplement the regular work force as needed with part-time employees.

COMMENT:

- 1) A part-time employee is an individual who is hired on an at-will basis, but works less than 72-hours during a pay period.
- 2) Part-time positions generally will be filled according to the procedures contained in the Hiring Policy.
- 3) An employee whose status changes from full-time to part-time will be paid out their accrued PTO in June. Information concerning eligibility of part-time employees for other LIFE, Inc. benefits is available from the Human Resources Department.
- 4) Part-time employees are not eligible for Bereavement Leave.
- 5) Part-time employees will accrue PTO if they work 72 hours in a pay period but may not use PTO. Payout of PTO will occur as outlined in policy 504 (4).
- 6) Part-time employees that have not worked in 6 pay periods will be terminated. This does not include employees out on FMLA, Workman's Compensation, military leave of absence, or have been granted a leave of absence.
- 7) Employees' part-time status will be calculated twice a year.

LAYOFF/REDUCTION IN FORCE**212**

Effective: November 5, 2008
Last Revision Date: November 5, 2015
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that, if it must reduce employment because of a change in facility needs or other conditions, layoff/reductions in force will be conducted in accordance with the procedures set forth below.

COMMENT:

- 1) LIFE, Inc. will attempt to avoid layoffs whenever possible; however, a change in Company needs and other conditions may lead to a reduction in force.
- 2) Layoffs that are expected to be temporary will be handled according to the provisions of this policy. Selections for layoffs that are known to be permanent will be made according to this policy and then handled according to the Termination of Employment policy.
- 3) Whenever possible, layoffs will be avoided by transferring an employee to another LIFE, Inc. facility within a forty mile radius that has a comparable position available.
- 4) Employees are to be selected for layoff with consideration given both to seniority and attendance/work performance history.
- 5) An employee's seniority is measured from the original date of employment with LIFE, Inc.
- 6) Employees selected for layoff will be given as much notice as is required by law or is reasonable under the circumstances.
- 7) Employees selected for layoff will be considered eligible for rehire if they left in good standing as stated in Personnel Policy 203:3, Comment (9). The supervisor must secure written authorization from the Director of ICF/IDD Services or the Director of Contract Services or the Director of Business Operations and the Director of Human Resources before rehiring any former employee.
- 8) Employees selected for layoff will be paid for any Paid Time Off hours they have accrued during the current fiscal year, less any Paid Time Off taken during the current fiscal year.

TERMINATION OF EMPLOYEEMENT**213**

Effective: May 2013
 Last Revision Date: March 2013
 Last Reviewed Date: February 20, 2023
 Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to terminate employment because of an employee's resignation, discharge, retirement, expiration of an employment contract, or reduction in the work force. Discharge can be for any reason not prohibited by law. In the absence of a specific written agreement, employees are free to resign at any time and for any reason, and LIFE, Inc. reserves the right to terminate employment at any time and for any reason.

REGULATORY REFERENCE:

Title VII of the Civil Rights Act of 1964
 Age Discrimination in Employment Act
 Equal Pay Act
 Americans with Disabilities Act
 Rehabilitation Act of 1973
 Vietnam Veterans' Readjustment Assistance Act of 1974

FORMS MANUAL REFERENCE: 213(a), 213(b)**COMMENT:**

- 1) Employees are required to give written notice of their intent to resign. Failure to give written notice will result in forfeiture of payment for Paid Time Off accrued during the current fiscal year and ineligibility for re-employment. The following guidelines are suggested:
 - a) Corporate and managerial employees (Qualified Professionals, Habilitation Coordinators, Social Workers, Facility Nurses, Day Program Coordinators, Program Managers, Business Managers) must give four 4 weeks' notice;
 - b) All other employees must give at least two (2) weeks' notice.

Employees who are absent from work for three consecutive days without being excused or giving proper notice will be considered as having voluntarily quit without written notice.

- 2) For policies and procedures leading up to discharge for disciplinary reasons, see Disciplinary Procedure policy.
- 3) For policies and procedures governing termination of an employment contract, see Employment Agreements policy.
- 4) For policies and procedures governing a reduction in force, see Layoff/Reduction in Force policy.
- 5) The employee's immediate supervisor will send notices of resignation or recommendations for termination to their supervisor for review. These notices or recommendations will be accompanied by any needed supporting documents, such as disciplinary reports and separation

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- notices. Final review will be made by the QPII or Program Manager of the area to ensure Company policy is followed. Some resignations or terminations may involve review by the Human Resources Department.
- 6) Notice of involuntary terminations should be handled carefully and discretely, preferably in a private meeting including the employee to be terminated, the immediate supervisor, and another member of management.
 - 7) For resignations, the Accounting Clerk will forward to the Corporate Payroll Department within 1 business day of resignation date:
 - a) Payroll Transmittal
 - b) Separation Notice form 213(b)
 - c) Copy of the resignation document
 - 8) The Corporate Payroll Department will forward copies of the Separation Notice form and the resignation document to the Human Resource Administrator.
 - 9) For involuntary terminations, the Accounting Clerk will forward to the Corporate Payroll Department within 1 business day of termination date:
 - a) Payroll Transmittal
 - b) Separation Notice form 213(b)
 - c) Employee Warning Notices 806(a) documenting progressive discipline including the termination.
 - 10) The Corporate Payroll Department will forward copies of the Separation Notice form and the Employee Warning Notices to the Human Resource Administrator.
 - 11) The Human Resource Administrator will mail the Exit Interview form 213(a) to each separating employee in a self-addressed return envelope. These forms will be returned to the appropriate Departmental Director for review and possible recommendation for changes in policy. The Departmental Director will forward the form to the Human Resources Department. The responses from the interviews will be analyzed and possible trends identified. The Human Resource Administrator will file all the documents.
 - 12) Terminated employees will receive final pay for time worked as well as for any accrued unpaid Paid Time Off time for which they are eligible (see Paid Time Off Policy) on the next regular pay date following the termination. The supervisor will be responsible for securing the return by terminated employees of all LIFE, Inc. property in their possessions. Final pay will be accordance with established policy on Distribution of Paychecks (303:1).
 - 13) Terminated employees may be eligible for future employment if so recommended by their supervisor and approved by the Director of ICF/IDD Services or Director of Contract Services, Director of Business Operations, and the President.
 - 14) Requests for employment references should be made by mailing a written request to the Human Resources Department and must include an authorization by the employee for the release of the requested information. Generally, the Human Resources Department will not release reference information without the employee's written and signed authorization, or will limit the information to verification of the employee's position, job location, and dates of employment with LIFE, Inc.

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- 15) Termination and discharge procedures are only guidelines and do not constitute a legal contract between LIFE, Inc. and its employees. LIFE, Inc. reserves the right to implement its policies and procedures as it sees fit. In addition, specified grounds for termination are not all-inclusive since LIFE, Inc. reserves the right to terminate employment for any reason.

CRIMINAL RECORD BACKGROUND CHECK**214**

Effective: February 2014
Last Revision Date: February 2014
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

Prior to employment, it is the policy of LIFE, Inc. to ensure that no one is hired that has a history of relevant offenses, to include the abuse, neglect or mistreatment of others. This is done by securing a criminal history record check. Each applicant is also checked against a list of people excluded from participating in federal programs by searching the Office of Inspector General's List of Excluded Individuals and Entities (LEIE) and the General Services Administration's Excluded Party List System (EPLS.)

REGULATORY REFERENCE:

Mental Health, Developmental Disabilities and Substance Abuse Act of 1985, as amended N.C. Gen. Stat. 122 C-80
North Carolina State Bureau of Investigation
10A NCAC 70E .0405 and .0511
Fair Credit Reporting Act

FORMS MANUAL REFERENCE: 214 (a), 214(b), 214(c), 214(d)**COMMENT:**

- 1) All applicants are required to disclose any criminal conviction. It is mandatory that all applicants for employment with LIFE, Inc. provide written consent to a criminal history record check as a condition to any offer of employment. (Forms 214(a) – 214(d). A summary of their rights under the Fair Credit Reporting Act will be given to each applicant. (Forms 214(b) – 214:10).
- 2) The purpose of the criminal history check is to satisfy the Mental Health, Developmental Disabilities and Substance Abuse Act of 1985, as amended, N.C. Gen. Stat 122-C 80, as well as Company's policy of not hiring any individual with a history of abuse, neglect or mistreatment of others.
- 3) Applicants should be made aware of the reason for the requirement of any background records check at the time it is requested.
- 4) An applicant who is being considered for a position will be asked by the interviewer to provide a check as follows:
 - a) State:
If the applicant has been a resident of the state of North Carolina for five (5) or more years, the applicant must consent to a state criminal history check.
 - b) State/National
If the applicant has been a resident of the State of North Carolina for less than five (5) years, the applicant must consent to a state and national criminal history record check.

The national criminal history record check includes a fingerprint check. The Corporate Office will mail the fingerprint card to the interviewer or designated person to be completed by the applicant. The applicant will take a fingerprint card to the local law enforcement and return the completed card to the interviewer. This must be done within five (5) business days. The interviewer or designated person must return the completed fingerprint card to the Corporate Office with twenty-four (24) hours for processing. LIFE, Inc. will be responsible for the fees for fingerprinting. The fingerprints will be processed by the State Bureau of Investigation for the state record check and then forwarded to the Federal Bureau of Investigation for a national check.

All documentation relating to any national fingerprint check will be maintained in a separate locked file cabinet at the Corporate Office and accessible only by authorized personnel.

A background check will be conducted on all authorized personnel that will be handling the national fingerprint checks. Anyone with a felony conviction may not have access to this information.

The criminal record and fingerprint card will be kept unless authorization is received to destroy them. If destroyed, the responsible person must shred or burn the information. It is not acceptable to just throw it in the trashcan. Also, an outside agency cannot do the shredding for LIFE, Inc. (called outsourcing). The shredding or burning of the documents must be done in-house by the responsible person, and then the shredded items can be outsourced. The Authority for Release form or the Electronic Release form will be maintained in LIFE, Inc. files for one (1) year.

- 5) Applicants must complete Forms 214(a)-(c) at the time they are completing an application for employment. These forms will be sent to the Human Resource Administrator at the Corporate Office. An offer to hire shall not be made until the approval has been given based on the results of the release. This criminal record check is filed at the Corporate Office. Confirmation of the criminal record check will be sent to the local office for filing in the employee's personnel file.
- 6) Applicants who refuse to consent to any background record check requested by LIFE, Inc. will not be considered for employment.
- 7) "Relevant Offenses" means a state crime, and will include federal crimes either a felony or misdemeanor, that affects an applicant's fitness to be responsible for the safety and well-being of persons needing mental health, developmental disability and substance abuse services and includes the following crimes:
 - Counterfeiting
 - Endangering executive & legislative offices
 - Homicide
 - Rape and other sex offense
 - Assaults
 - Kidnapping & abduction
 - Malicious injury or damage by use of explosive devices
 - Burglary
 - Arson

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- Larceny
 - Robbery
 - Embezzlement
 - False pretense and cheats
 - Obtaining property or services by false or fraudulent use of credit device
 - Financial transaction card crime
 - Frauds
 - Forgery
 - Offense against public morality and decency
 - Adult establishments
 - Prostitution
 - Perjury
 - Bribery
 - Misconduct in public office
 - Offense against public peace
 - Riots and civil disorders
 - Protection of minors
 - Protection of the family
 - Public intoxication
 - Computer related crime
 - Possession or sale of drugs
 - Alcohol related offense (sale to underage person or DWI)
- 8) The following factors will be taken into consideration if the record shows one or more convictions for a “relevant offense”. The conviction of the “relevant offense alone shall not bar employment, but must be considered with the following factors”:
- a) Level and seriousness of the crime;
 - b) Date of the crime;
 - c) Age of person at time of conviction;
 - d) Circumstances surrounding the commission of the crime;
 - e) Nexus between the criminal conduct of the applicant and the job duties of the position to be filled;
 - f) Prison, jail, probation, parole, rehab and employment records of the applicant since the date the crime was committed; and
 - g) Subsequent commission by the applicant of a “relevant offense”.
- 9) If an applicant is disqualified based upon the criminal record report or motor vehicle record check, they will be mailed a letter from the Human Resources Department with the following information:
- a) Stating the reason for disqualification;
 - b) A copy of the report or reports
 - c) The reporting agency name, address, telephone number
 - d) A summary of rights under the Fair Credit Reporting Act;
 - e) Deadlines for disputing the report or reports.

Criminal record reports and motor vehicle report checks will not be given to another agency.

- 10) The criminal record check should only be used for the original hire/not hire decision.
- 11) When a public record check is conducted, a copy of the results will be kept in the Corporate Office for audit purposes.
- 12) The Human Resource Administrator at the Corporate Office will search the LEIE and EPLS websites for each applicant. An offer to hire shall not be made until approval has been given based on the results. The results will be printed from the websites and filed at the Corporate Office.
- 13) The Human Resource Administrator at the Corporate Office will search the North Carolina Sex Offender and Public Protection Registry website for each applicant. An offer to hire shall not be made until approval has been given based on the results. The results will be printed from the website and filed at the Corporate Office.

MOTOR VEHICLE RECORD CHECK**215**

Effective: February 2014
Last Revision Date: March 19, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

Prior to employment, it is the policy of LIFE, Inc. to ensure that no one is hired that has a history of unacceptable driving violations. This is done by securing a motor vehicle record report.

REGULATORY REFERENCE:

N.C. General Statute 122C-80
LIFE, Inc. Policy

FORMS MANUAL REFERENCE: 215(a)**COMMENT:**

- 1) It is mandatory that all applicants for employment with LIFE, Inc. provide written consent to a motor vehicle record check as a condition to any offer of employment. (Form 214(a) and 215(a)).
- 2) The motor vehicle record check will be sent to the Human Resource Administrator at the Corporate Office, who will review for approval. (If there are any questions, the Human Resource Administrator will consult with the Director of Human Resources and/or our insurance agent if necessary.) Prior to making an offer to hire, approval must be given based on the results of the motor vehicle record check.
- 3) The following are the guidelines for unacceptable records. Any driver with:
 - a) three (3) or more moving violations in the last three (3) years;
 - b) two (2) to three (3) “at fault” accidents in the last four (4) years;
 - c) a DUI (Driving Under the Influence) in the last five (5) years;
 - d) more than two (2) suspensions with reinstatements in the last three (3) years;
 - e) a revocation of license in the last three (3) years.
- 4) Any driver under the age of nineteen (19) is unacceptable to drive a LIFE, Inc. vehicle or to drive their personal vehicle on LIFE, Inc. business. Any driver over the age of sixty-five (65) must provide a signed statement from a physician annually.
- 5) Any “not at fault” accidents may require a detailed statement from the driver.
- 6) Any unacceptable offenses that occur during employment must be reported in accordance with Personnel Policy 801:2(1). Dependent on the seriousness of the violation, a written warning may

be issued or the violation may result in termination. The action taken on these offenses will also be dependent on the employee's position responsibilities.

- 7) Motor Vehicle Record Checks will be completed annually on all employees considered to be borderline by our insurance carrier or agent. The policies stated in Comment (6) above will be followed. Failure to report offenses will result in disciplinary action up to and including termination.

ACCOMMODATING PERSONS WITH A DISABILITY**216**

Effective: March 16, 2009
Last Revision Date: March 25, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to reasonably accommodate qualified individuals with a disability.

REGULATORY REFERENCE:

Americans with Disabilities Act (ADA)
Americans with Disabilities Amendment Act (ADAA)

FORMS MANUAL REFERENCE: 216(a), 216(b), 216(c)**COMMENT:**

- 1) This policy prohibits discrimination against a qualified individual with a disability to include discrimination with respect to application, hiring, promotion, discharge, compensation, benefits, training, and all other aspects of employment.
- 2) Disability is defined as:
 - a) A physical or mental impairment that substantially limits one or more major life activities;
 - b) A record of such impairment;
 - c) Being regarded as having such impairment.
- 3) This policy also prohibits discrimination against an employee because a family member is a person with a disability.
- 4) LIFE, Inc. seeks to reasonably accommodate qualified individuals with disabilities. Such reasonable accommodation may take the form of making existing facilities readily accessible to or usable by individuals with a disability, restructuring jobs, modifying schedules, acquiring or modifying equipment, adjusting training materials, adjusting employment policies, and the like. Generally, such reasonable accommodation will be made unless it creates an undue hardship for the Company.

The factors to be considered with respect to an undue hardship are:

- a) the nature and cost of the accommodation;
- b) the overall financial resources of the facility at which the reasonable accommodation is to be made;
- c) the number of persons employed at that facility;

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- d) the effect on expenses and resources or other impact upon that facility;
 - e) the overall financial resources of the Company;
 - f) the overall number of employees and facilities;
 - g) the operations of the particular facility as well as the entire Company; and
 - h) the relationship of the particular facility to the Company.

These are not all of the factors that may be considered.

When an applicant or employee requests an accommodation, the Human Resources Department must be contacted for guidance and approval.

- 5) All employees are expected to be able to comply with safety rules at all times. Any applicant for a position who poses a direct threat to the safety or health of others in that position, when that threat may not be eliminated by reasonable accommodation, will not be employed in that position. Similarly, current employees who become disabled and thereby pose a direct threat to fellow employees, when the threat may not be eliminated by reasonable accommodation, will be placed on an appropriate leave of absence until a decision about continued employment can be made. An attempt will be made to place applicants and employees in positions for which they are qualified and in which they do not pose a direct threat. The determination that an employee poses a direct threat to the safety or health of others will be confirmed by an opinion in writing from an appropriate professional, e.g., a physician. {Forms 216(a)-(c)}.
- 6) All employees are expected to comply at all times with the Company's policy regarding the use of drugs and alcohol. For example, all employees are expected to cooperate with drug testing, in accordance with that policy. The Company will reasonably accommodate individuals who are recovering from chemical dependency or alcohol dependency. Employees who have an alcohol dependency will not be judged on the fact that they have an alcohol dependency.
- 7) Any applicant or employee who believes that there has been a violation of this Company policy, or any applicable law relating to accommodating a person with a disability, should immediately contact their interviewer or supervisor, as the case may be. If the interviewer or supervisor is unable to resolve the issue, the individual is to contact the Human Resources Department. All complaints will be promptly investigated. All individuals are expected to cooperate with an investigation. The information obtained in the course of an investigation, will generally, be held in confidence and will only be disclosed to those individuals on a need to know basis.
- 8) This policy regarding qualified individuals with disabilities will be coordinated with all other Company policies such as safety, drug testing, flextime, leave, and the like.

FORM I-9**217**

Effective: June 2013
Last Revision Date: March 26, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to complete the Form I-9 as required by law.

REGULATORY REFERENCE:

Immigration Reform and Control Act of 1986 (IRCA)

COMMENT:

- 1) All employees will complete a Form I-9 in accordance with the specific instructions included with the form.
- 2) Accounting Clerks will review the employee's section for accuracy.
- 3) Accounting Clerks will not suggest any documents to use for verification.
- 4) Accounting Clerks will complete the employer's required sections and forward a copy to the Human Resources Administrator. This must be done within 3 business days of hire date. The Human Resources Administrator will enter the required data from the Form I-9 into the E-Verify system.
- 5) Accounting Clerks will file the completed Form I-9 in alphabetical order by last name in a binder separate from the employee's Personnel file. Copies of the Verification documents will not be filed with the Form I-9.
- 6) The Human Resources Administrator will email the Accounting Clerk the Case Verification Number when the E-Verify process has been completed. The Accounting Clerk will staple a copy of the email behind the Form I-9.
- 7) If an employee has a legal name change, the Accounting Clerk will complete Section 3 of the Form I-9. Documentation supporting the name change will be attached to the Form I-9.
- 8) Accounting Clerks will move the Form I-9's of terminated employees to a termination file.
- 9) Accounting Clerks must retain the Form I-9 for each terminated employee either three years after the hire date or one year after the employee's last date of employment, whichever is later.
- 10) Accounting Clerks will follow the steps on the Form I-9 Retention Worksheet (217:2) to determine which date applies. They will attach the completed Form I-9 Retention Worksheet to the Form I-9 and file in the terminated file.

Form I-9 Retention Worksheet

- Step 1: On the employee's *first day*, complete employee name and date of hire. Staple this form directly to the Form I-9.
- Step 2: On the employee's *last day*, complete date of termination, complete the calculations, and enter the retention date in the box provided. Move these documents to a termination file.
- Step 3: On the *retention date*, shred this form, the Form I-9, and the Case Verification email (if applicable)

For all *current employees*, complete this form in its entirety on the employee's *last day* and move to termination file.

<hr/> Employee Name		
1.	Enter employee hire date: _____	
	Add 3 years to line 1	A. _____
2.	Termination date: _____	
	Add 1 year to line 2	B. _____
	Which date is later: A or B? Enter retention date here.	C. _____
Store Form I-9 until this date.		

EMPLOYEMENT STATUS AND ELIGIBILITY OF BENIFETS**218**

Last Revision Date: March 26, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to determine employment status and eligibility for benefits in accordance with the guidelines listed below.

REGULATORY REFERENCE: LIFE, Inc. Company policy

COMMENT:

- (1) An employee who works at least 36 hours per week will be considered Full-time.
- (2) An employee who works less than 36 hours per week will be considered Part-time.
- (3) All employees, regardless of employment status, are eligible for retirement benefits, providing they meet eligibility requirements of the Retirement Plan (see Policy 509:1).
- (4) An employee who averages working at least 30 hours per week is eligible for Group Health Insurance if he/she is (a) Full-time employee at the time of hire, or (b) achieves working an average of 30 hours or more during a designated 6-month measurement period.
- (5) All employees, regardless of employment status, are eligible to accrue PTO during any pay period in which the employee is paid for at least 72 hours. An employee who is paid for less than 72 hours, regardless of employment status, will not accrue PTO.
- (6) Part-time employees who accrue PTO are not allowed to utilize PTO, but can be paid out their PTO balance during June, provided they are still employed. If the part-time employee submits his resignation and works a proper notice (2 weeks), all accrued PTO will be paid in the employee's final paycheck. If a part-time employee is terminated for cause, all accrued PTO will be forfeited.

PERSONNEL RECORDS**219**

Effective: May 22, 2008
Last Revision Date: May 22, 2014
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to maintain personnel records for applicants, employees, and past employees in order to document employment-related decisions, evaluate and assess policies, and comply with government recordkeeping and reporting requirements.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy
Privacy Act of 1974
Internal Revenue Service requirements
Federal and State Laws regarding record retention
OSHA Guidelines

COMMENT:

- 1) LIFE, Inc. tries to balance its need to obtain, use, and retain employment information with a concern for each individual's privacy. To this end, it attempts to maintain only the personnel information that is necessary for conducting LIFE, Inc. business or required by federal, state, or local law.
- 2) The Human Resources/Payroll Departments are responsible for overseeing recordkeeping for all personnel information and will specify what information should be collected and how it should be stored and secured. (For the need to maintain separate medical files, see Medical Procedures Policy).
- 3) Employees have a responsibility to keep their personnel records up to date and should notify the Payroll Department in writing of any changes in at least the following:
 - a) Name;
 - b) Address;
 - c) Telephone Number;
 - d) Marital status (for benefits and tax withholding purposes only);
 - e) Number of dependents;
 - f) Addresses and telephone numbers of dependents and spouse or former spouse (for insurance purposes only);
 - g) Beneficiary designations for any of the Company's insurance and retirement plan; and
 - h) Persons to be notified in case of emergency
 - i) Current copy of driver's license.

In addition, employees who have a change in the number of dependents or marital status must complete a new Form W-4 for income tax withholding purposes within ten days of the change.

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- 4) Personnel, Training, and Medical files are private Company property. Current employees may request to review certain records such as evaluations and disciplinary actions. This request must be in writing to the Human Resources Department. Records that are considered to contain sensitive or confidential information may be excluded from the review. All reviews must be conducted in the presence of a designated member of management. At the request of an employee, they may be furnished one (1) copy each of any record, including certificates, from the Company approved or sponsored training. Otherwise, no alteration, copying, or removal of records will be permitted.
 - 5) Employees who believe that any file material is incomplete, inaccurate, or irrelevant may submit a written request for file revisions to the Human Resources Department. If the request is not granted, the employee may place a written statement of disagreement in the file and make a complaint using the established grievance procedure.
 - 6) Only supervisory and management employees who have an employment-related need-to-know information about another employee may inspect the files of that employee. The inspection must be approved by the Human Resources Department and should be recorded in the file inspected.
 - 7) Employees are to refer all requests from outside LIFE, Inc. for personnel information concerning applicants, employees, and past employees to the Human Resources Department. The Human Resources Department normally will release personnel information only in writing and only after obtaining the written consent of the individual involved. Exceptions may be made to cooperate with legal, safety, and medical officials who need specific employee information. In addition, exceptions may be made to release limited general information, such as the following:
 - a) Employment dates;
 - b) Position held; and
 - c) Location of job site

EMPLOYEE ADDRESS AND TELEPHONE NUMBER ACCESSIBILITY**220**

Effective: January 2006

Last Revision Date: May 14, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. for initial and continued employment that each employee provides their immediate supervisor with a telephone number and a home address where he can be reached quickly and easily.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

DFS Certification Standards – W188

COMMENT:

- 1) A current telephone number is required for employment to assure easy access to off duty employees.
- 2) A current address is needed so that any work-related correspondence and paychecks (in cases when it is necessary to mail them to employees) will reach the proper party.
- 3) Any change of address or telephone number should be reported to the employee's immediate supervisor the first work day after the change has occurred.
 - a) The change needs to be documented by the Supervisor on the LIFE, Inc. Update/Set-up Sheet and a copy sent to the Payroll Department in the Corporate Office. The original copy will be filed in the facility Personnel file.
- 4) Address and telephone numbers of employees are not public records, and it is the responsibility of each QP, Habilitation Coordinator, and Accounting Clerk to ensure confidentiality and privacy in reference to access to this information.
- 5) Any instance in which this information is inappropriately given to an outside source will be considered a breach of confidentiality and the violator will be subject to disciplinary action.
- 6) When clients are not present in a group home facility, a responsible staff member must be available by telephone in case of emergency (W188).

REMEMBRANCES FOR EMPLOYEES, CLIENTS AND NONEMPLOYEES**221**

Effective: February 25, 2008
Last Revision Date: February 25, 2008
Last Reviewed Date: February 20, 2023
Responsibility: Director of Human Resources

POLICY:

It is the policy of LIFE, Inc. to remember employees, clients and others during periods of illness and bereavement as well as on special personal occasions according to the guidelines established below.

REGULATORY REFERENCE:

DMA Guidelines
LIFE, Inc. Company Policy

COMMENT:

- 1) In the event of a death in the family of an employee, the following guidelines apply:
 - a) Death of parent, child or spouse of an employee – LIFE, Inc. will either send flowers or make a memorial contribution in an amount not to exceed \$100.00.
 - b) Death of any other family member of an employee – LIFE, Inc. will send a sympathy card.
 - c) These arrangements should be made by the appropriate department head or his designee.
- 2) In the event of illness/hospitalization of an employee, LIFE, Inc. will send appropriate cards, make phone calls and/or visit.

In cases of extended hospitalizations and serious illness of an employee, the appropriate supervisor should contact the Director of ICF or Director on Contract Services.

- 3) In the event of the death of a LIFE, Inc. employee, the appropriate supervisor should contact the Director of ICF or Director of Contract Services.
- 4) Because of LIFE, Inc.'s fiduciary relationship with the Division of Medical Assistance and in an effort to be impartial, the company will not coordinate nor sponsor any special celebration for an individual employee (birthdays, wedding and baby showers, resignations, or retirements.) LIFE, Inc. encourages coworkers to coordinate and sponsor such events as they desire during non-work times.

If there is a desire to solicit contributions for any such events from LIFE, Inc. staff, these arrangements should be approved in advance by the QP and should be in keeping with established policy on Solicitation (603:1).

- 5) Any special recognition of classes of employees (National Social Worker's Week, Secretary's Day, etc.) will be determined by the President and communicated to the appropriate staff.

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- 6) In the event of a death in the family of LIFE, Inc. client, the following guidelines apply:
 - a) Death of parent or legal guardian (if an individual and not an agency) of a client – LIFE, Inc. will either send flowers or make a memorial contribution in an amount not to exceed \$100.00
 - b) Death of a sibling of a LIFE, Inc. client – appropriate expression of sympathy to be determined by consumer’s social worker, case manager, or QP.
 - c) These arrangements should be made by the appropriate department head or his designee.
 - 7) In the event of the hospitalization of a client or client’s family member, appropriate expressions of concern will be recommended by the appropriate social worker/case manager and should be approved by the Director of Social Work.
 - 8) LIFE, Inc. will not approve any monetary remembrances or gifts for nonemployees for any reason as they are not allowed under our reimbursement system.
 - 9) Christmas cards may be prepared at the Corporate Office in order to avoid duplicating greetings.

TRAVEL**222**

Effective: July 2018

Last Revision Date: July 24, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to outline travel requirements and expectations for exempt and nonexempt employees.

REGULATORY REFERENCE: LIFE, Inc. Company Policy
Fair Labor Standards Act

COMMENTS:

For information on mileage reimbursement, please refer to Policy 401, Personal Automobile Usage.

- 1) Employees in positions classified as nonexempt under the Fair Labor Standards Act are eligible for compensation for some time they spend traveling:
 - a) *Travel for a One-Day Assignment in Another City:* An employee who regularly works at a fixed location and is given a special one-day assignment in another city and returns home the same day will be paid for the time spent traveling to and from the other city, except for the time the employee would normally spend commuting to and from the regular worksite.
 - b) *Travel during the workday:* Time spent by an employee traveling as part of his or her regular job duties, such as travel from jobsite to jobsite during the workday, is work time and will be paid as such.
 - c) *Travel away from home:* Travel that keeps an employee away from home overnight is travel away from home. Travel time that takes place within normal work hours, regardless of the day of the week, is treated as work hours. When an employee travels between time zones, the time zone associated with the point of departure should be used to determine whether the travel falls within normal work hours.
 - d) *Travel time as the driver of an automobile:* All authorized travel time spent driving an automobile (as the driver, not as a passenger) is treated as work hours, regardless of whether the travel takes place within normal work hours or outside normal work hours.
- 2) Employees in positions classified as exempt should follow these guidelines when traveling:
 - a) Travel time in between facilities is counted as work time.
 - b) Travel outside your region or home office is only expected when a full day's work is warranted in that region, or if it is a necessity to the Company.

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- c) To meet the guidelines of policy 209:8 that outlines an exempt employee's normal work day, the Company will count one way's travel between a worksite over an hour away from their home office to/from home as work time. This travel time cannot be split between both to and from a facility. This means, a traveling employee is expected to be at a facility in the region at the start of their standard business day or at the end of their standard business day. Examples of this would include:
- An exempt employee that works in Washington must travel to Wilmington (2.5 hours away) arrives at 8. If all of their business has been conducted, they will be permitted to leave at 2:30.
 - An exempt employee that works in Washington must travel to Wilmington (2.5 hours away) arrives at 9:30. This employee would be expected to stay at the Wilmington facility until 5:00 to meet their standard business day.
 - An employee that's home office is in Goldsboro Arrives in Washington (1.25 hours away) arrives at 9:20 and leaves at 4:00. This employee would be expected to request incidental leave, or utilize one hour of PTO.

SECTION 3**PAY PRACTICES**

Salary Administration	301:1
Pay Procedures	302:1
Distribution of Pay	303:1
Overtime Pay	304:1
Garnishments	305:1
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Pay Deduction	307:1
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SALARY ADMINISTRATION**301**

Effective: March 28, 2008

Last Revision Date: March 11, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to pay compensation that is nondiscriminatory and competitive. However, all compensation policy decisions must take into consideration LIFE, Inc.'s overall financial condition and competitive position.

REGULATORY REFERENCE:

Title VII of the Civil Rights Act of 1964

Equal Pay Act

COMMENT:

- 1) The Business and Human Resources Departments are responsible for coordinating the continuing internal review of all compensation and for making sure that each job is evaluated and assigned a salary range. This review should determine whether compensation accurately and fairly reflects each individual's responsibilities and performance.
- 2) The business and Human Resources Departments will, when considered appropriate, participate in or conduct compensation surveys covering other employers with similar jobs. This and other available information should be used to help set pay policy and to determine the relative competitive position of LIFE, Inc.'s pay structure.
- 3) Employees who are not satisfied with their performance review or who have questions about LIFE, Inc.'s salary administration and benefits program should direct their concern to their supervisor, department head, or the Human Resources Department.

PAY PROCEDURES**302**

Effective: March 28, 2008

Last Revision Date: March 11, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. to pay employees by direct deposit, electronic pay card or check on a bi-weekly basis and in a manner so that the amount, method, and timing of such payments comply with any applicable laws or regulations.

REGULATORY REFERENCE:

LIFE Company Policy

Federal and State Wage and Hour Laws

COMMENT:

- 1) The workweek is Sunday through Saturday beginning and ending at midnight on Saturday, consisting of forty hours.
- 2) A pay period consists of two workweeks.
- 3) Employees are paid every other Friday except when pay day is a bank holiday. In this event, employees will be paid before Friday.
- 4) Check stubs will include a statement showing gross pay, deductions, and net pay. Local, state, federal, and Social Security taxes will be deducted according to Federal and State Wage and Hour Laws. No other deductions will be made unless required by law, contract, or employee obligation. Employees may elect to have additional voluntary deductions taken from their pay only if they authorize the deductions in writing.
- 5) Nonexempt employees (i.e., those not exempt from the provisions of the Fair Labor Standards Act) will be paid overtime compensation at the rate of one and one-half times their regular hourly pay rate for work in excess of forty (40) hours during the normal work week.
- 6) Wages will not be paid in advance.

DISTRIBUTION OF PAY**303**

Effective: June 2007

Last Revision Date: March 26, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. to pay all employees electronically in accordance with standard practices and applicable law.

REGULATORY REFERENCE:

LIFE, Inc. Corporate Policy

COMMENT:

- 1) Each employee and terminated employee will receive his pay through direct deposit
- 2) Paystubs, pay history and PTO balances are available online at <https://LIFEINC.greenemployee.com/payhistory.aspx>.
- 3) Employees who enroll will be notified electronically when a paystub is ready to view.
- 4) Paystubs will remain online for one year and may be viewed or printed. Employees may “opt-in” for other features, such as the ability to receive notification by text message.

OVERTIME PAY**304**

Effective: November 2013
 Last Revision Date: March 26, 2018
 Last Reviewed Date: February 20, 2023
 Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. to pay each hourly and salaried non-exempt employee overtime who works longer than 40 hours in any work week at a rate of time and one half of the regular rate of pay of the employee for those hours in excess of 40 per week.

REGULATORY REFERENCE: Wage and Hour Act, North Carolina General Statute 95-25.4

COMMENT:

- 1) Salaried exempt employees are excluded from this policy. Salaried exempt employees are defined as QDDP I and II, Registered Nurses, Social Workers, Program Managers, Business Managers, Regional Directors, Corporate Directors and Officers.
- 2) Any employee working in excess of 40 hours in a work week will receive pay equivalent to one and a half times his normal hourly rate for each hour worked in excess of 40. For example, John Doe, who makes \$10.00 per hour, works 43 hours during the first week of the pay period. For the first week, John Doe would be paid accordingly:

40 hours at \$10.00 per hour and 3 hours at \$15.00 per hour (\$10 times 1.5) per hour

- 3) The overtime calculation for employees that perform duties paid at multiple pay rates must be averaged to include the multiple pay rates. For example, John Doe works 10 hours doing a job that pays \$10 per hour and 35 hours on a job that pays \$12.00 per hour. John Doe's overtime rate for week one would be figured accordingly:

Step 1

Pay Rate	Hours Worked	Dollars
\$10.00	10	\$100.00
\$12.00	35	\$420.00
Total	45	\$520.00

Step 2 Dollars ÷ Hours = Average Pay Rate (\$520 ÷ 45 = \$11.56)

Step 3 Average Pay Rate X 1.5 = Overtime Pay Rate (\$11.56 X 1.5 = \$17.34)

- 4) A work week is defined as the period from Sunday through Saturday beginning and ending at midnight on Saturday.

-
- 5) All overtime must be prior approved by the Supervisor. The Supervisor must be able to clearly justify that overtime constituted the best (or only) means of addressing the situation.

Circumstances in which overtime may be authorized:

- a) Overtime may be authorized only when it is not possible for staffing patterns and/or employee work schedules to provide essential staffing in the following types of circumstances.
- 1) Emergency Circumstances – Adverse circumstances of a temporary nature which reduce normal staffing or increasing staffing requirements. For example:
- a) Unexpected absence of an employee whose position must be filled to avoid a disruption of necessary services.
- b) Necessity to immediately perform an expected heavier than normal volume of work or avoid disruption of necessary services.
- c) Situations which are uncontrollable, such as severe weather, disruption of utilities, etc.
- 2) Non-Emergency Circumstances
- a) Situations in which overtime work is considered to be the best way to make necessary staff available to handle a particular situation. For example:
- 1) To provide essential staffing where vacancies exist in a department due to the unavailability of qualified applicants.
- 2) To perform an unusually heavy volume of work of a temporary nature in the implementation of an approved program.
- 3) To perform work which cannot be performed during normal working hours without disrupting necessary activities or services.

General Guidelines for distribution of overtime among employees

- a) To the extent feasible, overtime will be distributed equally among regular employees, of the same classification in a department, who are willing to work overtime, provided the employees concerned are equally capable of performing the duties required.
- b) To the extent consistent with number one (a) above, overtime work will be offered to regular employees considered equally capable of its performance in the order of their length of continuous full-time employment.
- c) An employee who refuses overtime will not be asked to work overtime again until his turn comes again, or an emergency exists in which he is the most logical person to work the overtime required.

GARNISHMENTS**305**

Effective: November 2013
Last Revision Date: November 2013
Last Reviewed Date: February 20, 2023
Responsibility: Director of Business Operations

REGULATORY REFERENCE:

North Carolina General Statute I-400.21 et. Seq.
Consumer Credit Protection Act (15 US Code 1673)

POLICY:

It is the policy of LIFE, Inc. to withhold court ordered garnishments from an employee's earnings for payment of a debt in accordance with federal and state laws.

COMMENT:

- 1) Garnishment orders are delivered to the employee and the employer. Once it is received by LIFE, Inc. the applicable amount will be deducted from the employee's earnings until the debt is satisfied.
- 2) If the employee chooses to pay the debt in full upon receipt of the garnishment, he must notify the Corporate Office Payroll Manager, otherwise the garnishment amount will be deducted from his earnings. In the event the employee chooses to pay the debt in full and the garnishment amount is deducted from his earnings, the employee is responsible for collecting the overpayment from the Clerk of Court.

LOANS AND PAY ADVANCES**306**

Last Revision Date: March 26, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. that loans and pay advances will not be made to any employee.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Compensation for hours worked to any employee will be made only on established pay days and in accordance with Pay Procedures policy.
- 2) Reimbursement of employee expenses to any employee will be processed only according to established accounts payable procedures and in accordance with policies on Reimbursement of Employee Expenses.
- 3) Supervisory personnel should communicate this information to employees if inquiries are made concerning loans and pay advances. Requests of this nature should not be presented for consideration.

PAY DEDUCTION**307**

Effective: July 2, 2018

Last Revision Date: February 6, 2009

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. not to deduct from the compensation of employees of the company who are exempt from the overtime provisions of the Fair Labor Standards Act. This policy does not apply to deductions required by law; deductions made for employee's benefit or with employees' consent; deductions for payments of the costs of employee benefits, such as for payment of health insurance premiums; or deductions for the reimbursement or offset of costs or expenses incurred by employee.

REGULATORY REFERENCE: Fair Labor Standards Act**COMMENT:**

- 1) The purpose of this policy is to clearly communicate to exempt employees what types of deductions may be properly made from their pay; to provide a complaint mechanism for employees who believe an improper deduction has been made; to mandate a policy of prompt reimbursement for any improper deduction; and to reflect the company's commitment to comply with the Fair Labor Standards Act with respect to such deductions now and in the future.
- 2) Deductions from the pay of exempt employees, when PTO is not available, may be properly made:
 - a) When an exempt employee is absent from work for one or more full days for personal reasons, sickness, or disability;
 - b) For absences of one or more full days occasioned by sickness or disability (including work-related accidents) if the deduction is made in accordance with a bona fide plan, policy or practice or providing compensation for loss of salary occasioned by such sickness or disability (including wage replacement benefits under state disability or workers' compensation laws);
 - c) To offset any amounts received by an employee as jury fees, witness fees or military pay for a particular week against the salary due for that particular week;
 - d) For penalties imposed in good faith for infractions of safety rules of major significance;
 - e) For unpaid disciplinary suspensions of one or more full days imposed in good faith for infractions or workplace conduct rules;
 - f) So that a proportionate part of an employee's full salary is paid for the time actually worked in the first and last week of employment, or;
 - g) For weeks in which an exempt employee takes unpaid leave under the Family and Medical Leave Act.

3) **Partial Day Absence**

The Company is required to pay an exempt employee for the full day. Regardless of the employee having enough PTO to cover a partial day's absence, the absent time must be recorded as PTO. If the employee does not have enough PTO, his leave bank will accumulate a negative balance or payback for the employee. Any employee with a negative balance cannot be approved for PTO until the negative balance is corrected. A salaried employee should never have more than eight (8) hours of negative PTO. Supervisors must determine an employee's PTO status before approving PTO. Negative balances should only occur because of emergencies or sickness.

4) **Full Day Absence**

The Company is not required to pay an employee for a full day's absence. PTO must be utilized. If an employee does not have PTO, the absence is not paid.

It is possible for both types of absences to arise in the same pay period. Each day is to be treated differently. (Example: An employee has no PTO. Employee leaves work at noon on Tuesday, does not work Wednesday, and returns to work Thursday. In this scenario, the employee is paid four (4) hours for the remainder of Tuesday. The time is recorded as PTO, thus creating a 4-hour negative PTO balance. The employee is not paid for Wednesday because (1) employee does not have any PTO available; and (2) it was a full day's absence.)

5) All other deductions are prohibited.

6) Any exempt employee who believes that an improper deduction has been taken from his/her salary should report the deduction in writing to their supervisor. Alternatively, or if the employee is not satisfied that his/her complaint is being addressed promptly and properly, he/she should provide a copy of the complaint to the appropriate Director of ICF/IDD Services or Director of Contract Services. The company will investigate the deduction, and if it is found to have been improper, will reimburse the employee for the improper deduction on the company's next regular pay day.

PURCHASING OF COMPANY PROPERTY**308**

Effective: August 2014

Last Revision Date: June 19, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Facilities

POLICY:

It is the policy of LIFE, Inc. that purchase orders be utilized as a method of cost containment and to provide staff members with the authority to purchase property on behalf of the company.

REGULATORY REFERENCE: LIFE, Inc. Company Policy
LIFE, Inc. Business Operations Manual

COMMENT:

- 1) Purchase orders must be used for all purchases as outlined in the LIFE, Inc. Business Operations Manual.
- 2) All purchases must be approved by a QP prior to a purchase.
- 3) A QP cannot make purchase for which he/she is the approver.
- 4) The purchase of an asset that costs \$25 or more must first be approved by a QP and then approved in writing or via email by the Director of Facilities. Except for emergency situations, verbal or telephone approval is not acceptable.
- 5) After a purchase is made on an asset of \$25 or more, the make, model and serial number must be reported to the Director of Facilities via email.

DISPOSAL OF COMPANY PROPERTY**309**

Effective: August 2014

Last Revision Date: August 2014

Last Reviewed Date: February 20, 2023

Responsibility: Director of Facilities

POLICY:

It is the policy of LIFE, Inc. to control and properly dispose of company property.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) Disposition of company property with a replacement value greater than \$25 must be approved by the Director of Facilities.
- 2) Any company property deemed unusable will be disposed of in a landfill in accordance with state and local laws.
- 3) Any company property deemed unserviceable by LIFE, Inc. but still useable will be donated to a non-profit organization.
- 4) At no time will company property be given away or sold to any individual. This includes yard sales, swap meets, etc.

SPECIALTEES SALES BONUS**310**

Effective: August 2017

Last Revision Date: August 1, 2023

Last Reviewed Date: August 1, 2023

Responsibility: Executive Vice President

POLICY:

Each employee who refers a NEW customer to Life's SpecialTees will receive a \$1.00 bonus for each garment ordered and paid for. Any repeat business will be bonused at 50 cents per garment. (not applicable to promotional items such as koozies, can huggers, pens, tote bags)

COMMENT:

1. A 'garment' is defined as a shirt, hat, coat, pants, shorts, jersey, pullover, jacket, work vest, or polo.
2. Employees must notify the Accounting Clerk or the SpecialTees manager (919-778-1970) before the sale of a potential order. The purchaser's name and company or group will be required. This will be cross-checked with the customer.
3. Life's SpecialTees will ask each customer if they were referred by a LIFE, Inc. employee when the initial order is being placed.
 - a. If the purchaser does not remember the employee's name, a note will be made on the invoice until the name is determined.
 - b. If confirmation of a referral is not made during the initial order, no LIFE, Inc. employee will receive the bonus.
4. The employee will receive the bonus when the entire order has been paid for in full.
5. The employee will receive the bonus the following pay period after the order has been paid in full.
6. All bonuses are subject to all taxes and are reported on the employee's W-2 form.
7. A bonus may be split between two employees.
8. If there is a dispute over bonuses, no LIFE, Inc. employee will receive a bonus.
9. Sales are not to be conducted on company time.

SECTION 4**REIMBURSEMENT OF EMPLOYEE EXPENSES**

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PERSONAL AUTOMOBILE USAGE**401**

Effective: September 2006

Last Revision Date: August 2, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to reimburse employees for business use of personal vehicles according to the guidelines below.

REGULATORY REFERENCES:

LIFE, Inc. Company Policy

FORMS MANUAL REFERENCE: 401(a)**COMMENT:**

- 1) Employees who drive a personal vehicle on LIFE, Inc. business must exercise due diligence to drive safely and to maintain the security of the vehicle and its contents. In addition, such drivers must make sure that the vehicle meets any LIFE, Inc. or legal standards for insurance, maintenance and drivability. Employees are also responsible for any driving infractions or fines as a result of their driving.
- 2) Employees are not permitted, under any circumstances, to operate a personal vehicle for LIFE, Inc. business, when any physical or mental impairment causes the employee to be unable to drive safely. This prohibition includes, but is not limited to, circumstances in which the employee is temporarily unable to operate a vehicle safely or legally because of illness, medication or intoxication.
- 3) Employees who use their personal vehicle for business purposes will receive a mileage allowance of \$.40 per mile for such usage. This allowance is to compensate for the cost of gasoline, oil, depreciation and insurance. In addition, employees driving on LIFE, Inc. business may claim reimbursement for parking fees and tolls actually incurred.
- 4) Charges for mileage allowance must be entered on a LIFE, Inc. expense report {see 401(a)}, approved by the employee's supervisor and submitted to the Accounting Department for payment.
- 5) Expense reports should be submitted each pay period.
- 6) When employees travel between home and any work site that is not their regular work place, they will follow these guidelines.
 - a) When traveling from home to any work site that isn't your regular work place (or region), you may be reimbursed for any additional mileage that you have accrued. For the purpose of this policy, if your regular work place is over 45 miles from your home, you only have to deduct 45 miles from your mileage one way (90 miles round trip).

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- b) When traveling from any work site that isn't your regular work place (or region), to your home, you may be reimbursed for any additional mileage that you have accrued. For the purpose of this policy, if your regular work place is over 45 miles from your home, you only have to deduct 45 miles from your mileage one way (90 miles round trip).
- 7) When employees serve multiple facilities, reimbursable mileage should be computed as follows:
 - a) If the first place of work is your home office (region), no mileage will be reimbursable to work.
 - b) If the last place of work is your home office (region), no mileage will be reimbursable to home.
 - c) Mileage between all facilities and appointments are reimbursable.
 - d) Corporate Personnel are not considered as employees that serve multiple facilities.
 - 8) In the event that an employee is "on-call" and is required to go from his home to office/group home, he will not be reimbursed for this mileage. If after reporting from home to work site he is required to travel from one destination to another, he may be reimbursed for this mileage.
 - 9) All supervisors should review expense reports closely to ensure efficiency and the adherence to the above guidelines. Whenever possible, use of a company vehicle should be encouraged.
 - 10) Employees must report any accident, theft, or malicious damage involving a personal vehicle used on LIFE, Inc. business to their supervisor and the Director of Business Operations, regardless of the extent of damage or lack of injuries. Such reports must be made as soon as possible but no later than forty-eight hours after the incident. Employees are expected to cooperate fully with authorities in the event of an accident. However, employees should make no voluntary statement other than in reply to questions of investigating officers.
 - 11) Time spent by nonexempt employees (those subject to the wage and hour provisions of the Fair Labor Standards Act) driving a Company or personal vehicle on LIFE, Inc. business during normal working hours is to be considered hours worked for pay purposes.
 - 12) A consumer of LIFE, Inc. will only be allowed to be transported in an employee's personal vehicle with the permission of the employee's supervisor.

MEAL REIMBURSEMENT**402**

Effective: April 2014
Last Revision Date: April 2014
Last Reviewed Date: February 20, 2023
Responsibility: President

POLICY:

It is the policy of LIFE, Inc. to reimburse employees for meals according to the guidelines below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Employees who are eligible for meal reimbursement will be compensated, up to but not to exceed, \$6.00 for breakfast, \$8.00 for lunch and \$12.00 for dinner.
- 2) The following circumstances qualify an employee for meal reimbursement:
 - a) If an employee's duties require an overnight stay, only dinner and breakfast will be reimbursed.
 - b) If an overnight stay is not involved, no meals will be reimbursed.
 - c) Notwithstanding (b) above, if an employee attends a luncheon, banquet or similar meeting as a representative of LIFE, Inc., reimbursement will be made.
 - d) The President may approve any meal and amount.
- 3) If an employee is traveling and works only his regularly scheduled work day, there will be no reimbursement for meals.
- 4) Alcoholic beverages are not reimbursable.
- 5) Receipts for reimbursable meals should be attached to the employee's expense report [see 401:3(a)] and submitted to his supervisor for approval. If the receipt exceeds the allowable limit, please note on the back of the receipt the appropriate amount that is to be reimbursed.

OVERNIGHT ACCOMMODATIONS**403**

Effective: January 2006

Last Revision Date: April 2021

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. to reimburse employees for expenses of business-related overnight accommodations according to the guidelines below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Plans for overnight accommodations for the purpose of conducting LIFE, Inc. business or in conjunction with training sessions, seminars, etc. should be approved in advance by the employee's supervisor.
- 2) Arrangements for direct billing to the company for overnight accommodations will be made whenever possible by the Director of Business Operations. In these cases, the employee should present a purchase order at the time of his arrival and sign the receipt when departing. In the event the vendor does not require that a purchase order be presented, the employee should complete a purchase order and submit it to the Accounts Payable Clerk at the Corporate Office so that it can be attached to the bill when it is received.
- 3) In all cases in which a purchase order cannot be utilized, overnight accommodations should be paid by the employee. Expenses paid by the employee should be submitted on a LIFE, Inc expense report form [see 401:3(a)] with an accompanying receipt. Reimbursement will be made to the employee based upon the expense report and according to the payables check-run schedule.

MEMBERSHIP IN CLUBS AND CIVIC ORGANIZATIONS**404**

Effective: January 2006

Last Revision Date: April 3, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to encourage employees to participate in the activities of certain community clubs and organizations.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Employees are encouraged to seek membership in community clubs and civic organizations where such membership will promote LIFE, Inc.'s business interests and enhance its image in the community. However, employee participation in such community organizations must not adversely affect the employee's job performance, be detrimental to LIFE, Inc.'s interests, or place the employee in the position of a conflict of interests.
- 2) LIFE, Inc. may identify certain community organizations in which it wants to be represented and then designate the employees that it will sponsor for membership in such organizations. Employees so designated will represent LIFE, Inc. in the organization and will be expected to promote its interests.
- 3) LIFE, Inc. will normally consider the following factors in selecting organizations for representation and in designating employees to be sponsored for membership.
 - a) The nature and purpose of the club or organization;
 - b) The benefit to be derived by LIFE, Inc. from employee representation;
 - c) The cost to LIFE, Inc.;
 - d) The extent to which LIFE, Inc. is already represented in the club or organization;
 - e) The employee's job responsibilities, length of service, and overall qualifications for membership.

LIFE, Inc. will, on a periodic basis, review its representation in community organizations and its sponsorship of employees for membership and will make changes whenever it deems appropriate.

- 4) Employees who are sponsored for membership in community clubs and civic organizations are eligible for reimbursement for certain of their expenses. Reimbursable expenses include dues, special charges and/or initiation fees; and, when business-related, activities and fees and meal

expenses. All employees who are not designated and sponsored for membership in community organizations are responsible for their own expenses.

PARTICIPATION IN PROFESSIONAL ASSOCIATIONS**405**

Effective: March 28, 2008

Last Revision Date: April 3, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to encourage employees to participate in certain professional associations.

COMMENT:

- 1) Employees are encouraged to participate in professional associations that promote LIFE, goals, individual skill development, and/or professional recognition. However, employee participation in such associations must not conflict with LIFE, Inc.'s interests.
- 2) LIFE, Inc. may identify certain professional associations in which it wants to be represented and then designate the employees that it will sponsor for membership in such associations. Employees so designated will represent LIFE, Inc. in the organization and will be expected to participate actively and promote its interests.
- 3) The Department Heads are responsible for coordinating overall representation in professional associations, and supervisors should recommend interested employees for sponsored membership. The Department Heads and Supervisors will normally consider the following factors in selecting associations for representation and in designating employees to be sponsored for membership:
 - a) The nature and purpose of the association;
 - b) The benefit to be derived by LIFE, Inc.'s support and from employee participation;
 - c) The cost to LIFE, Inc.;
 - d) The extent to which LIFE, Inc. is already represented in the association; and
 - e) The employee's job responsibilities, length of service, and overall qualifications for membership. The Department Heads will, on a periodic basis, review LIFE, Inc.'s representation in and support of professional associations and its sponsorship of employees for membership and will make changes whenever it deems appropriate.
- 4) Employee participation in professional association activities will not be considered as hours worked for pay purposes unless it is at LIFE, Inc.'s request or under its direction and control.
- 5) Department heads are responsible for planning, budgeting, and approving the expenses of their employee's participation in association activities. LIFE, Inc. will pay or reimburse the approved and reasonable expenses of employees sponsored for membership in professional associations. Employees not sponsored for association membership are eligible for reimbursement of individual activities expenses if participation in the activity is approved in advance by their supervisor and/or department head.

- 6) Employees must have their supervisor's advance approval before seeking or accepting a position in a professional association. If approval is granted, the supervisor should also determine the degree to which the employee is eligible for compensation for working time lost and for reimbursement of expenses incurred in performing official duties.
- 7) Employees are encouraged to contribute articles, present papers, and participate in presentations at professional associations. However, employees must obtain the prior approval of their Department Head for any communication that might be considered as representing LIFE, Inc.'s position on any subject or involving any information that is confidential.

SECTION 5**EMPLOYEE BENEFITS**

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VACATION**501**

Effective: August 2003

Last Revision Date: August 2003

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to give Paid Time Off in lieu of vacation days.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

FORMS MANUAL REFERENCE: 501(a)**COMMENT:**

- 1) Paid Time Off may be used at the employee's discretion for vacation.
- 2) All requests are subject to approval and should be submitted in writing on a Request for Paid Time Off Form to employee's supervisor as far in advance as possible (minimum two weeks).
501(a)

HOLIDAYS**502**

Effective: August 2003

Last Revision Date: April 3, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to give Paid Time Off in lieu of holidays.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Paid Time Off may be utilized for holidays.
- 2) All requests are subject to approval and should be submitted in writing, on a Request for Paid Time Off Form, to employee's supervisor as far in advance as possible (minimum of two weeks).

SICK LEAVE**503**

Effective: August 2003

Last Revision Date: August 2003

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to give Paid Time Off in lieu of designated sick days.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Paid Time Off may be utilized for hours not worked due to personal illness, injury and medical appointments.
 - a) Supervisory approval must be obtained, when at all possible, in advance.
 - b) When advance notice is not possible, established call-in procedures must be followed.
 - c) The following of established call-in procedures does not necessarily ensure that an absence is excused.
 - d) A doctor's excuse may be required when an employee is absent from work for personal illness, injury and medical appointments.
- 2) If adequate Paid Time Off time is not available, the employee will have to take the time off without pay.

PAID TIME OFF**504**

Effective: June 2014

Last Revision Date: February 20, 2023

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to grant Paid Time Off (PTO) each pay period to employees who are paid for 72 hours or more accordance with guidelines established below.

Regulatory Reference:

LIFE, Inc. Company Policy

- 1) Employees who are paid for 72 hours or more during any pay period will accrue PTO for that pay period.
- 2) Any PTO which is utilized for scheduled work time will count as time worked for the purpose of determining hours worked for any pay period.
- 3) For full-time employees, PTO will be used for any absence for a scheduled work day or any portion of scheduled work day. PTO may be used for vacation, holidays, personal illness, immediate family illness, medical appointments, absences due to inclement weather, jury duty or personal reasons. A supervisor may require a doctor's excuse for absence due to personal illness, immediate family illness or medical appointments.
- 4) Part-time employees who accrue PTO are not allowed to utilize PTO, but can be paid out their PTO balance in June of each year. (Request should be made by June 10. Payout will occur prior to June 30.) If the part-time employee submits his resignation and works a proper notice (2 weeks) all accrued PTO will be paid in the employee's final paycheck. If a part-time employee is terminated for cause, all accrued PTO will be forfeited.
- 5) PTO will be granted according years of service and will be accrued bi-weekly based on the number of hours worked multiplied by the hourly accrual rates listed below:

a)	<u>Years of Service</u>	<u>Hourly Accrual Rate</u>
	0-2	0.0731 per hour worked
	3-5	0.0808 per hour worked
	6-7	0.0885 per hour worked
	8-15	0.0962 per hour worked
	16+	Add 0.0077 per hour worked for each year of additional service

- 6) PTO is not accrued after 80 paid hours in a pay period.

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- 7) Eligible employees begin to accrue PTO from the first day of employment. Accrual of PTO ends on the last day of the pay period prior to the resignation/termination date.
 - 8) Full-time employees are allowed to utilize PTO as it is accrued but cannot exceed the amount of leave indicated on his last paycheck stub.
 - 9) Accrued PTO carried over from year to year should not exceed 1,000 hours. PTO hours in excess of 1,000 will be forfeited by the employee. Adjustments that result from forfeiture of PTO hours will be made by the Payroll Department on the last day of each accounting year (June 30).
 - 10) Payout of PTO:
 - Upon voluntary termination (resignation) of employment from LIFE, Inc. and submission of a proper written notice (see Termination of Employment 213), an employee will be paid out the total of PTO hours accrued during the current fiscal year less any PTO hours taken during the fiscal year. If a proper written notice is not submitted, he forfeits all accrued PTO.
 - Upon voluntary termination (resignation) without a proper written notice, the employee will not be paid out or allowed to utilize any PTO.
 - An employee who reaches the age of 62 with fifteen (15) years of service with LIFE, Inc. will be paid out all of their remaining PTO hours if they retire with proper written notice (see Termination of Employment 213:1). An employee who reaches the age of 66 will be paid out all of their remaining PTO hours if they retire with proper written notice according to the Termination of Employment policy.
 - If an employee is terminated for cause, he forfeits all accrued PTO.
 - If an individual's employment is terminated "at will" by LIFE, Inc., he will be paid for the total of PTO hours accrued during the fiscal year less any Paid Time Off hours taken during the current fiscal year.
 - The number of Paid Time Off hours for which a terminating employee is entitled to be paid should be indicated on a Payroll Transmittal form. The terminating employee's supervisor is responsible for completing this transmittal and forwarding it to the Payroll Department.
 - All PTO payouts are at the employee's regular rate of pay.
 - An employee's last day worked cannot utilize PTO.
 - 11) Fiscal year for LIFE, Inc. will be July 1 – June 30,
 - 12) Employees must submit requests for utilization of PTO for their normal scheduled workdays for vacations, holidays, or military leave to their supervisor a minimum of two (2) weeks in advance whenever possible. Management reserves the right to designate when some or all vacations and holidays must be taken. Supervisors are responsible for ensuring adequate staffing levels and should attempt, when feasible, to resolve scheduling conflicts involving vacations and holidays based on seniority. However, employees who want to change their vacation/holiday plans after work schedule has been set, lose their seniority consideration.

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- 13) Employees who feel there is a discrepancy in the calculation of their PTO or eligibility may request a review of that calculation through the Accounting Department.
 - 14) Employees must utilize PTO for absences from work and cannot elect to take leave without pay. They cannot utilize PTO for tardiness (Punctuality 701)
 - 15) Full Time employees may request a pay out of the PTO by June 15th of each year. They must leave a balance of at least 120 hours after payout and the payout will be distributed in the first week of July.
 - 16) In certain circumstances, and with approval of the President, an employee may transfer all or part of his PTO to an immediate family member employed by LIFE, Inc.

BEREAVEMENT LEAVE**505**

Effective: May 2013

Last Revision Date: April 2013

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to grant bereavement leave to full time employees who have completed the introductory period according to the guidelines below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Bereavement leave is intended to allow an employee paid time off from scheduled work to arrange, travel to, and/or attend funeral services for members of his immediate family. It is also viewed as an adjustment period after the death of an immediate family member.
- 2) “Immediate family” means the employee’s spouse, parent, child (a biological, adopted or foster child, step-child, a legal ward, or a child of a parent standing in “loco parentis”), sibling (biological or step sibling), mother-in-law, and father-in-law.
- 3) Any non-introductory full-time employee will be granted up to three (3) days of bereavement leave for absences that occur during scheduled work time. The bereavement leave must be taken within seven (7) calendar days of the death of the immediate family member unless approved by the President.
- 4) Part time employees will not be granted bereavement leave.
- 5) The employee must request bereavement leave from his supervisor. The supervisor should be notified as soon as possible to allow for necessary schedule changes to be made.
- 6) A supervisor may request from the employee verification of the need for bereavement leave.
- 7) The supervisor should document bereavement leave on the employee’s time sheet.
- 8) If any employee needs additional time off, this must be requested and approved through the appropriate Vice President of ICF/IDD Services or the Vice President of Contract Services, or Vice President of Business Operations. If approved, the employee may utilize Paid Time Off. If the employee has no accrued Paid Time Off, the time off must be without pay.
- 9) Employees who are not eligible for bereavement leave, who experience a death in their immediate family, should request time off through their supervisor.
- 10) Any employee who needs time off from work due to the death of a family member other than an immediate family member will be allowed to utilize accrued Paid Time Off. In the event that

there is not accrued leave, the employee may be permitted to take time off without pay. The employee should arrange this through his supervisor.

CIVIL LEAVE**506**

Effective: August 2003

Last Revision Date: April 3, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to grant non-compensated leave to employees who are called to perform their civic duties in accordance with the guidelines below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) An employee selected for jury duty at the same time as scheduled for work will not be entitled to compensated leave but will have the option to utilize Paid Time Off.
- 2) The employee should notify his immediate supervisor promptly upon receipt of a jury summons and subsequent notice of selection to serve as a juror. A copy of the summons and the selection notice should be submitted to the supervisor.
- 3) An employee released early from jury duty during their regular scheduled work hours with LIFE, Inc. will be reassigned to duty.
- 4) Employees who serve as jurors will retain any compensation paid to them by the court.
- 5) An employee subpoenaed or directed by proper authority to appear as a witness in a court of law may be granted uncompensated civil leave and can utilize accrued Paid Time Off for work time missed.
- 6) An employee must submit a copy of the subpoena to his supervisor.
- 7) Employees that are parties (plaintiff or defendant) in a court proceeding are not eligible for compensated leave. Paid Time Off may be requested. If leave time is not available, time off will be without pay.

INCIDENTAL LEAVE**507**

Effective: May 2005

Last Revision Date: May 2005

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to allow salaried employees the ability to take limited time off during a scheduled work day without utilizing Paid Time Off in accordance with the guidelines established below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Exempt employees, with prior approval from their supervisor, will be allowed the flexibility to leave the work site for periods not to exceed two (2) hours during an eight (8) hour work day without utilizing Paid Time Off. This time will be defined as incidental leave.
- 2) When exempt employees take off more than two (2) hours in a work day, Paid Time Off shall be utilized.
- 3) Paid Time Off should always be utilized for an entire day's absence.
- 4) Supervisors of exempt employees generally should not grant incidental leave in excess of two (2) hours per calendar month.

FLEXED SCHEDULE**508**

Effective:

Last Revision Date: April 3, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to allow salaried employees the ability to flex their work schedules in accordance with the guidelines established below:

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) Each exempt employee must secure prior approval for his proposed work schedule from his supervisor on a weekly basis. The proposed work schedule must be submitted to the employee's supervisor and approved before the work week begins. Any deviation from the approved schedule must be pre-approved by the employee's supervisor.
- 2) Any deviation from the traditional work day and work week must be pre-approved and documented by the employee's supervisor.
- 3) If for any reason the employee is unable to follow his pre-approved schedule, he must notify his supervisor.
- 4) Any work day which is less than eight (8) working hours must involve the utilization of Paid Time Off or incidental leave. The utilization of any leave must be pre-approved by the employee's supervisor.
- 5) Failure to comply with this policy will result in disciplinary action, up to and including termination.

RETIREMENT PLAN**509**

Effective: May 2013

Last Revision Date: November 2017

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that eligible employees participate in the company retirement plan according to the guidelines below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

COMMENT:

- 1) To be eligible for participation in the company retirement plan an individual must be an employee, 18 years old and have completed ninety (90) days of service. Once meeting these criteria, the employee becomes a Plan participant on the first day of the month following ninety (90) consecutive days of employment.
- 2) For a participant to receive a profit sharing contribution for any Plan Year, the employee must be an employee of LIFE, Inc. on December 31 (last day of Plan Year). The Last Day Worked on our Separation Notice 213.6 (b) will be entered as the Termination Date in the retirement plan recordkeeping system.
- 3) LIFE, Inc. may contribute an amount up to fifteen percent (15%) of an eligible employee's annual wages into the retirement plan on the employee's behalf. The contribution percentage is determined annually and is based on the Company's efficiencies and profits during the preceding fiscal year. This constitutes no guarantee of any retirement contribution at any time. Any yearly contribution is solely dependent upon LIFE, Inc.'s determination.
- 4) An employee is vested when he completes three (3) years of service, reaches age 55, is permanently disabled, or when he/she dies.
- 5) An employee who terminates employment prior to being vested will forfeit all monies contributed on his behalf.
- 6) Loans are not permitted
- 7) Distributions

For the purposes of retirement, LIFE, Inc. will run an abbreviated plan year from July 1, 2017 to December 31, 2017. Starting 2018, the retirement plan year will run from January 1 through December 31. A vested employee who terminates service will be eligible for a distribution at any time following a year from their termination date. The only exceptions will be in the event of an employee's death, permanent disability, or bona-fide retirement (attainment of age 55); in these instances, all distribution requests will be processed immediately.

If an employee terminates with a vested balance of \$1,000 or less, the employee must take it out of the Plan. If an employee does not notify the Company of what to do with the vested balance [e.g. roll it over to an individual retirement account (IRA)], LIFE, Inc. will distribute it in a lump sum

If an employee terminates with a vested balance between \$1,000 and \$5,000, the employee must take it out of the Plan. If an employee does not notify the Company of what to do with the vested balance, it will be rolled over to a Merrill Lynch individual retirement account (IRA).

Distribution/Separation from Service documents will be mailed from the Corporate Office to any employee who terminates his/her employment with the Company.

- 8) Questions concerning the retirement plan should be directed to the Plan Administrator at 919-778-1900.

MAJOR MEDICAL AND LIFE INSURANCE**510**

Effective: March 2015

Last Revision Date: August 8, 2022

Last Reviewed Date: August 8, 2022

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to provide eligible employees with major medical and life insurance according to the guidelines below and the Affordable Care Act (ACA).

REGULATORY REFERENCE: LIFE, Inc. Company Policy
Consolidated Omnibus Budget Reconciliation Act of 1986
Affordable Care Act (ACA)

DEFINITIONS:

Measurement Period	LIFE, Inc. has adopted December 1 of each calendar year until May 31 of the following year and June 1 until November 30 as our Measurement Periods.
Administrative Period	One month following each Measurement Period.
Employee Eligible for Health Insurance	An employee is eligible for health insurance if they are expected to work an average of 30 or more hours per week. These employees shall be eligible to enroll in our Group Health Plan after the initial waiting period.
Employee Not Eligible For Health Insurance	An employee is not eligible for health insurance if they average less than 30 hours per week. These employees are not eligible for our Group Health Plan.
Hour (or Hour of Service)	Hours for the purpose of this policy shall mean an hour of service for which any employee is paid, including but not limited to hours worked, hours paid for sick, vacation, disability (including workers compensation), jury duty, bereavement leave, or other purposes which result in the employee receiving compensation whether actively at work or utilizing employees benefits or time off. Hours shall also include layover hours or on-call hours for which the employee is required to be paid under state and/or federal wage and hour laws. Salaried and commissioned employees are assumed to work eight hours per day unless otherwise designated in their personnel record.

Full-Time Equivalents	<p>Under the Affordable Care Act, the number of full-time equivalent employees is determined by using the category of employee in the calculation for each month of the year:</p> <ul style="list-style-type: none"> • Employees that work at least 30 hours per week in any month are each counted as one FTE. • Employees who work less than 30 hours per week in any month are each counted as a fraction of one FTE and determined by calculating the hours worked by all part-time employees in a month and dividing that amount by 130.
Waiting Period	Eligible employees must enroll during the first pay period for immediate acceptance into the plan. Major medical and life insurance coverage shall begin sixty days from the first day of the month following the employee's hire date.
Open Enrollment Period	The annual enrollment is June 1 to June 30

COMMENT:

- (1) The **ACA COMPLIANCE NOTICE TO NEW EMPLOYEES** 510:4 form will be completed for all new hires. This form will be filed in the employee's Personnel File.
- (2) All employees who work an average of 30 or more hours per week are eligible to apply for participation in LIFE, Inc.'s group health insurance plan.
- (3) Eligible employees must enroll during the first pay period for immediate acceptance into the plan. Employees who fail to enroll during this period, if eligible, during the next Administrative Period following a Measurement Period or during the Open Enrollment Period.
- (4) Major medical and life insurance coverage shall begin sixty days from the first day of the month following the employee's hire date. Employees must enroll in the group health insurance plan to get life insurance coverage. Life insurance coverage is not available separately. The President may, on a case-by-case basis, make exception to the number of days upon consultation with appropriate supervisory staff.
- (5) Eligible employees are offered employee only coverage or self-children coverage. In order to assist employees with major medical insurance expense, LIFE, Inc. will make a contribution for each eligible employee. Current information concerning company contribution, rates and details regarding coverage are available from the regional Accounting Clerk.
- (6) At the beginning of each Measurement Period, the **EMPLOYEE HEALTH CARE COVERAGE ELIGIBILITY CHANGE NOTICE** 510:6 form will be completed and filed in the employee's Personnel File.
- (7) Major medical insurance coverage ends on the last day of the month within which employment is terminated. The Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1986 provides employees and dependents certain continuation rights in the event they cease to be eligible for

LIFE, Inc.'s insurance coverage. The employees are to be notified of these rights after hire and upon employment termination by our insurance representative.

- (8) An individual who is rehired thirteen (13) weeks or less after termination of their employment and who was eligible for enrollment but not necessarily enrolled in the LIFE, Inc. Group Health Plan will be entitled to enroll in the group health plan on the first day of their return to active employment, provided they are hired into a full-time position working thirty (30) or more hours per week on average.
- (9) An individual rehired more than thirteen (13) weeks after termination of their employment will be treated as any other new employee in terms of group health plan eligibility, including (if applicable), serving a waiting period before being eligible to enroll.
- (10) Employees on FMLA or Workers Compensation leave must pay their portion of health insurance premiums during the period of leave. The employee portion for those out on leave due to FMLA or Workers Compensation shall be determined based on the per pay-period average for the six (6) pay periods prior to the leave minimum of \$44.14 per pay period. Premium payments are due the first day of each month for the entire month. Employees have a 30-day grace period to make payment. If payment is not made within this 30-day grace period, health insurance will be cancelled back to the last day of coverage paid. A notice of lapse will be provided 15 days prior to termination. If health insurance is cancelled due to non-payment, coverage will be offered upon return from FMLA or Workers Compensation leave.
- (11) An employee with our major medical insurance coverage can request reimbursement of an emergency room co-payment by completing the Medical Expense Reimbursement Claim Form 510:7. The form should be presented to the Plan Administrator for approval or denial by the Trust Committee of the Employee Benefit Trust for Employees at LIFE, Inc. For the request to be considered, the emergency room visit must be for an actual emergency that is a life-threatening situation, or the result of a broken bone or other accident requiring immediate medical treatment.
- (12) The following are Special Enrollment Rules:
 - a. If an employee loses other coverage and is eligible to be enrolled in our plan, but did not enroll originally because they had other coverage, they must notify us within 30 calendar days of the event to be eligible to enroll in our plan.
 - b. If the dependent of an enrolled employee in our plan loses other coverage, the enrolled employee must notify us within 30 calendar days of the event for the dependent to be eligible to enroll in our plan.
 - c. An eligible employee loses coverage due to legal separation from their covered spouse, a divorce from their covered spouse, cessation of their dependent status, death of covered spouse, termination of covered spouse's employment and reduction in the number of hours of employment of the covered spouse, must notify us within 30 calendar days of the event to be eligible to enroll in our plan.
 - d. An eligible employee that was in another plan that no longer offers any benefits to similarly situated individuals must notify us within 30 calendar days of the event to be eligible to enroll in our plan.

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- e. An eligible employee in a plan where the employer terminates their contribution towards the employee's or dependent's coverage must notify us within 30 calendar days of the event to be eligible to enroll in our plan.
 - f. An employee that becomes eligible or loses eligibility for Medicaid or State Children's Health Insurance Program (S-CHIP) must notify us within 60 calendar days of the event to be eligible to enroll in our plan or Medicaid or State Children's Health Insurance Program (S-CHIP).

EMPLOYEE COUNSELING**511**

Effective: March 12, 2010

Last Revision Date: March 12, 2010

Last Reviewed Date: February 20, 2023

Responsibility: Director of Human Resources

POLICY:

It is the policy of LIFE, Inc. to encourage employees to seek counseling services to solve personal problems.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) Employees experiencing personal problems are encouraged to seek assistance from counseling services. Personal difficulties such as marital, family, emotional, stress, interpersonal, medical, financial, and legal problems, plus alcohol and drug abuse, can adversely affect job performance.
- 2) Supervisors should be alert to detect the existence of personal problems affecting their employees. Indications of personal problems include excessive absenteeism, changes in both behavior patterns and employee attitudes, and substandard job performance.
- 3) Supervisors, when appropriate, should try to communicate with employees who seem to be experiencing problems by suggesting professional counseling.
- 4) If the employee's problem is an unresolved complaint or grievance, the supervisor should advise the employee of the appropriate steps to be taken in compliance with the Grievance Procedure.
- 5) Employees needing extended treatment should request a sick leave of absence in accordance with LIFE, Inc.'s leave policy.
- 6) Employees are responsible for their job performance. Performance appraisals are to be based on factors related to job performance, regardless of whether an employee seeks counseling.
- 7) Communications between employees, supervisors, the Human Resources Department, and professional counselors or agencies as a result of this policy are to be strictly confidential, except to the degree necessary to protect the security of LIFE, Inc. property.

LONGEVITY AND RETENTION

512

Effective: January 2008

Last Revision Date: December 7th, 2021Last Reviewed Date: February 13th, 2023

Responsibility: Chief Financial Officer

**POLICY:**

It is the policy of LIFE, Inc., in an effort to retain and to reward employees for their continued service to the Company with a yearly Longevity and Retention Bonus to be paid on the employee's anniversary date.

COMMENT:

- 1) Employee Anniversary Date- The annual date coinciding with the Employee's date of hire without a break in service or employment.
- 2) Rehires will begin their longevity calculation over beginning with their new hire date. On a case-by-case basis, the President of the company may review the reason for termination and decide to allow the rehired employee's prior years of service to be calculated in their Longevity and Retention Bonus.
- 3) The employee must be actively employed at the time the employee is eligible for the Longevity and Retention Bonus and at the time the Longevity and Retention Bonus is distributed. If an employee is on a Leave of Absence, they will be eligible for the bonus upon return.
- 4) The Longevity and Retention Bonus will be paid by the end of the week of an employee's Anniversary Date, or there next day worked. A part-time employee's Longevity and Retention Bonus will be paid on their Anniversary Date or the next day they report to work. If a Longevity and Retention Bonus is due on a date the bank is closed, the bonus will be paid out on the following working day.
- 5) The Longevity and Retention Bonus will be formulated by this calculation:

[Years of Service Bonus Amount] x [Number of Hours Paid Since Last Anniversary Date]

**The Number of Hours Paid will include used PTO hours and will be capped at 2088 hours.*

- 6) The Following Table will be used to determine the Years of Service Bonus Amount.

1-4 Years	.25 per hour
5-9 Years	.50 per hour
10-14 Years	.68 per hour
15-19 Years	.75 per hour
20-24 Years	.88 per hour
25 or more	1.00 per hour

- 7) The Longevity and Retention Bonus amount for each year of service will be reviewed annually and recalculated based on available resources.

SECTION 6**COMPANY PREMISES AND WORK AREAS**

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MAINTENANCE OF WORK AREAS**601**

Effective:

Last Revision Date: July 13, 2021

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

Implementer: All LIFE, Inc. Employees

POLICY:

It is the policy of LIFE, Inc. that work areas are to be kept clean and orderly at all times.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) All employees are required to be responsible for maintaining their work areas in a clean and orderly fashion at all times. To fulfill this responsibility, each employee should, at a minimum, do the following:
 - a) Prior to the end of the workday, clean and store all tools and equipment and properly secure any items, papers, or information of value.
 - b) Consume any food or beverages only in designated break areas so that work areas are kept free of food and related litter; and
 - c) Place coats, boots, umbrellas, and other items of clothing in designated areas so that work stations are not unnecessarily cluttered.
- 2) Supervisors are responsible for making sure that their employees maintain their work areas in accordance with the requirements of this policy. Each supervisor should:
 - a) Make sure that aisles, floors, and walls are free of debris and other unnecessary items and that all end-of-the-shift tasks have been performed;
 - b) Monitor the facilities and equipment and submit maintenance work order requests when appropriate;
 - c) Arrange for the removal of any items from the work place that are not needed for the flow of business or the comfort and enhancement of clients and employees;
 - d) Report to the Safety Officer any existing or potential work-place hazards; and
 - e) Ensure that all trash and waste are properly disposed.

PERSONAL PROPERTY/PERSONAL PROPERTY DAMAGES**602**

Effective: May 2005

Last Revision Date: May 2005

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to expect its employees to refrain from bringing unnecessary personal belongings to work and to be responsible for safeguarding their belongings. Missing and damaged personal property will be addressed by LIFE, Inc. in accordance with the following guidelines.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**FORMS MANUAL REFERENCE:** 602(a)**COMMENT:**

- 1) Employees are not allowed to bring unnecessary personal belongings to work.

If any staff member must bring prescription medication to work, it must first be reported to the facility nurse and the employee's supervisor. The medication can only be brought to the work site if it has to be taken during work hours.

The medication must be packaged in its original container with the employee's name. Only the dosage that must be taken during work hours should be brought to work. The medication container must be locked in the medication room/closet at all times if the employee is working in a group home setting. If the employee travels with clients to a school or day program setting, the medication should be transported in the lock box.

It is the employee's responsibility to take the medication with them at the end of the shift on a daily basis.

Failure to follow these guidelines will result in disciplinary action.

- 2) LIFE, Inc. will not assume responsibility for the loss or theft of any personal belongings of its employees, including money.
- 3) LIFE, Inc. will not assume responsibility for damages or theft as it relates to employees' automobiles while on LIFE, Inc. property.
- 4) Employees are expected to report missing items to their immediate supervisor.
- 5) In cases of suspected theft of personal belongings, employees are encouraged to contact the appropriate law enforcement agency to investigate the matter.
- 6) LIFE, Inc. will not be responsible for damages to any jewelry items, with the exception of a wristwatch. If an employee's watch is damaged during any time in which the employee is appropriately involved with a consumer (i.e., intervening during a behavior episode, assisting in a

process of habilitation, etc.) damages will be reimbursed, not to exceed a \$25 maximum. The damages should be reported to the immediate supervisor. The facility QP will be responsible for determining the reimbursable amount after examining the damaged item.

- 7) If damages should occur to an employee's hearing aid during any time in which the employee is appropriately involved with a consumer, damages to the hearing aid will be reimbursed in full by LIFE, Inc. Damages should be reported to the immediate supervisor.
- 8) Repairs to prescription glasses (lens and/or frames), if damaged when an employee is appropriately involved with a consumer, will be reimbursed, not to exceed a \$100 maximum. This will not include costs incurred for an eye examination, more expensive frames than the damaged pair or for replacement of an undamaged lens because a different type of frame is used. Damages should be reported to the immediate supervisor and the damaged glasses must be produced for inspection. Employees are encouraged not to wear designer-type frames to the work site.
- 9) There will be no reimbursement for damages to contact lenses.
- 10) Damages to clothing items will not be considered for reimbursement unless they are incurred during an employee's appropriate intervention during a behavior episode involving a consumer. Reimbursement amount, up to a \$25 maximum per item, will be determined by facility QP following his inspection of damaged item(s). Damages to clothing items should be reported to the immediate supervisor.
- 11) The QP and Habilitation Coordinator should submit reimbursement requests through the routine payables process (do not utilize petty cash). Included with the request should be a brief description of the incident and property that was damaged.
- 12) Any damaged personal items must be inspected by the employee's supervisor. In the absence of this inspection, no reimbursement will be made.
- 13) Any damaged items that are replaced in full by LIFE, Inc. become the property of the company and should be disposed of by the Facility QP.

SOLICITATION**603**

Effective: August 2006

Last Revision Date: April 9, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

If is the policy of LIFE, Inc. to prohibit solicitation and distribution on its premises by nonemployees and to permit solicitation and distribution by employees only as outlined

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) Persons who are not employed by LIFE, Inc. are prohibited from soliciting funds or signatures, conducting membership drives, distributing literature or gifts, offering to sell merchandise or services, or engaging in any other solicitation or similar activity on LIFE, Inc. premises.
- 2) The President or the President's designee may authorize a fund drive by employees on behalf of charitable organizations or for employee gifts. Employees are encouraged to volunteer to assist in these drives. However, employees are not to be discriminated against because of their willingness or unwillingness to participate.
- 3) Employees of LIFE, Inc. are strictly prohibited from engaging in any solicitation or distribution activity both during work time and in working areas.
- 4) LIFE, Inc. communicates information to employees by posting notices in Company facilities in designated posting areas (i.e. bulletin boards, refrigerators, etc.). All areas of posting are for LIFE, Inc. information and notices only. At no time are personal solicitations or notices permitted anywhere inside or outside of LIFE, Inc. facilities. Only persons designated by the Executive Vice President may place notices on or take down material from the designated posting areas.

SMOKING AND USE OF TOBACCO PRODUCTS**604**

Effective: March 25, 2009

Last Revision Date: June 2015

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to comply with all applicable federal, state and local regulations regarding smoking and the use of tobacco products in the workplace and to provide a work environment that promotes productivity and well-being of its employees.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) LIFE, Inc. upholds the worth and dignity of each of its employees and shall not single out any group of employees to treat differently or in a discriminating manner. However, due to the overwhelming and ongoing evidence that smoking, and the use of tobacco products is dangerous and injurious not merely to the smoker but to all those that are around him who must rely on the same air supply, it is critical that LIFE, Inc. provide a safe living environment to clients and workplace to employees.
- 2) As a new employee is enrolled, he shall be made aware of the “Smoking and Use of Tobacco Products” policy.
- 3) Smoking and the use of tobacco products is prohibited inside all Company facilities. “No Smoking” signs shall be posted in each group home, workshop and office and a copy of the “Smoking and Use of Tobacco Products” policy shall be posted on company bulletin boards.
- 4) Smoking and the use of tobacco products in a LIFE, Inc. facility will be grounds for termination of employment.
- 5) Employees should remind visitors, if necessary, that smoking and the use of any tobacco products is not allowed inside the facility and should direct them to the designated “outside” smoking area.
- 6) Employees are allowed to smoke and use tobacco products in designated “outside” areas and only during their designated break(s). Cigarette butts and other tobacco byproducts must be discarded in a company-approved manner.
- 7) Supervisors must ensure that smokers do not have more frequent or lengthier breaks than nonsmokers. A supervisor’s failure to enforce this fairly and consistently will be grounds for disciplinary action, up to and including termination.
- 8) Smoking and the use of tobacco products is prohibited in all LIFE, Inc. vehicles. This shall include privately owned vehicles when being used to transport consumers on company time.
- 9) Clients are not allowed to smoke or use tobacco products in any LIFE, Inc. facility or vehicle. Clients are only allowed to smoke and use tobacco products in designated “outside” areas and

must discard all cigarette butts and tobacco byproducts in a company approved manner (normally a container will be designated at each facility for this purpose).

- 10) The company does not discriminate against individuals on the basis of their use of legal products, such as tobacco, if the use occurs during non-working time or off the Company's premises.
- 11) LIFE, Inc.'s policy on Smoking and the Use of Tobacco Products equally applies to the use of e-cigarettes, vapes and vaping. Whenever the terms tobacco and smoking occur in our policies, those terms also include and equally apply to e-cigarettes, vapes and vaping. All restrictions and prohibitions regarding the use of tobacco products include and equally apply to the use of e-cigarettes and vapes.

VISITORS**605**

Effective: November 2012
Last Revision Date: April 11, 2023
Last Reviewed Date: April 11, 2023
Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to allow authorized visitors into our facilities according to the guidelines below.

REGULATORY REFERENCE: LIFE, Inc. Company Policy

COMMENT:

- 1) Visitors at LIFE, Inc. facilities, for the purpose of visiting clients, will be allowed to visit according to established procedures. If employees have questions regarding client visitors, they should notify the on-call manager.
- 2) Visitors at LIFE, Inc. facilities for the purpose of surveys, inspections or investigations should be asked to identify themselves to employees by identification badge and/or official business card. The employee must immediately notify his supervisor of the visit. The supervisor will immediately e-mail all Corporate 8 members with the name of the person and the reason for their visit.
- 3) Any other visits by non-employees of LIFE, Inc. are prohibited unless authorized by a QP or company official. Visits/tours by community groups and organizations should be authorized in advance with proper notice given to clients and employees on duty. If an employee has a question regarding a visit by a non-employee, he should contact his supervisor or the staff member on call immediately.
- 4) Visits to company premises by LIFE, Inc. employees during nonworking hours are not allowed without proper authorization from the employee's supervisor.
- 5) Employees should never receive visitors, including visits from friends and family members, without proper authorization from their supervisor. "Reasonable" exceptions will be made but should always be arranged in advance. Visits to employees that might occur without prior authorization because of an emergency should be immediately reported to their supervisor.
- 6) Visitors who cannot produce proper identification should not be allowed to enter a facility. If an unauthorized visitor is found on the premises, the highest level of management on-site should direct or escort the unauthorized visitor out of the building. Law enforcement agencies should be contacted as needed.
- 7) All visitors must sign in and out of LIFE, Inc. facilities according to the established policy on Visitation Log (606:1).
- 8) Visitors may be required to follow guidelines set forth by CMS, LIFE, Inc., or local ordinances as they relate to health and safety.

VISITATION LOG**606**

Effective: November 2012
Last Revision Date: April 9, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to utilize a visitation log to document all visitors to any LIFE, Inc. operation.

REGULATORY REFERENCE: LIFE, Inc. Company Policy

REGULATORY REFERENCE: 606(a)

COMMENT:

1. Visitors are defined as:
 - a) All LIFE staff with the exception of Direct Support Professionals assigned to that particular facility.
 - b) Consultants contracted to provide services within a facility.
 - c) Individuals representing outside agencies.
 - d) Contracted maintenance individuals that work in the facility.
2. The Direct Support Professionals working in the facility are not required to sign the Visitation Log.
- 3) Family members and guardians are not required to sign the Visitation Log.
- 4) LIFE Operations are defined as any ICF/IDD Group Home, DDA Group Home, Day Program or Office.
- 5) While it is the responsibility of any staff member working within a facility to remind visitors to sign in, it is the individual's responsibility to sign the log.
- 6) The log will be in a designated notebook marked "Facility Visitation Log" at each operation. The attached LIFE, Inc. form will be utilized.
- 7) The comment section will be used as a means to provide information to other personnel.
- 8) It is the responsibility of the QP to maintain the Visitation Log for each facility and to send the preceding month's completed entries to the President at the Corporate Office no later than the fifth (5th) working day of each month. The President forwards them to the QA/QI Specialist for further analysis.

SECURITY**607**

Effective: August 2003
Last Revision Date: April 9, 2018
Last Reviewed Date: February 20, 2023
Responsibility Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to make reasonable efforts to provide security for its property, its clients, its employees and authorized visitors to its premises.

REGULATORY REFERENCE: LIFE, Inc. Company Policy
Employee Polygraph Protection Act of 1988

COMMENT:

- 1) Employees are expected to know and comply with LIFE, Inc. security procedures and are expected to report any violations or potential problems to their immediate supervisor. Employees violating security procedures will be subject to discipline; and in addition, illegal acts committed by employees may be reported to law enforcement authorities.
- 2) For the protection of clients and employees, supervisory staff will secure background investigations on all applicants for employment. This will be done in accordance with established policy on Criminal Records Checks (214:a).
- 3) All employees are expected to comply with established procedures regarding employee identification badges.
- 4) Supervisors are expected to issue and control keys and to identify and control LIFE, Inc. physical assets in accordance with established procedures.
- 5) Supervisors are responsible for communicating security procedures, including the operation of security devices, to employees through training and retraining with respect to the employer's security policies and procedures.
- 6) Supervisors should monitor all solicitations in accordance with established policy (603:1).
- 7) Incidents of employee theft will be handled in accordance with established policy on Personal Property (602:1).
- 8) Employees in group home facilities should never receive visitors without prior approval from their immediate supervisor.
- 9) All authorized visitors to any LIFE, Inc. facility must sign in and out in accordance with the established policy on Visitation Log (606:a).
- 10) Employees are subject to search, surveillance and interrogation whenever management feels such action must be taken to maintain security. All searches should be supervised by top management. Employees may be asked to take a polygraph examination when LIFE, Inc. is investigating economic losses, such as those resulting from theft and embezzlement. LIFE, Inc. will only ask

those employees who had access to the property being investigated and only those employees whom it has reason to suspect were involved to take a polygraph examination as part of a LIFE, Inc. investigation. Further, no adverse action will be taken against any employee solely on the basis of the results of a polygraph test.

- 11) Employees may enter or remain on LIFE, Inc. premises fifteen (15) prior to and fifteen (15) minutes after scheduled work time. Supervisors may not allow any employee to come in earlier or stay later than fifteen (15) minutes of scheduled work times. This time on site will not be considered work time, and is only for the convenience of the employee.
- 12) Employees are expected to exercise reasonable care for their own protection and for that of their personal property while on LIFE, Inc. premises and while away from the premises on business. LIFE, Inc. assumes no responsibility for employee losses resulting from robbery or theft.

EMERGENCY RELOCATION OF CLIENTS**608**

Effective: September 28, 2011

Last Revision Date: April 9, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of ICF/IDD Services and Director of Contract Services

POLICY:

It is the policy of LIFE, Inc. to ensure the safety and health of the clients during emergency situations by adhering to the following relocation procedures.

REGULATORY REFERENCE: DHSR Recommended Guidelines
LIFE, Inc. Company Policy

FORMS MANUAL REFERENCE: 608(a)

COMMENT:

- 1) All LIFE, Inc. residential facilities should relocate clients when an emergency situation makes the facility unavailable for use.
- 2) The term “emergency” refers to any situation which is sudden and unforeseen, such as a natural disaster, fire or other catastrophe which necessitates the removal of clients from the facility to protect their health and safety. This term does not apply to emergency placement of clients outside of a facility due to behavior problems.
- 3) The following are examples of some situations which fall within the category of “emergency”.
 - a) A hurricane, snowstorm, tornado or other natural occurrence in which allowing clients to remain in the facility might jeopardize their health or safety; or
 - b) A facility fire, malfunctioning heating or cooling system (in cold or hot weather, respectively), malfunctioning septic system, or other situations in which allowing clients to remain in the facility might jeopardize their health or safety; or
 - c) Any other unforeseen occurrence not noted above in which allowing clients to remain in the facility might jeopardize their health and safety.
- 4) In all instances when a facility must move clients from a licensed facility to an unlicensed facility due to an emergency situation as described above, the QP or designee shall do the following:
 - a) First ensure the safety and health of the clients by evacuating them to a safe and secure facility, where the client’s health and safety needs will be met. There must be sufficient staff, food, medicine, medical equipment and supplies in the facility to which the clients have been moved.
 - b) Prior to, or as soon as possible after evacuation, notify the Director of Facilities and either the Director of ICF/IID Services or the Director of Contract Services. Prior to, or

as soon as possible after evacuation, the Director of Facilities will notify the members of the Corporate 12 as to explain the situation, the reason for the relocation and the plan to respond to the emergency. The Director of ICF/IID or the Director of Contract Services may notify the Corporate 12 upon discussion with the Director of Facilities.

- c) Prior to, or as soon as possible after evacuation, notify all legal guardians via phone and explain the situation and reason for the relocation.
 - d) The QP for the facility to be relocated is responsible for completing the “Relocation of Clients” form which is found on the website for the Division of Health Services Regulations (www.2.ncdhhs.gov/dhsr). When you locate the home page, under “Licensure and Certification, click on “Mental Health” go to left side of the page and click on “Emergency Relocation of Clients”. Under emergency relocation guidelines click on #3, “Emergency Relocation of Clients form”. When sending the completed document, please attach facility’s emergency plan.
- 5) In cases where the facility cannot be used in the immediate future or the facility is otherwise unavailable for use, we will make plans for relocating the clients. When relocating to a permanent setting, it will be appropriately licensed.
- 6) The facility’s emergency plan should include the identification of potential evacuation sites to which clients might be moved in the event of an emergency, with assurance that the evacuation site will be able to accommodate the health and safety needs of the clients.

SECTION 7**ABSENCE FROM WORK**[Punctuality](#)

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PUNCTUALITY**701**

Effective: August 2003

Last Revision Date: September 2016

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to require employees to report for work punctually. Excessive tardiness disrupts company operations and will not be tolerated.

REGULATORY REFERENCE: LIFE, Inc. Company policy**COMMENT:**

- 1) All employees are expected to report to work on time. Tardiness is defined as arrival to the work station five minutes or more after the designated starting time. Excessive tardiness is grounds for discipline, up to and including termination.
- 2) An employee who is tardy two times in a 60 day period is considered to have excessive tardiness. This would result in an oral warning according to the policy on Disciplinary Procedure.
- 3) The employee would generally advance one step in the progressive discipline system with each additional instance of tardiness in a 60 day period.
- 4) The 60 day period is defined as a 60 day floating period. At the time of each instance of tardiness, the supervisor should count back 60 days to determine the number of tardies within this time frame.
- 5) The employee should notify his supervisor in advance of the need to be tardy, the reason for the tardiness and when he expects to report to work. Failure to follow these notification procedures or failure to report to work within a reasonable time frame (as it relates to the reason) can result in disciplinary action. All cases of tardiness are considered unexcused.
- 6) In some cases, an employee can anticipate a need to report to work late. If an employee acknowledges this need to his supervisor in advance (prior to the scheduled work day), the supervisor may be able to adjust his schedule. All schedule adjustments of this nature will be based solely upon company needs as determined by the supervisor.

A bona-fide approved schedule adjustment is not considered as an instance of tardiness.
- 7) A single instance of tardiness of 30 minutes or more without notification to the supervisor as to the expected delay will be grounds for the application of progressive discipline, even if it does not cumulatively result in excessive tardiness as specified in the definition in Comment (2), above.
- 8) Employees who are tardy in excess of 60 minutes who have not notified their supervisor of the expected delay may lose their right to work for the balance of the work day. In these cases, the instance will be treated as an unexcused absence in reference to the application of progressive discipline.

- 9) An employee's leaving the work site prior to the designated end of the work day without prior approval from a supervisor disrupts company operations to the same degree as tardiness and will not be tolerated. Each single incident of leaving the work site early without prior approval from their supervisor shall result in the application of progressive discipline, up to and including termination.

ATTENDANCE**702**

Effective: January 2004

Last Revision Date: April 16, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

Implementer: All Supervisory Personnel

POLICY:

It is the policy of LIFE, Inc. to expect employees to report for work as scheduled. Poor attendance disrupts work flow and results in loss of efficiency and will not be tolerated.

REGULATORY REFERENCE: LIFE, Inc. Company Policy
Americans with Disability Act

COMMENTS:

- 1) Absenteeism detracts from quality and causes an undue burden for those employees who must fill in for absent employees. In regard to attendance, employees are expected to:
 - a) Maintain good personal health standards which will allow them to perform their work in a competent manner on a regular basis.
 - b) Avoid letting minor indispositions keep them from performing their jobs. At the same time, good judgment should be used with respect to contagious ailments which might have an adverse effect on clients or other employees. When there is a need to be absent, the employee must call in to his supervisor within a reasonable time frame prior to the scheduled report to work time.
 - c) Attend to personal affairs, whenever possible, during nonworking hours.
- 2) The supervisor (or the on-call management staff for a specific group home facility) is responsible for maintaining the lowest practical level of absenteeism. Effectively, the supervisor can accomplish this by talking to the employee returning from an absence. This will place proper emphasis on attendance and set the climate in the facility. By talking to the employee, the supervisor is further able to ascertain if there is a reason for the absenteeism. Although it is ultimately the employee's responsibility to correct problems and prevent absenteeism, the supervisor can counsel the employee on the importance of maintaining good attendance. In order to accomplish this the supervisor should:
 - a) Receive the call concerning absence personally.
 - b) Speak directly to the employee rather than to a relative or friend.
 - c) If employee appears to be suffering only minor discomforts, encourage the employee to come to work.
 - d) Inquire whether the employee has taken steps to improve the condition causing absence.

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- e) Determine when the employee expects to return to work.
- 3) By following the procedure outlined in Comment (2), above, the supervisor should be able to detect poor attendance habits and take corrective action. The supervisor is expected to work closely with the employee in determining the validity of each absence as it occurs. The supervisor is further responsible for documenting, at the end of each pay period, each employee's attendance on an attendance calendar, including a reason for each absence:
- 4) In reviewing each employee's attendance at the end of each pay period, the supervisor should consider the following:
- a) Frequency of absence. Frequent short-term absences often indicate poor attendance habits.
 - b) Patterns of absence. A pattern of Monday or Friday absences in conjunction with weekends off, or absences on the day before or after a holiday, will indicate an unsatisfactory attendance pattern.
 - c) Causes of absence. Absences of a questionable nature or those absences which could have been avoided by proper advance planning should be monitored closely.
 - d) Tardiness record. Tardiness should be considered with absenteeism in determining unsatisfactory attendance patterns.
- 5) Absenteeism is defined as an employee's failure to report to work as scheduled. Each case of absence is either excused or unexcused.
- 6) Excused absences include those absences for which an employee does not report to work for reasons beyond his control but has adhered to all established departmental notification procedures (i.e., called in to proper authority, called in within a reasonable time frame, with consideration given to the reason for the absence, prior to beginning of shift). Examples of these absences might include, but are not limited to, personal illness, personal emergencies or illness in the employee's family. The supervisor will determine excusability on a case by case basis, consistently and in accordance with established policy. Although employees are required to follow established notification procedures, this in and of itself does not determine excusability (i.e., If a supervisor judges that there is not a legitimate reason for an absence it may be deemed unexcused, even if there is leave time and even if proper notification procedures are followed).
- 7) An unexcused absence is defined as an absence for which an employee:
- a) fails to notify his supervisor of the need to be out of work (i.e., "no call- no show"),
 - b) fails to call in to his supervisor (or on-call management staff) within a reasonable time frame prior to scheduled "report to work" time (with consideration given to the reason for the absence),
 - c) is absent for reasons which are not considered to be beyond the employee's control,
 - d) reports to work in improper attire and is not permitted to work,

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- e) reports to work in any condition deemed not fit for work and is not allowed to work,
 - f) is tardy in excess of 60 minutes without notification to supervisor and loses his right to work for the remainder of the shift, or
 - g) leaves the company premises during working hours without prior approval from supervisor, even during designated meal breaks.
- 8) Excessive absenteeism will result in disciplinary action, up to and including termination.
- 9) In order to translate attendance standards into effective working policy, the following guidelines should typically be utilized in the application of progressive discipline:
- a) In any case in which an employee's frequency of excused absences creates a disruption to the work schedule, creates an unfair burden on other employees or decreases the quality of services, disciplinary action may be taken at the discretion of the supervisor in accordance with the company's established policies. Each instance would typically result in the first step of progressive discipline.

If the employee has other documented disciplinary actions, related or unrelated to absenteeism, each instance would generally result in the application of the next sequential step of progressive discipline.
 - b) Given the serious ramifications of cases of unexcused absence, the company reserves the right to vary from the application of progressive discipline when necessary.

A single instance of an unexcused absence will result in a written warning. A second instance of an unexcused absence within a six-month period will be grounds for termination of employment.

Because this procedure is not based upon the general principles of progressive discipline, the written warning should clearly state that a second occurrence of an unexcused absence within a six-month period will result in termination of employment. The six-month period is defined as a six month floating period. At the time of the instance of an unexcused absence, the supervisor should count back six months to determine the number of unexcused absences within this time frame.
 - c) Employees who are absent from work for three (3) consecutive days without properly notifying the supervisor will be considered as having voluntarily resigned without notice. The supervisor should formally note the termination and advise the individual of the action by certified mail.
 - d) An employee who fails to report to work at the end of any designated leave of absence without properly notifying the supervisor will be considered as having voluntarily resigned without notice. The supervisor should formally note the termination and advise the individual of the action by certified mail.
- 10) If an absence is due to illness or injury of an employee or a family member, written certification from the health care provider of the ill or injured employee or family member verifying the need for the absence is required if the absence exceeds three consecutive work days. The supervisor, at

his discretion, may require this for absences of shorter duration as well. Employees are prohibited from falsifying the need for an absence. Employees must also report to a supervisor on each scheduled work day. Employees who violate this policy will be subject to disciplinary action, up to and including termination (unless other arrangements have been agreed upon between the employee and his supervisor.)

- 11) Particular attention should be paid to an employee in reference to attendance standards during the introductory period. If an employee's habits appear undependable and uncorrectable after counseling, disciplinary action should occur.
- 12) An employee must use any accrued Paid Time Off time to compensate for an absence from work (except tardiness). Any absence from work for which the employee does not have accrued Paid Time Off to use, will be designated leave without pay.
- 13) Any employee with a disability who needs an accommodation should request it from his supervisor. LIFE, Inc. will provide reasonable accommodations to such individuals in accordance with applicable laws.

LEAVES OF ABSENCE**703**

Effective: March 2013

Last Revision Date: March 2013

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to grant employees extended leaves of absence under certain circumstances. Except as stated below, employees will not receive compensation during a leave of absence.

REGULATORY REFERENCE: Family and Medical Leave Act of 1993 and Amendments
The Americans with Disabilities Act
Pregnancy Discrimination Act
EEOC Guidelines
The Uniformed Services Employment and Re-employment Rights Act of 1994
LIFE, Inc. Company Policy
National Defense Authorization Act 2008

FORMS MANUAL REFERENCE: 703(a), 703(b), 703(c), 703(d), 703(e), 703(f), 703(g)

COMMENT:

- 1) LIFE, Inc. will comply with the provisions of the federal Family and Medical Leave Act (FMLA). The appendix to this policy outlines the FMLA's requirements including the rights and obligations of employees, notification requirements, and LIFE, Inc.'s obligations.
- 2) Employees generally are eligible for leaves of absence if they have completed at least one year of service, or as specified by law. The granting and duration of each leave of absence and the compensation received by the employee, if any, during the leave of absence will be determined by LIFE, Inc. in conjunction with applicable federal and state law. The following types of leaves will be considered:
 - a. Sick Leave of Absence. Employees who are unable to work because of a serious health condition or disability may be granted a sick leave of absence with proper physician certification. This type of leave covers disabilities caused by pregnancy, childbirth, or other related medical conditions. LIFE, Inc. requires certification of an employee's need for sick leave, both before the leave begins and on a periodic basis thereafter, by the employee's health care provider. Employee will submit form 703 (a).
 - b. Parental Leave of Absence. Female employees, when not disabled by pregnancy or childbirth (see above), and male employees may be granted a parental leave of absence to care for a child upon birth or upon placement for adoption or foster care.
 - c. Family Care Leave of Absence. Employees may be granted a family care leave of absence for the purpose of caring for a child, spouse, or parent who has a serious health condition. LIFE, Inc. requires certification of the family member's serious health condition, both before the leave begins and on a periodic basis, by the family member's health care provider. For the purpose of establishing the 12-month period for FMLA, LIFE, Inc. will utilize a rolling 12-month period, measuring backward from the date an

employee first uses any FMLA leave in the applicable 12-month period. Specifically, an employee's leave entitlement is determined each time leave is requested by looking back over the immediately preceding 12-month period. Employee will submit forms 703(a), 703(b).

d) Personal Leave of Absence. Employees may be granted a leave of absence to attend to personal matters in cases in which LIFE, Inc. determines that an extended period of time away from the job will be in the best interests of the employee and LIFE, Inc.

e) Military Leave of Absence. A military leave of absence will be granted if an employee is absent in order to serve in the uniformed services of the United States for a period of up to five years (not including certain involuntary extensions of service). Employees who perform and return from service in the Armed Forces, the Military Reserves, the National Guard, or certain Public Health Service positions will retain certain rights with respect to reinstatement, seniority, layoffs, compensation, length of service promotions, and length of service pay increases as required by applicable federal or state law.

Leave granted for military service is unpaid. Employees will be permitted to utilize accrued Paid Time Off for military training purposes but are not required to do so.

f) Military Caregiver Leave of Absence. Employees may be granted up to twenty-six (26) weeks of military caregiver leave during a single 12-month period on a per-covered service member per-injury basis (which may be taken continuously, intermittently, or on a reduced schedule basis). This will include veterans who are undergoing medical treatment, recuperation or therapy for serious injury or illness that occurred any time during the five (5) years preceding the date of treatment. If an employee does not take all of the twenty-six (26) weeks of military caregiver leave during the applicable single 12-month period, the balance is forfeited, and no carry-over is permitted. Employee will submit forms 703(c) and 703(d).

g) Military Exigency Leave of Absence. Employees may be granted exigency leave if the person is a member of the National Guard or a Reserve component, a retired member of the Regular Armed Forces or Reserve, or an active duty service member. Exigency leave must be within the following activities or mutually agreed upon the Company.

- Short-notice deployment (leave permitted up to seven (7) days if the military member receives seven (7) or less days' notice of a call to active duty);
- Military events are related activities;
- Certain temporary childcare arrangements and school activities (not ongoing childcare);
- Financial and legal arrangements.
- Counseling by a non-medical counselor (such as a member of the clergy);
- Rest and recuperation (leave permitted up to five (5) days when the military member is on temporary rest and recuperation leave);
- Post-deployment military activities.

Employee will submit forms 703(c), (d).

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- h) Educational Leave of Absence: Employees who want to continue their education in preparation for added responsibilities with the Company may be granted an educational leave of absence.
- i) Public Service Leave of Absence: Employees who want to accept temporary employment in federal, state, or local government or with an organization devoted to community service may be granted a public service leave of absence.
- 3) Requests for a leave of absence or any extension of a leave should be submitted to the employee's supervisor using the form on page 703(a) thirty (30) days prior to commencement of the leave period, or as soon as in practicable. The supervisor will forward the Employee's Leave of Absence Request {703 (a)} and the Employer Response to Employee Request for Leave of Absence {703(f)}, to the HR Department for review and processing. The HR Department will be responsible for forwarding the leave request to the appropriate Corporate Director for their approval and/or denial. Final approval or denial will be signed off the Executive Vice-President. The HR Department will notify the employee's supervisor of the decision.
- If leave is approved, the employee's supervisor will submit a payroll transmittal to the HR Department indicating the actual date the employee's leave began. A payroll transmittal should also be submitted to the HR Department once the employee returns to work as well.
- All employees on approved leave are expected to report any change of status in their need for leave or their intention to return to work to both the Corporate Office HR Department as well as their supervisor every thirty (30) days.
- 4) Employees who are on an approved leave of absence may not perform work for any other employer during that leave, except when the leave is for military or public service.
- 5) Employees must use all available PTO to cover as much of the FMLA leave as possible. LIFE, Inc. will provide health insurance and other benefits to employees on leave as required by law. An employee must make arrangements to pay his or her normal portion of the health insurance premium in order to maintain insurance coverage. LIFE, Inc.'s obligation to maintain health benefits under FMLA stops if and when an employee informs us that they do not intend to return to work at the end of the leave period, or if the employee fails to return to work when the FMLA leave entitlement is exhausted. LIFE, Inc.'s obligation also stops if the employee's premium payment is more than thirty (30) days late and written notice will be given to the employee at least fifteen (15) days in advance advising that coverage will cease if payment is not received. Benefits that accrue according to length of service, such as Paid Time Off, do not accrue during periods of leave (See policy on Paid Time Off – 504:1).
- 6) If their position remains open, employees returning from a leave of absence will be reinstated to their same job or to an equivalent job with equivalent status and pay, as required by law. Employees returning from a sick leave must provide certification of their ability to perform the functions of the job. Employees returning from a military leave must also comply with all of the reinstatement requirements specified by federal law.
- 7) Employees who are unable to report for work because of arrest and incarceration will be placed on a special personal leave of absence. If the employee is unable to secure bail, the leave of absence will continue until final disposition of the charges. If the employee is freed on bail, a decision whether to allow the resumption of active employment pending disposition of the

charges will be made by the employee's supervisor and the appropriate Corporate Director. They will determine whether reinstatement would be consistent with LIFE, Inc.'s needs and requirements.

- 8) If an employee fails to return to work at the conclusion of an approved leave of absence, including any extension of the leave, the employee will be considered to have voluntarily terminated employment. If an employee has used all of their FMLA entitlement hours, they may submit a request for a personal leave of absence using form 703(a) with any supporting documentation requested. The President will review each request after consulting with the appropriate staff and grant or deny the request. The President's decision is final.
- 9) A period of FMLA leave (regardless of whether it is paid or unpaid) must be treated as "continued service" (i.e., no break in service) for purposes of vesting and eligibility to participate in benefit plans or in the retirement plan. An employee who takes family and medical leave will continue to accrue Paid Time Off for the duration of the leave that is "paid" leave. Paid Time Off will cease to accrue during the first pay period of "unpaid" leave.
- 10) It is the Department of Labor's (DOL) position that if an employee qualifies for job-protected Family and Medical Leave Act of 1993 (FMLA) leave, the employee may not be forced to return to work in a "light duty" position before the employee's FMLA leave entitlement has expired. Forcing the employee to return to such a position would violate his right to be restored to the same or an equivalent position. Under state workers' compensation statutes however, an employee's workers' compensation benefits may be suspended if the employee refuses a light duty assignment. According to DOL, the FMLA does not prohibit such a result. Thus, if an employee is injured on the job, and the injury also qualifies as a "serious health condition", the employee will qualify for both workers' compensation benefits and FMLA leave. This would allow the employee to receive workers' compensation benefits for replacement of lost wages, and have his health benefits maintained under the FMLA. If, as part of the workers' compensation process, the employee is offered a medically-approved "light duty" position, the employee may decline the position and instead choose to exercise his or her FMLA rights. If the employee accepts the "light duty" position in lieu of FMLA leave or returns to work before the 12 weeks are up, the employee retains his right to the original or an equivalent position until 12 weeks have passed {Wage Hour Opinion Letter FMLA-55 (March 10, 1995)}.

With regard to the FMLA's provisions regarding substitution of paid leave for unpaid FMLA leave, an employee who incurs a work-related illness or injury must elect whether to receive paid leave from the employer or workers' compensation benefits. If the employee has elected to receive workers' compensation benefits, the employer cannot require the employee to substitute any paid leave that is covered by the workers' compensation fund. Payments provided by state workers' compensation funds are not considered "accrued paid medical or sick leave" within the meaning of the FMLA. The workers' compensation absence can be counted against the employee's FMLA leave entitlement if it is properly designated as FMLA leave by the employer.

APPENDIX: Notice to Employees Regarding the Family and Medical Leave Act of 1993

LIFE, Inc. will comply with all applicable requirements of the Family and Medical Leave Act of 1993 (FMLA).

The FMLA requires private employers with 50 or more employees and all public agencies, including state, local, and federal employers, and local education agencies (schools), to provide eligible employees up to 12 weeks of unpaid, job-protected leave in any 12-month period for certain family and medical reasons.

Employee Eligibility

The FMLA defines eligible employees as employees who: (1) have worked for the Company for at least 12 months over the prior seven (7) years; (2) have worked for the Company for at least 1250 hours in the previous 12 months; and (3) work at or report to a worksite which has 50 or more employees or is within 75 miles of worksites that taken together have a total of 50 or more employees.

Leave Entitlement

Eligible employees may take leave for the following reasons: (1) to care for a child upon birth or upon placement for adoption or foster care; (2) to care for a parent, spouse, or child with a serious health condition; (3) when an employee is unable to work because of the employee's own serious health condition; or (4) certain military-related situations.

According to the FMLA, a "serious health condition" means an illness, injury, impairment, or physical or mental condition that involves: (1) inpatient care (i.e., an overnight stay), including any period of incapacity or any subsequent treatment in connection with the inpatient care; or (2) "continuing treatment" by a health care provider. For further information on what is considered "continuing treatment", contact the Human Resources Department.

FMLA leave for birth or placement for adoption or foster care must conclude within 12 months of the birth or placement. In addition, spouses employed by the same employer are jointly entitled to a combined leave of 12 work weeks of family leave for the birth or placement of a child for adoption or foster care, and to care for a parent who has a serious health condition.

Eligible employees may take FMLA leave intermittently (for example, in blocks of time) or by reducing a work schedule in certain circumstances. If FMLA leave is to care for a child after the birth or placement for adoption or foster care, employees may take their FMLA leave intermittently or on a reduced work schedule only with the Company's permission. If the FMLA leave is because of the employee's serious illness or to care for seriously ill family member, the employee may take the leave intermittently or on a reduced work schedule if it is medically necessary.

Notice and Certification

Employees who want to take FMLA leave ordinarily must provide the Company at least 30 days' notice of the need for leave, if the need for leave is foreseeable. If the employee's need is not foreseeable, the employee should give as much notice as is practicable. When leave is needed to care for an immediate family member or for the employee's own illness and is for planned medical treatment, the employee must try to schedule treatment in order to prevent disruptions of the Company's operations.

In addition, employees who need leave for their own or a family member's serious health condition must provide medical certification from a health care provider of the serious health condition. The Company also may require a second or third opinion (at the Company's expense), periodic recertification of the serious health condition, and, when the leave is a result of the employee's own serious health condition, a fitness for duty report to return to work. The Company may deny leave to employees who do not provide proper advance leave notice or medical certification.

Benefits During FMLA Leave

Employees taking leave under the FMLA are entitled to receive health benefits during the leave at the same level and terms of coverage as if they had been working throughout the leave. An employee must make arrangements to pay his or her normal portion of the health insurance premium in order to maintain insurance coverage. LIFE, Inc.'s obligation to maintain health benefits under FMLA stops if and when an employee informs us that they do not intend to return to work at the end of the leave period, or if the employee fails to return to work when the FMLA leave entitlement is exhausted. LIFE, Inc.'s obligation also stops if the employee's premium payment is more than thirty (30) days late and written notice will be given to the employee at least fifteen (15) days in advance advising that coverage will cease if payment is not received. In some instances, the Company may recover premiums it paid to maintain health coverage for an employee who fails to return to work from FMLA leave.

The employee's use of FMLA leave will not result in the loss of any employment benefit that accrued prior to the start of the employee's leave.

Job Restoration After FMLA Leave

The Company will reinstate an employee returning from FMLA leave to the same or equivalent position with equivalent pay, benefits, and other employment terms and conditions. However, an employee on an FMLA leave does not have any greater right to reinstatement or to other benefits and conditions of employment than if the employee had been continuously employed during the FMLA leave period.

Certain highly compensated key employees also may be denied reinstatement when necessary to prevent "substantial and grievous economic injury to the Company's operations. A "key" employee is a salaried eligible employee who is among the highest paid ten percent of employees within 75 miles of the worksite. Employees will be notified of their status as a key employee, when applicable, after they request FMLA leave.

Other Provisions

The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights.

Salaried executive, administrative, and professional employees of the Company who meet the Fair Labor Standards Act (FLSA) criteria for exemption from minimum wage and overtime do not lose their FLSA-exempt status by using any unpaid FMLA leave. This special exception to the "salary basis" requirements for the FLSA's exemptions extends only to eligible employees' use of leave required by the FMLA.

Further Information

For more information, employees may contact the Human Resources Department.

INCLEMENT WEATHER**704**

Effective: March 2009

Last Revision Date: March 2009

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to support all clients during periods of inclement weather. Employees will be compensated for work hours during inclement weather in accordance with applicable law and the guidelines established below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

Fair Labor Standards Act, 29 CFR Part 541

COMMENT:

- 1) All worksites will remain open during periods of inclement weather unless the President authorizes the worksite to close. Employees who are scheduled to work are expected to make all reasonable effort to report to work. However, no employee should expose himself to personal danger in seeking to arrive to work.
- 2) Typically, a worksite will be officially closed due to inclement weather if the following three criteria are met:
 - the area schools are closed and teachers and staff are directed not to report to work;
 - city/county employees are directed not to report to work;
 - area health care providers (local hospitals) are operating on an established inclement weather schedule

Worksite supervisors will assess the situation in their area to determine if it is safe for clients, their families, or staff to report to work. If they determine it is unsafe, they will contact the Director of ICF-IID Services, or the Director of Contract Services, or the Director of Business Operations, or the Director of Facility Services, as appropriate, requesting to close their worksite. The appropriate Director will contact the President to request authorization to close the worksite.

If the worksite is closed by the President, nonexempt hourly employees may use Paid Time Off to compensate for the absence from work or make the time up during that pay period. Time made up that involves overtime must be authorized by their supervisor.

If the worksite is closed by the President, salaried exempt employees must be paid for the day. They must use Paid Time Off and if they do not have enough, they will be loaned Paid Time Off to compensate for the day.

- 3) If it is decided to close the worksite, responsible supervisors must notify staff of the closing and to instruct staff as to what they need to do in the event the worksite closes for multiple days, or

opens on a delayed schedule. Each staff member supervising a case load must call their consumers and inform them that the worksite is closed.

- 4) In the event a decision is made to close a worksite for inclement weather during the day and send employees home, the employees will be paid and they will not be required to use Paid Time Off or make the time up during that pay period. If the office remains officially closed the next day, or for an extended period after that, each employee must either use Paid Time Off or make the time up during the pay period.
- 5) If an employee reports to work even though the worksite is officially closed, the Company assumes no responsibility for any property damage or physical injury that may occur due to the employee's actions and they will not be paid.
- 6) If a worksite remains open and an employee is unable, or chooses not to report to work, that employee must notify their immediate supervisor to inform them of the situation. The employee must use Paid Time Off, or in the case of hourly employees, they could use Paid Time Off or make the time up during that pay period. Time made up that involves overtime must be authorized by their supervisor. The salaried exempt employee is given the option of reporting to work or utilizing Paid Time Off.
- 7) Late arrivals to the work site by nonexempt hourly employees during periods of inclement weather, with supervisory approval, will be excluded from the provisions of the Punctuality policy. The nonexempt hourly employee may opt to utilize Paid Time Off to compensate for late arrival during inclement weather.

Nonexempt hourly employees who are unable to work due to adverse weather conditions must contact their supervisor or the on-call manager. These employees, with approval from their supervisor, will be allowed to utilize Paid Time Off to compensate for the absence from work. Further, absences due to inclement weather will be excluded from the provisions of the Attendance policy.

- 8) Nonexempt hourly employees who report to work will be paid for all hours actually worked, with overtime provisions being applicable.

During periods of inclement weather, some nonexempt hourly employees may be authorized by their supervisor to arrive to the worksite early or to remain at the worksite after the end of their work time. In the event that a nonexempt hourly employee remains at the worksite during non-work times, he will be required to sign a statement acknowledging that he is not officially on duty.

- 9) Employees who are able to report to work during inclement weather may be assigned duties other than those routinely performed and may be expected to fulfill several job functions. Cross-training will be provided by LIFE, Inc. in order to allow for this.
- 10) In certain extreme cases, non-employees may be authorized by supervisor or on-call manager to remain at the worksite. In these cases, the non-employee is expected to provide his own food.

SECTION 8**STANDARDS OF CONDUCT**

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BEHAVIOR OF EMPLOYEES**801**

Effective: August 2007

Last Revision Date: October 2017

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that certain rules and regulations regarding employee behavior are necessary for the efficient operation of the Company and for the benefit and safety of all employees. Conduct that interferes with operations, discredits LIFE, Inc., or is offensive to clients or fellow employees will not be tolerated.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**FORMS MANUAL REFERENCE:** 801(a)**COMMENT:**

1. Employees are expected at all times to conduct themselves in a positive manner so as to promote the best interests of LIFE, Inc. Such conduct includes:
 - a) Reporting to work punctually as scheduled and being at the proper work site, ready for work, at the assigned starting time. This includes reporting to work for scheduled meetings and training sessions (see Attendance and Punctuality);
 - b) Giving proper advanced notice whenever unable to work or report on time (see Attendance and Punctuality);
 - c) Complying with all LIFE, Inc. safety and security regulations;
 - d) Smoking and use of tobacco products only at times and in places not prohibited by LIFE, Inc. rules or local ordinances (see Smoking);
 - e) Wearing clothing appropriate for the work being performed (see Personal Appearance of Employees);
 - f) Eating meals only during meal periods and in the designated eating areas (see Meal Breaks);
 - g) Maintaining work place and work area cleanliness and orderliness (see Maintenance of Work Areas);
 - h) Treating all clients, visitors, the general public and fellow employees in a courteous manner;
 - i) Refraining from behavior or conduct deemed offensive or undesirable, or which is contrary to LIFE, Inc.'s best interests;

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- j) Performing assigned tasks efficiently and in accord with established standards; and
 - k) Reporting to management suspicious, unethical, or illegal conduct (especially harassment) by fellow employees. This includes reporting to management any known or suspected abuse or mistreatment of a client or an unauthorized abridgement of a client's rights.
 - l) Reporting to management any misdemeanor or felony charges which have been brought against the employee. This is to include receipt of any traffic violations. If a moving fine is charged to a LIFE, Inc. vehicle, LIFE, Inc. will pay the fine and deduct it from the employee's paycheck. Management will complete the Misdemeanor and Felony Report Form {Form 801(a)} and file in the Employee's Personnel File.
 - m) Complying with LIFE, Inc. Quality Assurance and Quality Improvement Plan to include performing inspections and responding to discrepancies with plans of correction and following the procedures and policies of the Plan.
- 2) The following conduct is prohibited and will subject the individual involved to disciplinary action, up to and including immediate termination (see Disciplinary Procedure):
- a) The reporting to work under the influence of alcoholic beverages and/or illegal drugs and narcotics or the use, sale, dispensing, or possession of alcoholic beverages and/or illegal drugs and narcotics on LIFE, Inc. premises.
 - b) Refusal to submit to an alcohol or drug test performed by a qualified medical examiner in conjunction with a LIFE, Inc. investigation;
 - c) The use of profanity or abusive language;
 - d) The possession of firearms or other weapons on LIFE, Inc. property;
 - e) Insubordination or the refusal by an employee to follow management's instructions concerning a job-related matter;
 - f) Fighting or assault on a fellow employee;
 - g) Theft, destruction, defacement, or misuse of LIFE, Inc.'s property, of another employee's property, or of a client's property;
 - h) Gambling on LIFE, Inc. property;
 - i) Falsifying or altering any LIFE, Inc. record or report, including but not limited to, application for employment, a medical report, a client record including service notes, a time record, or an expense account.
 - j) Threatening or intimidating management, supervisors, clients or fellow workers;
 - k) Smoking if prohibited by local ordinance or LIFE, Inc. rules;

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- l) Horseplay, pranks, or practical jokes;
 - m) Unauthorized sleeping on the job;
 - n) Failure to wear assigned safety equipment or failure to abide by safety rules and policies;
 - o) Improper attire or inappropriate personal appearance;
 - p) Engaging in any form of sexual harassment;
 - q) Participation in any action that would disrupt or disturb the normal operation of the facility;
 - r) Improper disclosure of confidential information;
 - s) Unauthorized abridgement of client's rights;
 - t) Mistreatment, negligence, abuse, or exploitation of a client;
 - u) Conviction of a felony while employed at LIFE, Inc.
 - v) Guilty of gross misconduct or conduct unbecoming a LIFE, Inc. employee;
 - w) Inefficiency or incompetency in the performance of a job duty;
 - x) Negligence in the performance of job duties;
 - y) Unexcused absence or failure to report to work at the assigned time and place;
 - z) Receiving unauthorized visitors while at work;
 - aa) Failure to maintain a current license or certification required by law or as a condition or performing the job;
 - bb) Failure to report an on-the-job injury;
 - cc) Failure to report as instructed to the company physician as a result of an on-the-job injury,
 - dd) Fraudulent behavior as it relates to worker's compensation;
 - ee) Failure to follow documented physician's orders when out of work or after returning to work due to an illness or injury. This applies to job-related injury as well as non-job related. Physician's orders include, but are not limited to, bed rest, limited activity, etc.
 - ff) Failure to provide supervisor, in a timely fashion, documented physician's orders regarding employee's ability to attend work or to perform any function of his job as it relates to worker's compensation or any non-job-related illness or injury

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- gg) Presenting or causing to be presented to the United States Government or any other health care payer, a claim for an item or service that was not provided as claimed;
 - hh) Making, using, or causing to be made or used, any false record, statement or representation of a fact to determine rights to any benefit or payment under any health care program;
 - ii) Conspiracy to get a health care payer to allow a false claim;
 - jj) Refusing to treat, transfer, or discharge any emergency consumer without first providing for appropriate medical screening to determine whether or not an emergency condition exists, and if it exists, stabilizing the condition or appropriately transferring the consumer in accordance with policy;
 - kk) Failing to provide covered services or necessary care;
 - ll) Attempting to execute a scheme to defraud any health care benefit program;
 - mm) Presenting a claim for reimbursement to any individual, third party payer, or other entity for health services because of a referral by a physician who has a financial relationship with LIFE, Inc.;
 - nn) Knowingly and willfully soliciting or receiving any remuneration in return for: referring an individual for services; purchasing any goods, facility, service, or item; or, offering or paying any remuneration in case or in-kind to induce someone to refer an individual for services; or to purchase any goods, facility, service, or item;
 - oo) Engaging in any activity which is in restraint of trade or monopolizes interstate commerce;
 - pp) Not promptly reporting any issues on non-compliance as described above.
 - qq) Failure to follow any of the above policies may result in disciplinary action up to and including termination.
- 3.) The examples in Comment (2), above, are illustrative of the type of behavior that will not be permitted, but are not intended to be an all-inclusive listing. Any questions in connection with this policy should be directed to the Director of Human Resources.

CONFIDENTIALITY**802**

Effective: March 2008

Last Revision Date: March 2008

Last Reviewed Date: February 20, 2023

Responsibility: Director of Human Resources

POLICY:

It is the policy of LIFE, Inc. that each employee has a continuing obligation to assure privacy as it relates to information regarding clients, employees and the internal business affairs of the company.

COMMENT:

- 1) Information concerning employees, clients and company operations that is designated as confidential should not be discussed with unauthorized persons either inside or outside LIFE, Inc.
- 2) Supervisory staff are responsible for identifying information that should be confidential and should develop procedures to secure and control the information. Once information has been designated as confidential, it should be clearly identified as such and properly secured. A list of employees authorized to have access to the information should be prepared and all access should be logged.
- 3) All inquiries seeking employment information concerning current or former employees should be referred to the Director of Human Resources. All inquiries seeking verification of wages or information concerning garnishment of wages should be referred to the Payroll Department.
- 4) At no time should information concerning client records, employee records or company operations be discussed during the course of casual conversation. Indiscriminate disclosure of confidential information will be cause for termination of employment and possible legal action.

CONFLICTS OF INTEREST**803**

Effective: August 2009

Last Revision Date: August 2009

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to prohibit its Board of Directors and employees from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of LIFE, Inc. and its clients.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) A conflict of interest is an actual or perceived interest by a Board member or employee in an action that results in, or has the appearance of resulting in, personal, organizational, or professional gain. This includes any bias or the appearance of bias in a decision-making process that would reflect a dual role played by a Board member or employee.
- 2) A conflict of interest occurs when a Board member or employee has a direct or fiduciary interest in another relationship.
- 3) A conflict of interest could include:
 - a) ownership with a member of the Board of Directors or an employee where one or the other has supervisory authority over the other or with a client who receives services;
 - b) employment of or by a member of the Board of Directors or an employee where one or the other has supervisory authority over the other or with a client who receives services;
 - c) contractual relationship with a member of the Board of Directors or an employee where one or the other has supervisory authority over the other or with a client who receives services;
 - d) creditor or debtor to a member of the Board of Directors or an employee where one or the other has supervisory authority over the other or with a client who receives services;
 - e) consultative or consumer relationship with a member of the Board of Directors or an employee where one or the other has supervisory authority over the other or with a client who receives services.
- 4) Board members and employees must disclose any financial interest they or their immediate family have in any firm which does business with LIFE, Inc. or which competes with LIFE, Inc. LIFE, Inc. may require divestiture of such interest if it deems the interest to be in conflict with its best interests.

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- 5) Board members, employees, and the immediate families of both are prohibited from accepting gifts, money, or gratuities from the following:
 - a) persons receiving benefits or services from the organization;
 - b) any person or organization performing or seeking to perform services under contract with the organization; and
 - c) persons who are otherwise in a position to benefit from the actions of any employee of the organization.
 - 6) Board members and employees may, with prior written approval, receive honoraria for lectures and other such activities. If the employee is acting in any official capacity, honoraria received by an employee in connection with activities relating to employment with the organization are to be paid to the organization.
 - 7) Board members and employees are not to engage in, directly or indirectly, either on or off the job, any conduct which is disloyal, disruptive, competitive, or damaging to LIFE, Inc.
 - 8) Board members and employees are prohibited from disclosing confidential information to anyone, either inside or outside the organization, who does not have a legitimate business need to know such information.
 - 9) It is in the interest of the organization, individual staff, and Board members to strengthen trust and confidence in each other, to expedite resolution of problems, to mitigate the effect of, and to minimize organizational and individual stress that can be caused by a conflict of interest.
 - 10) If LIFE, Inc. becomes aware of an unapproved outside employment or provision of consultant service which is deemed to be a violation of this policy, the employee will be subject to disciplinary action, up to and including termination.
 - 11) If other activities or actions are deemed to be a conflict of interest, the violator will be subject to disciplinary action, up to and including termination.
 - 12) Since it is impossible to describe all of the situations which may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and only include some of the more clear-cut examples. Questions and concerns should be referred to your supervisor.

PERSONAL APPEARANCE OF EMPLOYEES**804**

Effective: August 2003

Last Revision Date: June 2015

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that each employee's dress, grooming, and personal hygiene should be appropriate to the work situation.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) Employees are expected at all times to present a professional, business-like image to clients, visitors, and the public. Favorable personal appearance is an ongoing requirement of employment with LIFE, Inc. Radical departures from conventional dress or personal grooming and hygiene standards are not permitted.
- 2) The personal appearance of all employees should be governed by the requirements of safety and comfort, but should be as neat and business-like as is practical based upon the specific position responsibilities.

Although supervisors may address any concern with individual employees, the personal appearance of each employee should generally be in accordance with the following standards:

- a) Employees are expected to dress in a manner that is normally acceptable in similar business establishments. The wearing of suggestive or overly casual attire is not permitted. The length and fit of all articles of clothing should be "tasteful" and should take into account the employee's job duties. Frayed articles of clothing are not allowed in the workplace.
- b) Shoes should be appropriate and safe for the job requirements of each individual employee. All employees who work directly with clients are required to wear flat, closed to, closed heel shoes that provide good traction.
- c) Hair should be clean, combed and neatly trimmed or arranged.
- d) Sideburns, mustaches and beards should be neatly trimmed.
- e) Employees are required to cover any tattoo that is deemed "extreme" or "offensive".
- f) Nails should be clean and well-groomed and should not inhibit any employee from performing any facet of his job. For employees who work directly with clients, extremely long nails are prohibited for health and safety reasons. These employee's nails must be maintained at a shorter length with no sharp edges that could pose a threat of scratching, present a hygiene concern or interfere with the employee's ability to assist clients in any activities of daily living. Each employee is expected to comply with the

guidelines set forth by the supervisor. Failure to comply with this requirement may result in disciplinary action, up to and including termination.

- g) Employees are to refrain from wearing any jewelry item that would present a safety concern. Employees who are primarily responsible for client care are prohibited from wearing any pierced earring that hangs below the ear lobe.
 - h) Direct Support Professionals are allowed to wear shorts that are a conservative/Bermuda length during the summer months. Direct Support Professionals are not allowed to wear clothe at a length that could present a tripping hazard. That includes floor length dresses and skirts as well as pants which drag the floor. No exercise type attire can be worn at work.
 - i) No manager or clerical staff is allowed to wear shorts in the workplace. Any exception to this must be approved by the Company President on a case by case basis (consideration may be given in the event of non-routine outdoor events). Shorts will not be allowed for managers who are providing employee training. Capri length slacks will be allowed.
- 3) Certain employees may be required to meet additional personal appearance standards that are not specified within this policy depending on the nature of their jobs. In these cases, the supervisor is responsible for communicating these details to the employee at the time the job offer is made.
 - 4) Supervisors are held accountable for employees' compliance with established dress code guidelines. Any employee who does not meet the standards of this policy will be required to take corrective action, which may include leaving the premises to change clothes. Any employee who is required to leave the workplace in order to comply with personal appearance standards will be required to utilize any accrued PTO for their absence from the worksite.
 - 5) Supervisors are expected to enforce all appearance standards fairly and consistently. If an employee raises a bona fide religious or other concern, the supervisor should contact the HR department to determine whether or not accommodation should be made.
 - 6) All employees are expected to comply with general as well as specific departmental personal appearance standards. Failure to do so may result in disciplinary action, up to and including termination. Supervisors who do not enforce established personal appearance guidelines would also be subject to disciplinary action, up to and including termination.

PERSONAL PHONE CALLS**805**

Effective: May 2003

Last Revision Date: August 2, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to allow employees to make and receive personal phone calls according to the guidelines below.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) LIFE, Inc. acknowledges that, on occasion, it may be necessary for employees to make personal calls. Employees are asked to limit calls to emergencies and essential personal business that cannot be handled during non-work hours.
- 2) Personal phone calls should be made during meal and/or break periods with the permission of your supervisor. They should be as brief as possible, to a maximum of three (3) minutes.
- 3) Bluetooth or similar devices are prohibited during work hours.
- 4) All employees should make efforts to ensure that they do not receive unnecessary personal phone calls during work hours.
- 5) Personal cell phone usage is not reimbursable.
- 6) Violations of this policy will result in disciplinary action, up to and including termination.

DISCIPLINARY PROCEDURE**806**

Effective: July 2008

Last Revision Date: April 16, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that all employees are expected to comply with the Company's standards of behavior and performance and that any noncompliance with these standards must be corrected.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**FORMS MANUAL REFERENCE:** 806(a)**COMMENT:**

- 1) Under normal circumstances, LIFE, Inc. endorses a policy of progressive discipline in which it attempts to provide employees with notice of problems and an opportunity to improve. LIFE, Inc. does, however, retain the right to administer discipline in any manner it sees fit.
- 2) The normal application of progressive discipline will occur according to the guidelines established below:
 - a) The first written warning will be given initially. If an employee is not meeting LIFE, Inc.'s standards of behavior or performance, the employee's supervisor should take the following action:
 - i) Meet with the employee in private to discuss the matter;
 - ii) Inform the employee of the nature of the problem and the action necessary to correct it, and
 - iii) Document as the first written warning on the LIFE, Inc. Employee Warning Notice form and place in the employee's personnel file. The documentation should be dated and signed by the supervisor and the employee. The deficiencies, employment problems, or misconduct should be briefly stated. The documentation should also clearly state the next step of discipline that will occur if there are further policy infractions. Employees will be offered a copy of the written warning.
 - iv) If the employee disagrees with the action, allow him the opportunity to write down his own version of what happened. This should be encouraged.
 - b) If problems continue, the second written warning would be issued. After the second occurrence of a problem, the supervisor should hold another private meeting with the employee. A witness (a member of management, never a peer of the employee) should be present unless otherwise authorized by the next level of management. The following action should be taken:

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- i) Issue a second written warning to the employee. The written warning should be documented on the attached LIFE, Inc. Employee Warning Notice Form. Be sure to indicate on the form the appropriate level of discipline.
 - ii) Go over the problem with the employee. The deficiencies, employment problems or misconduct should be thoroughly detailed. The form should clearly state the next step that will occur if certain performance or conduct is not changed.
 - iii) If the employee disagrees with the action, allow him the opportunity to write down his own version of what happened. This should be encouraged.
 - iv) The employee, supervisor and witness (as applicable) should both sign the written warning. Explain to the employee that his signature does not indicate that he agrees with the action taken, but serves as an acknowledgement that he has reviewed the written warning. If the employee refuses to sign the written warning the witness should verify the employee's refusal to sign the document. (If a witness was not initially included in the conference, one should be called in if at all possible.) Offer the employee a copy of the written warning.
 - v) The completed written warning should be filed in the employee's facility personnel file.
- c) If problems still continue after the issuance of the second written warning, a final written warning would be given, stating that termination will occur if the problem is not corrected immediately. The final written warning should be issued according to the guidelines below.
- i) The final written warning should be documented on the LIFE, Inc. Employee Warning Notice Form. Be sure to indicate on the form (by placing an "X" in the correct box) the appropriate level of discipline. The final written warning should be reviewed and approved by the supervisor's next level of management before it is issued to the employee. The manager's signature indicates his/her review of the document.
 - ii) The supervisor should hold a private meeting with the employee. A witness must be present. The witness should be a member of management, never a peer of the employee.
 - iii) Go over the problem with the employee. The deficiencies, employment problems or misconduct should be thoroughly detailed. The form should clearly state that termination of employment will occur if the problem is not immediately corrected.
 - iv) If the employee disagrees with the action, give him the opportunity to write down his own version of what happened. This should be encouraged.
 - v) The employer, supervisor and witness should sign the form. Explain to the employee that his signature acknowledges his review and receipt of the

document. If the employee refuses to sign the document, this should be indicated in writing and verified by the witness. Offer the employee a copy of the written warning.

- vi) The final written warning should be placed in the employee's facility personnel file.
- d) If the employee's problems are not immediately corrected, the employee will be discharged. The termination of employment for disciplinary reasons should be in accordance with the Termination of Employment policy. The Employee Warning Notice form indicating termination, a payroll transmittal form, and a completed separation notice should be forwarded to the Payroll Department and the Human Resources Department.
- 3) The progressive disciplinary procedures described in Comment (2) may also be applied to an employee who is experiencing a series of unrelated problems involving job performance and/or behavior. That is, the first written warning could be for one problem, while the second written warning is given in reference to a different policy infraction.
- 4) In cases involving serious misconduct, deliberate or willful breaches of company policy or violations/suspected violations of the law, the procedures contained in Comment (2), above, may be disregarded. In these instances, the supervisor should suspend the employee immediately in order to investigate (if necessary) and if appropriate, recommend termination. Employees suspended from work must take PTO. The suspended employee will not receive any other compensation or employee benefits unless the President grants an exception.

To the extent practicable, the Company and all supervisors should apply the progressive discipline policy uniformly to all similarly situated employees. However, the progressive discipline procedure may also, at times, be modified so that the level of discipline is appropriate to the specific circumstances. In other words, the severity, nature or frequency of the problem may warrant accelerating the process to a higher level of discipline. In these cases, supervisors should discuss the circumstances with the next highest level of management in order to decide the appropriate level of discipline.

- 5) A twelve-month timetable is utilized in implementing the progressive discipline policy. If after any step of discipline there are no further documented problems for a twelve-month period, an employee's record is cleared of any disciplinary incidents. So, for example, if a first written warning is given, with a second written warning being given one month later, but no additional warnings are documented for the next twelve months, the progressive discipline period would start over again for that particular employee.

It is imperative that supervisors calculate the steps of progressive discipline according to this timetable. The supervisor should write "Inactive" at the top of outdated disciplinary documents but should maintain them in the employee's file.

Example of Disciplinary Action Timeline:

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	X				X							
2				X								

Employee is on their final written warning because they **have not** gone 12 consecutive months since their last disciplinary action.

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	X				X							
2						X						

Employee is on their first written warning because they **have been** 12 consecutive months since their last disciplinary action.

- 6) All documentation discussed in connection with the progressive discipline policy should be recorded and issued to the employee in a timely manner. As a general rule of thumb, all documentation meetings should be held within 48 hours of the occurrence of the problem, or in some cases, within 48 hours of the supervisor's awareness of the problem. Extended periods of time between the supervisor's awareness of the problem and his counseling with the employee regarding the problem must be brought to the attention of the Director of Human Resources. In cases when employees are scheduled off, the supervisor must determine on a case by case basis if it is necessary to call the employee in to work to discuss the problem.
- 7) Supervisors should utilize the progressive discipline system as a means of documenting significant disciplinary concerns. Less significant matters can be discussed with the employee informally or documented in the performance review without referring to it as a documented warning.
- 8) The LIFE, Inc. grievance procedure cannot be utilized in connection with the termination of an employee.

SUBSTANCE ABUSE**807**

Effective: March 28, 2008

Last Revision Date: May 1, 2023

Last Reviewed Date: May 1, 2023

Responsibility: Director of Human Resources

POLICY:

It is the policy of LIFE, Inc. that all of its employees should be free of drug abuse and refrain from the misuse of alcohol.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**FORMS MANUAL REFERENCE:** 807(a), 807(b)**COMMENT:**

- 1) LIFE, Inc. recognizes that abuse of drugs or alcohol by its employees presents a serious threat to the safety and health of such employees, their co-workers, consumers and members of the general public.
- 2) The purposes of the Substance Abuse Policy are as follows:
 - a) to establish and maintain a safe and healthy working environment for all Company employees;
 - b) to ensure the reputation of the Company and its employees as good citizens worthy of the business and responsibilities entrusted to them;
 - c) to reduce the likelihood of accidental injury to persons and property;
 - d) to reduce absenteeism, tardiness and poor or substandard job performance of Company employees; and,
 - e) to provide guidance for employees who seek the Company's help in overcoming any addiction to, dependence upon or related problem with alcohol or drugs.
- 3) It is believed that the benefits to be derived from the reduction in number of accidents, the greater safety of all employees, improved job performance, and the rehabilitation or termination of those who, because of alcohol or drugs, are a burden upon all other employees, will more than make up for an inconvenience the rest of us may experience. The Company earnestly solicits the understanding and cooperation of all employees in implementing this Policy and the rules and procedures contained herein.

4) Definitions:

- a) “Alcohol” or “Alcoholic Beverage” means any beverage that may be legally sold and consumed and that has an alcoholic content in excess of 0.5% by volume.
- b) “Drug” means any substance (other than alcohol) capable of altering the mood, perception, pain level, or judgment of the individual consuming it.
- c) “Illegal drug” means any drug or controlled substance, the sale, possession or consumption of which is illegal, including, without limitation, any substance defined as a controlled substance under 49 CFR Part 40 or N.C. Gen. Stat. Section 90-87(5) (e.g. cocaine, opiates, amphetamines, and phencyclidine (PCP)). The term “Illegal Drug” also includes any Prescribed Drug (as defined herein) that is not being used for prescribed purposes.
- d) “Prescribed Drug” means any Drug or other substance lawfully prescribed for the individual possessing and consuming it by a licensed medical practitioner.
- e) “Safety-Sensitive Function” means any function of an employee’s position, the improper performance (or nonperformance) of which could adversely affect the health and/or safety of such employee, other employees of the Company, consumers of the Company or members of the general public, including, without limitation, operating (or riding in) a motor vehicle, inspecting, operating, repairing or testing equipment, loading or unloading inventory and loading or unloading a motor vehicle.

5) Qualification for Employment

- a) No person applying for employment with the Company who is presently using Illegal Drugs will be knowingly employed by the Company.
- b) For safety reasons, no applicant for employment who has a history of alcohol or drug dependence will be knowingly employed by the Company, unless there is evidence of rehabilitation satisfactory to the Company.

6) Prohibited Conduct

Following are a number of rules of conduct for Company employees. Any violation of these rules will result in immediate disciplinary action, up to and including termination of employment with the Company.

- a) The consumption of, or being under the influence of, Illegal Drugs or Alcohol (except as otherwise provided by this Policy) on Company premises or during working hours is prohibited.

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- b) Bringing or consuming an Alcoholic Beverage on Company premises or during working hours, except as expressly authorized by the Company in connection with company-authorized events, is prohibited.
 - c) Excessive absenteeism, tardiness, poor work or an accident caused by an employee's off-duty abuse of Alcohol or Alcoholic Beverages, or drugs will not be tolerated. Such violations will result in termination of employment or referral for rehabilitation, depending upon the frequency and/or severity of such violations. If the employee refuses or fails rehabilitation, he will be terminated.
 - d) Bringing or using a Prescribed Drug on Company premises where such Prescribed Drug has not been prescribed for the employee bringing or using it is prohibited. Prescribed Drugs shall be possessed and used only by the person for whom they are prescribed and only in the manner, combination and quantity prescribed. Any employee who performs a safety-sensitive function as part of his position with the Company and has been directed (by a licensed medical professional) to use a Prescribed Drug that could interfere with such employee's ability to perform his job safely must inform the Company in writing prior to such use and prior to the performance of any such safety-sensitive function. Appropriate reporting forms should be obtained from Human Resources Department.
 - e) The use of an Illegal Drug or the possession of same on or off duty is strictly prohibited and constitutes grounds for immediate termination of employment with the Company.
 - f) The use of any substance before or during work that may prohibit your ability to perform your job duties is prohibited and may lead to immediate termination.
 - g) The purchase, sale, trade or delivery of Illegal Drugs by an employee to, from or with another person is cause for immediate termination of employment and referral to law enforcement authorities.
- 7) Types of Drug Testing

In furtherance of the above rules and to promote the Company's goal of a drug-free workplace, the Company is implementing several types of Illegal Drug and Alcohol screening for the benefit of all its employees. Such screening shall be performed only by approved laboratories (as defined in N.C. Gen. Stat. Section 95-231).

- a) Probationary Testing – Employees will be drug tested during their first ninety (90) days of employment. Their continued employment is contingent upon passing this test. Employees that do not pass this test will be immediately terminated for cause. Any employee that refuses to submit to this test will be

immediately terminated for cause. All applicants for employment will be notified of this requirement at the time they complete an employment application.

- b) Periodic Testing – The Company reserves the right to require all of its employees to undergo periodic medical examinations. Testing for the use of Illegal Drugs and/or Alcohol may be required as a part of such examination, at the discretion of the Company.
- c) Reasonable Suspicion Testing – If an employee is on duty or reports to work in a condition giving the Company reasonable cause to suspect the influence of Alcohol or Illegal Drugs, the employee may be required to submit to a test, to determine whether such employee has used Illegal Drugs or is under the influence of Illegal Drugs or Alcohol. For purposes of this Policy, “reasonable suspicion” shall mean belief that an employee has violated the Illegal Drug or Alcohol prohibitions of this Policy based upon specific, contemporaneous, articulable observations concerning the appearance, behavior, speech or body odors of the employee in question. Where there is reasonable cause, and at the discretion of the Company, vehicles, lockers, and/or related personal areas will be searched without prior notice to ensure a work environment free of Illegal Drugs and Alcohol.
- d) Post-Accident/Post-Injury Testing – Any Company employee who suffers an on-the-job injury requiring medical treatment, or who is involved in an accident occurring while such employee was performing a safety-sensitive function, shall be required to submit to tests for Alcohol and Illegal Drug use as soon as practicable after such injury or accident.

Any employee who is involved in an accident, or who suffers an –on-the-job injury requiring medical treatment, shall notify his supervisor at the first available opportunity after such accident or injury. The notified supervisor shall make the determination as to whether the employee should report to an appropriate collection site to submit to Illegal Drug and/or Alcohol Testing. If local law enforcement officials are on the scene of the accident and request the employee to undergo an Alcohol or Illegal Drug test, the employee shall comply with such request, but shall still notify the Company of the accident as soon as possible.

- e) Random Testing – In order to deter the misuse of Illegal Drugs, the Company may randomly select and require employees to submit to Illegal Drug tests. These tests will be unannounced, and all Company employees are subject to being selected. The random selection process will be completely objective and anonymous. Appropriate safeguards will be in place to ensure that the identity of each individual selected cannot be determined prior to or at the time of selection. Any employee who is randomly selected for testing will still be subject to additional testing if his name is again selected at any time in the future.

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- f) Return-to-Duty and Follow-Up Testing
- 1) Return-to-Duty Testing. Any employee who is not discharged as a result of failing an Illegal Drug or Alcohol Test administered pursuant to this Policy, or who successfully completes a rehabilitation program and wishes to return to work, shall be required to submit to and pass the appropriate test(s) before returning to duty.
 - 2) Follow-Up Testing. If a licensed medical practitioner determines (in writing) that a Company employee is in need of assistance in resolving Alcohol or Drug problems, such employee, if he is not discharged from employment with the Company as a result of such problems, shall be subject to (and be required to pass) a minimum of six (6) Drug tests and/or (6) Alcohol tests, depending upon the nature of the employee's problems, during the twelve (12) month period following such violation.

In addition to the foregoing types of testing, Company employees may be requested to submit to Illegal Drug and Alcohol testing pursuant to the lawful requirements of another company or entity for which the Company is performing a service if required by such other company or entity.

Any Company employee who fails a test for Alcohol or Drug use required or authorized by the terms of this Policy shall be subject to immediate disciplinary action, up to and including termination of employment.

Any Company employee who refuses to submit to a test for Alcohol or Drug use required or authorized by the terms of this Policy, or who refuses to authorize by the terms of this Policy, or who refuses to authorize the release to the Company of the results of an Illegal Drug or Alcohol test conducted by or on behalf of law enforcement officials, shall be deemed to have failed such test and shall be subject to immediate discipline, up to and including termination.

- 8) Drug Testing Procedures
- a) Specimen Collection and Screening. Any employee requested to undergo a test for Illegal Drugs or Alcohol will be accompanied by a supervisor or sent by other safe transportation to a designated collection site to provide a testing specimen or specimens. Collection of specimens shall be performed under reasonable and sanitary conditions with individual dignity of the employee or applicant being preserved to the extent practicable. Employees will be asked to list prescription drugs they are taking to avoid false positive results. Any employee requested to undergo a test for Illegal Drugs will be provided a copy of written specimen collection procedures designed to prevent substitution of samples and interference

with the collection and screening process. Such procedures must be followed by the employee and collection site personnel.

- b) **Confirmatory Tests.** Any specimen identified as positive on an initial test screen for Illegal Drugs will be confirmed by a second analytical procedure independent from the initial test which uses a different chemical technique and procedure, such as gas chromatography/mass spectrometry for a urine specimen or an equivalent scientifically accepted method. A portion of every specimen that produces a positive test result will be preserved by the laboratory performing the screening for a period of at least ninety (90) days after the date the results of such screening are delivered to the Company. An employee may request, in same or another approved laboratory in order to verify the test results, but all costs of such independent test will be bore solely by the employee.
 - c) **Reporting of Test Results.** After appropriate review of a test result and related data, but within five (5) working days after receipt of the specimen in question, the testing laboratory will report such test result to the Director of Human Resources. The laboratory will also report the results of any other specimens submitted at the same time to the laboratory. Both the laboratory and the Company will take all reasonable measures to ensure the confidentiality of all information reported to the Director of Human Resources and will limit access to its data transmission storage and retrieval system.
 - d) The Company will notify all employees who test positive in writing of the results of the test and the statutory right to a retest. This notification will be made within thirty (30) days from the time that the results are mailed or otherwise delivered to the Company.
- 9) **Employee Assistance and Confidentiality**
- a) It is the responsibility of each employee to seek assistance before Alcohol and/or Illegal Drug problems lead to disciplinary action which can include discharge for a first offense. Once an employee has violated this Policy, subsequently seeking assistance on a voluntary basis will not have any bearing on the determination of appropriate disciplinary action for such a violation.
 - b) An employee's decision to seek prior assistance will not be used as a basis for disciplinary action and will not be used against such employee in any disciplinary proceeding. Conversely, using the assistance will not be a defense to the imposition of disciplinary action where facts proving a violation of this Policy are obtained other than as a result of an employee's use of the assistance.
 - c) Treatment programs are partially covered by the Company's health plan through specific riders covering alcohol, drug, and psychological counseling and treatment.

- d) The Company respects the confidentiality and privacy rights of all its employees. Accordingly, the results of any test administered under this Policy may not be revealed by the Company except: (i) to Company personnel who have a definite need to know; (ii) upon the express consent of the employee in question; or (iii) as otherwise requested by applicable law or regulation.

10) Drug Convictions

Any employee who is convicted of a criminal drug offense must report such conviction within five (5) days after the conviction. Failure to report such a conviction will result in immediate termination.

11) Acknowledgement of Receipt of Substance Abuse Policy

All Company employees must acknowledge receipt of a copy of this Policy by signing the appropriate statement [Item 5(b)] on the General Orientation Form.

12) Staff notification of Substance Abuse Policy

LIFE, Inc. will display, on all company bulletin boards, a statement notifying employees that the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the workplace. (This will be done in accordance with attached procedures.)

PROCEDURES FOR DRUG-FREE WORKPLACE AWARENESS MESSAGE

Effective: March 28, 2008

Last Revision Date: April 23, 2018

Last Reviewed Date: February 20, 2023

Responsibility: President

POLICY NUMBER REFERENCE: (12) and (13)

SCOPE STATEMENT:

The President will be responsible for distributing to responsible persons all Drug-Free Workplace Awareness Messages.

COMMENT:

- 1) On November 15 of each calendar year, a copy of President's letter regarding Drugs (Awareness Message [804:8 (b)]) shall be posted on the company bulletin board in each LIFE, Inc. Facility.
- 2) The President shall ensure that each employee of LIFE, Inc. receives a copy of the company's Drug-Free Awareness Message [807(a)] at least one time per calendar year. This will be accomplished through digital messaging systems or the company website.
- 3) On February 1 of each calendar year, the staff will be responsible for removing [807: (b)] and for posting a second Drug Awareness Message on the bulletin board [807(b)]. The second notice should remain on the bulletin board until November 15 of the following year, when the process will be repeated.

CORPORATE COMPLIANCE**808**

Effective: February 25, 2009

Last Revision Date: December 2019

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to train staff on acceptable conduct and provide a process to express concerns. LIFE, Inc. will exercise due diligence to prevent and detect criminal conduct.

FORMS MANUAL REFERENCE: 808(a), 808(b)**COMMENT:**

- 1) During orientation, employees will be trained on
 - a) Personnel Policy Manual, Section 8, Standards of Conduct;
 - b) Personnel Policy Manual, Section 1, 105:1, Code of Employer-Employee Relations;
 - c) Personnel Policy Manual, Section 12, Resident's Rights Policy;
 - d) Personnel Policy Manual, Section 12, Rights' Violation;
 - e) Health Insurance Portability and Accountability Act
 - f) Federal False Claims Act;
 - g) Whistleblower Protection Act; and
 - h) Code of Conduct.
- 2) Any violation of these policies and laws should be reported immediately to your supervisor and will be investigated in accordance with LIFE policy. Employees are encouraged to report suspected Medicaid fraud to their supervisor first but also can report it to:
 - a) the Corporate Compliance telephone line, 1-877-778-1945; or
 - b) via secure email at Compliance@lifeincorporated.com; or
 - c) the NC Division of Medical Assistance, Program Integrity Section by calling the CARE-LINE at 1-800-662-7030; or
 - d) the Health Care Financing Administration Office of Inspector General's Fraud Line at 1-800-HHS-TIPS; or
 - e) the State Auditor's Waste Line at 1-800-730-TIPS; or

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- f) The Attorney General's Medicaid Investigations Unit at 919-881-2320.
 - 3) In order to give employees another process to express concerns, supervisors will interview employees at least twice annually. These interviews will be confidential. Employees will also be offered a questionnaire to complete and mail to the Corporate Compliance Officer.
 - 4) The completed interview forms will be sealed and mailed to the Corporate Compliance Officer for review.
 - 5) The Corporate Compliance Officer will consult with the Compliance Committee consisting of:
 - a) Board of Directors;
 - b) Executive Vice-President;
 - c) Director of Business Operations;
 - d) Director of ICF/IID Services;
 - e) Director of Contract Services;
 - f) Director of Facilities.

They will decide to investigate or resolve informally.

- 6) If an investigation is necessary, a Corporate Director will be designated to perform and make recommendations.
- 7) LIFE will have a toll-free telephone line and a secure email address that can be used to report concerns.
- 8) The Corporate Compliance Officer will review all reported concerns and the resolutions to those concerns with the Board of Directors.
- 9) No employee will be retaliated against for reporting valid concerns.
- 10) Knowingly falsifying concerns is counter-productive and the employee will be disciplined up to and including termination.
- 11) In addition to questionnaires, auditing procedures and internal controls will be implemented to reduce the likelihood of criminal conduct.
- 12) The results of audits and internal controls will be summarized quarterly (January, April, July, October) and reviewed by the Board of Directors.
- 13) If criminal conduct has been discovered, appropriate steps to resolve the situation will be implemented and revisions to the audits and internal controls will be done.
- 14) Code of Conduct violations should be reported to the Corporate Compliance toll-free telephone line, 1-877-778-1945 or via email at compliance@lifeincorporated.com.
- 15) The Corporate Compliance Officer will investigate the reported violation. The Corporate Compliance Officer, with input from appropriate staff, will make the decision to resolve by no action, corrective action, or discipline. The investigation will be completed within 30 days.

16) The decision may be appealed to the President. The President's decision is final.

IMPROPER RELATIONSHIPS**809**

Effective: May 2005

Last Revision Date: April 23, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Human Resources

POLICY:

Supervisors shall not engage in consensual or non-consensual relationships with employees they supervise.

REGULATORY REFERENCE: LIFE, Inc. Company Policy*Definitions: For purposes of this policy only*

- 1) *Consensual relationship is any dating, romantic, or sexual relationship.*
- 2) *“Position of authority” includes, but is not limited to, situations in which an individual is responsible for the evaluations or supervision of an employee.*

COMMENT:

- 1) When the supervisor has a “position of authority” with respect to the employee, other staff may be affected because it places one in a position of favor or may advance another’s interest and/or may implicitly make obtaining benefits contingent on the relationship.
- 2) When a consensual relationship exists or develops between an individual having a “position of authority” with respect to another within the same department, the person with the greater position shall immediately terminate the “position of authority” and report it to an appropriate supervisor.
- 3) Supervisors who fail to remove themselves from a “position of authority” over an employee with whom a consensual relationship exists will be deemed to have violated an ethical obligation to other employees, colleagues and LIFE, Inc.
- 4) Credible allegations of a supervisor’s failure to terminate a relationship involving a “position of authority” while in a consensual relationship obligates the immediate or other appropriate supervisor to conduct a prompt and thorough inquiry to determine whether there is any validity to the allegations.
- 5) When it is concluded that a relationship involving a “position of authority” exists, the immediate or other appropriate supervisor shall terminate the “position of authority” and may impose sanctions against any supervisor who has failed to report a position of authority as outlined in this policy.
- 6) Following a termination of a position of authority, LIFE, Inc. will attempt to transfer the employee to an alternate supervisor.

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- 7) Nothing in this policy alters the at-will nature of employment between LIFE, Inc. and any employee.

WORKPLACE VIOLENCE**810**

Effective: October 8, 2008

Last Revision Date: November 13, 2019

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to maintain a violence-free workplace. LIFE, Inc. has adopted a zero-tolerance policy toward workplace violence and all acts or threats of violence will be taken seriously.

REGULATORY REFERENCE: LIFE, Inc. Policy – Behavior of Employees**COMMENT:**

- 1) For our purposes, a threat or act of violence shall include, but not be limited to, any act or gesture intended to harass or intimidate another person, any act or gesture likely to damage Company property, or any act or gesture likely to leave another person injured or fearing injury.
- 2) All employees are responsible for helping to maintain a violence-free workplace. To that end, each employee is required to govern himself accordingly. In addition, any employee experiencing an act or threat of violence is asked to report such act or threat to his or her immediate supervisor and/or another designated manager and do not confront the person exhibiting the behaviors. If the supervisors or managers are not available, leave the area immediately and notify others of the situation. Call 911 for assistance if necessary.
- 3) To prevent inappropriate behavior from escalating into life-threatening actions, the following are three (3) stages of violence that must be recognized and dealt with according to our Disciplinary Procedure policy, 806:1. Any violent incident will lead to disciplinary action, up to and including termination.
 - a) Stage I: Early Potential for Violence
 - 1) Dehumanizing other people; name-calling, racial insults, or other verbal abuse, or sexual harassment;
 - 2) Challenging authority: insubordination;
 - 3) Regularly being argumentative, alienating customers or co-workers;
 - 4) Unusual or strange behavior: paranoid comments, social isolation, fixation on violence, angry responses to situations.
 - b) Stage II: Escalated Potential for Violence
 - 1) Ignoring Company policies and procedures;
 - 2) Stealing from the Company or co-workers;

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- 3) Making threats verbally, in writing, by e-mail, or by voicemail;
 - 4) Blaming others for all problems;
 - 5) Destruction of property.
- c) Stage III: Potential for Violence is Realized
- 1) Displaying or brandishing a gun, knife, grenade;
 - 2) Punching, kicking, slapping;
 - 3) Committing assault, arson, or threatening suicide;
 - 4) Stalking.

CODE OF ETHICS**811**

Effective: October 26, 2021
Last Revision Date: November 28, 2022
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to provide our Code of Ethics, which will serve as a guide to proper business conduct for all employees and stakeholders. We expect the highest standards of ethics and integrity throughout the company.

REGULATORY REFERENCE:**COMMENT:****Confidentiality (Refer to Policy 802)**

Maintain the highest level of confidentiality by not disclosing any information identifying persons served to others, including co-workers, unless:

- the person served consents in writing,
- or the disclosure is required by a court order,
- or the disclosure is made to emergency personnel in an emergency,
- or the suspicion of adult or child abuse or neglect,
- or person served threatens to harm self or others.

Employees will access person served protected information only to conduct business on behalf of the individual served.

Fraud Waste Abuse

Fraud- An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to them or other people.

Waste- The extravagant, careless, or needless expenditure of funds resulting from deficient practices, systems, controls, or decisions.

Abuse- Practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost, or reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards of care.

Common methods include fabrication or falsification of claims, unbundling, duplicate claim submissions and fictitious providers/individuals served.

All concerns of fraud, waste, and abuse should be reported to the compliance officer or the Human Resources Department.

False Claims Act

Prohibits:

- Presenting a false claim for payment or approval;
- Making or using a false record or statement in support of a false claim;
- Conspiring to violate the False Claims Act;
- Falsely certifying the type/amount of property to be used;
- Certifying receipt of property without knowing if it's true;
- Buying property from an unauthorized officer; and
- Knowingly concealing or knowingly and improperly avoiding or decreasing an obligation to pay.

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Whistleblower Protections

The False Claims Act allows everyday people to bring suits against organizations or individuals who are defrauding the government. If the government moves forward with a case, the individual who brings the suit is generally entitled to receive a percentage of any recovered funds once a decision has been made. Federal statutes and related State and Federal laws shield employees from retaliation for reporting illegal acts of employers. An employer cannot retaliate in any way, such as discharging, demoting, suspending or harassing the whistleblower.

Conflict of Interest (See Policy 803)

Employees and stakeholders must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs.

Gifts

LIFE, Inc. is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by the company was sought, received, or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment, or other benefits from persons or companies with whom LIFE, Inc. does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation, or policies.

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical standards of the marketplace, including:

- Flowers, fruit baskets, and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps, and t-shirts (or other novelty, advertising or promotional items).

Personal Property (refer to Policy 602)

LIFE, Inc. will not be liable for any personal possessions lost, stolen, or damaged. A personal possession is defined as anything used in job-related activities that is not LIFE, Inc. property. Employees should refrain from using personal property in the workplace. All personnel shall respect and safeguard the personal property of clients, visitors, and other personnel as well as the property of LIFE, Inc.

Professional Boundaries

Any fraternization (non-professional, non-work-related interaction between any employee and any individual) is prohibited and will be investigated. Fraternization is prohibited during employment with the company.

If a violation is established, the employee will be terminated, and a report will be filed with the appropriate authorities if a vulnerable client is involved.

Notary and Witnessing of Legal Documents

Employees who are certified as Notary Publics may witness documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts for clients, personnel, and other stakeholders in accordance with applicable state laws. The person who witnesses a document should be neutral and have no financial or other interest involved.

Personnel are authorized to countersign documents such as intake forms, authorizations (i.e., release of information form), treatment plans, etc. as directly related to their job duties.

Accountability

Each employee is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department. We take seriously the standards set forth in the Code, and violations are cause for disciplinary action, up to and including, termination of employment.

Integral to LIFE, Inc.'s business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers, and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses, or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

SECTION 9**COMMUNICATION AND TECHNOLOGY**

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BULLETIN BOARDS**901**

Effective: September 2006
Last Revision Date: April 23, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that bulletin boards are a means of communicating necessary and pertinent information to employees. The posting of items on facility bulletin boards should be according to the guidelines below.

REGULATORY REFERENCE:

Federal and State Labor Laws
OSHA Regulations
LIFE, Inc. Company Policy

COMMENT:

- 1) LIFE, Inc. maintains bulletin boards to communicate LIFE, Inc. information to employees to and to post notices required by law. These bulletin boards are for posting of LIFE, Inc. information and notices only, and only persons designated by the Executive Vice President or Qualified Professional may place notices on or take down material from the bulletin boards.
- 2) Bulletin boards must be maintained in a neat and orderly fashion.
- 3) Appropriate information originating from the Corporate Office or from within the facility should be posted.
- 4) No solicitation items can be posted.
- 5) Information that must be posted includes, but is not necessarily limited to the following:
 - a) Notice to Employees: North Carolina State Laws Governing Your Wages and Working Conditions;
 - b) Employee Polygraph Protection Act of 1988;
 - c) Family and Medical Leave Act of 1993;
 - d) Fair Labor Standards Act; Minimum Wage effective October 1, 1996;
 - e) The Occupational Safety and Health Act of 1970- Job Safety and Health Protection;
 - f) EEOC laws – Age Discrimination in Employment Act of 1967, Title VII of the Civil Rights Act of 1964, Equal Pay Act of 1963, Americans with Disabilities Act of 1990, Rehabilitation Act of 1973;

- g) The Occupational Safety and Health Act 200 Log form (must be posted from February 1 – March 1, annually);
- h) Letter from the Company President regarding Drug-Free Workplace;
- i) Emergency phone numbers;
- j) Copy of “Smoking” Policy.

EMPLOYEE HANDBOOK**902**

Effective: May 2005

Last Revision Date: May 2005

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to provide each employee with an Employee Handbook.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) Every new employee should receive an Employee Handbook. The handbook should be reviewed, with proof of the employee's receipt of it. Proof of receipt is indicated by employee's signature on the General Orientation form.
- 2) The handbook will contain written summaries of many of the company's policies and procedures. These will include, but may not be limited to, employment practices, benefits and standards of conduct.
- 3) The handbook will be reviewed and updated as needed. Changes must be authorized in writing by the Chief Executive Officer or by an assigned designee. Although reasonable attempts will be made to keep the handbook current, there may be times when policy will change before the handbook can be revised. When updates, revisions, or new policies are made a memo will be sent by policy committee via E-mail. Supervisors will print the information and post at each LIFE, Inc. facility notifying all employees of the changes, updates or new policy. Supervisors should also advise employees that they may request and receive a hard copy of the updates, revisions or new policy directly from their supervisor if so desired.
- 4) LIFE, Inc. policies, practices and procedures with respect to any matter discussed in the Employee Handbook are not to be considered as creating any contractual obligation on the company's part or as stating/implying in any way that termination will occur only for "just cause".

GRIEVANCE PROCEDURE**903**

Effective: March 28, 2008

Last Revision Date: April 23, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Human Resources

POLICY:

It is the policy of LIFE, Inc. that employees should have an opportunity to present their work-related complaints and to appeal management decisions through a grievance procedure. LIFE, Inc. will attempt to promptly resolve all grievances that are appropriate under this policy.

REGULATORY REFERENCE: LIFE, Inc. Company Policy
Wage and Hour Regulations

FORMS MANULA REFERENCE: 903(a)

COMMENT:

- 1) An appropriate grievance is defined as an employee's expressed feeling of dissatisfaction concerning any interpretation or application of a work-related policy by management, supervisors, or other employees. Examples of matters which may be causes for grievances appropriate under this policy include:
 - a) A belief that company policies, practices, rules, regulations, or procedures have been applied in a manner detrimental to an employee. This would include complaints regarding job duties, the work place, decisions by management, and the application of progressive discipline for which the employee believes was not for just cause (in all cases except termination of employment);
 - b) Treatment considered unfair by an employee, such as coercion, reprisal, harassment, or intimidation (see Policy 202:1 – "Productive Work Environment" for additional information regarding complains of harassment);
 - c) Alleged discrimination because of race, color, sex, sexual orientation, age, religion, national origin, marital status, or handicap; and
 - d) Improper or unfair administration of employee benefits or conditions of employment such as scheduling, vacations or other utilizations of PTO, benefits, promotions, performance reviews, salary, or seniority.
- 2) Examples of matters which are not appropriate for review under this policy include:
 - a) The questioning of policies themselves. Actual policy and/or established procedure cannot be grieved. As stated in (1) (a) above, a grievable issue exists when there is dissatisfaction regarding the administration of such policy or procedure.
 - b) The application of progressive discipline which results in termination of employment.

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- 3) Employees must notify LIFE, Inc., in a timely fashion, of any grievance considered appropriate for handling under this policy. The grievance procedure is the exclusive remedy for employees with appropriate grievances. As used in this policy, the terms “timely fashion”, “reasonable time”, and “promptly” will mean five working days.
 - 4) Employees are not to be penalized for proper use of the grievance procedure. However, it is not considered proper if an employee abuses the procedure by raising grievances in bad faith or solely for the purpose of delay or harassment, or by repeatedly raising grievances that a reasonable person would judge have no merit. Implementation of the grievance procedure by an employee does not limit the right of LIFE, Inc. to proceed with any disciplinary action which is not in retaliation for the use of the grievance procedure.
 - 5) The grievance procedure has a maximum of three steps, but grievances may be resolved at any step in the process. Grievances are to be fully processed until the employee is satisfied, does not file a timely appeal, or exhausts the right of appeal. A decision becomes binding for all parties whenever an employee does not file a timely appeal or when a decision is made in the final step and the right of appeal no longer exists.
 - 6) Employees who feel they have an appropriate grievance should proceed as follows:
 - a) Step One – Promptly bring the grievance to the attention of the immediate supervisor. If the grievance involves the supervisor, then it is permissible to proceed directly to Step Two. The supervisor is to investigate the grievance, attempt to resolve it, and give a decision to the employee within a reasonable time. The supervisor should prepare a written and dated summary of the grievance and proposed resolution for file purposes.
 - b) Step Two – Appeal the decision to the department head, if dissatisfied with the supervisor’s decision, or initiate the procedure with the department head if Step One has been bypassed. Such an appeal or initial complaint must be made in a timely fashion using a written form prepared for this purpose. The employee must enter a written explanation of his grievance on the appropriate form or it will not be considered a bona fide grievance and will not be reviewed in accordance with this policy. The supervisor’s version of the grievance and decision will then be submitted using a similar written form. The department head will, in a timely fashion, confer with the employee, the supervisor, and any other members of management considered appropriate, investigate the issues; and communicate a decision in writing to all parties involved. It is important to note that at step two, the aggrieved employee and the supervisor must document the grievance and the response from management in writing.
 - c) Step Three – Appeal an unsatisfactory department head decision to the Director of Human Resources. The timeliness requirement and procedures to be followed are similar to those in Step Two. The Director will take the necessary steps to review and investigate the grievance and will then issue a written, final, and binding decision. At this step the Company president may be consulted for a final decision in the matter.
 - 7) Final decisions on grievances will not be precedent-setting or binding on future grievances unless they are officially stated as LIFE, Inc. policy. When appropriate, the decisions will be retroactive to the date of the employee’s original grievance.

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- 8) Information concerning an employee's grievance is to be held in strict confidence. Supervisors, department heads, and other members of management who investigate a grievance are to discuss it only with those individuals who have a need to know about it or who are needed to supply necessary background information.
 - 9) Time spent by employees in grievance discussions with management will be considered hours worked for pay purposes.
 - 10) All documentation regarding grievances shall be made on attached form 903(a). Completed forms will be maintained by the Director of Human Resources. In the event that a grievance is resolved during step (1) or (2), above, the highest level of management involved should forward the completed form to the Director of Human Resources.

CYBER SECURITY**904**

Effective: July 13, 2021

Last Revision Date: May 3, 2022

Last Reviewed Date: March 14, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. that employees should be properly trained and understand the importance of Cyber Security in and out of the workplace. Employees will be properly trained in all aspects of Cyber Security as it pertains to their role with the company.

COMMENT:

- 1) LIFE, Inc. has an IT Manual that outlines the purposes and usage of technology in the company.
- 2) The company will conduct a yearly IT Risk Assessment that will reflect:
 - a. potential risk associated with technology and how to limit each risk.
 - b. Maintenance and replacement of technology.
 - c. Update on software utilized.
 - d. Backup and recovery procedures
 - e. Security
- 3) Separate Policies regarding Use of Computer Equipment (905), Email (906), Electronic Signature (907), Video Surveillance (908), Company Cell Phones and Devices (909), Personal Cell Phones and Devices (910), and Social Media (112) can be found in this policy manual.

USAGE OF COMPUTERS AND TABLETS**905**

Effective: October 2002

Last Revision Date: June 19, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. that computers are provided to employees on an “as needed” basis to facilitate company business and standardization in keeping company records and information. Equipment provided to the employee and information or data contained within the computer system remains property of the company.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

For the purpose of this policy, the reference of “computer” will refer to all computers and tablets.

- 1) Software not purchased by LIFE, Inc. should not be installed on company computers. This includes over-the-counter software, production software, downloads, games, AOL or instant messenger software.
- 2) Hardware not purchased by LIFE, Inc. should not be attached to or installed on the company computers.
- 3) Employees should only access the computer in which he has been given authorization to access.
- 4) Information stored on LIFE, Inc. computers is considered proprietary and confidential.
- 5) Company computers should not be removed from company premises.
- 6) Unauthorized connections via modems are not permitted.
- 7) Repair to computer equipment should only be completed by company authorized personnel.
- 8) Care should be taken to turn off and unplug equipment during electrical storms.
- 9) Virus detection software should be installed.
- 10) Information on LIFE, Inc. computers should be backed up periodically or as instructed by the implementer of the program in use.
- 11) Do not order personal products or sign in to banking sites on the internet from a company computer.
- 12) Cookies, temporary files, and internet history shall not be deleted or removed from company computers except by authorized personnel.

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- 13) Employees are provided computers on an as needed basis to facilitate company business. Computers are to be used for business purposes only. The company reserves the right to enter, search and monitor a computer of any employee, without advance notice, for business purposes such as investigating theft, disclosure of confidential business or proprietary information, personal abuse of the system or monitoring workflow or productivity, and for other reasons deemed necessary by the company.
 - 14) Computers taken outside of the office are the responsibility of the employee. No company computer should be stored in a vehicle overnight.
 - 15) Computers provided to employees by LIFE, Inc. should be password protected to meet HIPAA standards.
 - 16) No company business should be conducted, saved, or viewed on private computers.
 - 17) An employee's failure to follow these policies that result in the loss of data; additional labor to recover lost data; accessing, reading, distributing, tampering, or copying of proprietary and confidential information; or, causing the unnecessary repair and maintenance cost as a result of malfeasance shall be subject to disciplinary action up to and including termination.

E-MAIL**906**

Effective: December 2005

Last Revision Date: June 18, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

LIFE, Inc. will provide E-mail services to employees when needed to facilitate the business of the company.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**FORMS MANUAL REFERENCE:** 906(a)**COMMENT:**

- 1) E-mail services provided by LIFE, Inc. are to be used for business purposes only. The company reserves the right to enter, search and monitor the e-mail of any employee, without advance notice, for business purposes, such as investigating theft, disclosure of confidential business or proprietary information, personal abuse of the system or monitoring workflow or productivity, and for other reasons deemed necessary by the company.
- 2) LIFE, Inc. provides e-mail to assist in conducting business. It is therefore understood that e-mail is company property.
- 3) No offensive or disruptive messages are allowed.
- 4) E-mail cannot be used to send or receive copyrighted materials.
- 5) Do not e-mail jokes, personal pictures, chain letters, propaganda, personal beliefs or philosophies, religious materials, or any other material that may be offensive or is not absolutely necessary to conduct the company's business. If there is information you believe may benefit the company or its employees, please send it to the Executive Vice-President for distribution approval.
- 6) Remove stationary settings from your e-mail configuration. Stationary uses a lot of bandwidth that slows down the system.
- 7) Do not share your password with anyone.
- 8) Log off your computer when you plan to be away from it for more than thirty (30) minutes.
- 9) Employees do not have the right to read or retrieve other employee's e-mail without prior approval.
- 10) Violators of the e-mail policy are subject to disciplinary action, up to and including termination.
- 11) Employees assigned an e-mail account must read this policy and sign form {905(a)} acknowledging their understanding of the e-mail policy.

ELECTRONIC SIGNATURE (E-SIG)**907**

Effective: April 2006

Last Revision Date: April 2006

Last Reviewed Date: February 20, 2023

Responsibility: Director of Business Operations

POLICY:

It is the policy of LIFE, Inc. to allow utilization of electronic authentication as a means of electronically affixing an employee's signature to his/her timesheets, allocation worksheets, and expense reports.

REGULATORY REFERENCE: LIFE, Inc. Company Policy
HIPAA

FORMS MANUAL REFERENCE: 907(a)

COMMENT:

- 1) The use of an electronic signature must be approved by the appropriate Qualified Professional at each facility.
- 2) Each employee who utilizes an electronic signature will be required to sign a Notice of Participation Statement. The Notice of Participation Statement will be permanently retained in the employee's personnel file.
- 3) All electronic signature users will certify, in writing, that they will not disclose their user identification and password or other device to anyone, which would permit someone to use their electronic signature.
- 4) The electronic signature will be treated as a written signature.
- 5) The employee's logon name and passwords will be assigned by the system/administrator of the software used. Employee access to do electronic signature will be set up by Information Technology personnel.
- 6) The assignment or creation of an electronic signature must be based on criteria unique to the author in order to avoid the possibility of duplicate assignment/creation.
- 7) User authentication cannot utilize known or common passwords, expressions or character combinations (such as the dog's name, a nickname or maiden name, social security number, one's telephone number, etc.).
- 8) The use of digital signatures must comply with existing and future laws and regulations including HIPAA, with regards to message integrity and non-repudiation.
- 9) Use of the electronic signature is secured by a means that minimizes the risk of unauthorized use.

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- 10) All users are documented by a unique identifier, date and time. The electronic signature provides the identity of the signer and the date and time of the transaction. The assignment of signatures is tracked to provide an audit trail in case of a dispute of authenticity.
 - 11) Should an employee not remember his/her password, he/she can call the Information Technology Department and after appropriate identification is provided, he/she can call the Information Technology Department and after appropriate identification is provided, he/she will be assisted with his/her password assignment.
 - 12) The employee is responsible for reviewing each document for accuracy prior to affixing his/her electronic signature.
 - 13) The integrity of the electronically signed document is protected from alteration. All attachments must follow the same guidelines and restrictions required for the original entry.
 - 14) Information Technology is responsible for instructing all users on the proper use of software and technology. Information Technology will also provide education to management regarding the process used for electronic signature. The department providing education will document all educational sessions including title, date, time presenter(s), contents of sessions, and participants.
 - 15) Documents that have been electronically signed cannot be edited or deleted. Electronically signed reports may be moved to a “cancelled” status by the system administrator only but cannot be deleted. Any corrections to an electronically signed document must clearly identify the document it replaces.
 - 16) Electronically signed reports will be maintained in their electronic media as required by LIFE, Inc. document retention policy.
 - 17) Software/hardware tools to manage electronic signatures and insure that the signature is unique to the author and represents the authentication will be in place.

VIDEO SURVEILLANCE**908**

Effective: August 2014

Last Revision Date: August 2014

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

LIFE, Inc. may utilize video surveillance cameras within the common areas of any group home or day program for the security of consumers and employees, to monitor consumer care, and to aid in enhancing consumer care training for LIFE, Inc. employees as need warrants.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**COMMENT:**

- 1) Video surveillance shall be used only for the security of consumers and employees, to monitor consumer care, and to aid in enhancing consumer care training for LIFE, Inc. employees.
- 2) Video surveillance will only occur in common areas of the facility.
- 3) Video surveillance will not occur in areas where there is an expectation of privacy, such as, bathrooms and bedrooms unless there is a health and safety issue. This video surveillance will not be done without proper authorization and consent and is done on a case by case basis.
- 4) Surveillance will be identified by way of signage posted upon entrance to the facility.
- 5) Video surveillance will be monitored by authorized personnel only.
- 6) Any records (video, digital images, still photographs) produced by the video surveillance system will be maintained in a secure manner by authorized personnel only.
- 7) Video records may be used by the facility or authorized governing agencies to investigate consumer complaints and/or allegations of mistreatment. This will be done with respect to consumers' right to privacy and in accordance with HIPAA regulations and N.C. Confidentiality Laws.
- 8) Video records may be used by law enforcement to assist with the investigations of any crime that may be depicted. This will be done with respect to consumers' right to privacy and in accordance with HIPAA regulations and N.C. Confidentiality Laws.

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- 9) Video records will be automatically deleted after 7 days unless circumstances warrant preservation.

COMPANY CELL PHONES AND DEVICES**909**

Effective: May 2003

Last Revision Date: August 4, 2023

Last Reviewed Date: August 4, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to supply certain employees with cell phones to conduct company business.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**FORMS MANUAL REFERENCE:** 909(a)**COMMENT:**

- 1) Each employee assigned a company computer, phone, or tablet will be financially responsible for the device if lost or destroyed.
- 2) Any data overages or unauthorized purchases will be expensed to the employee.
- 3) Employees assigned a cell phone must acknowledge receipt of the cell phone by signing the POLICY life, Inc. Cell Phone Receipt 908(a).
- 4) LIFE, Inc. cell phones or personal cell phones should not be used while the vehicle is in motion.
- 5) LIFE, Inc. cell phones should only have applications downloaded to them that have been approved by the IT Department.
- 6) Personal cell phone use is not reimbursable.
- 7) LIFE, Inc. cell phones and devices should be password protected to meet HIPAA standards.

PERSONAL CELL PHONES, TABLETS, AND OTHER DEVICES**910**

Effective: July 2022

Last Revision Date: July 19th, 2022Last Reviewed Date: July 19th, 2022

Responsibility: Executive Vice President

POLICY:

LIFE, Inc. prohibits the use of personal cell phones tablets, cameras, or recorders by any employee working directly with the individuals we serve to ensure their privacy in according to HIPAA standards and their safety.

REGULATORY REFERENCE:

Health Insurance Portability and Accountability Act (HIPAA)

COMMENT:

1. Employees are prohibited from taking personal phone calls, chats, texts, using social media, or surfing the internet on any personal or company phone, tablet, or other device. LIFE, Inc. acknowledges that, on occasion, it may be necessary for employees to make personal calls. Employees are asked to limit calls to emergencies and essential personal business that cannot be handled during non-work hours. Employees should refer to the Personal Phone Calls Policy, 805.
2. Employees working directly with the Individuals we serve:
 - a. Any employee working directly with the individuals we serve in a facility should leave their personal devices in their vehicle or in the staff room.
 - b. Employees are allowed to bring their personal devices with them in personal and LIFE, Inc. vehicles. Employees may also carry their personal devices on outings. Employees are still expected to follow the Personal Phone Calls Policy, 805.
 - c. Employees are approved to access their personal devices for personal or professional emergency purposes. Your direct supervisor should be made aware of any occurrences or potential occurrences.
 - d. Employees should make anyone that may need to reach them aware of their facility phone numbers.
3. Employees are prohibited from using cameras or other photo, video, or audio recording devices in the workplace unless specific authorization has been granted by the Director of ICF or Contract Services.
4. Employees should regard this policy as an explicit statement that the employer does not consent to the recording of any meetings or discussions without prior authorization as discussed above.
5. LIFE, Inc. is not liable for any damaged personal property or devices on company grounds as outlined in policy 602.

Any violation of this Policy will result in disciplinary action up to and potentially including termination

SUGGESTIONS AND FEEDBACK**911**

Effective: March 2008

Last Revision Date: February 20, 2023

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

LIFE, Inc. encourages all employees at LIFE, Inc. to offer suggestions and feedback that may help improve performance and propose solutions to enhance the efficiency, effectiveness, and the quality of the work environment.

REGULATORY REFERENCE: LIFE, Inc. Company Policy**FORMS MANUAL REFERENCE:** 911(a)**COMMENT:**

- 1) Employees are encouraged to make suggestions and give the company feedback, whenever they see a need to do so.
- 2) There are multiple ways an employee can offer suggestions and feedback to the company:
 - a. Bringing suggestions and feedback directly to your immediate supervisor. This can be done a few different ways:
 - i. Passing conversations
 - ii. Staff Meetings
 - iii. During yearly one-on-one meetings such as Corporate Compliance Interviews and Performance Reviews
 - b. Call the Corporate Feedback number: 1-877-778-1945. You can leave this information anonymously or you can leave your contact information if you would like a response once reviewed.
 - c. Email the compliance@lifeincorporated.com email address.
 - d. Utilizing the SCOMM on Therap, you can message the Feedback/Suggestions inbox.
 - e. You can mail the Feedback and Suggestion Form, 910(a) to:
Feedback
2609 Royall Ave.
Goldsboro, NC 27534
- 3) Employees are encouraged to offer suggestions and feedback without any worry of repercussion from a manager or the company.

SECTION 10**TRAINING AND DEVELOPMENT**[Performance Evaluations](#)

1001

[Position Descriptions](#)

1002

PERFORMANCE EVALUATIONS**1001**

Effective: November 5, 2008
Last Revision Date: November 5, 2008
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. that the job performance of each employee should be evaluated periodically by the employee's supervisor.

REGULATORY REFERENCE: LIFE, Inc. Company Policy

FORMS MANUAL REFERENCE: 1001(a)

COMMENT:

- 1) Supervisors should complete performance evaluations annually.
- 2) Supervisors, in evaluating employees, should consider the position description and the employee's attainment of previously set objectives and goals.
- 3) Supervisors should prepare a thorough and detailed written evaluation of each employee's job performance. The evaluation should include the supervisor's comments and recommendations for improvement.
- 4) The evaluator's immediate supervisor should review each written evaluation to assure that the evaluation has been properly completed in as fair and objective a manner as possible.
- 5) After the written evaluation has been reviewed, the supervisor and employee should meet and discuss the evaluation, assess the employee's strengths and weaknesses in a constructive manner, and set objectives and goals for the period ahead. The employee should be given the opportunity to examine the evaluation and make written comments about any aspect of it. The employee and supervisor should then sign and date the evaluation and forward it for inclusion in the employee's personnel file.
- 6) In addition to adding written comments to their performance evaluation, employees may request a review by appropriate management staff.
- 7) Information derived from the performance evaluation may be considered when making decisions affecting training, promotion, transfer, or continued employment.
- 8) The procedures discussed in the policy are only guidelines. LIFE, Inc. may, at its sole discretion, modify or revoke them in whole or in part at any time. Therefore, these procedures are not a promise or contract, express or implied, and LIFE, Inc. retains the right to determine whether and how they will be applied, depending on the circumstances.

POSITION DESCRIPTIONS**1002**

Effective: March 28, 2008

Last Revision Date: April 23, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. that each employee has a position description.

COMMENT:

- 1) Each employee, upon hire, will sign a copy of his position description after it is reviewed with their manager.
- 2) Signed copies of position descriptions will be maintained in the employee's personnel file.
- 3) Supervisors will review and/or update each of their employee's position descriptions on an annual basis.

SECTION 11**SAFETY AND HEALTH**

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HEALTH AND SAFETY**1101**

Effective: February 2018
Last Revision Date: February 2021
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice-President

POLICY:

LIFE, Inc. is committed to maintaining healthy, safe and clean environments and facilities that support quality services and to minimize risk of harm to persons served, employees, visitors, and other stakeholders.

REGULATORY REFERENCE:

CMS State Operations Manual, Appendix Z

FORMS MANUAL REFERENCE:**COMMENT:**

Safety is a core value at LIFE, Inc, and the company is committed to continued advancement of a safe and healthy culture with strong programs of personal safety, accident and injury prevention, wellness promotion, and compliance with applicable environmental and health and safety laws and regulations.

- Promote occupational and personal safety, health, and wellness.
- Protect the health and safety of all stakeholders.
- Provide information to all staff, and individuals about health and safety hazards.
- Identify and correct health and safety hazards and encourage employees and individuals to report potential hazards.
- Maintain a risk-based emergency management program to reduce the impact of potential health or safety issues.

1. SAFETY OFFICER:

A Safety Officer will be designated by the Executive Vice President and the President of the company.

2. EMERGENCY RESPONSE AND DISASTER PREPAREDNESS PLAN

Each LIFE, Inc. facility will have an Emergency Response and Disaster Preparedness Plan that will be reviewed annually and customized for the needs of that facility. Each facility's plan will consist of:

- Hazard Risk Assessment
- Procedures for Emergency Preparedness
- Communication Procedures
- Training and Testing
- Evacuation and Relocation Procedures

3. TRAINING:

Stakeholders are trained during orientation (employees) and as outlined in section 5 of the Emergency Response and Disaster Preparedness Plan.

4. HEALTH AND SAFETY INSPECTIONS

- Safety Inspections will be completed monthly by managers of each facility. Other inspections such as Randoms, Scheduled, and Audit inspections will also cover health and safety topics to provide information for managers.
- External inspections will be completed at least annually on alarms, heating and cooling systems, sanitation, septic systems, and other electrical or gas systems by professionals.

MEDICAL PROCEDURES**1102**

Effective: December 15, 2009
Last Revision Date: May 7, 2018
Last Reviewed Date: February 20, 2023
Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that applicants to whom a conditional offer of employment has been extended and current employees may be required to undergo medical tests, procedures or examinations whenever management determines that these are necessary for the safe or efficient operation of the organization.

REGULARY REFERENCE:

OSHA Regulations
The Family and Medical Leave Act
Americans with Disabilities Act
Fair Labor Standards Act
Division MH/DD/SAS Rules
LIFE, Inc. Company Policy

FORMS MANUAL REFERENCE: 1102(a), 1103(a)**COMMENT:**

- 1) All new employees will be required to complete the LIFE, Inc. Health Questionnaire before they begin work.
- 2) Employees may be required to have a medical examination on occasions when the examination is job-related and consistent with business necessity. For example, a medical examination may be required if an employee is exposed to toxic or unhealthful conditions, requests an accommodation for a disability, or has a questionable ability to perform his duties or the job for which he is being considered.
- 3) Required examinations and procedures for Direct Support Professionals will be in accordance with established policy on Medical/Tuberculosis Assessment (1103(a)).
- 4) Medical examinations required by LIFE, Inc. will be paid for by the company and must be performed by a physician or licensed medical facility designated or approved by LIFE, Inc. Medical examinations paid for by LIFE, Inc. are the property of the company, and the examination records are to be treated as confidential and held in separate medical files that are maintained by the facility RN. However, records of specific examinations, if required by law or regulation, will be made available to the employee, persons designated and authorized by the employee, public agencies, relevant insurance companies or the employee's doctor.
- 5) Employees who are taking prescribed drugs or narcotics must report this to their immediate supervisor and the facility nurse. (For example, Darvocet for pain, drugs with codeine, or Xanax for anxiety.) These types of drugs may impair the employee's ability to perform their job safely

and effectively. Depending on the circumstances, employees may be reassigned, forbidden to perform certain tasks or even prohibited from working if they are judged unable to perform their jobs safely and properly while taking prescribed drugs and narcotics. Failure to report prescribed drugs or narcotics to the proper authority will result in disciplinary action, up to and including termination.

- 6) LIFE, Inc. reserves the right to require acceptable confirmation of the nature and extent of any illness or injury that requires an employee to be absent from scheduled work. Prior to continuation of duty, employees returning from disability leave, who has been injured or complains of an injury, or who becomes pregnant, shall be required to provide a doctor's certification of a release to return to work by having their attending physician complete the LIFE, Inc. Release to Report to Work form (see attachment 1102(a)).
- 6) LIFE, Inc. reserves the right to require a second and, if necessary, third medical opinion regarding an employee's absence because of illness or injury. Any required second or third opinions will be paid for by LIFE, Inc.
- 8) Employees who become ill on the job or suffer any work-connected injury, no matter how minor, must immediately report such injury to their supervisors who will arrange, as necessary, referral for examination, treatment and recording of the incident. Time spent by an employee waiting for and receiving initial medical attention will be considered hours worked for pay purposes.
- 9) An injured employee's supervisor, any member of management, the Director of Human Resources, or medical personnel are authorized to have the employee transferred to an outside medical facility for treatment.

Employee TB Tests/Medical History**1103**

Effective: December 15, 2009

Last Revision Date: May 7, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to ensure that all employees are free from communicable and infectious disease and they are physically and emotionally capable of fulfilling their job duties.

REGULARY REFERENCE:

North Carolina Administrative Code, Title 15A, Chapter 19, Subchapter 19A, Section .0200, .0205

LIFE, Inc. Company Policy

NC Tuberculosis Control Program

Center for Disease Control

FORMS MANUAL REFERENCE: 1103(a)**COMMENT:**

- 1) LIFE, Inc. shall require than an annual Medical/Tuberculosis Assessment be completed by all employees.
- 2) All new employees of LIFE, Inc. will be required to complete a Medical/Tuberculosis Assessment form [1103(a)]. All new Direct Support Professionals will be required to submit, at their cost, TB Skin Test results before new employee training. If the new hire has had a TB Skin Test at a previous job within the last 12 months, a copy will be accepted. If the employee cannot receive a PPD, evidence of a negative chest x-ray within the last 12 months or a Health Department Screening report from the local Health Department stating the employee is free from active disease will be required. Positive TP Skin Test will be referred to the local Health Department.
- 3) Annually, all employees will update the Medical/Tuberculosis Assessment form [Attachments 1103(a)]. The facility nurse will be responsible for reviewing and filing forms. Problems will be referred to local physicians.
- 4) Failure to submit TB Skin Test results or screenings in the designated time frame may result in the employee not being permitted to work.
- 5) Any employee who shows symptoms of communicable or infectious disease may not be permitted to work and may be required to report to a physician immediately.

HEPATITIS B IMMUNIZATIONS**1104**

Effective: January 2003

Last Revision Date: May 7, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Nursing Services

POLICY:

It is the policy of LIFE, Inc. to assure compliance with OSHA's Blood Borne Pathogen Rule (29 CFR – Part 1910.1030) and to protect employees who might face significant health risk as the result of occupational exposure to blood and other potentially infectious materials because they may contain blood borne pathogens.

FORMS MANUAL REFERENCES: 1104(a)**COMMENT:**

- 1) LIFE, Inc. will make available to all employees who have a reasonable likelihood of occupational exposure, an information sheet on Hepatitis B and Hepatitis B Vaccine {1104(a)}.
- 2) LIFE, Inc. will make available the Hepatitis B vaccination series at no cost to all employees who have a risk of occupational exposure.
- 3) Each employee should sign a statement indicating whether or not he chooses to receive the Hepatitis B vaccine, or indicating that he has received it in the past {1104(a)}.
- 4) The Hepatitis B vaccination shall be made available within the first 10 days of employment, unless:
 - a) The employee previously received the complete Hepatitis B vaccination;
 - b) The employee produces documentation indicating that antibody testing revealed immunity;
 - c) Vaccine is contraindicated for medical reasons.
- 5) If the employee initially declines the Hepatitis B vaccination but at a later date decides to accept, the above procedures will be followed.
- 6) In the case of an exposure, any booster dose of Hepatitis B vaccine recommended by a physician will be made available at no cost to the employee.
- 7) All Hepatitis B Vaccine forms will be filed in the employee's individual OSHA Compliance File located in their medical file in a locked cabinet.
- 8) Each LIFE, Inc. facility's Safety Officer is responsible to ensure these files are kept undated and properly secured.

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- 9) If a routine booster dose(s) of Hepatitis B vaccine is recommended by the Public Health Service at a future date, such booster dose(s) shall be available at no cost.

WORKER'S COMPENSATION**1105**

Effective: March 2014

Last Revision Date: January 2018

Last Reviewed Date: January 13, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to manage employee's injuries or illnesses that result from exposure that occur on the job according to the guidelines below.

REGULATORY REFERENCE:

North Carolina Industrial Commission Guidelines

OSHA Guidelines

LIFE, Inc. Company Policy

North Carolina General Statute 95-126 et. Seq.

FORMS MANUAL REFERENCE: 1105(a), 1105(b), 1105(c) 1105(d)**COMMENT:****1) Initial Report and Review of Accident**

- a) The employee is responsible for immediately reporting all job-related injuries to his supervisor. In the absence of the immediate supervisor, the employee must report the incident to the next highest level of authority or the on-call staff member.
- b) The facility nurse will report any work-related fatality by calling 1-800-258-2667 during working hours (weekdays, 8 a.m. to 5 p.m.). After working hours (5 a.m. to 8 p.m.) weekends and holidays, the facility nurse will leave a message. This report will be documented in the employee's medical file. If the fatality occurs within thirty (30) days of work-related incident, it will be reported as above. If the fatality did not occur within thirty (30) days of the work-related incident, it will be recorded on our OSHA injury and illness records. If we did not learn of the fatality at the time it took place or right away, it will be reported within 8 hours at the telephone number above. This report will be documented in the employee's medical file. Fatalities will be reported immediately to the HR Department and the President.
- c) The facility nurse will report any work-related in-patient hospitalization of one or more employees, any work-related amputation, and any work-related loss of eye to the OSHA Division within 24 hours of the incident at 1-800-258-2667. For any incident resulting in the hospitalization of two or more employees after working hours, weekends or holidays, the facility nurse will leave a message. If we did not learn of the above incidents at the time they took place or right away, they will be reported within 24 hours at the telephone number above. The facility nurse will also complete and submit electronically the NCDOL Accident Reporting Form. This form is located at www.nclabor.com/osha/compliance/accident_reporting_form.pdf. A copy of this form will be filled in the employee's medical file. These injuries will be reported immediately to the HR Department and the President.

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- d) The injured employee completes the OSHA Form No. 301 {see 1105(a)} and the form is faxed to the HR department at (919) 778-2928. The original is maintained in the employee's medical file. The employee's supervisor is responsible for reviewing the OSHA form No. 301, taking necessary action to ensure completeness of the document and submitting it for review by the QP and the facility nurse.
 - e) The injured employee is given Form 18 (see 1105(b) and a Consent for Release of Medical Information Form to complete. A copy of Form 18 and the original Consent for Release of Medical Information is maintained in the employee's medical file.
 - f) In all cases, the individual to whom the accident is reported it to notify the QP of the report no later than the next working day.

2) **Securing Medical Treatment**

- a) The facility nurse or the employee's supervisor will evaluate the injury, determine the type of treatment necessary, and must authorize medical treatment. Generally, the employee with major injuries (i.e. lacerations requiring sutures, human bites, second degree burns, suspected fractures, musculoskeletal strains and sprains, etc.) will be referred for medical treatment. More minor injuries may be able to be appropriately treated by administering first aid. If possible, a decision regarding medical treatment for an injured employee should be made by the employee's supervisor in conjunction with the QP and facility nurse. In all cases, the highest level of management within the facility must be notified of the need to have sought medical treatment within a 24-hour period.
- b) The facility nurse or the supervisor will direct the injured employee to an appropriate medical treatment center or physician's office. In the event of a serious injury, LIFE, Inc. should send the injured employee directly to the emergency room.
- c) In cases of the most serious injury/extreme emergency, it may be necessary to have the injured employee transported by rescue squad. In all other cases, if the employee is unable to transport himself, transportation will be provided by LIFE, Inc.
- d) In cases in which it is practical, the facility nurse (or other designated management staff) should accompany the injured employee to the physician/medical treatment center. This will allow for appropriate exchanges of information regarding employee's job duties and/or questions about the employee's return to work (need for "light duty", specific restrictions, etc.)
- e) The facility nurse or the injured employee's supervisor should call the West Bend/Argent Provider (insurance provider) and advise them that an injured employee is on the way to the health care facility.
- f) The facility nurse or supervisor should advise the MCMC Provider to send all bills to the attention of the Human Resources Administration at the Corporate Office. The Human Resources Administrator will copy the bills for filing and forward the originals to MCMC for payment.
- g) The injured employee must be drug tested. If the drug test is administered by an outside facility, the invoice should be sent to the Human Resource Administrator for payment.

The facility nurse or the employee's supervisor will notify the Director of Human Resources that the drug test was administered and the date it was done.

- h) An injured employee's failure to report to the designated medical service provider will result in disciplinary action. The employee must secure prior written approval from MCMC before selecting his physician for treatment.
- i) If an injured employee chooses not to seek medical attention when instructed to do so by his supervisor or facility nurse, he must sign a LIFE, Inc. Refusal of Medical Treatment form (see attached 1105:9). He may also be subject to suspension and disciplinary action, up to and including termination.

3) **Prescription Costs**

- a) If prescription medication is needed **and the injured employee has insurance**, the employee will pay the prescription co-pay cost out of pocket and submit the receipt(s) to their Accounting Clerk. The Accounting Clerk will forward the receipt(s) directly to the Human Resources Department. The Human Resources Department will be responsible for forwarding the receipt(s) to West Bend/Argent for reimbursement to the injured employee. (In these instances, it is not necessary to submit any documentation to the Accounts Payable Department.)
- b) **If the injured employee has no insurance**, a Company credit card, if available, and/or petty case should be used to pay the prescription cost. The Accounting Clerk will forward the receipt(s) to the Accounts Payable Department for payment/reimbursement. The Accounts Payable Department will make copies of all receipts and forward to the Human Resources Department, who will record these payments and forward to West Bend/Argent for the purpose of monitoring and reimbursing these claim expenses to LIFE, Inc.
- c) West Bend/Argent will mail a prescription card to the injured employee as soon as possible.

4) **Employer's Report of Injury**

- a) The facility nurse will complete the Form 19, "Employer's Report of Employee's Injury or Occupational Disease to the Industrial Commission" (see attached 1105(c) – 1105(d)) and submit to the Human Resources Administrator. The Human Resources Administrator will file the Form 19, along with all other required claim forms (when applicable), with West Bend/Argent. Upon receipt, West Bend/Argent will assign a claims adjuster who will communicate directly with the Human Resources Administrator regarding any further information needed to process the claim.

For incidents that do not require medical treatment, the facility nurse will file with a statement that indicates this is "for information only" reporting.

- b) The facility nurse, in the role of the Safety Officer, should initiate an investigation of the accident to determine the cause and the remedial action to be taken to prevent reoccurrences.

5) **Return to Work**

- a) If all cases, the employee must make contact with his immediate supervisor to discuss the details of the physician's visit, rather than to rely on the nurse or management staff to do so.
- b) If "light duty" or other restrictions have been recommended, this will be considered on a case-by-case basis. Determinations will be based upon the employee's job duties and/or the availability of alternate work.
- c) If an employee fails to return to work when released by the physician or fails to notify the LIFE, Inc, of his intention to return to work after release by the physician or fails to follow documented doctor's orders while on leave or after returning to work, disciplinary action will be taken, up to and including termination.

6) **Payment of Claims/Reimbursement of Lost Wages**

- a) All claims forwarded to West Bend/Argent will be paid in accordance with guidelines of the North Carolina Industrial Commission.
- b) Claims for lost wages resulting from job-related injuries will be paid according to guidelines established by the North Carolina Industrial Commission.

7) **Employee Benefits During Workers' Compensation Leave**

- a) Time spent by an injured employee waiting for and receiving initial medical treatment will be paid as time worked but not counted as time worked for overtime purposes.
- b) Employees on worker's compensation leave will be required to utilize accrued Paid Time Off.
- c) Employees on workers' compensation leave will not accrue Paid Time Off for any pay period in which there were no hours actually worked.
- d) LIFE, Inc. will continue to pay the company portion of health insurance premiums for insured employees on workers' compensation leave. The employee will be responsible for his portion of the premiums. Premium payments are due the first day of each month for the entire month. Employees have a 30-day grace period to make payment. If payment is not made within this 30-day grace period, health insurance will be cancelled back to the last day of coverage paid. A notice of lapse will be provided 15 days prior to termination. If health insurance is cancelled due to non-payment, coverage will be offered upon return from Workers Compensation leave.

SAFETY COMMITTEE**1106**

Effective: July 2001

Last Revision Date: May 7, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. to promote the safety and health of its employees through the establishment of safety committees in each facility.

REGULATORY REFERENCE:

LIFE, Inc. Policy Manual

OSHA North Carolina General Statutes 95, Article 22

COMMENT:

- 1) LIFE, Inc. has established safety committees for each of its facilities.
- 2) Each committee shall be composed of the following representation:
 - a) Group Homes and Day Programs
 - 1) Safety Officer (Facility Nurse)
 - 2) Habilitation Coordinator
 - 3) Direct Support Professional II and III
 - 4) Day Program Coordinator
 - 5) QP
 - b) The Corporate Office shall have representation.
- 3) Safety meetings shall be held at least quarterly.
- 4) The agenda for the meetings shall be accordance with the procedures outlined in the “OSHA Compliance Manual”.
- 5) Matters involving employee safety and health shall be addressed directly to the facility Safety Officer or to the OSHA Compliance Officer if it relates to the Bloodborne Pathogens Standard.

OSHA NO. 300 FORM**1107**

Effective: January 2008
Last Revision Date: January 2008
Last Reviewed Date: February 20, 2023
Responsibility: OSHA Compliance Officer

POLICY

It is the policy of LIFE, Inc. to comply with the requirements of OSHA Federal/State Standards.

REGULATORY REFERENCE:

Occupational Safety and Health Act of 1970 and Part 1904 of Title 29 CFR

FORMS MANUAL REFERENCE: 1107(a)**COMMENT:**

- 1) In compliance with the standard, the nurse of each facility shall maintain a summary of all recordable occupational injuries and illnesses for that location.
- 2) Each recordable injury or illness shall be documented on an OSHA 300 Log {See 1107(a)}.
- 3) The summarized section of the OSHA 300A Log {See 1107(a)} shall be posted in a conspicuous place no later than February 1 and shall remain in place until April 30 for all recordable injuries and illnesses covering the previous year.
- 4) The OSHA 300 Logs shall be maintained on a calendar year basis. The Logs shall remain current and retained for five (5) years following the end of the calendar year to which they pertain.
- 5) The OSHA Forms may also be obtained by utilizing the web at:
<http://www.osha.gov/recordkeeping/new-osha300form1-1-04.pdf>.

BLOODBORNE PATHOGENS**1108**

Effective: November 1997
Last Revision Date: October 24, 2022
Last Reviewed Date: February 20, 2023
Responsibility: OSHA Compliance Officer

POLICY:

It is the policy of LIFE, Inc. to comply with the requirements of OSHA Federal/State Bloodborne Pathogens Standard.

REGULATORY REFERENCE: 29 CFR 1910.1030

COMMENT:

- 1) In compliance with the Bloodborne Pathogen Standard, LIFE, Inc. makes available to its employees a copy of the company's written bloodborne pathogen program. LIFE, Inc.'s "OSHA Compliance Manual" is located in the office of each group home and available at each LIFE, Inc. day program/office.
- 2) LIFE, Inc. will provide each new employee initial training on each component of the Standard.
- 3) Training will be provided to all employees on an annual basis to discuss additions or revisions to the Standard, and to insure proper handling, storage, and disposal of any hazardous materials.
- 4) Employees will be responsible for complying with the procedures outlined in LIFE, Inc.'s "OSHA Compliance Manual" and "Behavior of Employees" policy {801:1(n)}.
- 5) In compliance with the Standard, LIFE, Inc. makes available to its employee's personal protective equipment (PPE) to be utilized in the prevention of transmission of a bloodborne disease.
- 6) In LIFE, Inc. ICF/IID facilities, the personal protective equipment is placed in a large box located in a designated storage area. Each ICF/IID group home van and/or vehicle will be provided a bag stocked with personal protective equipment.
- 7) In non-ICF facilities, employees will be provided or have accessible to them, any personal protective equipment deemed necessary by anticipated exposure through their position's responsibilities.
- 8) Personal protective equipment should be used as outlined in LIFE, Inc.'s "OSHA Compliance Manual" under the bloodborne pathogen program.

HAZARDOUS COMMUNICATIONS AND HANDLING**1109**

Effective: November 1997
Last Revision Date: October 24, 2022
Last Reviewed Date: February 20, 2023
Responsibility: OSHA Compliance Officer

POLICY:

It is the policy of LIFE, Inc. to comply with the requirements of OSHA Federal/State Hazardous Communications Standard.

REGULATORY REFERENCE:

29 CRF 1910.1200

COMMENT:

- 1) In compliance with the Hazardous Communications Standard, LIFE, Inc. makes available to its employees a copy of the company's written Hazardous Communications Program. LIFE, Inc.'s "OSHA Compliance Manual" is located in the office of each group home and available at each LIFE, Inc. day program/office.
- 2) LIFE, Inc. will provide each new employee initial training on each component of the standard. Staff will be trained on the proper handling, storage, and disposal of all hazardous materials.
- 3) Annual training will be provided to all employees on an ongoing basis in order to discuss additions or revisions to the Standard.
- 4) Employees will be responsible for complying with the procedures outlined in LIFE, Inc.'s "OSHA Compliance Manual" and "Behavior of Employees" policy {801:1(n)}.
- 5) LIFE, Inc. facilities will be stocked with protective equipment outlined in the Standard. The specific standards are documented in LIFE, Inc.'s "OSHA Compliance Manual".

VEHICLE SAFETY**1110**

Effective: August 27, 2012
Last Revision Date: March 24, 2022
Last Reviewed Date: March 24, 2022
Responsibility: Director of Facilities

POLICY:

It is the policy of LIFE, Inc. to ensure optimal vehicle safety for consumers and employees according to the guidelines established below.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy
North Carolina Law

FORMS MANUAL REFERENCE: 1110(a)**COMMENT:**

- 1) At all times when operating company vehicles, staff members should ensure that all consumers and employees follow all motor vehicle safety laws and recommendations as well as company policy.
- 2) Driver and all passengers must wear seat belts whenever the vehicle is moving. Driver shall check all passengers for compliance prior to putting the vehicle in motion.
- 3) Mileage/Head Count Sheet should be documented during each outing by the driver of the van {see attached 1110(a)}.
- 4) If a vehicle is equipped with a passenger side air bag, children 12 years of age or younger should be seated in rear of vehicle. Also, the passenger seat should be positioned as far back as possible from the air bag.
- 5) If at any time when driving the vehicle there is any activity or circumstance that is unsafe in any way, the driver should safely exit the roadway, stop the vehicle and resolve the issue before continuing to drive.
- 6) The driver should at all times follow all motor vehicle safety laws and recommendations. Employees who are issued a citation while operating a company vehicle should report the incident immediately to their supervisor. Employees who are found to actually be “at fault” while operating a company vehicle are subject to disciplinary action, up to and including termination.
- 7) All managers should have procedures in place to keep the company vehicles clean both inside and out. This should be handled in-house. All staff should be frequently reminded of the importance of vehicle safety and cleanliness. As in policy, there will be no smoking, eating, or drinking in company owned vehicles by either employees or consumers of LIFE, Inc. If policy is not followed, progressive discipline will be implemented.

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- 8) A second employee should never be seated in the passenger seat of a company vehicle when transporting consumers. The non-driver should be seated in a fashion that allows for optimal supervision of consumers.
 - 9) All employees should ensure that first aid kit in van is properly maintained.
 - 10) A company vehicle should never be left running when the driver is not in the seat.
 - 11) Consumers are never to be left alone in a company vehicle. Further, consumers and staff should never remain on the vehicle for extended periods of time while a portion of the group is not in the van (while one staff runs errands, shops for groceries, etc.)
 - 12) LIFE, Inc. employees are required to have a valid driver's license from employee's current state of residency. If for any reason an employee's license is restricted or revoked, the employee must immediately report this to his supervisor.
 - 13) If an employee is driving a company vehicle, cell phone use is prohibited while the vehicle is in motion.
 - 14) At each shift change, there will be a visual inspection done of the company vehicle. The two (2) staff members who are assigned will look for evidence of eating, drinking, or smoking on the van. They will also be checking for any damage that has been done to the exterior or interior of the vehicle. If no problems are noted, the staff should draw a solid line across the van mileage sheet (directly under the last entry), then write the date, their names, and document either "no problems noted", or either "problems noted". If problems are noted, they are to be written in detail on the "Daily Communication Log". **BE SURE THAT ALL FACILITIES ARE USING THE CORRECT MILEAGE SHEET. IT SHOULD BE THE SHEET THAT WAS REVISED JUNE 2007.**
 - 15) Managers are to read and initial the Daily Communication Log sheets. This should be done every time a manager is in the facility. If problems are noted on the vehicle, the manager is to determine on which shift the problem occurred and take appropriate disciplinary action with the staff who violated company policy. The Director of Facilities will be randomly checking mileage sheets and communication log entries to see if problems are being documented and if disciplinary action is being issued accordingly.
 - 16) Habilitation Coordinators, QP's, and Corporate staff member who are in facilities when vehicles are present are to do visual inspections also. Any findings should be documented as outlined in Comment #14 above.
 - 17) Van mileage logs are to be sent to the Corporate Administrative Assistant on the first of every month.
 - 18) All staff members should be reminded that all accident/incidents that result in damage to interior or exterior of the vehicles should be reported to their supervisor. Facility managers are responsible for making Director of Facilities aware of the damages. Disciplinary action should be taken with staff as warranted.
 - 19) The driver is responsible for placement and retrieval of the orange safety cone {as outlined in General Orientation for New Employees}. If there is not an orange cone in the van, notify the

Director of Facilities immediately. The driver of the van will be held accountable for ensuring that it is used when the van is parked. Be sure that all staff know the purpose of the cone. A consumer is never allowed to put the cone in place nor remove it.

- 20) A Company vehicle should never park in a handicapped space when no handicapped consumer is in the vehicle.
- 21) A Company vehicle should never exceed the posted speed limit or sixty-five miles per hour.
- 22) A Company vehicle should not be used to conduct personal business.
- 23) LIFE, Inc. Safety Officer will monitor monthly to ensure training has been provided, checklist completed, and to ensure written emergency procedures are in all company vehicles.
- 24) Monthly safety inspection will be filled in the inspection booklet.

PROCEDURES FOR VISUAL INSPECTIONS OF COMPANY VEHICLES**1110(2)**

Effective: November 2007

Last Revision Date: November 2007

Last Reviewed Date: February 20, 2023

Responsibility: Director of Facilities

POLICY:

It is the policy of LIFE, Inc. to ensure that all supervisors be responsible for making all employees aware of “visual inspections” of all LIFE, Inc. vehicles.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy 1110 “Vehicle Safety”

COMMENT:

- 1) At each shift change, there will be a visual inspection done of the Company vehicle. The two (2) staff members who are assigned will look for evidence of eating, drinking, or smoking on the vans. They will also be checking for any damage that has been done to the exterior or interior of the vehicle. If no problems are noted, the staff should draw a solid line across the van mileage sheet (directly under the last entry), then write the date, their names, and document either “no problems noted”, or either “problems noted”. If problems are noted, they are to be written in detail on the “Daily Communication Log”. **BE SURE THAT ALL FACILITIES ARE USING THE CORRECT MILEAGE LOG. IT SHOULD BE THE SHEET THAT WAS REVISED JUNE 2007.**
- 2) Managers are to read and initial the Daily Communication Log sheets. This should be done every time a manager is in the facility. If problems are noted on the vehicle, the manager is to determine on which shift the problem occurred and take appropriate disciplinary action with the staff that violated Company policy. The Director of Facilities will be randomly checking mileage sheets and communication log entries to see if problems are being documented and if disciplinary action is being issued accordingly.
- 3) Habilitation Coordinators, QP’s, and Corporate staff members who are in facilities when vehicles are present are to do visual inspections also. Any findings should be documented as outlined in Comment # 1 above. It is hoped that these visual inspections by managers will occur at a high frequency. If problems continue to be identified, minimums will be established.
- 4) All staff members should be reminded that all accidents/incidents that result in damage to interior or exterior of the vehicles should be reported to their supervisor. Facility managers are responsible for making the Director of Facilities aware of the damages. Disciplinary action should be taken with staff as warranted.
- 5) If you do not have an orange cone, notify the Director of Facilities immediately. The driver of the van will continue to be held accountable for ensuring that it is used when the van is parked. Be sure that all staff knows the purpose of the cone. It is not the responsibility of a consumer to put the cone in place not to remove it.

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- 6) All managers should have procedures in place to keep the Company vehicles clean both inside and out. This should be handled in-house. If you have questions, please contact the Director of Facilities.
 - 7) All staff should be frequently reminded of the importance of vehicle safety and cleanliness. As in policy, there will be no smoking, eating, or drinking in Company owned vehicles by either employees or consumers of LIFE, Inc. If policy is not followed, the employee should be given one (1) verbal warning (to be documented in the performance review). The next step should be termination of employment.

RETURN TO WORK PROGRAM**1111**

Effective: August 2013

Last Revision Date: August 2013

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to facilitate the earliest possible return of injured employees to the workplace to perform meaningful, productive work within their physical capabilities.

REGULATORY REFERENCE:

North Carolina Industrial Commission Guidelines

LIFE, Inc. Company Policy

COMMENT:

- 1) When an employee has a work-related injury, their restrictions and time away from work will be managed by the Human Resources Department. The HR Department will review any physician ordered restrictions and evaluate the employee's fitness for duty for modified or alternative work positions.
- 2) The first option for modified duty will always be the employee's current job. If it is possible with reasonable accommodations, the employee's current position will be modified to meet the restrictions of light duty.
- 3) The other option will be an alternative work position. This will be determined on a case by case basis.
- 4) For either option, the employee will be subject to the same policies with regard to attendance and job performance and subject to disciplinary action for failure to do so.

EMERGENCY PREPAREDNESS**1112**

Effective: October 2017

Last Revision Date: October 2017

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

It is the policy of LIFE, Inc. to promote an Emergency Preparedness Program that involves a comprehensive approach to meeting the health, safety, and security needs of each facility, its staff, their client population and community prior to, during and after an emergency or disaster.

REGULATORY REFERENCE:

State Operations Manual, Appendix Z – Interpretive guidelines for
Emergency Preparedness

COMMENT:

- 1) LIFE, Inc. supports an Emergency Preparedness Program which enables us to better anticipate and plan for emergency needs, to rapidly respond as a facility, as well as to integrate with local public health and emergency management agencies and healthcare coalitions' response activities and to rapidly recover following the disaster.
- 2) LIFE, Inc.'s Emergency Preparedness Program encompasses four core elements: An Emergency Plan that is based on a Risk Assessment and incorporates an all hazards approach; Policies and Procedures; Communication Plan; and a Training and Testing Program. These four elements are included in LIFE, Inc.'s Medical Protocol and Disaster Preparedness Manual.
- 3) For the purpose of this policy and our Emergency Preparedness Plan, an Emergency/Disaster is defined as an event that can affect the facility internally as well as overall target population, the community at large or a geographic area.

An emergency is defined as a hazard impact causing adverse physical, social, psychological, economic or political effects that challenges the ability to respond rapidly and effectively. It requires a step-up capacity and capability (call back procedures, mutual aid, etc.) to meet the expected outcome. An emergency commonly requires change from routine management methods to an incident/command management process, the outcome is lower than expected compared with a smaller scale or lower magnitude impact (see "emergency" for important contrast between the two terms).

A disaster is defined as a hazard impact causing adverse physical, social, psychological, economic or political effects that challenges the ability to respond rapidly and effectively. Despite a stepped-up capacity (call back procedures, mutual aid, etc.) and change from routine management methods to an incident/command management process, the outcome is lower than expected compared with a smaller scale or lower magnitude impact (see "emergency" for important contrast between the two terms).

- 4) Regularly scheduled emergencies that will be practiced and reviewed are:
 - a. Fires

-
- b. Bomb Threats
 - c. Utility Failures
 - d. Natural Disasters
 - e. Medical Emergencies
 - f. Violent or other threatening situations.

Detailed procedures can be found in the Emergency Plan.

- 5) LIFE, Inc.'s emergency plan provides the framework for the emergency preparedness program. The emergency plan is developed based on facility and community based risk assessments that assist a facility in anticipating and addressing facility, clients, staff and community needs and support continuity of business operations.

EMERGENCY AND CRITICAL INCIDENT POLICY**1113**

Effective: February 2017

Last Revision Date: February 2022

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice-President

POLICY:

Emergencies and critical incidents in the workplace can affect people physically and psychologically, and affect program continuity of LIFE, INC.

The purpose of this policy is to ensure LIFE, INC. prepares for and effectively responds to emergency situations and critical incidents through the appropriate use of resources. The prevention and effective management of emergency situations and critical incidents can assist to minimize the negative impact of an unexpected event.

The policy applies to all employees and individuals served.

REGULATORY REFERENCE:**FORMS MANUAL REFERENCE: 214 (a), 214(b), 214(c), 214(d)****COMMENT:**

Definitions:

An emergency is an unplanned or imminent event that affects or threatens the health, safety or welfare of people, property, and infrastructure, and which requires a significant and coordinated response. The defining characteristic of an emergency event or situation is that usual resources are overwhelmed or have the potential to be overwhelmed.

Emergencies may be a specific event with a clear beginning, end and recovery process, or a situation that develops over time and where the implications are gradual rather than immediate.

Emergency management is the coordination of an emergency response and management of recovery. The aim of emergency management is to minimize physical and psychological impacts on all parties and to minimize damages to assets, operations, reputation, and staff productivity.

A critical incident is an unexpected traumatic event, involving personal or professional threat, which evokes extreme stress, fear, or injury. Providing appropriate supports following a critical incident is part of emergency management.

Listed below are examples of critical incidents:

- Medication errors
- Overdose of medication or illegal narcotics
- Use of physical restraint
- Incidents involving injury

-
- Communicable disease
 - Infection control
 - Aggression or violence
 - Elopement
 - Vehicular accidents
 - Allegations of abuse
 - Allegations of neglect
 - Allegation of sexual assault

1. Principles

Emergency management planning is being prepared for events or incidents that stretch our ability to cope beyond normal day-to-day capacity.

The organization is committed to the protection of all individuals served and employees during emergencies.

LIFE, INC. quickly and effectively responds to emergency situations, with the foremost goals of preserving life, protecting the organization's property, and restoring operations as quickly as possible.

Critical incidents can be a threatening experience and appropriate supports are required to minimize long term effects arising from exposure to the trauma.

2. Outcomes

Emergency situations are prevented as much as possible.

The negative impact of emergency situations and critical incidents are minimized through effective management.

3. In reference to risk management

All employees are trained in disaster and emergency response procedures upon hire and annually thereafter.

Emergency evacuation drills are undertaken in all sites under the instructions of the Quality Professional and the safety officer.

Disaster and emergency management plans are reviewed annually and/or following the event of a disaster or emergency situation.

As far as possible, traumatic events are prevented, and the impacts of trauma are minimized following traumatic events.

4. In reference to policy implementation

All employees have access to and are familiar with policies and procedures relating to disaster emergency management.

All staff have information which outlines actions to follow for various disaster and emergency situations and are supported to undertake training for specific roles in case of emergency and critical incident.

5.

LIFE, INC identifies, prevents, and manages disaster and emergency situations within its sphere of responsibility and influence, until the arrival of appropriate emergency services.

A range of emergency situations may occur on the premises with the potential to impact on the safety of individuals served and all employees.

- Fires
- Bomb threats
- Natural disasters
- Utility Failures
- Medical Emergencies
- Violent or other threatening situations

6.

Identification of functions and delegations of emergencies and critical incidents is critical. The corporate team will not only develop and review the policy for emergencies and critical incidents, but also ensure compliance with policy.

The Safety Officer ensures potential disasters and emergency situations are identified, and appropriate emergency management plans are in place. The Safety Officer will also review critical incidents monthly in the Quality Assurance and Improvement team meeting.

The Qualified Professional for each LIFE, INC. facility will be responsible for implementation of emergency and critical incident procedures. The Qualified Professional is also responsible for documenting and communication of response plans, reporting on actual situations and reviewing policies and procedures following an emergency situation. The Qualified Professional will coordinate all emergency evacuation drills.

All LIFE, INC. employees are responsible for compliance of this policy and for recommend any changes, additions, or revisions of the policy.

7.

All information regarding emergency and critical incident procedures are located in the LIFE, INC. Medical Protocol and Disaster Preparedness manual. Emergency Contact Information is included in this manual for each LIFE, INC facility.

8.

Documentation for Analysis of potential hazards would include evacuation procedures, security procedures, drills, safety assessments on risk management plans. Each emergency procedure is tested, analyzed for performance, documented, and including the analysis.

9.

Implementation of an emergency procedure in response to an actual emergency and its subsequent documentation maybe used in place of a test of an emergency drill.

10.

LIFE, INC. will ensure ready access to:

- First aid expertise
- First aid equipment
- First aid supplies
- Relevant emergency information on persons served and all personnel

11.

Information needed for persons served and all personnel will include any medical conditions, emergency contact persons, primary care doctor, allergies on the use of medications and assistive devices. If persons served are transported for action taken on services, this information should be available to the employee supervising the outing.

12.

LIFE, INC. implements written procedures for critical incidents that include:

- Prevention
- Reporting
- Documentation
- Remedial action
- Timely debriefings conducted following a critical incident
- Critical incidents include:
 - a) Medical errors
 - b) Use of restraints
 - c) Incidents involving injury
 - d) Communicable disease
 - e) Infection control
 - f) Aggression or violence
 - g) Elopement
 - h) Vehicular accidents
 - i) Allegations of abuse
 - j) Allegations of neglect
 - k) Allegations of sexual assault
 - l) Death

13.

LIFE, INC. will follow legal requirements regarding investigation and reporting of incidents to proper authorities.

14.

Personnel will be trained in how documentation is to be completed, who is responsible for completing documentation, who is to be notified and where documentation should be kept. The LIFE, INC. training module for critical incidents includes the above information.

15.

Personnel will be trained upon hire during initial orientation and annually thereafter.

16.

The Critical Incident Form is filed in the Medical Protocol and Disaster Preparedness Manual. All critical incident reports will be entered into the app and the initial written form used for reporting purposes will be stored in a secure location and maintained for three years. The utilization of the app will allow us to summarize causes and trends of incidents.

17.

The Safety Officer will review all Critical Incidents monthly in the Quality Assurance and Improvement Team minutes.

18.

All written analysis of all Critical Incidents is reviewed in the Corporate Meeting annually. This analysis will include:

- a) Causes
- b) Trends
- c) Areas needing improvement
- d) Actions to address the improvements needed
- e) Implementation of actions
- f) Whether the actions taken accomplished intended results
- g) Necessary training of personnel
- h) Prevention of recurrence
- i) Internal Reporting requirements
- j) External Reporting requirements

19.

LIFE, INC. Human Rights Committees will review critical incidents on a quarterly basis.

20.

The analysis of critical incidents will include:

- a) The cause of incident

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- b) Identification of trends in critical incidents (locations, times, personnel involved, involvement of persons served, types of incidents and methods of intervention.

21.

Upon reviewing the analysis, the Quality Assurance and Improvement Team will make recommendations (environmental changes, additional training, changes in any policies on procedures, etc.). The committee's recommendations will be reflected in the monthly minutes.

22.

The Director of ICF/IID Services and the Director of Contract Services will ensure that critical incidents of neglect, abuse or death are reported to the appropriate external authorities. The CARF resource specialist will be informed of all investigations within 30 days of occurrences on the CARF form (available online). The Director of ICF/IID and the Director of Contract Services will be responsible for submitting these reports.

SERIOUS DISEASES**1114**

Effective: July 2001

Last Revision Date: May 7, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Executive Vice President

POLICY:

It is the policy of LIFE, Inc. that employees with infectious, long-term, life-threatening, or other serious diseases may work if they are physically and mentally able to perform the duties of their job without undue risk to their own health or that of other employees, clients, or members of the public.

REGULARY REFERENCE:

The Family and Medical Leave Act
OSHA Regulations
Americans with Disabilities Act
EEOC Guidelines

COMMENT:

- 1) Serious diseases for the purposes of this policy include, but are not limited to cancer, heart disease, multiple sclerosis, hepatitis, tuberculosis, human immunodeficiency virus (“HIV”), and acquired immune deficiency syndrome (“AIDS”).
- 2) LIFE, Inc. will support, when feasible and practical, educational programs to enhance employee awareness and understanding of serious diseases.
- 3) Employees afflicted with a serious disease are to be treated no differently than any other employee. Therefore, if the serious disease affects their ability to perform assigned duties, those employees will be treated like other employees who have disabilities which limit their job performance.
- 4) Employees who are diagnosed as having a serious disease and who want an accommodation should inform their supervisor or the Human Resources Department of their condition as soon as possible. Supervisors and the Human Resources Department should review with the employee LIFE, Inc. policy on issues such as employee assistance, leaves and disability, infection control, requesting and granting accommodations, LIFE, Inc.’s continuing expectation regarding the employee’s performance and attendance, and available benefits.
- 5) Employees who have a serious disease and who want an accommodation should provide the Human Resources Department with any pertinent medical information needed to make decisions regarding job assignments, ability to continue working, or ability to return to work. LIFE, Inc. may also require a doctor’s certification of an employee’s ability to perform job duties. Additionally, LIFE, Inc. may request that an employee undergo a medical examination in order to determine the employee’s ability to perform essential functions and/or to identify possible accommodations.
- 6) LIFE, Inc. will attempt to maintain the confidentiality of the diagnosis and medical records of employees with serious diseases, unless otherwise required by law. Information relating to an

employee's serious disease will be treated as confidential and ordinarily will not be disclosed to other employees.

- 7) LIFE, Inc. will comply with applicable occupational safety regulations concerning employees exposed to blood or other potentially infectious materials. Universal precautions, work practice controls, and personal protective equipment will be used when appropriate to limit the spread of diseases in the workplace.
- 8) Employees concerned about being infected with a serious disease by a coworker, client, or other person should convey this concern to their supervisor or the Human Resources Department. Employees who refuse to work with or perform services for a person known or suspected to have a serious disease, without first discussing their concern with a supervisor, will be subject to discipline, up to and including termination. In addition, where there is little or no evidence of risk of infection to the concerned employee, the employee's continued refusal, after consultation with supervisory personnel, may result in discipline, up to and including termination.

**ACCOMMODATION FOR SINCERELY HELD RELIGIOUS BELIEF,
OBSERVANCE, OR PRACTICE AND FOR MEDICAL REASONS****1115**

Effective: January 2022
Last Revision Date: January 17, 2022
Last Reviewed Date: January 17, 2022
Responsibility: Executive Vice President

POLICY:

LIFE, Inc. is committed to the principle of fair and equal employment opportunities for everyone. As part of this commitment, LIFE, Inc. will make good faith efforts to provide a reasonable accommodation of an employee's sincerely held religious belief, observance, or practice and for medical reasons unless such accommodation would create an undue hardship.

FORMS MANUAL REFERENCE: 1115(a). 1115(b)

COMMENT:

These guidelines explain the process for assisting individuals desiring a workplace accommodation for religious or medical reasons.

Definitions

Reasonable accommodation – a reasonable religious or medical accommodation is any adjustment to the work environment that will allow an employee to act in accordance with the employee's religious beliefs, observances, or practices or medical situation. A reasonable accommodation should not cause any major hardships for LIFE, Inc., or the individuals we serve.

Strongly Held Practice or Belief – Religion includes all aspects of religious observance and practice, as well as belief. Religious beliefs are not only those beliefs held by traditional, organized religions, but also include moral or ethical beliefs as to what is right or wrong which are sincerely held with the strength of traditional religious views.

Undue hardship – An undue hardship may be shown if the accommodation would impose more than a minimal cost or burden on operations. Factors for making an analysis include but are not limited to the nature and cost of the requested accommodation; the impact on resources and business operations; the impact on workplace safety; safety of the individuals we serve; and the number of employees requesting similar accommodations at the same time.

Requesting an Accommodation

A request for a religious accommodation must be made within a reasonable amount of time, when possible, at least 30 days in advance of the need for the accommodation, in order to minimize the impact to the agency/division operations. Employees and applicants should complete the Request for Accommodation Medical Exemption Form or the Religious

Accommodation request form and submit it and any supporting documentation to their supervisor or the Director of Human Resources.

Discussing the Request

Once LIFE, Inc. becomes aware of the employee's request for a religious or medical accommodation, the Corporate 12 Team will review if an accommodation is available that would address the employee's religious belief or medical condition without any undue hardships for the company.

Analysis of the Request for Accommodation

Reasonable accommodations are determined on an individual, case-by-case basis. Some common religious or medical accommodations include flexible scheduling, voluntary substitutions or swaps, job reassignments and lateral transfers, modification of grooming requirements, and other workplace practices, policies, and/or procedures.

In determining whether a request for a particular accommodation imposes an undue hardship, the Corporate 12 Team may consider relevant factors such as the nature and cost of the requested accommodation; the impact on resources and business operations; the impact on workplace safety; and the number of employees requesting similar accommodations at the same time.

Notification and Implementation of an Accommodation

The Director of Human Resources shall provide a written response either granting, denying, or extending the request to the employee within seven (7) business days of receipt of the request. If the accommodation request is determined to be unreasonable and cannot be granted, then an alternative accommodation may be proposed to the employee. The employee may submit a modification of the request within five (5) business days of receiving the agency's written response.

Employees who believe they have been discriminated against based on religion by the denial of a requested religious accommodation may follow the Grievance Procedure (Policy 903).

Retention of Documents

All documentation related to a religious or medical accommodation request shall be maintained by LIFE, Inc. in the same manner as workplace discrimination and harassment documents, separate from an employee's personnel file by the HR department.

Questions regarding these guidelines may be directed to the Department of Human Resources.

COVID VACCINATION MANDATED BY CMS AND PPE**1116**

Effective: January 2022

Last Revision Date: January 17, 2022

Last Reviewed Date: April 4th, 2023

Responsibility: Executive Vice President

POLICY:

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation as a whole. LIFE, Inc. has adopted this policy on mandatory vaccination to safeguard the health of our employees from the hazard of COVID-19 as required by CMS rule. This policy complies with CMS QSO-22-04-ALL.

COMMENT:

This Mandatory COVID-19 Vaccination Policy applies to all employees of LIFE, Inc. except for employees who do not report to a workplace where other individuals (such as coworkers and individuals we serve) are present.

All employees covered by this policy are required to be fully vaccinated as a term and condition of employment at LIFE, Inc. Employees are considered fully vaccinated two weeks after completing primary vaccination with a COVID-19 vaccine, with, if applicable, at least the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as the Johnson & Johnson vaccine, or two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series. All employees are required to report their vaccination status and to provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results. Employees not in compliance with this policy will be subject to termination.

Employees may request an exception from this mandatory vaccination policy if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Employees also may be legally entitled to a reasonable accommodation if they cannot be vaccinated because of a disability, or if the provisions in this policy for vaccination, conflict with a sincerely held religious belief. Requests for exceptions and reasonable accommodations must be initiated utilizing the **Religious Accommodation Request Form** or the **Request for Medical Accommodation Form**. All such requests will be handled in accordance with applicable laws and regulations and LIFE, Inc. policies and procedures.

Procedures:**Overview and General Information**

All LIFE, Inc. employees must be fully vaccinated no later than **February 28th, 2022**

To be fully vaccinated by **February 28th, 2022**, an employee must:

- Obtain the first dose of a two-dose vaccine no later than **January 27th, 2022**; and the second dose no later than **February 28th 2022** or
- Obtain one dose of a single dose vaccine no later than **January 27th, 2022**.

Employees will be considered fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine. An employee will be considered partially vaccinated if they have received only one dose of a two-dose vaccine.

Vaccination Status and Acceptable Forms of Proof of Vaccination

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted to any manager, Accounting Clerk, or the HR department.

Acceptable proof of vaccination status is:

1. The record of immunization from a healthcare provider or pharmacy.
2. A copy of the COVID-19 Vaccination Record Card.
3. A copy of medical records documenting the vaccination.
4. A copy of immunization records from a public health, state, or tribal immunization information system; or
5. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine(s).

If an employee is unable to produce one of these acceptable forms of proof of vaccination, despite attempts to do so (e.g., by trying to contact the vaccine administrator or state health department), the employee can provide a signed and dated statement attesting to their vaccination status (fully vaccinated or partially vaccinated); attesting that they have lost and are otherwise unable to produce one of the other forms of acceptable proof; and including the following language:

“I declare (or certify, verify, or state) that this statement about my vaccination status is true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to criminal penalties.”

An employee who attests to their vaccination status in this way should, to the best of their recollection, include in their attestation the type of vaccine administered, the date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine.

Face Coverings

1. Any employee that has been directly exposed to COVID19 according to state and federal guidance must wear a face covering while working with individuals being served at LIFE, Inc. The time frame will be a minimum of 3 days after the exposure or in accordance to state and federal guidelines.
2. All employees working at a facility that is on quarantine must wear a face covering.

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3. Any employee that would like to wear an approved face covering regardless of exposure or quarantine status while working at LIFE, Inc. is approved to do so. Mask can be any solid color but should not have any artwork or wording on it.
 4. Face coverings will be provided by LIFE, Inc. during quarantine and due to exposures only.

New Hires:

All new employees are required to comply with the vaccination requirements outlined in this policy as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to the start of employment.

Confidentiality and Privacy:

All medical information collected from individuals, including vaccination information, test results, and any other information obtained because of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.

Questions:

Please direct any questions regarding this policy to the HR Department.

SECTION 12**INDIVIDUALS WE SERVE**

Consumer Rights' Policy	1201:1
Consumer Incidents	1202:1
House Rules	1203:1
Consumer Meal Outings	1204:1
Accessibility Plan	1205:1
Personal Transportation of Individuals Served	1206:1

CONSUMER RIGHTS' POLICY**1201**

Effective: May 2014
Last Revision Date: May 14, 2020
Last Reviewed Date: February 20, 2023
Responsibility: Director of Advocacy

POLICY:

It is the policy that the rights of consumers shall be understood, respected, and preserved. The rights of the consumers will be communicated initially and annually for persons served in a program longer than one (1) year. Each employee of LIFE, Inc. will be informed of consumer rights. In general, these rights shall include but shall not be limited to the right of dignity, humane care and treatment, and proper assistance and guidance. All employees of LIFE, Inc. working directly with consumers will receive initial and ongoing training to promote consumer well-being and prevent abuse, neglect, and mistreatment. It's also the policy that all alleged rights violations and crimes be investigated promptly with proper disciplinary and/or corrective measures taken as deemed appropriate.

REGULATORY REFERENCE:

LIFE, Inc. Company Policy
NC Rules Governing Categories A and B Providers
Section 1150B of the Social Security Act

Tag Numbers: W122, W123, W124, W125, W126, W127, W128, W129, W130, W131, W132, W133, W134, W135, W136, W137, W138, W139, W140, W141, W142, W143, W144, W145, W146, W147, W148, W149, W150, W151, W152, W153, W154, W155, W156, W172, W189

FORMS MANUAL REFERENCE: 1201(a), 1201(b), 1201(c)

COMMENT:

- 1) In recognition of the consumer's status as a developing individual, assistance, training, and treatment shall be provided the consumer relative to the exercise of rights.
- 2) All rights of the consumer shall devolve to the Guardian, next of kin or sponsoring agency if the consumer has been adjudicated incompetent or if it has been documented in the consumer's record the specific impairment(s) that have rendered the consumer incapable of understanding his rights.
- 3) Each consumer of LIFE, Inc. shall have the following rights:
 - a) Exercise his rights as a consumer and citizen;
 - b) Have the right to dignity, privacy, humane care, and freedom from physical punishment, abuse, neglect, and exploitation by all LIFE, Inc. employees;

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- c) Be informed of the policies, rules and regulations of LIFE, Inc. at or prior to the time of admission. Be informed upon the adoption or revision of pertinent policies which are applicable;
 - d) Be fully informed of his rights and responsibilities, and the rules and regulations governing conduct and responsibility; any fees will be assessed and explained upon admission, failure to pay any assessed fees may result in termination of services as well as legal action;
 - e) Have the right to live as normally as possible while receiving care and treatment;
 - f) Have the right to receive care, services and treatment based on a plan written especially for the individual consumer. The plan must be implemented within the service definition requirements:
 - g) Participate in the planning of his total care and medical treatment; and given a copy of the treatment/habilitation plan by LIFE, Inc.;
 - h) Be informed of the benefits or risk involved in the services the consumer will receive prior to agreeing to participate in the program;
 - i) Be fully informed in writing of the services available in the facility, and of related changes, including changes in services not covered under the Title XIX Program or by the facility's basic per diem rate, (IID);
 - j) Be fully informed by a physician of his health or medical condition unless it is documented in his record as medically contraindicated by his physician;
 - k) While receiving services, the consumer has the right to be free from unnecessary or excessive medications of any kind and have the right not to have medication used as punishment for discipline or for the convenience of staff. The use of medication will only occur as ordered by a physician in accordance with sound medical advice and following consent by consumer or guardian. Any known side effects or serious risks involved with a specific medication will be shared prior to obtaining consent;

Be free from restrictive interventions involving physical or chemical restraint and use of protective devices unless informed consent is given in conjunction with an approved behavior modification program within 30 days of initiation and when authorized in writing by a licensed, practicing psychologist or physician for use during behavior modification sessions or in an emergency situation in which restrictive intervention is necessary to prevent danger or injury to self or others. Refer to 1202(a) for the use of emergency restrictions.

1. The approved use of restrictive interventions and protective devices is valid only for 6 months. Approval is based upon assessment of the consumer and documentation and justification of the restrictive intervention or protective device proposed. Initiations and continued use of restrictive interventions or protective devices must be based on precise, clear, and recent behavioral data that the intervention or device will or continues to have a positive impact and is warranted. Reasons for the intervention or protective devices must be explained to the treatment team, consumer or guardian

and the LIFE, Inc. Human Rights Committee and approval obtained from all prior implementation. The Human Rights Committee must review the plan initially and every 6 months for ongoing plans. Approval, disapproval, or abstention by the Human Rights Committee will be based on a majority vote. If at any time the treatment team, consumer or guardian, or Human Rights Committee does not approve the plan it will not be implemented or if in current use will be discontinued.

2. Upon admission to LIFE, Inc., the consumer's medical history is reviewed, and a health history assessment is completed with the consumer and/or legally responsible person. If there are foreseeable physical consequences to using a restrictive intervention, approval by physician following a medical exam will be obtained and the physician will monitor the plan which will include specific monitoring procedures. If the consumer has a physical disability or medical issue which may cause his/her sensitivity to injury, such condition is to be documented in the consumer's plan with instruction not to utilize any interventions felt by the physician to be potentially harmful. Any alternative techniques that may be used, per physician approval, will be documented in the consumer's plan and all employees in-serviced on the consumer's condition and alternative techniques.
3. LIFE, Inc. supports using the least restrictive, most appropriate, and most effective positive therapeutic treatment modalities. Use of restrictive methods will only be used when clinically or medically indicated for therapeutic treatment and after less restrictive and more positive methods have proven unsuccessful and will be used in a manner that does not inflict harm or pain. The restrictive intervention is to be discontinued immediately when a risk to the consumer's health or safety is noted or as soon as the consumer demonstrates behavioral control.
4. LIFE, Inc. employees will only use the degree of restriction necessary to repel or secure a violent and aggressive consumer with the highest degree of restriction allowed by policy being the use of state approved restrictive intervention techniques.

Restrictive intervention may be used in an emergency situation when the intervention is necessary to prevent abuse, injury (to self or others), or property damage that poses imminent risk. In an emergency situation, a certified staff may use emergency intervention for up to 3 minutes without additional approval from a QP. Emergency restrictive intervention lasting longer than 3 minutes must be authorized by a QP trained and privileged to authorize the intervention. The QP can write a continuation authorization after the initiation of the intervention. A verbal authorization can be given for up to 3 hours and then the written authorization must be in place. When an order is renewed, up to 24 hours, the order is to be signed by the designated staff. Written orders are valid only for 4 hours for adults, 2 hours for children ages 9 to 17 years of age, and 1 hour for children under 9 years of age. The original order is renewable only within these limits or to a total of 24 hours. Restrictive intervention is discontinued immediately once a consumer regains control or at the first indication of imminent danger to health or safety of the consumer.

Use of emergency restrictive intervention will become planned when the intervention is utilized more than 4 times or 40 hours in a calendar month, used in a single episode up to a total of 24 hours, and/or used to therapeutically decrease dangerous, aggressive, self-

injurious, or undesirable behaviors to a level which will allow use of a less restrictive treatment procedure.

The use of restrictive intervention will be used only as a last resort and implemented only by trained staff. LIFE, Inc. supports and teaches The MANDT System. All employees who provide direct care services to consumers shall be certified in The MANDT System Rational (R) and Technical (T) interventions. A written and physical test must be passed by the employee initially and annually in order to access competency and be certified in the use of MANDT. The LIFE, Inc. Human Rights Committee is informed of the use of any restrictive intervention and approval obtained prior to use except in emergency situations. Restrictive intervention will not be used as punishment, coercion, retaliation by staff, or for staff convenience. It should be noted that LIFE, Inc. does not use seclusion, time out isolation, or use of restrictive intervention in excess of 24 hours;

- m) Be free of treatment involving electro-convulsive shock, corporal punishment, aversive conditioning, experimental drugs or procedures and non-emergency surgery unless informed, voluntary consent of the consumer or guardian is given and the use of such is clinically and medically indicated;
- n) Have the right to agree to or refuse any specific treatment. The only time treatment can occur without consent is:
 - in an emergency situation;
 - if treatment has been ordered by the court;
 - when more than one professional agrees that the specific treatment is needed in order to improve or to prevent harm; or
 - if under 18 years old, the parents/legal custodian can give permission if the consumer objects;
- o) The fact the consumer is receiving services or any other information about the consumer's care is CONFIDENTIAL. The information in the consumer record is available to the consumer, unless more than one professional determines that it would be harmful to the consumer;
- p) In general, under state and federal law, no one can share information with another about the services provided. These same laws, however, require LIFE, Inc. to share information with others under the following conditions:
 - 1) The next of kin may be informed, it is in the consumer's best interest; and if under 18, the parents may be informed about the consumer's care when it is in the consumer's best interest and not considered harmful;
 - 2) With consumer permission, the next of kin, or a family member with a legitimate role in the consumer's service, or another person named by the consumer may be given other information about the consumer;
 - 3) With any other person if the consumer gives specific permission;
 - 4) If the consumer has or if LIFE, Inc. assigns a consumer advocate, to work on behalf of the consumer, the advocate may review the consumer record;

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- 5) If LIFE, Inc. is ordered by a court to release the consumer record;
 - 6) Review of the consumer record by a LIFE, Inc. attorney because of a lawsuit, a commitment proceeding, or guardianship proceeding;
 - 7) Transfer of care to another public agency;
 - 8) If committee and there is a need to share information about the consumer in order to manage the consumer's care;
 - 9) If imprisoned, LIFE, Inc. may share the consumer's record with prison officials;
 - 10) If there is an emergency, information may be shared with another professional who is treating the consumer;
 - 11) With a physician or other professional who referred the consumer to our facility;
 - 12) If LIFE, Inc. believes that the consumer is a danger to themselves or others, if LIFE, Inc. believes the consumer is likely to commit a crime; LIFE, Inc. may share information with law enforcement;
 - 13) Allegations or suspicions of abuse, neglect, sexual victimization or exploitation will be reported to the proper local authorities.
- q) Have access to all living areas, recreational areas and habilitative supplies and equipment of LIFE, Inc.;
 - r) Be paid for work performed that is not part of his Habilitation plan;
 - s) Goods or services will not be sold or purchased from a consumer unless approval has been obtained from the consumer or consumer's legally responsible entity (if applicable) and the President of LIFE, Inc.;
 - t) Be free from unreasonable or excessive compensation for damage resulting from his behavior;
 - u) Exercise all civil rights including disposing of property, making of purchases, entering into contracts, registering and voting, marrying and advancing;
 - v) Manage his personal financial affairs unless written authorization for assistance is given by the consumer and the extent of assistance is provided with Title XIX Program rules;
 - w) Be treated with consideration, respect and full recognition of his dignity and individuality, including privacy in treatment and in care for his personal needs;
 - x) Communicate and meet with persons of his choice upon mutual consent and under appropriate supervision;
 - y) Communicate and consult with the individual or agency having legal custody;

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- z) Communicate and consult with legal counsel, doctor or intellectual and developmental disabilities' specialist of his choice or his guardian's choice at his expense;
 - aa) Privacy for visits by his spouse if married, or to share a room with his spouse if both are consumers of the facility, however, unless married no consumers of the opposite sex will share a room unless under the age of six years. Children or adolescents and adults do not share bedrooms. The facility will not serve more consumers than legally licensed to serve;
 - bb) Obtain and or retain a driver's license, unless otherwise prohibited;
 - cc) Send and receive unopened mail, have access to writing materials, postage and assistance, and have access to a schedule of collecting and distributing mail;
 - dd) Live and work in an unlocked environment during working hours;
 - ee) Make and receive confidential phone calls at his expense;
 - ff) Be transferred, discharged, suspended or expelled from services, only for medical reasons, his welfare, the welfare of other consumers, or nonpayment of charges except as prohibited by the Title XIX Program or lack of authorization by area authority. Suspension of services will occur for a time period no greater than 4 weeks. At that time, if the consumer is not able to resume services, expulsion or discharge will occur. Expulsion will occur when it is determined the consumer's needs cannot be met for the foreseeable future due to medical reasons, his welfare, welfare of other consumers, or nonpayment of charges. Consumers will be free from the threat or fear of unwanted transfer, discharge, suspension, or expulsion from services. If transferred, discharged, suspended, or expelled from services, the reasons will be documented in the consumer record along with the anticipated time frame to resume services (if applicable). Documentation will include referral for alternative services including type of service and efforts made by LIFE, Inc. to help the consumer secure the service. All information regarding a necessary transfer, discharge, suspension, or expulsion will be relayed to the consumer, the consumer's legally responsible person, and persons of consumer choice via telephone or face to face conversation and followed up by written correspondence. If not satisfied with the transfer, suspension, expulsion, or discharge, the grievance policy is to be followed.
 - gg) Receive or refuse visitors at any reasonable time;
 - hh) Make scheduled trips in the community unless being held here because of judicial criminal proceedings;
 - ii) Be out of doors daily, have access to facility's equipment for physical exercise several times a week and participate in recreational/social activities;
 - jj) Have access to individual lockable storage space for his private use; and,
 - kk) Participate in religious worship of his choice;
 - ll) Wear, keep and use his clothing, personal hygiene items and personal possessions; and be free from unwarranted search and seizure;

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1. LIFE, Inc. recognizes the need to reserve the right to inspect living areas in situations when personal property of other consumers is missing, a consumer is suspected of having illegal drugs, or a consumer is suspected of having a weapon;
 2. LIFE, Inc. will conduct the inspection of a consumer's living area with the approval and in the presence of the consumer;
 3. Suspicion of illegal drugs or weapon will constitute a warranted search and seizure. The Human Rights Committee and the family/guardian will be notified. Personal property of others, illegal drugs, or weapons will be seized. Law enforcement will be contacted to determine appropriate disposal of illegal drugs or weapons. Personal property of others will be returned to the owner(s).
 4. Every search and seizure in a facility shall be documented in the consumer's chart, reviewed with the Human Rights Committee, and reported as warranted by completion of the NC IRIS and the DHHS Quarterly Provider Incident Report;
 5. Documentation shall include, but not limited to:
 - the scope of the search;
 - the reason for the search;
 - procedures followed in the search;
 - description of the item seized, and
 - an accounting of the disposition of seized property.
- mm) Be free from the loss of any meal or a portion of a meal as a disciplinary action;
- nn) Keep and spend a reasonable sum of personal money;
- oo) If under 18 years old, contact and consult with parents or legal guardian;
- pp) Be involved in research only if informed, voluntary consent is given;
- qq) Receive written notice and rationale, if transferable with LIFE, Inc. or to another facility;
- rr) Voice grievances and recommend changes in policies and services through facility staff (assigned QP) and/or through outside representatives, and to do so without restraint, interference, coercion, discrimination or reprisal; to ensure consumer self-governance, consumer involvement will occur in the LIFE, Inc. Human Rights Committee and opportunities provided for involvement in self-advocacy groups
1. LIFE, Inc. defines grievance as a complaint, misunderstanding, disagreement, conflict, dispute or circumstance regarding services or interventions offered by LIFE, Inc. which cannot be resolved through discussion between the consumer, guardian, QP I and QP II, and/or Corporate Clinicians.
 2. If a consumer or individual acting on behalf of the consumer determines it is necessary to file a formal grievance, LIFE, Inc. will follow these procedures below;

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- LIFE, Inc. will provide appropriate names, addresses, and telephone numbers specific to the situation;
 - A written grievance will be required with information including specific details or concerns regarding the situation at hand. As warranted, a consumer will be assisted by staff and/or an individual of choice in compiling a written grievance;
 - Once completed, the grievance must be forwarded to the QP who will acknowledge receipt of the grievance in writing;
 - All information concerning the grievance is to be reviewed in detail with the QP and appropriate team members. A decision is to be made and the QP is to respond in writing within a time period not to exceed 5 days;
 - If a grievance cannot be resolved through the aforementioned procedures or the response/decision is not acceptable, appropriate information will be submitted to the appropriate Director (Director of ICF/IDD Services or Director of Contract Services) who will review it in detail and respond in writing to the consumer or individual acting on the consumer's behalf within 10 days of initial receipt.
 - In the event the response/decision made by the appropriate Director is not acceptable, the grievance will be referred to the area LIFE, Inc. Human Rights Committee. The decision of the Human Rights Committee will be final.
- ss) LIFE, Inc. can only restrict rights of a consumer or utilize restrictive interventions following consent from the consumer and/or guardian and approval by the LIFE, Inc. Human Rights Committee unless it is an emergency situation in which restrictive intervention is necessary to prevent danger or injury to self or others. Refer to 1204:3 (l) #4 for emergency usage of restrictive interventions. The possible use of restrictive intervention in an emergency situation or as planned intervention is explained to the consumer and family/guardian at admission during the review of the Consumer Rights policy 1204 and Consumer Incident Policy 1205 by the QP or Director of Social Work. If the consumer and/or guardian refuses the proposed rights restriction or restrictive intervention, LIFE, Inc. will not implement the restriction or restrictive procedure. The refusal will be treated as a grievance and handled as outlined in the grievance procedures above in (rr). The QP is responsible for explaining to the consumer and/or guardian and the Human Rights Committee the reason for the restriction of the right and/or the restrictive procedures proposed. If and when such occurs, the consumer has a right to have an advocate or someone the consumer designates, informed of the restriction as soon as possible but within 24 hours of the next working day. The QP is responsible for ensuring notification when the restrictive intervention is utilized. The QP is required to notify as soon as possible, but within 24 hours, the consumer's treatment team, the governing body designee which is the LIFE, Inc. Corporate Program Specialist, the legally responsible person, and persons identified by the consumer. LIFE, Inc. must keep a written report of any restriction in the consumer's record. Refer to Restrictive Intervention Documentation in Policy 1205 #3.
- tt) Upon becoming age 18 and upon request, the consumer may have any court records related to his care and treatment destroyed;

- uu) LIFE, Inc. is required to develop a discharge plan for consumers and provide a copy upon request before leaving the facility;

SPECIAL NOTE: If the consumer's primary need is related to the fact that he has intellectual and developmental disabilities and is receiving residential care, there is an additional right. If LIFE, Inc. determines the need to discharge the consumer and if the consumer still requires residential care, LIFE, Inc. will provide as much assistance as possible in locating another appropriate placement. This right exists unless the consumer broke the rules he agreed to follow of if LIFE, Inc. located another appropriate placement and the consumer refused that offer;

- vv) If a consumer leaves without permission, LIFE, Inc. may notify law enforcement officers to pick up the consumer and return him to the facility;
- xx) The fact a consumer is receiving services does not take away from the consumer's basic civil rights. Only after being declared incompetent by a court, can these rights be limited;
- yy) Assistance regarding consumer rights can be obtained from:

Disability Rights North Carolina 1-877-235-4210
 The NC Mental Health Consumer's Organization, Inc. 1-877-235-4210
 The NC Care line 1-800-662-7030
 Division of Health Service Regulations Public Complaint Line 1-800-624-3004
 These toll-free numbers are open Monday through Friday between 8:00 am and 5:00 pm

4) **Human Rights Committee Meeting**

- a) A Human Rights Committee for LIFE, Inc. shall be developed in each region. Members of the committee are to include professionals of associated disciplines (i.e., Social Work, Education, Psychology, Medicine and other Allied Health Professions), family members, consumer representatives, and concerned lay persons from the community. At least one adult consumer representative will participate as a member to ensure all applicable disabilities served by LIFE, Inc. are represented. LIFE, Inc. only serves individuals with intellectual disabilities. Members for the committee will be recommended to the LIFE, Inc. area QP II and approved by the Committee via a majority vote. LIFE, Inc. employees who will attend the meetings include the QP's and other staff when deemed appropriate (i.e. psychologist). At least one member or trained consultant of the Committee that is not directly involved with the consumer will be certified in the utilization of the restrictive intervention utilized by LIFE, Inc. The Committee will be comprised of a majority of non-board members. Board members and staff members will not be allowed to vote. Confidential consumer information is only shared with the Committee or Board members following consent by the legally responsible entity. Human Rights Committee Members will sign a confidentiality agreement. At least 5 members are recommended who are not involved directly with the consumer. Training for Committee members will be provided by the QP II. The members will be provided with the LIFE, Inc. Human Rights Committee By-Laws, LIFE, Inc. Consumer Rights and Consumer Incident Policies, and copies of restrictive programs and alternatives. These will be reviewed with the members with emphasis on governmental statutes and rules by the QP II.

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- b) By-laws shall govern the committee's operation. The purpose of the committee is to review program services, review exercise and restriction of the consumer's rights including use of restrictive interventions, review any individual cases of abuse/neglect, provide advice/guidance to the LIFE, Inc. professional staff, ensure consumer rights protections, and review unresolved consumer grievances for final decision including all consumer rights protections outlined in NC GS 122, ASPM 30-1, and ASPM 95-2. All actual or alleged consumer rights violations are reported to the area authority within 24 hours through use of the NC IRIS. LIFE, Inc. is responsible for completion of the NC IRIS and is required to inform the Committee that such notification has been completed. The committee also has the authority to provide active intervention to ensure the consumers of LIFE, Inc. receive all benefits, services, and rights to which they are entitled to.
 - c) The committee must meet on at least a quarterly basis. Consumers will not be identified by name in the minutes, oral discussion, or written reports. The QP's must ensure all planned restrictive plans and use of behavior medications and use of protective interventions receive approval by the committee prior to implementation or use. In addition, the QP must ensure that all potential consumer abuse, neglect or right violations are reviewed by the committee as well as any unresolved grievances. Approval for restriction of rights, final decisions on grievances, and any other issues requiring decisions by the Committee will require a majority vote by voting members. The process will consist of presentation of the rights restriction, restrictive intervention, abuse/neglect incident, and/or consumer grievance to the Committee by the QP. Discussion by members will occur along with any questions to LIFE, Inc. or request for additional information. Once the members feel they have sufficient information, a vote will occur. Comparison of progress will be reviewed quarterly with the Human Rights Committee regarding use of restrictive interventions and rights restrictions in order to determine effectiveness and need for continuance. It is the responsibility of the area QP to schedule meetings and inform the members of the meeting time, date, as well as location. Minutes of all Human Rights Committee Meetings will be maintained by the QP along with a copy of the by-laws, list and addresses of the members, as well as confidentiality forms signed by each member. Minutes of Human Rights Committee meetings will be provided to the Quality Assurance and Improvement Committee following each meeting. An annual report will be provided to the Area Authority as contractually required.
 - d) For reference, a copy of the LIFE, Inc. Human Rights Committee Bylaws are maintained in Section 9 of the QP Manual.

5) **Rights Assessment of ICF/IID Consumers**

- a) Within one year of ICF/IID admission for adult consumer, the QP shall conduct a consumer rights assessment and document findings on the LIFE, Inc. Rights Assessment form. A copy of the Rights Assessment Form is available in the ICF/IID QP Manual.
- b) A Rights Assessment is not required for minors under the age of 18. Upon reaching 18, the QP must complete the Rights Assessment.
- c) The Rights Assessment shall be filed in the consumer's active medical record in the Legal Section. It should also be discussed at the Interdisciplinary Team Meeting and referenced in the Life Plan on an annual basis to ensure it remains accurate.

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- d) The Rights Assessment shall be reviewed by the QP during the annual team meeting. The review of the rights assessment by the Interdisciplinary Team should be documented in the Independent Living subsection of the Life Plan. In addition, Objectives and Service Goals shall be established as needed in the Life Plan to promote the exercise of rights to the fullest extent possible.
- 6) **Promotion of Consumer Well Being and Abuse Prevention**
- a) All employees of LIFE, Inc. will receive initial training for the “Promotion of Consumer Well Being and Abuse Prevention.” Training will be provided annually to all employees providing direct services and care to consumers to ensure the provision of quality care and prevention of abuse, neglect and mistreatment.
- b) The Promotion of Consumer Well Being and Abuse Prevention training module developed by LIFE, Inc. consists of seven key components identified by the Centers for Medicaid and Medicare Services.
- c) The training module is included on (Page 218).
- 7) **Consumer Rights Violations:**
- a) All employees are expected to immediately report any alleged or witnessed incidents of rights’ violations and suspected abuse, neglect, or exploitation of persons served. Failure to report is a class 3 misdemeanor punishable by a fine. Reports of this nature should be directed to someone in a supervisory capacity role (i.e., QP, Habilitation Coordinator, Corporate Team Members) in order to ensure that immediate action is taken. Any employee making a report in good faith is immune from civil liability. LIFE, Inc. will not retaliate against an individual who lawfully reports a reasonable suspicion of a crime under Section 1150B of the Social Security Act. LIFE, Inc. will not discharge, demote, suspend, threaten, harass, or deny a promotion or employment-related benefit to an employee, or in any manner discriminate against an employee, or file a complaint or a report against a nurse or other employee with the appropriate state professional disciplinary agency because of lawful acts done by the nurse or employee. The identity of the individual who makes a report will not be disclosed without consent with exception to authorized persons of LIFE, Inc., state and/or federal agencies conducting an investigation, or when disclosure is legally compelled. For the purpose of clarity, the following descriptions/definitions should be referred to:
- 1) **Crime:**
Crime is defined by law of the applicable political subdivision where a long-term care facility is located. LIFE, Inc. will coordinate with law enforcement entities to determine what actions are considered crimes within their political subdivision.
- 2) **Physical Abuse:**
Physical abuse is any physical action that results in or could potentially result in physical injury to a consumer. Examples include but are not limited to: hitting, beating, pinching, kicking, harmful restraint, and use of a weapon or other instrument to inflict bodily harm.

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- 3) Sexual Abuse:
Sexual abuse is any sexual behavior imposed on a juvenile or non-consenting adult. This involves a range of activities, including but not limited to: the fondling of the genital area, oral sex, vaginal or anal penetration, exhibitionism, pornography, and suggestive behaviors or comments.
 - 4) Emotional Abuse:
Emotional abuse is expressing attitudes or behaviors toward a consumer that creates or can create psychological damage. Examples include but are not limited to: verbal threats, demeaning comments, profanity, and harsh/loud negative tones of voice.
 - 5) Neglect:
Neglect is defined as serious disregard for a consumer's supervision, care, or treatment. It is any action by an employee that results in harm/injury or could potentially result in harm/injury to a consumer.
 - The failure of a caregiver to provide the goods or services necessary to maintain the health or safety of a consumer.
 - The failure to provide goods and services necessary to avoid physical harm, mental anguish, or mental illness.
 - 6) Exploitation:
Exploitation is the fraudulent or otherwise illegal, unauthorized, or improper act or process of an individual, including caregiver or fiduciary, that uses the resources of a consumer for monetary or personal benefit, profit, or gain, or that results in depriving a consumer of rightful access to, or use of, benefits, resources, belongings, or assets.
 - 7) Self-Neglect:
Self-Neglect is an adult's inability, due to physical or mental impairment or diminished capacity, to perform essential self-care tasks including obtaining food, clothing, shelter, and medical care; obtaining goods and services necessary to maintain physical health, mental health, or general safety; or managing one's own financial affairs.
- b) It is unlawful for any person in the facility to:
- assist, advise or solicit a consumer to leave the facility without authorization by the facility or legally responsible person
 - transport or encourage a minor consumer or incompetent consumer of the facility into any place, structure, building, or area for the purpose of engaging or soliciting to engage in any act that would constitute a sexual offense
 - hide an individual who has left the facility without authorization to engage in or offer to engage in any act with a consumer of the facility that would constitute a sexual offense.
- c) All alleged incidents of rights' violations and crimes will be investigated and documented with appropriate corrective actions taken based on findings. Any employee who intentionally abuses a consumer or exploits a consumer's property is guilty of a Class 1 misdemeanor.

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- d) Upon receipt of reported allegations, it is the responsibility of designated staff (i.e., QP or Habilitation Coordinator) to visit the location of the alleged violation in order to initiate a preliminary investigation, ensure completion of an Accident/Incident Report {Refer to Consumer Incident Policy #1205}, and to conduct a “physical check” of the consumer as deemed appropriate. The safety of the consumer is paramount, and all efforts are to be made to ensure the consumer is not in immediate harm or danger of possible abuse/neglect. Suspension of the accused staff may be necessary pending the outcome of the investigation. The designated staff initiating the preliminary investigation is responsible for notifying the Director of ICF/IID or Director of Contract Services of the allegation and initial results. The QP will then contact the Director of Social Work to discuss the specific information regarding the allegation/situation. It will be the responsibility of the Director of Social Work to share pertinent details of the report with appropriate Corporate Team Members.
- e) If a preliminary investigation reveals sufficient information to suggest that an alleged rights’ violation may have occurred, a Formal Investigation/Inquiry will be initiated by the assigned QP. The QP is responsible for notifying the local Department of Social Services, local law enforcement, the consumer’s guardian/family, the Human Rights Committee, and submitting an initial NC IRIS Report online at <https://iris.dhhs.state.nc.us/> which will serve as the 24 Hour Health Care Personnel Registry Report. If the incident has resulted in serious bodily injury to the consumer, a report must be made within a 2-hour time frame and all local agencies notified as indicated above. NC IRIS is a web based electronic incident reporting system required for all Level II, Level III, and deaths involving consumers of MH/DD/SAS. The local Department of Social Services and local law enforcement will determine if their involvement is warranted as they will determine what actions are considered crimes in their political subdivision.
- f) The QP, Habilitation Coordinator, and/or other individuals as appointed will comprise the Investigative Team and shall have the authority to interview appropriate staff. In addition, team members will have the right to request written statements from staff using the Confidential Investigative Statement (Forms Manual 1201(a)). The team should also interview consumers in order to gather information pertinent to the investigation.
- g) Failure of an employee to cooperate during an investigation may be grounds for disciplinary action, up to and including termination from LIFE, Inc.
- h) Upon completion of the formal investigative process, it will be the responsibility of the QP to complete a written report utilizing the LIFE, Inc. Formal Inquiry Form in the Forms Manual (1201(b)). The QP is responsible for forwarding the completed form to the Director of Social Work who will ensure review and acknowledgement by the President of LIFE, Inc. or designee. The form will then be returned to the QP for filing with the other completed forms.
- i) A copy of the final written report will be shared with the Human Rights Committee by the QP at the next scheduled meeting. In addition, verbal information will be shared with Members of this committee in efforts to obtain their input and/or recommendations regarding rights’ issues involved in any particular case.

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- j) The responsible QP will edit and resubmit online the NC IRIS within 4 days of the initial submission with the details of the completed investigation, prevention recommendations, and action taken. This will serve as the required 5 Working Day Report for the NC Health Care Personnel Registry.
 - k) Based on findings during the alleged rights' violation investigation, appropriate disciplinary action will be taken, including possible termination, as specified in other policies approved and/or adapted by LIFE, Inc.
 - l) The Department of Social Services and/or the NC Health Care Personnel Registry may elect to conduct an outside investigation. It is expected that all LIFE, Inc. staff will fully cooperate with these agencies. Failure to do so will be grounds for disciplinary action, up to and including termination from LIFE, Inc.

PROMOTION OF CONSUMER WELL BEING AND ABUSE PREVENTION

The purpose of the following training module is to promote the health, safety, and well-being of all consumers of LIFE, Inc. Training is provided to all Direct Support Professional staff annually to ensure the provision of quality care and prevention of abuse, neglect, and mistreatment. Following this training, each employee will be required to pass a proficiency test.

Seven key components identified by the Centers for Medicaid and Medicare Services are used by LIFE, Inc. in a systematic approach to prevent abuse and neglect.

1. PREVENT

- A) It is the responsibility of LIFE, Inc. to ensure the rights of all consumers. This is accomplished through ongoing training programs for staff, advocacy for consumers, oversight, and specific committees to review compliance as well as effectiveness, (i.e., Human Rights Committee, Accident/Injury Report Review Committee).
- B) LIFE, Inc. is to allow and encourage individual consumers to exercise their rights as clients of the facility and as citizens of the United States. All staff are provided Consumer Rights training prior to working with the consumers. Through this training, staff are made aware of the individual consumer's rights; LIFE, Inc. policies regarding consumer rights; definitions of abuse and neglect; appropriate reporting procedures for rights violations; and potential consequences for abuse, neglect, or mistreatment of consumers.
- C) Consumers are encouraged to report and file complaints, but many are not able to do so for themselves. It is our responsibility as care givers and consumer advocates to speak for them.

2. SCREEN

Employees are screened by LIFE, Inc. prior to hire:

- A) Reference checks are obtained. (i.e., previous and/or current employers, character references)
- B) Criminal Record Checks are obtained. (local and state)
- C) North Carolina Health Care Registry contacted to ensure no substantiation of abuse, neglect, or mistreatment

3. IDENTIFY:

LIFE, Inc. maintains a proactive approach to identify events and occurrences that constitute or contribute to abuse, neglect, and mistreatment of consumers.

A) Accident/Injury Reports:

How to complete a report:

- 1. Review blank report and give details as to how to properly complete each section and who is responsible for each section.
- 2. Share correctly completed reports with the group as examples of how it should be done.

When to complete a report:

1. Reports should be completed as soon as possible following the occurrence of a consumer accident or discovery of a consumer injury.
2. The report is to be completed by the staff who witnessed the accident or discovered the injury.

What to report:

1. Reports are to be completed for all physical injuries requiring medical treatment.
2. A report is to be completed if a therapeutic hold is required. This report is to be attached to the physical restraint form that is completed for each use of a therapeutic hold.
3. A report is to be completed for all accidents that result in injury to the client or are significant enough that injury (although not present at the time of the accident) may be noted at a later time. For example, significant accidents/incidents that may cause bruising, swelling, or physical complications within the next few hours should be documented. Examples are significant falls, self-injurious behaviors, and aggression by another person.

*Accident/Injury Reports should not be completed for physical ailments that are not injuries such as skin rashes, stomach viruses, in-grown toe/finger nails, foot fungus, toileting accidents, etc.

Where to put the report

1. The staff person completing the report should file it in the Accident/Injury Report file in order for the management team to review it in a timely fashion, complete follow up, and make recommendations to prevent such from occurring again.

B. Review of Accident/Injury Reports:

- a) Review by local management (facility QP, Nurse, and Habilitation Coordinator). Need for immediate action/intervention, treatment, and formal inquiry is determined and ensured. Preventative measures are implemented.
- b) Review by Area Accident/Injury Report Committee. Patterns of repeat accident/injuries are identified. Ensures that immediate response occurred and was appropriate. Additional preventative measures are determined and implemented as warranted.
- c) Review by the Corporate Accident/Injury Report Committee. Ensures reports are being completed as per policy, immediate action and prevention procedures are used, and that local management as well as the Area Accident/Injury Report Committee is fulfilling their responsibilities.

4. TRAIN:

LIFE, Inc. provides training during orientation and on an ongoing basis to ensure staff understands required information regarding abuse and neglect. Employee competency is determined through the use of proficiency testing following initial and ongoing training for the promotion of consumer well-being and abuse prevention.

- A) Abuse: The willful infliction of injury, unreasonable confinement, intimidation, or punishment with resulting harm, pain, or mental anguish.

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- a) Physical: any physical action that results in physical injury. Examples may include kitting, kicking, spanking, pinching, unauthorized physical or chemical restraint, use of any instrument to inflict bodily pain, etc.
 - b) Verbal: any negative verbal communication that results in emotional pain. Examples may include threats, profanity, harsh or loud negative tones of voice, demeaning comments, etc.
 - c) Sexual: any sexual behavior imposed on a juvenile or non-consenting adult. Examples may include fondling of genital area, fondling of breasts, oral sex, vaginal or anal penetration, exposing of genitals/breasts, suggestive sexual behavior or comments, etc.
 - d) Psychological/emotional: any expression of attitudes or behavior that creates psychological or emotional damage. Examples may include mimicking a consumer's behavior or handicap, demeaning comments, making fun of/joking, ignoring, discussion of negative consumer concerns in front of peers, eating/drinking in front of consumers when same is not provided to the consumer.
 - e) Corporal punishment/discipline: spanking, unauthorized seclusion, restricting rights/privileges without appropriate approval, withholding meals and/or snacks, etc.
- B) Neglect: Failure to provide goods or services necessary to avoid physical harm, mental anguish, or mental illness.

*Specific examples of neglect that have occurred include: staff failure to implement procedures to prevent falls; staff not discovering injuries until 2 to 3 days later; failure to prevent/protect a consumer from a peer's aggression; staff failure to report alleged rights violations immediately to management staff; failure to ensure injuries of unknown origin were thoroughly investigated, failure to ensure alleged rights violations were thoroughly investigated; staff did not provide privacy during personal hygiene/dressing (left door open, did not make sure client closed the door, allowed another consumer in bedroom, did not knock before entering room, etc.); staff did not provide consumer with correct diet consistency and consumer could have choked (diet not pureed as ordered, food not cut into bite size pieces as ordered, staff did not prevent from overfilling mouth, staff did not slow down the eating pace, etc.); and failure to prevent the same injuries from occurring again.

- C) Injuries of Unknown Origin: Any injury found on a consumer without a known cause. Examples may include scratches, bruises, cuts, scrapes, etc. All staff must put forth effort to try to determine the cause of any unexplained injury to a consumer. Investigation and follow-up will occur by the QP, Nurse, and Habilitation Coordinator for any injuries for which origin cannot be determined.

5. PROTECT

- A) Prevent further potential abuse while investigation is occurring.
 - a) Suspension of employees.
 - b) Discharge/transfer of dangerous consumers.
 - c) Reassess consumer supervision needs.

- B) Promote proactive ways to protect.
 - a) Remain aware of consumer grouping to avoid consumer personality conflicts and confrontations with one another.
 - b) Stay alert and aware of environment to ensure absence of danger or harm. If you question what is occurring behind closed doors or in another area of the home, you are compelled to check on your co-worker(s) to ensure consumer safety.
 - c) Listen to client concerns/reports of potential mistreatment and report immediately.
 - d) Observe for verbal and non-verbal cues of pain and/or emotional duress.
 - e) Monitor co-worker's demeanor and attitude in order to intervene during stressful situations and prevent harm/mistreatment from occurring.
 - f) Ensure appropriate supervision and monitoring of consumers to prevent potential for injury or harm.
 - g) Monitor consumers for self-injurious behavior and prevent/redirect immediately.
 - h) Watch for consumers that target other consumers and provide supervision/intervention to prevent from occurring.
 - i) Repeat head counts throughout the day and especially when leaving on the van to prevent leaving consumers unattended or having a consumer to elope.
 - j) Provide safety checks in frequency according to specific need of consumer.

6. REPORT:

LIFE, Inc. employees are required by policy to report all injuries of unknown origin and any potential abuse, neglect, or mistreatment to the QP or manager on-call immediately. This includes suspected, witnessed, or rumored abuse, neglect, and mistreatment. If you feel the consumer is in danger, intervene first to ensure safety and then report immediately to the supervisor.

- A) Confidentiality: Reports are to be confidential and not discussed with other co-workers, persons in the community, etc.
- B) Statements: Statements will be obtained from persons deemed appropriate by the facility investigative team.
- C) Facility Reporting Process:
 - a) **What to report:** Injuries of unknown origin, any consumer rights' violations, any potential abuse, neglect, mistreatment.
 - b) **When to report:** You must report immediately. Failure to report is grounds for disciplinary action.
 - c) **Who to report to:** Direct Support Professionals are to report to the management staff on-call. The management will then report to the Director of Social Work.

7. INVESTIGATE AND RESPOND:

LIFE, Inc. investigates all consumer injuries of unknown origin and all allegations of consumer mistreatment, neglect, and/or abuse. Appropriate corrective action is given in accordance with applicable local, State and Federal law.

- A) Facility Investigation Process
- B) Response
 - a) Progressive Disciplinary Action:
 - 1) First written warning.
 - 2) Second written warning.
 - 3) Final written warning.
 - 4) Termination of employment.
 - b) Actions by outside agencies.
 - 1) Local Department of Social Services may substantiate abuse/neglect by the staff person and recommend criminal prosecution by the District Attorney.
 - 2) The North Carolina Health Care Personnel Registry maintains a list of all persons substantiated of abuse/neglect. Health Care agencies in North Carolina are legally obligated not to hire anyone who is listed on this registry for abuse/neglect.
 - 3) The Department of Health and Human Services may determine that the facility (LIFE, Inc.) is in violation of state and federal regulations for failing to protect the consumer and the facility could be fined from \$250.00 up to \$5000.00. Additionally, the facility will not be allowed to license a new facility or service for 6 to 60 months depending upon the number of violations.

SUMMARY OF KEY COMPONENTS AND REGULATORY CODES

The Centers for Medicaid and Medicare Services (CMS) recommends a regulatory cross reference to surveyors to address and cite incidents of abuse while assessing the provider's ability to detect and prevent the abuse and neglect. The specific tags (Federal Regulations) that address this process are:

Prevention:

- W127** Ensure that clients are not subjected to physical, verbal, sexual, or psychological abuse or punishment.
- W129** The facility must develop and implement written policies and procedures that prohibit mistreatment, neglect, or abuse of the client.
- W150** Facility staff must not use physical, verbal, sexual, or psychological abuse or punishment.

Screen:

- W152** The facility must prohibit the employment of individuals with a conviction or prior employment history of child or client abuse.

Train:

- W189** The facility must provide each employee with initial and continuing training that enables the employee to perform his or her duties effectively, efficiently, and competently.

Identify:

W153 The facility must ensure that all allegations of mistreatment, neglect or abuse, as well as injuries of unknown source, are reported immediately to the administrator or to other officials in accordance with State law through established procedures.

Protect:

W155 The facility must prevent further potential abuse while the investigation in is progress.

Report/Investigate:

W154 The facility must have evidence that all alleged violations are thoroughly investigated.

W156 The results of all investigations must be reported to the administrator or to other officials in accordance with State law within five working days of the incident.

Respond:

W157 If the alleged violation is verified, appropriate corrective action must be taken. (Note: Under the federal code of regulations, the guidelines for this tag states; “When the intentional action or inaction of a staff person has resulted in abuse, neglect or mistreatment which poses a serious and immediate threat to the individuals’ health and safety, termination of employment is the only acceptable corrective action.”)

**FOLLOWING THIS TRAINING MODULE EACH EMPLOYEE WILL BE
REQUIRED TO PASS A PROFICIENCY TEST**

CONSUMER INCIDENTS**1202**

Last Revision Date: May 21, 2018

Last Reviewed Date: February 20, 2023

Responsibility: Director of Social Work

POLICY:

It is the policy that all consumer accidents, injuries, use of restrictive interventions, medication errors, and deaths are reported immediately and investigated promptly with recommendations implemented to prevent future occurrences as need warrants,

REGULATORY REFERENCE:

LIFE, Inc. Company Policy

NC Rules Governing Categories A and B Providers

Section 1150B of the Social Security Act

FORMS MANUAL REFERENCE: 1202(a), 1202(b), 1202(c)**COMMENT:****1) ACCIDENT/INJURY REPORT PROCEDURES**

All employees must be in-serviced on the use of LIFE, Inc. Accident/Injury Reports upon beginning work with the consumers. This training consists of location of the reports, how to complete the report properly, and when to complete a report. LIFE, Inc. will also provide procedures for review of the reports, ensure follow-up, and implement recommendations to promote safety and prevent future occurrences,

- a) A LIFE, Inc. Accident/Injury Report is to be completed for all consumer injuries and accidents that cause or could cause an injury or harm to the consumer. Accidents involve occurrences of falls, self-injurious behavior (i.e., head banking, biting self, hitting self, etc.), aggression by another person (i.e., being hit, kicked, bit, etc.), and so forth that could cause injury. Injury may not be evident at the time the accident occurs, but a report is to be completed if the accident is severe enough that injury may be noted later (i.e., bruising, swelling, pain, etc.). Refer to Accident/Injury Report for Consumer.
- b) The Qualified Professional is responsible for reviewing all Accident/Injury Reports as soon as possible and initiating follow-up. Injuries of unknown origin or allegations of abuse, neglect, or mistreatment are to be reported to the Qualified Professional (Contract Services) or the on-call staff (ICF) immediately and an investigation initiated.
- c) The Qualified Professional must develop procedures to ensure their staff know where to place completed reports for review by management staff. There4 is not to be a lapse in time where it takes several days for a Qualified Professional to review the reports. During extended leaves of absence, the Qualified Professional II or the Regional Director must ensure the reports are reviewed and follow-up provided as warranted.

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- d) The Qualified Professional (Contract Services) and the Qualified Professional, Habilitation Coordinator, and Nurse (ICF and group home settings) must initiate follow-up on all Accident/Injury Reports to determine the most effective way to prevent reoccurrence of the accident and/or injury. The Accident/Injury Report must be signed by the appropriate staff, follow-up and recommendations documented on the report, and the name of the responsible person indicated on the form that will ensure the implementation of the recommendations/remedial procedures.
 - e) The Qualified Professional (Contract Services) and the Qualified Professional and Nurse (ICF) will maintain the completed Accident/Injury Reports for their assigned consumers. The reports are to be reviewed by the LIFE, Inc. Area Accident/Injury Report Committee on at least a quarterly basis. The committee will be comprised of the regional nurse(s), Qualified Professional I's, Qualified Professional II, Habilitation Coordinators, and Program Director/designee (Contract Services).
 - f) The Area Accident/Injury Report Committee will review the reports, follow-up findings, recommendations/remedial procedures and make any additional recommendations. Additional recommendations are to be relayed to the assigned Qualified Professional, who is responsible for ensuring they are implemented. Minutes of the meeting are to be taken and maintained in a notebook along with the reports. This notebook is to be kept in the group home for ICF and group home settings. The QP or designee for Contract Services will maintain the other reports. The Qualified Professional II or Program Director or designee must sign on the back of the report acknowledging review by the committee and the review date.
 - g) Following each Area Accident/Injury Report Committee meeting, the minutes of the meeting and the original Accident/Injury Reports are to be forwarded to the Program Specialist. Copies of the reports may be made and kept in the area and/or group home until the original reports are returned by the Corporate Representative.
 - h) The Quality Assurance and Improvement Committee will meet monthly to review the minutes, reports, follow-up findings, and recommendations. Any additional recommendations will be relayed to the area QP.
 - i) During the Quality Assurance and Improvement team meeting, a corporate representative will sign the back of the report, acknowledging the review and date of review. The original reports will be returned to their area for filing. The flow chart summarizing the process is included on page 231.

2) **LEVEL II AND III INCIDENT REPORTING REQUIREMENTS**

In accordance with NC Rules Governing Categories A and B Providers, LIFE, Inc. employees will follow the established procedures for responding to Level I, II or III incidents. Established procedures will also be followed for the completion and online submission of NC IRIS at <https://iris.dhhs.state.nc.us/>. NC IRIS is a web based electronic incident reporting system required for all Level II, Level III, and deaths involving consumers of MH/DD/SAS.

- a) LIFE, Inc. will respond to all incidents (Level I, II and III) by attending to the health and safety needs of the consumer, determining the cause of the incident, developing and

implementing corrective measures to ensure safety and prevent similar incidents, assigning a responsible person to ensure the implementation, and maintaining documentation that such occurred. Level I, II and III incidents are defined in the NC DHHS Incident and Death Response System Manual provided online by the NC Department of Health and Human Services.

- b) All Level II and III incidents will be reported to the area authority or county program within 72 hours of the incident if the incident does not involve abuse, neglect, mistreatment, a crime, self-neglect, exploitation, or emotional abuse. Reports will be made using the NC IRIS. However, if the incident requires notification to the NC Health Care Personnel Registry, an initial NC IRIS will have to be completed and submitted within 2 hours if the incident involves serious bodily injury or within 24 hours if no serious bodily injury. Refer to LIFE, Inc. Policy 1201(#7) Consumer Rights Violations.
 - c) The Qualified Professional is responsible for the completion and submission of the NC IRIS. The Qualified Professional should attach a copy of the final NC IRIS to the LIFE, Inc. Accident/Injury Report. The Qualified Professional is also required to send a copy of the NC IRIS to the LIFE, Inc. Director of ICF Services for incidents involving ICF consumers and to the LIFE, Inc. Director of Contract Services for incidents involving Contract Service consumers.
 - d) The Qualified Professional will edit and resubmit the NC IRIS, if warranted, to explain any missing or incomplete information on the initial NC IRIS. Information previously unavailable will be provided at that time as well as notification made of any information that may be erroneous, misleading, or unreliable.
 - e) The Qualified Professional will submit to the area authority or county program, upon request, any information obtained regarding the incident, including hospital records, reports to other authorities, and LIFE, Inc.'s response to the incident.
 - f) The Qualified Professional will also document the occurrence of the accident/incident in the consumer's record. The documentation is to be made in the T-Log for ICF and in the service note for Contract Services. The documentation is to include information related to the incident, actions taken on behalf of the consumer, and consumer's condition following the incident.
- 3) **RESTRICTIVE INTERVENTION DETAILS REPORT AND REPORTING REQUIREMENTS**

As per NC Administrative Code, "restrictive intervention" means an intervention procedure which presents a risk of mental or physical harm to the client and, therefore, requires additional safeguards. Such interventions include emergency or planned use of seclusion, physical restraint (including the use of protective devices for the purpose or with the intent of controlling unacceptable behavior), isolation time-out, and any combination thereof. Specified therapeutic treatment methods will only be employed when clinically or medically indicated: a. Planned non-attention to specific undesirable behaviors when those behaviors are health threatening; b. contingent deprivation of any basic necessity; c. other professionally acceptable behavior modification procedures that are not prohibited by rule APSM 95-2 27E .0101.

It should be noted that LIFE, Inc. does not use seclusion or isolation time-out. LIFE, Inc. supports using the least restrictive, most appropriate, and most effective positive treatment modalities. Use of restrictive treatment methods will only be used when clinically or medically indicated for therapeutic treatment and after less restrictive and more positive methods have proven unsuccessful and will be used in a manner that does not inflict harm or pain. The restrictive intervention is to be discontinued immediately when a risk to the consumer's health or safety is noted or as soon as the consumer demonstrates behavioral control. The possible use of restrictive intervention in an emergency situation is explained to the consumer and family/guardian at admission during the review of the Consumer Rights policy 1201(7) and Consumer Incident Policy 1202. Reasons for the intervention must be explained to the treatment team, consumer or guardian and the LIFE, Inc. Human Rights Committee and approval obtained from all prior to implementation. The Human Rights Committee must review the Plan. Approval, disapproval, or abstention by the Human Rights Committee will be based on a majority vote. If at any time the treatment team, consumer or guardian, or Human Rights Committee does not approve the plan it will not be implemented or if in current use will be stopped and the plan discontinued.

LIFE, Inc. employees will only use the degree of restriction necessary to repel or secure a violent and aggressive consumer with the highest degree of restriction allowed by policy being the use of state approved restrictive intervention techniques.

Restrictive intervention may be used in an emergency situation when the intervention is necessary to prevent abuse, injury (to self or others), or property damage that poses imminent risk. In an emergency situation, a certified staff may use emergency intervention for up to 3 minutes without additional approval from a QP. Emergency restrictive intervention lasting longer than 3 minutes must be authorized by a QP trained and privileged to authorize the intervention. The QP can write a continuation authorization after the initiation of the intervention. A verbal authorization can be given for up to 3 hours and then the written authorization must be in place. When an order is renewed, up to 24 hours, the order is to be signed by the designated staff. Written orders are valid only for 4 hours for adults, 2 hours for children ages 9 to 17 years of age, and 1 hour for children under 9 years of age. The original order is renewable only within these limits or to a total of 24 hours. Restrictive intervention is discontinued immediately once a consumer regains control or at the first indication of imminent danger to health or safety of the consumer.

The use of restrictive intervention will be used only as a last resort and implemented only by trained staff. LIFE, Inc. supports and teaches The MANDT System. All employees who provide direct care services to consumers shall be certified in The MANDT System Rational (R) and Technical (T) interventions. A written and physical test must be passed by the employee initially and annually in order to access competency and be certified in the use of MANDT. The LIFE, Inc. Human Rights Committee is informed of the use of any restrictive intervention and approval obtained prior to use except in emergency situations. Restrictive intervention will not be used as punishment, coercion, retaliation by staff, or for staff convenience. It should be noted that LIFE, Inc. does not use seclusion, time out isolation, or use of restrictive intervention in excess of 24 hours;

All uses of restrictive intervention must be documented by the employee administering the restrictive intervention. The employee administering the restrictive intervention is also responsible for checking the consumer's physical and psychological wellbeing to determine any potential consequences. The employee utilizing the restrictive intervention will be currently certified in the use of MANDT and CPR. Employees who are not certified in MANDT and CPR are not allowed to utilize restrictive interventions. Continuous monitoring and assessment will occur by an MANDT and CPR certified employee throughout the duration of the restrictive intervention and

for 30 minutes following the use of the restrictive intervention. The QP will meet with the employee utilizing the intervention and the consumer as soon as possible following the use of restrictive intervention.

- a) Documentation is to be on the LIFE, Inc. Restrictive Intervention Report (included in Forms Manual 1202(a)). A LIFE, Inc. Accident/Injury Report is to be completed also. The LIFE, Inc. Restrictive Intervention Report is to be attached to the Accident/Injury Report and maintained by the QP in the A/I notebook as a restrictive intervention log. A copy of the Restrictive Intervention report will also be maintained in the consumer's medical record. The form will document the consumer's name, QP's name, physical and psychological wellbeing of the consumer and any negative effects; frequency, intensity, and duration of the behavior leading to the restrictive intervention; events contributing to the onset of the behavior; less restrictive and positive intervention; events contributing to the onset of the behavior; less restrictive and positive intervention techniques utilized and their lack of effectiveness; rationale for use of the restrictive intervention; description of the restrictive intervention, date, time and duration of the restrictive intervention; debriefing description and planning with team, consumer (on their cognitive level), and legally responsible person to determine ways to reduce future occurrence of restrictive intervention use; signature of the employee who utilized the restrictive intervention and the employee who authorized the use of the intervention.
- b) The employee is required to provide the completed forms to the Qualified Professional who will determine if the restrictive intervention was appropriately used and that the forms are completed correctly. The QP is responsible for the review of the use of restrictive intervention for assigned consumers.
- c) The QP is to ensure the completed forms are maintained in accordance with LIFE, Inc. Policies and Procedures. The QP is also responsible for ensuring notification when the restrictive intervention is utilized. The QP is also required to notify within 24 hours the treatment team, the governing body designee which is the LIFE, Inc. Corporate Program Specialist, the legally responsible person, and persons identified by the consumer. The QP will summarize the use of the restrictive techniques used on a monthly basis for each assigned consumer and review progress with the treatment team monthly. This information is to be documented in the monthly behavior progress note for ICF consumers and in the service note for Contract Service consumers. The monthly behavior progress note, and the service note are contained in the consumer's record. The entry will include description and frequency of the debriefing with the consumer. The debriefing will be provided on the cognitive level of the consumer. On a Quarterly basis, the QP will present the summarization of the use of restrictive interventions at the Quarterly Psychiatric Clinic, the Quarterly LIFE, Inc. Human Rights Committee Meeting, and provide the summarization to the LIFE, Inc. Quality Insurance and Improvement Team for review. The LIFE, Inc. Human Rights Committee, Quarterly Psychiatric Clinic, and the Quality Insurance and Improvement Team will monitor for patterns of any unusual or unwarranted use of restrictive interventions and investigation will be initiated if such is detected. Evaluation of the Behavior Intervention Plan will occur at least every two months by the responsible person who approved the Behavior Intervention Plan. All Behavior Intervention Plans are approved by the Human Rights Committee and guardian every 6 months.

- d) The only time the use of a restrictive intervention needs to be reported as a Level II or Level III incident is when the restrictive intervention is not included in an approved Behavior Intervention Plan (emergency use); the restrictive intervention is administered improperly; or if the restrictive intervention (even if used appropriately) results in death, injury, discomfort, or complaint. Improper administration includes restrictive interventions administered without proper authorization, by staff without proper training, or for longer than the authorized time. Appropriate administration of a Restrictive Intervention included in an approved Behavior Intervention Plan is a Level I incident.
- e) When a Level II or III incident occurs involving the use of restrictive intervention, a NC IRIS must be completed and submitted online. A copy of the NC IRIS is to be attached to the completed LIFE, Inc. Accident/Injury Report and the LIFE, Inc. Restrictive Intervention Report. A copy of the NC IRIS is to be sent to the Director of ICF/IDD Services for ICF consumers or to the Director of Contract Services for Contract Service consumers.

4) **ADDITIONAL REQUIREMENTS FOR LEVEL III INCIDENT REPORTS**

In accordance with NC Rules Governing Categories A and B Providers, LIFE, Inc. employees will ensure implementation of the additional procedures for responding to Level III incidents.

- a) Upon being informed a Level III incident has occurred, the Qualified Professional will immediately secure the involved consumer's medical record by obtaining the record, make a photocopy of any related information, certify the copy's completeness, and transfer the copy to the Peer Review Team.
- b) The Qualified Professional will also immediately submit an initial NC IRIS online. The Qualified Professional will notify the consumer's legal guardian, and any other authorities required by law (refer to LIFE, Inc. Consumer Rights Policy for the procedures for investigation of consumer rights violations).
- c) The LIFE, Inc. Area Accident/Injury Report Committee will serve as the Peer Review Team. The Qualified Professional II will serve as chairperson for Level III incidents involving an ICF/IDD consumer and the Regional Director will serve as chairperson for Level III incidents involving a Contract Services consumer.
- d) The Peer Review Team will convene a meeting within 24 hours of the Level III incident. The Peer Review Team will at that time review a copy of the consumer record, gather information as needed, and issue a report concerning the incident to the Director of Social Work. The QP will edit and resubmit the NC IRIS with results of the Peer Team Review. The Director of Social Work will ensure appropriate corporate staff are informed.

5. **MEDICATION ERRORS**

- a) Medication errors must be reported immediately by the employee who discovers the error. The employee is to report the error to the Qualified Professional and the area Nurse. The Qualified Professional, Nurse, and attending Physician will determine if the medication error meets criteria for a Level I, II, or III incident. Medication errors that meet criteria for a Level II or III incident will require the Qualified Professional to follow

the requirements for completing and submitting a NC IRIS. A copy of the NC IRIS is to be attached to the LIFE, Inc. Medication Error Report.

- b) The employee responsible for the medication error must complete a LIFE, Inc. Medication Error Report (refer to LIFE, Inc. Medication Error Report in Forms Manual 1202(b)). The Qualified Professional and/or area Nurse should provide the employee assistance in completing the Report correctly.
- c) The area Nurse will complete the section of the form required to be completed by the Nurse. The Nurse will ensure the signatures of the physician and pharmacist are obtained for the form acknowledging they are aware of the error. The Nurse will then provide the form to the Qualified Professional for signature. The Qualified Professional will make a copy of the LIFE, Inc. Medication Error Report form to be used in informing the LIFE, Inc. Human Rights Committee members at the next scheduled Human Rights Committee meeting.
- d) The original completed LIFE, Inc. Medication Error Form is to be maintained in a file in the group home for ICF/IID and DDA group home consumers.

FLOW CHART SUMMARIZING ACCIDENT/INJURY REPORT PROCEDURES

Consumer
Accident/Injury Occurs

Employee with
Consumer completes
Accident/Injury Report

Report is given to
the Qualified Professional

Qualified Professional
Reviews and ensures
Follow-up and implementation of recommendations

Program Manager (CS)/ QP II (ICF)
Will ensure the QP implements
the recommendations

Report is reviewed by
Area Accident/Injury Report Committee

Qualified Professional ensures
Implementation of any
Additional recommendations

Report is forwarded to Corporate
Program Specialist by the
QP II and/or Regional Director/designee

Report is reviewed by the
Quality Assurance and Improvement Team

Program Manager (CS)/QP II (ICF) will
Ensure implementation of any
Additional recommendations

Report is returned to appropriate area
And filed in the home for group home settings
And area office for other report

HOUSE RULES**1203**

Effective: October 2013
Last Revision Date: October 2013
Last Reviewed Date: February 20, 2023
Responsibility: Director of Social Work

POLICY:

LIFE, Inc. will provide house rules to consumers in efforts to promote the growth, development, and independence of all individuals.

REGULATORY REFERENCE: W268, W269, W270, W271, W272, W273

COMMENT:

- 1) Consumers will be provided opportunities to make choices regarding various aspects of their daily lives and/or routine with emphasis on self-determination and self-management to the fullest extent possible.
- 2) Consumers will be given the opportunity to participate in planning recreational and/or leisure activities within the home and community.
- 3) Consumers will be given the opportunity to participate in religious worship of their choice.
- 4) To the extent possible, clients will have the opportunity to take part in discussions to review, develop, and/or amend house rules, policies and procedures as deemed appropriate.
- 5) A copy of established “house rules” will be made available to all individuals residing in a LIFE, Inc. group home setting. This information will be provided in writing upon acceptance/adoption of such rules and as warranted thereafter as revisions and/or modifications occur based on consensus of the group and acceptance of LIFE, Inc.
- 6) A copy of house rules, regulations, rights, and other pertinent information will be shared with all staff, parents of minor children, Legal Guardians, as well as, Representatives from community programs (i.e., DSS, MCO) as deemed appropriate.
- 7) Consumers will not discipline other clients unless procedures are adapted and approved by LIFE, Inc. to allow for some form/degree of self-government within the group home setting.
- 8) Consumers will respect the rights of other consumers at all times. As deemed appropriate, counseling should be provided to promote understanding along these lines.
- 9) Consumers will treat peers with dignity and respect at all times with counseling provided to enhance abilities and/or understanding of such concepts to the extent possible.
- 10) Consumers will recognize that others have a right to privacy.

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- 11) Consumers will respect the property belonging to others and/or to LIFE, Inc.
 - 12) Consumers can smoke in designated areas as outlined in policies approved by LIFE, Inc.
 - 13) Consumers who would like to have a pet must make a request to the President of LIFE, Inc. Approval for the request will be based upon arrangements for expenses associated with the pet; whether other consumers in the facility have allergies or phobias specific to the requested pet; and upon determination that sanitation regulations will not be violated.

INDIVIDUAL HOME MEAL OUTINGS**1204**

Effective: January 2019

Last Revision Date: October 24, 2022

Last Reviewed Date: October 24, 2022

Responsibility: Director ICF and Director of Contract Services

POLICY:

LIFE, Inc. will provide two meal outings per month for the individuals of each LIFE. Inc. group home.

COMMENT:

- 1) Two meal outings must be scheduled in advanced and approved by the QP of the home. If there is a special situation that would cause more than two outings in a month, the QP must get prior approval from the Director of ICF or the Director of Contract Services.
- 2) Meal outings are expected to be in the community and should not be takeout.
- 3) Outing allowances are as follows:
 - a. One outing will consist of a meal not to exceed **\$9.00** per meal including meal, drink, tax, and tip (these outings should be ‘fast food’ type restaurants).
 - b. One outing during the months of **January, March, May, July, September, and November** will consist of a meal not to exceed **\$16.00** per meal including meal, drink, tax, and tip.
 - c. One outing during the months of **February, April, June, August, October, and December** will consist of a meal not to exceed **\$20.00** per meal including meal, drink, tax, and tip.
 - d. Group homes may do ‘consumer and staff’ funded outings on a case by case basis. These outings will be paid for by consumer’s funds. Employee’s may choose to purchase food as well, but should be comparable to what the consumers are ordering (can’t order steaks and dessert if consumers are just getting a hamburger). These outings will NOT be reimbursed by the company and should be approved by the QP and put on the activity calendar.

Outings on the activity calendar should list the restaurant, and the type of meal outing it is (a, b, c, or d).

Outing	January	February	March	April	May	June	July	August	September	October	November	December
1	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00	\$9.00
2	\$16.00	\$20.00	\$16.00	\$20.00	\$16.00	\$20.00	\$16.00	\$20.00	\$16.00	\$20.00	\$16.00	\$20.00

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- 4) The home's assigned Direct Support Professionals and one manager's meal will be covered under this policy. Meal allowance amounts outlined in this policy will be enforced as well. Employees must eat at the same restaurant as the consumers.
 - 5) If a consumer or employees goes over the allowed amount, they must pay for the difference themselves at the restaurant or reimburse the company. Employees on the outing are accountable to this policy if there is any issue with a consumer's meal price.
 - 6) Money allowed for one meal cannot be used for another meal.
 - a. During the \$16.00 outing, if one meal only cost \$13.00 does not mean another persons can cost \$19.00. The person ordering the \$19.00 meal will be required to reimburse the company \$3.00.
 - b. If all meals on a \$16.00 outing only came up to 14 dollars does not mean they can add \$2.00 to the \$9.00 outing.

ACCESSIBILITY PLAN**1205**

Effective: January 2019

Last Revision Date: February 2021

Last Reviewed Date: February 20, 2023

Responsibility: Director ICF and Director of Contract Services

POLICY:

LIFE, INC. is committed to promoting accessibility and the removal of barriers for individuals served, families, personnel, and other stakeholders. An Accessibility Plan will be reviewed annually and be based on this policy.

COMMENT:

1. LIFE, INC. has a thorough knowledge of ways to promote accessibility and remove barriers. It is the company's belief that the degree to which individuals served get their needs met, is directly related to the access they have to resources and to those who have the means to control resources.
2. The ability of individuals served to get their health care (physical and behavioral) needs met is dependent on those who manage and/or control service delivery.
3. LIFE, INC. supports the expansion of access of services within a person-centered approach. The company strives to promote the voices of individuals who traditionally do not have a great deal of power to influence how resources will be used in providing access to health care.
4. LIFE, INC. utilizes these standards to support personnel accessibility.
5. The basic areas of access that LIFE, INC. focuses on are:
 - a. Architecture (the physical layout of the facility)
 - b. Environment (the "look and feel" of our facilities)
 - c. Attitudinal (the degree that written and verbal communication reflects positive and supporting language and service delivery approaches.
 - d. Transportation (availability of transportation of individuals served) this would also include evaluation of the location of the facility and ease of access for personnel.
 - e. Community Integration (the level of access, and participation in community-based services, organizations, and supportive environments by the individuals served., LIFE, INC. is committed to ensuring access to community supports, environments, services and being a part of the community in which the individuals served live.
 - f. Financial barriers- this would include insufficient funding for services/supports. LIFE, INC. is an advocate at the legislative level for increased funding in order to support the needs of the individuals served.
 - g. Communication Barriers: Materials should be provided in a format that is understood by the individuals served.
 - h. Technology: LIFE, INC. continuously assesses the utilization of up-to-date technology in order for service delivery to be more effective and efficient.

6. LIFE, INC. has a written accessibility plan that is reviewed annually by the Corporate Management Team. On a monthly basis, all accessibility issues which have been identified through inspections, safety committee walk throughs, etc. are reviewed by the Quality Assurance and Improvement Team.
7. A written status report will be developed annually by the Safety Officer. This plan will communicate the results of the Corporate Management Team's review of the plan. This will ensure the company remains actively engaged in the accessibility planning process.

PERSONAL TRANSPORTATION OF INDIVIDUALS SERVED**1206**

Effective: October 24, 2022
Last Revision Date: October 24, 2022
Last Reviewed Date: October 24, 2022
Responsibility: Executive Vice President

REGULATORY REFERENCE:

LIFE, Inc. Company Policy
NC Rules Governing Categories A and B Providers
Tag Numbers: W104, W136, W147

POLICY:

Transportation services will be provided for individuals of LIFE, Inc. for medical services, day program/workshop services, employment services, recreational/community activities, personal care, and events authorized by the President or Executive Vice President of LIFE, Inc.

COMMENT:

- 1) LIFE, Inc. provides transportation for the individuals served in its group homes to ensure the provision of active treatment as well as health and safety needs. Transportation is available for:
 - a) health appointments including but not limited to doctors, dentists, medical specialists, therapists, and counselors,
 - b) personal care services such as haircuts and personal shopping,
 - c) religious worship of choice,
 - d) outings to restaurants, recreational events, and community activities,
 - e) Adult Vocational Programs, Adult Day Programs, Sheltered Workshops, educational programs, and employment.
 - f) any events authorized by the President or Executive Vice President of LIFE, Inc.
- 2) Individuals will be given the opportunity to participate in planning recreational and/or leisure activities within the community based on their interests and choices.
- 3) Individuals will not be required to attend activities they are not interested in.
- 4) LIFE, Inc. will assist and encourage the individuals to communicate with their families or legal guardians in arranging therapeutic leave, away visits from the group home, and/or vacations.
- 5) When therapeutic leave, away visits or a vacation is scheduled by an individual and family/guardian, LIFE, Inc. will ensure necessary preparation is completed to facilitate the departure. Necessary preparation includes:
 - a) packing of appropriate clothing,
 - b) provision of medication or medical supplies sufficient for length of time away,
 - c) provision of any special instructions for health and safety needs,

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- d) scheduling of the individual to be present at the group home for pick up by the family/guardian as requested,
 - e) arranging for staff to be present at the group home for the individual's scheduled time of return by family/guardian.
- 6) LIFE, Inc. will not sponsor or allow an individual to take a trip, visit, or vacation that knowingly could jeopardize their safety or health without consultation with family/legal guardian and/or the Interdisciplinary Team.
- 7) Transportation by LIFE, Inc. for visits with family/guardian, within the local community (radius of 30 miles) may be requested. However, the QP of the group home will have the discretion to deny requests based on time, scheduled activities, previously planned appointments for other individuals, etc.
- 8) If assistance by LIFE, Inc. is needed for travel outside the 30 mile radius, the family or guardian should cover the expenses for the travel. These expenses included:
- a. Direct Care hourly rate (the time it takes staff to take the individual to the pickup location and to get back).
 - b. Mileage for fuel.
- 9) Assistance will be provided to the family/guardian and/or individual by LIFE, Inc. to schedule public transportation, if needed. LIFE, Inc. will promote, as appropriate with the individual, the acquisition of skills necessary to access community transportation resources.