



Catholic Charities of Louisville, Inc.

Policies and Procedures Manual

November 2018

This manual is complementary to the Archdiocese of Louisville Personnel Policies and Procedures Manual for Agencies, Parishes, and Schools (revised July 2017).

Catholic Charities of Louisville, Inc. adheres to all of the policies and procedures set forth by the Archdiocese of Louisville. This document does not contain all, but frequently referenced Archdiocesan policies and provides supplemental information which is specific to the agency.

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I. Agency Information

A. Introductory Statement from CEO

Staff:

Catholic Charities' mission centers around serving some of the most marginalized members of our community. The policies and procedures contained in this manual have been established to direct our agency in performing that work throughout the Archdiocese of Louisville and beyond.

None of our clients will receive a level of service that surpasses our employees' own experience with the agency. The purpose of these policies and procedures is to create a consistent environment which will provide all of our staff guidance in their work. I ask that you please read and become familiar with the contents of this manual and seek clarification from your supervisor if something appears unclear.

Together, we can continue to welcome, strengthen, and empower our clients and community partners, and each other as well.

-Lisa DeJaco Crutcher

B. Mission Statement

Catholic Charities of Louisville, as an apostolate of the Archdiocese of Louisville and a member of Catholic Charities USA, provides services for people in need, advocates for justice in social structures, and call the entire church and others of goodwill to do the same.

C. Work Environment

1. Catholic Identity

While it is not a requirement for a staff member to be Catholic to be employed by the agency, Catholic Charities of Louisville's mission is rooted in the Social Teachings of the Church and based on the recognition of the inherent dignity in all people. All staff must respect these teachings as they carry out the work of the agency. *For additional information, please refer to page 3, Christian Witness, in the Archdiocese of Louisville Personnel Policies and Procedures for Agencies, Parishes, and Schools.*

Information regarding Catholic Identity will be provided at New Employee Orientations. If any employee has a questions regarding any of these expectations, they should consult their supervisor or the Human Resource Manager.

a) Catholic Social Teaching

There are seven principles of Catholic Social Teaching that guide the work of the agency:

- Life and Dignity of the Human Person
- Call to Family, Community, and Participation
- Rights and Responsibilities
- Option for the Poor and Vulnerable

- The Dignity of Work and the Rights of Workers
- Solidarity
- Care for Creation

2. Ethical Standards

To direct how we perform our work, the agency adheres to the Catholic Charities USA Code of Ethics.

Further information about Catholic Social Teaching and the CCUSA Code of Ethics and can be found in the employee resource section of the agency’s website: <https://cclou.org/employee>

II. Personnel

This section highlights some Archdiocesan policies while containing agency specific information. Ensure you are familiar with the Archdiocese of Louisville Personnel Policies and Procedures Manual for Agencies, Parishes, and Schools for items not listed here. If you have any questions about Personnel policies and procedures, consult with the Human Resources Manager or your supervisor.

A. Employment in General

1. Equal Employment Opportunity / “At Will” Employment

Catholic Charities of Louisville is committed to make a positive effort to recruit, hire, and retain individuals in order to achieve a work force profile reflecting our labor market. We fully support and practice the principle of Equal Employment Opportunity. It is our policy to recruit, hire, train, promote, demote, terminate, and pay employees without regard to race, color, religion, handicap or disability, national origin, gender, age, ancestry, citizenship, marital or veteran status or any other classification protected by law and/or ordinance and to ensure that all employees are treated equally in all other aspects of human resources practices and policies. However, there are job assignments within Catholic Charities where religious background and education are required qualifications for the job.

Catholic Charities is an “at will” employer and this manual is neither a contract of employment nor a legal document, either expressed or implied, to continue to employ you at Catholic Charities. Nor does it guarantee any fixed terms and conditions of your employment. Your employment is not for any specific time period and may be terminated “at will”, with or without cause and without prior notice, by Catholic Charities, or you may resign for any reason at any time.

2. Employee Type and Status

The agency generally has two (2) types of employees based on the number of hours worked:

Regular Full-time Employees are persons who are employed for an indefinite period of time and are expected to work a minimum of 30 hours per week during the term of employment.

Regular Part-time Employees are persons who are employed for an indefinite period of time and who work less than 30 hours per week.

According to the Fair Labor Standards Act, administered by the U.S. Department of Labor, there are two status categories:

Non-Exempt employees are generally hourly employees and subject to the minimum wage and overtime provisions of the Fair Labor Standards Act.

Exempt employees are generally salaried employees and not subject to the minimum wage and overtime provisions of the Fair Labor Standards Act.

The status of an employee is based on the position, responsibilities, and type of work performed as established by the Fair Labor Standards Act. *For more information and rules for working with various statuses and types of employees, see page 3 of the Archdiocese of Louisville Personnel Policies and Procedures Manual for Agencies, Parishes, and Schools.*

3. Employee Conduct and Responsibilities

To ensure orderly operations and to provide the best possible work environment, Catholic Charities employees will conduct themselves in a manner which is respectful to all staff, clients, volunteers, and members of the community. Similarly, employee actions will protect the interests and safety of the aforementioned groups and the organization. If you have any questions about conduct or your work environment, please contact your supervisor or Human Resources.

a) Confidential Information

The protection of confidential business information is vital to the interests and the success of Catholic Charities. Such confidential information includes, but is not limited to, the following examples:

- client data
- employee data
- donor data
- compensation data
- computer processes, programs, and codes
- financial information
- employee and client medical records
- volunteer data

Employees and volunteers are required to sign both a general confidentiality agreement and a client confidentiality agreement as a condition of employment or of volunteer work at the agency.

b) Conflict of Commitment

By accepting a full-time position, staff members agree that their primary professional responsibility is to the Catholic Charities and that they shall devote their time and energy

primarily to the performance of their agency duties. At the same time, Catholic Charities recognizes that participation of staff members in outside professional activities may often serve the mission of the organization. Professional consulting, leadership in professional societies, and various forms of public service not only promote the professional development of the staff, but also expose to others the work of the agency.

Accordingly, a staff member may engage in non-agency employment, consulting, or professional practice insofar as such activity does not impede, diminish, or conflict with the staff member's responsibilities to Catholic Charities. Outside consulting or employment should not occur during normal business hours.

c) Conflict of Interest

A staff member must not engage in any activity that would lead to benefit from a personal or business relationship with an active client, donor, or volunteer. If it happens that a staff member has a business or if a family member owns a business the nature of which is to serve walk-in customers (i.e. a store open to the public), the staff member must not solicit or advertise its services to an active client, donor, or volunteer. An active client is a person whose case is still open and to whom services are still being provided.

Staff shall avoid personal relationships with active clients.

d) Harassment

Harassment, including sexual harassment, will not be tolerated. This behavior not only creates an unhealthy work environment but also does not represent the mission and values of the agency. *Please refer to page 19 of the Archdiocese of Louisville Personnel Policies and Procedures Manual for Agencies, Parishes, and Schools for more information.*

e) Attendance and Punctuality

Catholic Charities expects all employees to be reliable and punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on the agency. In the rare instance when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their supervisor as soon as possible in advance of the anticipated tardiness or absence. Poor attendance or excessive tardiness may lead to disciplinary action up to and including termination of employment.

f) Dress and Personal Appearance

Catholic Charities staff represent the agency and the Archdiocese of Louisville. It is very important that you dress appropriately and positively reflect the values of Catholic Charities and of the Archdiocese of Louisville.

Business Casual is considered acceptable dress for the office, however, staff must be mindful of any internal or external engagements which may require more formal attire.

For our agency's purposes, Business Casual includes:

- Dress, business, or khaki pants
- Short or long sleeve shirts with collars
- Short or long sleeve blouses or tops, dresses, skirts, or pant suits
- Sleeveless blouses or tops and dresses are acceptable
- Jeans are acceptable based on work being performed, but must not be faded or torn
- Tennis shoes should be in good shape without excessive wear

Not acceptable dress for the office:

- tank tops, halter tops, tube tops or tube/spandex dress
- revealing attire
- torn or ripped clothing
- flip flops or sports sandals
- sweat pants, yoga pants, exercise or athleisure wear
- inappropriate or offensive messages
- shorts
- hats or other head coverings worn inside building
 - *Head coverings for religious or cultural practices are acceptable*

Exceptions to these guidelines include truck drivers and maintenance staff who may wear shorts when it is warm or hats as they are outside and exposed to the elements.

If you have questions or concerns about any of the following guidelines, please discuss with your immediate supervisor or the director of your department.

Jewelry/Piercings

Jewelry should be appropriate for the work place and not cause a distraction. Large pieces or excessive amounts of jewelry should be avoided. Earrings are acceptable, but unusual piercings should be removed during work hours.

Tattoos

If possible, tattoos should be covered during work hours.

Dress Code, Jewelry/Piercings, and Tattoos Violations

A staff person who arrives at work in violation of any of the above guidelines may receive a verbal warning or will be sent home to change depending upon the gravity of the violation. Time away from the office will not be considered work time.

g) Use of Personal Mobile Devices

Employees should refrain from personal calls and emails, personal text messages, instant messages, and other electronic social media and means of electronic communications during work time. Employees should limit the use of handheld devices for personal use during working hours and ensure that friends and family members are aware of this policy. Meal and break periods are appropriate times to take care of personal matters. Flexibility will be provided in

circumstances demanding immediate attention. The employer is not liable for the loss of personal handheld devices brought into the workplace.

For business use of personal cell phones, please refer to section V. D. (2). Cell Phones of this manual.

h) Other Personnel Policies

The following policies are addressed in the Archdiocese of Louisville Personnel Policies and Procedures Manual for Agencies, Parishes, and Schools beginning on page 18:

- *Employment of Relatives*
- *Employment of Minors*
- *Child Abuse*
- *References for Current/Former Employees*
- *Political Campaign Activities*
- *Civic Duty*
- *Outside Employment*
- *Firearms*
- *Substance Abuse*
- *Reporting Criminal Activity*
- *Whistleblower*

4. Job Descriptions

Each job description consists of the job title, salary grade, department, job summary, essential duties, and required education and experience. See Appendix A for a sample job description.

The Program Directors in consultation with the Human Resources Manager will prepare job descriptions when new positions are created or changed significantly. Existing job descriptions are reviewed and revised annually. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. All employees are expected to help ensure that their job descriptions are accurate, reflecting the work being done.

Job descriptions do not necessarily itemize every task or duty that might be assigned. Additional responsibilities may be assigned as necessary.

5. Hiring Procedures

a) Job Postings

In general, notices of all regular, full-time and part-time job openings are posted for internal and external candidates. Catholic Charities reserves the right to withhold posting a particular opening.

Prior to being posted, vacant positions must be reviewed and approved by the Department Director and the Director of Finance. The approved positions are forwarded to the Human Resources Manager for posting.

Posted positions will remain on CCL's website for a minimum of five days.

b) Employment Application

Catholic Charities relies upon the accuracy of information contained in the employment application and resume as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in the exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

c) Interviews and Job Offers

(1) Interviews

Based on the selected criteria, applicant submissions will be forwarded to the program / department manager. Once the program / department manager has selected a slate of candidates for the position, the Human Resources Manager will schedule interviews. Together, the hiring manager and Human Resource Manager will develop agency and job specific questions. The Human Resources Manager and the hiring manager will conduct the interview along with any other staff that the hiring manager may deem beneficial to the process.

(2) Job Offers

The Human Resources Manager will make the job offer to the selected candidate.

If an offer is accepted, a pre-employment packet is forwarded to the candidate by the Human Resources Manager. The Human Resources Manager will follow the Human Resources New-Hire Checklist (Appendix A) prior to the candidate's first day.

d) Background Checks

All employees and volunteers of Catholic Charities will undergo a criminal background check prior to starting work. Credit checks may also be performed on individuals seeking finance or other positions which handle money.

e) New Hires

(1) Pre-Employment

Prior to an employee's first day, the supervisor is responsible for organizing the workspace and obtaining the necessary equipment for the new employee. To guide this process, the supervisor will use the Program New-Hire Checklist. (Appendix A)

(2) Employee's First Day

On an employee's first day they will first meet with the Human Resources Manager to complete the Human Resources New Hire Checklist. This checklist will be placed in the employee's personnel file.

After completion, they will be assigned to their supervisor. It is the responsibility of the supervisor to familiarize the new employee with their new workplace, job functions, and program specific procedures and will complete the Program New Hire Checklist. This checklist will be placed in the employee's personnel file.

(3) 30-60 Day Performance

After the first 30 days and before 60 days of employment, the Human Resources Manager meet separately with the supervisor and the new employee. This is to ensure the new hire has received the proper training and is performing as expected.

(4) New Employee Orientation

All new hires will be expected to attend Orientation within 90 days of his or her start date. *Please see section I. 9. (d) New Employee Orientation for further information.*

6. Compensation and Time Keeping

Total compensation includes more than an employee's annual salary. Based on the employee's status, this may include:

- Paid time off (holidays, sick days, vacation days, personal days)
- Health, Dental, Long-term Disability, and Life Insurance
- Employer portion of Federal Insurance Contributions Act (FICA) Taxes
- 401k Retirement and matching contributions

Annual salary increased are provided on a merit system and are implemented after the start of the agency's fiscal year (July 1).

Each employee will receive a total compensation information sheet at the start of each fiscal year.

a) *Personal Data and Employee Files*

Pertinent and up to date information on each employee must be maintained by the employer as mandated by federal law. It is the responsibility of the employee to notify Human Resources of changes in personal information, i.e. marital status, home address, etc.

Personnel records of employees are confidential. They shall be available only on a "need to know" basis. For example, supervisors may review the personnel section of an employee file of any employee reporting to them.

Employees have the right to view his/her personnel file. Requests should be made to the Human Resources Manager.

Refer to page 6 of the Archdiocesan Policies and Procedures Manual for Parishes, Schools, and Agencies for more information regarding Personal Data and Employee Files.

b) Work Hours

Catholic Charities workweek begins on Sunday and ends on Saturday. The standard agency full-time work schedule is 8:30 A.M. - 4:30 P.M. Monday through Friday with a one hour lunch break. Due to the nature of work in some departments, work schedules for employees may vary throughout the agency. Full-time employees with varying schedules and part-time staff will be advised of their work schedule by their supervisor.

(1) Summer Hours

The Archdiocese historically creates a summer schedule which allows for a half day of work on Fridays. Catholic Charities' normal Summer Work Schedule is as follows:

Monday through Thursday - 8:00 A.M. to 4:30 P.M. with a 45-minute lunch break.

Friday - 8:00 A.M. to 12:00 noon with no lunch break.

This schedule may vary for some departments based on work that must be performed.

For Exempt staff: If paid time off is used on a Friday during summer hours, a full day will be charged.

(2) Overtime

If a non-exempt (hourly) employee works more than 35 hours during a given week, they must record those hours for the workweek in which the hours were worked. Hours worked between 35 and 40 hours per week will be compensated at the regular hourly rate. Time worked in excess of 40 hours in one week will be compensated at 1 ½ times the employee's hourly rate. All hours worked must be correctly documented.

All overtime worked must have prior approval by the employee's supervisor. If regularly scheduled work will result in overtime, the supervisor must approve the hours to be worked in advance of that shift. In certain instances when prior approval is impractical, the supervisor must approve the overtime as soon as possible after the overtime is worked. This must be completed no later than the date timesheets are due for the pay period during which the overtime occurred.

(3) Flexible Work Schedules

Catholic Charities recognizes that the needs of the workforce are changing. Many employees are challenged with the demands of juggling work, family responsibilities, outside activities, and life related issues. Flexible work schedules can provide employees with increased flexibility with their work schedule while maintaining a productive work environment.

There are two types of flexible work schedules:

Flextime - allows full-time employee to adjust their arrival and departure time within specified ranges while still working a standard number of hours within a given time period,

such as 35 hours during a five-day workweek. An example would be an employee working 9:00 am -5:00 pm instead of the normal business hours of 8:30 am - 4:30 pm, Monday through Friday.

Compressed Workweek - allows full-time employees to perform the equivalent of a week's worth of work in fewer than five days. In exchange for working longer days, employees enjoy larger blocks of time off. An example would be an employee who works extended hours Monday through Thursday but does not work Friday.

Employees will be considered for flexible work schedules on a case by case basis when such schedule is practical and:

1. Accomplishes both work and personal goals
2. Provides coverage for individual department operations
3. Benefits the agency as a whole while maintaining productivity at no expense to quality

It is important to note that Flexible Work Schedules are not appropriate for all positions and it is not possible for all employees to be considered for flexible work scheduling. For positions in which a Flexible Work Schedule may be appropriate, considerations per individual employee will include:

- Current job performance
- Attendance record
- Consistency in completing tasks in a timely manner
- Level of supervision required
- Whether employee is self-directed or not
- Level of personal responsibility and accountability
- Ability of the employee to effectively communicate regularly and keep co-workers and supervisor in the loop

Catholic Charities has the right to terminate a Flexible Work Schedule if it fails to meet the organizational needs of the agency. Management or the employee may cancel the arrangement for any reason at any time with written notice. The presence of a Flexible Work Schedule Agreement neither constitutes an employment contract nor compromises Employee At-Will-Status.

Requesting a Flexible Work Schedule

1. Employee prepares a written request detailing the need for a Flexible Work Schedule with the anticipated start and end dates and submits to supervisor.
2. Supervisor discusses the request with Department Director and Human Resources.

3. If request is not approved, the employee will receive a written notice of the decision. If the request is approved, a Flexible Work Schedule Arrangement will be formalized with a written agreement.
4. The arrangement will begin with a trial period. During this time the supervisor and employee will meet regularly to discuss how the arrangement is going. The following questions can be reviewed:
 - Are expectations clearly understood?
 - Is productivity being maintained?
 - Are the department's needs still being met?
 - Are there benefits that can be identified?
 - Are there adjustments that are desired by either party?
 - Should the arrangement be continued?
5. The arrangement will be then be reviewed every three months to ensure its continuation is appropriate.
6. At the arrangements conclusion, the employee returns to their regular work schedule.

(4) Working from Home

As a rule, employees should not work from home. Employees need to be present in the workplace to facilitate communication and collaboration.

As with Flexible Work Schedules, however, in certain instances and circumstances, working from home may be acceptable to allow an employee to manage their work and home responsibilities. Since it is generally accepted that full-time exempt employees may work in excess of 35 hours per week especially during very busy times to accomplish the goals of their positions, it is reasonable that some of the additional work may be accomplished at home.

Non-exempt employees working from home must have prior approval from the Program Director, Executive Director, or other appropriate supervisor. This practice should only be in exceptional circumstances, for example, a power outage, technological issues, or severe weather. Care must be exerted to ensure that any hours worked from home by non-exempt employees are accurately recorded so they are fully compensated for all their work hours.

In no circumstances, however, should any staff member be allowed to work from home to avoid using sick time when they are staying home due to illness.

There will be no paid work hours from home allowed when a staff member is utilizing FMLA leave.

c) *Pay dates*

Catholic Charities employees are paid on the 15th and on the last day of every month. If these dates occur on a weekend, employees are paid on the Friday prior. All pay is directly deposited into the employee's bank account by PAYCOR. Employees may view and print their earnings statements through the PAYCOR online portal.

d) *Recording Work Hours*

Each Catholic Charities employee will use the PAYCOR Perform Time Management System. Instructions to utilize this system will be provided by the Human Resources Manager upon hire.

Exempt (salaried) employees will indicate a work day within the system by noting the hours worked on a particular day.

Non-exempt (hourly) employees will clock in and out utilizing either the system's "Punch" feature on the PAYCOR website or the "Clock" desktop application.

Any adjustments that may be needed, such as correcting a missing punch, indicating vacation, personal, or sick days should be requested of and performed by the employee's immediate supervisor. If the immediate supervisor is not available due to illness or leave, the employee should contact the Human Resources Manager.

Time keeping should be accurate and approved in the PAYCOR system by 4:30 P.M. on Monday of the week following the work completed.

(1) *Grant Funded Positions*

Employees whose compensation (in whole or in part) is drawn from federal funds or other grant sources will also submit time and effort sheets to document the breakdown of their time by funding source. Please refer to section VI. B. Time and Effort for more information of reporting procedures.

e) *Lunch and Break Periods*

In compliance with KRS 337.365 and 337.355 state law, employees are to be provided rest and meal periods. Such periods of time may vary with individuals or departments; however, each employee is allowed to take a rest period of at least ten (10) minutes during each four hours worked. No reduction in compensation will be made for break time.

Employees who work more than five (5) hours will be granted a reasonable unpaid period for lunch, and such time will be as close to the middle of the employee's scheduled work day as possible.

Break periods or lunch periods may not be accumulated to reduce working hours or to provide time off for personal business.

7. Benefits

a) *Holidays*

The Archdiocese of Louisville observes the following as paid holidays for all regular full-time employees (30+ hours per week). Regular part-time employees will receive a pro-rated amount of pay for each holiday. (Formula: normal hours worked per week divided by five days per week = holiday pay.) Example: 20 hours per week divided by five days per week = four hours of holiday pay. Temporary employees or those working less than 14 hours per week are not eligible for Holiday pay.

- New Year's Day
- Martin Luther King, Jr. Day
- Good Friday
- Oaks Day (Catholic Charities only due to proximity of Churchill Downs)
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Friday after Thanksgiving
- Christmas Eve
- Christmas Day
- Day after Christmas

When one of the above holidays falls on Saturday, it is observed on Friday. Holidays occurring on Sunday are observed on Monday. The Archdiocese of Louisville make other schedule adjustments after reviewing the annual calendar.

A substitute holiday may be granted when a particular job requires work on a regular holiday.

b) *Sick Time*

The Archdiocese realizes that inability to work because of illness or injury may cause economic hardship. Consequently, regular full-time employees will receive paid sick time based on the employee earning one sick day per month worked.

Regular part-time employees will earn sick time in proportion to the part-time hours worked. A sick day is earned the last day of each month worked. (Formula: normal hours worked per week divided by five days per week = sick pay.) Example: 20 hours worked per week divided by five days per week = four hours of sick pay per month.

Employees who work less than 14 hours per week do not earn paid sick leave.

It is the employee's responsibility to notify his/her supervisor of sick time needed. If the employee is too sick to report to work, the employee should call his/her supervisor and inform them of sick time needed.

Sick days may be used for illness, injury, doctor appointments, physicals, and annual exams. Sick time may also be used by the employee to care for an ill spouse, child, legal dependent, or parent of the employee.

Non-exempt (hourly employees) may take sick time in hourly increments.

Sick time may be accumulated up to 60 working days for regular full-time employees. Regular part-time employees may accumulate up to 60 working days at a pro-rated number of hours. When part or all of sick time is used, it begins to accumulate again at the rate of one day awarded at the end of the month worked.

Sick time granted beyond the amount accumulated will be without pay. In certain circumstances, however, an advance against sick leave up to 5 working days may be granted upon supervisor and departmental approval.

Before returning to work, a physician's statement may be required by a supervisor in any case exceeding three working days of absence or for frequently recurring absences.

Frequent absences and illness that adversely affect job performance may require job counseling. Employees may be required to submit a physician's statement as evidence of illness. When long-term absence occurs, the position held at the time the leave began, or a similar position at the same pay rate, will be held for the employee for up to 12 weeks if employee is eligible under FMLA. A leave beyond 12 weeks will not be granted except for extreme circumstances.

Unused sick time is not reimbursable, may not be used as vacation time, and is not paid at termination except as outlined in Sick Leave at Retirement. Employees are not permitted to "loan" unused sick days to other employees or to "buy" sick days from individuals.

c) *Vacation*

Annual vacation with pay will be granted to all eligible regular full-time employees and regular part-time employees. The following is intended to provide the information necessary to uniformly administer and schedule vacation allowance.

Vacation Eligibility:

1st year amount based on date of hire	
2 nd through 4 th year	2 weeks
5 th through 9 th year	3 weeks
10 th through 24 th year	4 weeks
25 years and over	5 weeks

Employees hired prior to May 31st are eligible for one week of vacation the year of hire, after having completed six (6) months service, and two weeks the following calendar year.

Employees hired after May 31st will be eligible for two weeks of vacation the following calendar year.

The calendar year in which an employee is hired is considered year one of employment.

Employees in positions requiring them to work less than 12 months are not eligible to receive paid vacation.

Employees who work less than 14 hours per week do not earn paid vacation.

Full time employees are those that work 30 or more hours per week. Regular part-time employees are those that work more than 14 hours but less than 30 hours per week. Regular part time employees are eligible for vacation as defined by their scheduled days of work. For example, an employee working three (3) seven hour days equates to earning three (3) seven hour vacation days.

Accumulating Vacation:

Up to two weeks of vacation time may be accumulated and carried over into the next year. However, if not used by the end of the year, any accumulated vacation time beyond two weeks is forfeited.

Scheduling Vacation:

Vacations may start on any day of the week and may be taken at any time during the calendar year. Although employees have earned their vacation, the first responsibility is to the employer. Therefore, to provide for smooth workflow, it may not be possible for employees to take vacation at the time desired. Every effort should be made to satisfy the employee's preference, but employees must be prepared to accept alternative dates.

Requests must be made to the immediate supervisor in writing at least one (1) week prior to the day(s) being requested. This request may be made via email or completing a Vacation Day Request Form. (Appendix A)

d) *Personal Days*

Full-time employees and regular part-time employees will be granted two (2) paid personal days per year.

Regular part-time employees will receive a pro-rated amount of pay for each personal day. (Formula: normal hours per week divided by five days per week = pay per each personal day.)
Example: 20 hours per week divided by five days per week = four hours of pay per each personal day.

Employees who work less than 14 hours per week do not earn paid personal days.

Personal days may not be accumulated and unused personal days will convert to sick days up to the maximum allowed at the end of the year.

8. Leave

a) *Family Medical Leave Act*

FMLA leave requests are to be made to the immediate supervisor and to HR. A request form is near the back of the Archdiocese of Louisville Personnel Policies and Procedures Manual. Once a verbal or written request is received by a supervisor, HR should be informed immediately. The request form has to be turned in at least 30 days in advance of a requested leave. In an emergency situation, the form should be completed as soon as practical.

Often an FMLA request will begin as a verbal or e-mail request. This does not replace the need to complete the formal request form.

To be eligible for FMLA, a person must have worked at Catholic Charities or the Archdiocese of Louisville for at least 1 year and worked at least 1,250 hours over the previous 12 months.

FMLA leave allows eligible employees up to 12 weeks unpaid, job protected leave during a 12 month period for the following:

- Incapacity due to pregnancy, prenatal medical care, or childbirth
- To care for employee's child after birth or placement for adoption or foster care
- To care for employee's spouse, son, daughter, or parent who has a serious health condition
- For a serious health condition that makes the employee unable to perform their job

See page 15 of the Archdiocesan Policies and Procedures Manual for Parishes, Schools, and Agencies for further information regarding FMLA.

b) *Adoption/Maternity/Paternity*

All regular employees will receive two (2) weeks of paid maternity or paternity leave. To be entitled to this pay, a written request must be made in advance of the leave. Eligible employees may request an additional ten (10) weeks unpaid leave of absence under FMLA for the birth/adoption of a child. However, accrued leave must be used concurrently with FMLA, if applicable. This leave can be taken within a twelve (12) month period beginning at the birth/placement of the child and expiring twelve (12) months from the date of birth/adoption. Refer to the FMLA policy in this handbook for further details.

Employees who are not eligible for FMLA leave may be granted an additional four (4) weeks unpaid leave of absence for the birth/adoption of a child. Accrued leave must be used in place of the remaining unpaid leave, if applicable. This leave must be taken immediately following the birth/placement of the child.

c) *Bereavement*

Employees are granted up to three (3) paid leave days for bereavement following the death of an immediate family member. Immediate family includes the employee's spouse, child, parent,

sibling, grandparent, grandchild, mother-in-law, father-in-law, brother-in-law, sister-in-law, and grandparent-in-law. Requests for leave beyond the three days or other relationships will be considered on an individual basis and approved by the supervisor.

d) *Military*

All full-time employees ordered to active military service shall be granted an unpaid leave of absence.

See page 15 of the Archdiocesan Policies and Procedures Manual for Parishes, Schools, and Agencies for military family leave entitlements.

9. Training and Professional Development

CCL recognizes that ongoing training and professional development is essential to maintain a skilled workforce. Staff will be expected to document 12 hours of professional development/training to Human Resources annually and are encouraged to research and request trainings relevant to their work. Attendance and any costs associated to attend trainings must be approved by the employee's supervisor and/or Program Manager. Additionally, Human Resources will evaluate staff development at least annually and provide internal training opportunities based on the needs of staff which will count toward the training requirement.

a) *Continuing Education for Professional Credentialing*

Certain positions and some staff members require Continuing Education Units (CEUs) to maintain their professional credentials for the work function they perform within the agency. This includes, but is not limited to, Immigration Attorneys, Social Workers, and Human Resource professionals.

It is the responsibility of the employee to monitor and obtain their CEUs to retain their professional credentials. The CEUs must be attained from an accredited sources and documentation maintained in the employees personnel file.

b) *Program Specific Training*

Some programs within the agency have mandatory training required by particular funding sources. Attendance to these trainings should be scheduled per the funder's regulations, but should generate minimal disruption to the program's ordinary activities if possible.

As the trainings are mandated by the funding source, all associated costs of the training should be included in the grant budget and charged as applicable.

c) *All Staff Meetings / Trainings*

The agency will schedule at least one mandatory all staff meeting /training annually. The purpose is to provide general agency information, such as financial, programmatic, administrative, or policy changes, employee health and welfare, staff engagement, and professional development opportunities relevant to all employees.

Additional meetings or trainings may be scheduled at the discretion of the CEO as circumstances arise. These meetings should not occur more than once per quarter and will not consist of more than a total of four work days (28 hours) per year.

d) New Employee Orientation and Training

All new employees will attend New Employee Orientation, which provides a general overview of the agency's history, programs, and operations within the Archdiocese and community. These are to be held once per quarter and scheduled by the Human Resource Manager.

(1) Safe Environment Training

All employees must attend Safe Environment Training conducted by the Archdiocese. Refer to page 3 of the Archdiocesan Policies and Procedures Manual for Parishes, Schools, and Agencies.

(2) Be Smart - Drive Safe

All employees who will operate company vehicles or transport clients must complete the Be Smart-Drive Safe Training from Catholic Mutual. This is an online training required for employees to be placed on the agency's approved driver list. For additional Driver Policy information, refer to page 22 of the Archdiocesan Policies and Procedures Manual for Parishes, Schools, and Agencies.

10. Performance Evaluations

In order to monitor performance and to create the basis of merit based salary increases, performance evaluations will be conducted by an employee's supervisor on an annual basis. The process will begin in mid-spring to be completed by June 1 so that salary adjustments can be implemented after the start of the fiscal year (July 1).

Evaluations are based on the 360-degree model, consisting of an employee self-evaluation, peer/supervisor evaluations, and the formal evaluation completed by the supervisor. It is designed to provide for a well-rounded critique of performance as well as promote discussion of employee's strengths, address any areas in need of improvement, and establish working goals to be evaluated during the next evaluation period.

The forms are located in the employee resource section of the agency's website. The information below outlines the general process flow, but more detailed instructions for specific programs and departments will be provided at the start of each evaluation time period. For programs with multi-tiered staff structures, more than one cycle may be necessary.

1. **Self-Evaluations** - During the first stage of the evaluation process, staff members will access the online self-evaluation to document their perspective of performance. Once complete, a hard copy of this form will be submitted to the employee's supervisor.
2. **Peer-Evaluations** - During the same time, employees will have the opportunity to provide an assessment for any of their coworkers via the online forms. These submissions are

anonymous and the data will be collected and provided to the respective supervisor of the employee being evaluated.

3. **Employee Evaluations** - The second stage of the process will consist of supervisors completing employee evaluations and scheduling individual conferences for review.
4. **Supervisor Evaluations** - For the third stage, supervisors will complete their own self-evaluations and employees will use the Supervisor Evaluation form to provide feedback about their supervisor. Peers of the supervisor should complete evaluations, if desired, at this time as well.
5. **Agency Administration** - After the program and support functions have completed the process, the CEO will conduct director evaluations in the same manner. All staff are encouraged to provide input for agency directors and the CEO. The CEO's evaluation is performed by the executive committee of the board of directors, and any employee submission regarding the CEO's performance will be forwarded to the committee for its review.

The working goals established by the employee and supervisor should be formally assessed at least once, at approximately six (6) months, during the evaluation period. Additional assessments can be made by the supervisor based on performance. This assessment should be forwarded to Human Resources when complete.

11. Disciplinary Action

If disciplinary action is necessary, it will be addressed at the time of the employee's infraction. All infractions should be addressed at the lowest level of supervision, and at that time the employee will be advised of the unsatisfactory performance or behavior by the immediate supervisor.

a) Disciplinary Process

1. **Verbal Warning** - With the support of the Human Resources Manager, the supervisor will consult with the employee and explain the unsatisfactory performance or behavior and provide expectations moving forward. The Human Resources Manager will document the conversation and maintain in the employee's file.
2. **Written Warning** - If unsatisfactory performance or behavior persists after a verbal warning, a formal written warning will be issued. The employee will retain a copy and the original will be forwarded to Human Resources to be placed in the employee's personnel file.
3. **Corrective Action Plan** - If the employee's behavior or performance does not indicate improvement after the Written Warning, the supervisor will meet with the employee and the Human Resource Manager to develop a corrective action plan (Appendix A). The plan will include:
 - Identification of the unsatisfactory behavior or performance
 - Expectations to alleviate the issue
 - Intervals (i.e 15-30-45 or 30-60-90 days) for monitoring progress

- Expected completion date of the plan
- Consequences of failure to satisfy the plan up to and including termination

With support from the Human Resources Manager, the supervisor will meet with the employee at the determined intervals to assess progress. The plan may be considered fulfilled or extended based on the employee's performance.

4. **Termination** - If the employee continues to fail in meeting agreed expectations outlined in the corrective action plan, the agency may terminate employment. This process is conducted by the Human Resources Manager in conjunction with the Archdiocesan Personnel Office.

These policies and procedures are designed to address a wide range of disciplinary issues. Depending on the nature of the infraction, the process may begin at any step. If you have any question regarding infractions or the disciplinary process, consult your supervisor or the Human Resources Manager.

12. Grievance

If an employee feels he/she have been treated unjustly, he/she has the option to present in writing a grievance to the immediate supervisor of the individual with whom he/she hold the grievance within one (1) business day following the incident that created the grievance. See Appendix A for a sample grievance form.

All subsequent proceedings should be in documented in writing, with a copy placed in each employee's personnel file.

In order to resolve a conflict or grievance, the steps below should be followed:

1. The supervisor receiving the grievance will meet with both staff members and the filer's supervisor as soon as possible in attempt to solve the issue between parties. The meeting will be documented in writing and forwarded to Human Resources.
2. If an agreement cannot be determined or if the severity of the grievance requires further intervention, the grievance is to be forwarded to the Human Resources Manager.
3. The Human Resource Manager will meet with both staff to determine an agreeable solution and each employee's supervisor will be notified of the outcome. If an outcome cannot be reached, or due to the nature of the grievance, the Human Resources Manager may consult with the Archdiocesan Personnel Office for a determination and course of action for the issue.
4. Supervisors or the Human Resources Manager will follow up with each staff member at 30 days to ensure each party is adhering to the resolution.

The above steps are outlined to address a wide range of circumstances. If you have a question regarding the grievance procedure or your treatment by a fellow staff member, consult with your supervisor or the Human Resources Manager.

13. Termination of Employment

Termination of employment may consist of:

- Voluntary Resignation
- Workforce Reduction
- Involuntary Resignation

Please refer to Page 25 of the Archdiocesan Policies and Procedures Manual for Parishes, Schools, and Agencies for further information regarding termination of employment.

III. Facilities, Equipment, and Workplace Conditions

A. Technology and Equipment

All equipment (office items with a usable life of more than one year) and technology (computers, tablets, cell phones, desk phones, and software) provided by the agency is property of the Archdiocese of Louisville. While minimal personal use is acceptable as long it does not interfere with job duties, staff should be aware that no information recorded, stored, produced, or transmitted on assigned equipment should be considered private and may accessed by the Archdiocesan technology staff or an authorized technology vendor at any time.

1. Acquisition

Please refer to section VI. C. Purchasing and Procurement for information regarding acquisition of equipment or technology.

2. Disposal

The Operations Department is responsible for the proper disposal of unused or unwanted equipment technology. Contact the Director of Operations or the Facilities Manager for reassignment or removal of equipment.

a) Office Equipment

Items such as chairs, desks, filing cabinets, printers, etc., if still in usable condition, may be reassigned or stored until needed.

b) Technology

Technology items which are still in usable condition may be reassigned or stored. Those items which are no longer usable will be disposed of in an environmentally appropriate manner. Items which may have sensitive client or agency data stored on them, prior to disposal or reassignment, will have that information permanently removed by the Archdiocesan Information Technology Department or have the hard drive or other storage mechanisms physically destroyed and documented on the computer inventory per Archdiocesan policy.

3. Proper Use

All equipment and technology will be used in its intended manner for business purposes. Any willful misuse or destruction of agency property will result in disciplinary action up to and included termination.

a) Archdiocesan Email

The Archdiocese of Louisville owns the e-mail system and the information transmitted and stored within it for all parishes, schools, and agencies. Employees have no expectation of privacy or confidentiality in any of their e-mails.

E-mail is to be used for official purposes. Private business (e.g., yard sales, etc.) may not be conducted with the archdiocesan e-mail system. As with the telephone, limited use of the e-mail system for communication with family and friends is acceptable. However, such use should be kept to a minimum.

Offensive and vulgar e-mail messages, such as messages that contain sexual, pornographic, or racial comments or pictures, are prohibited in conformity with the existing archdiocesan policies against harassment and discrimination.

Employees are prohibited from using e-mail, the Internet, or other communication systems to transmit confidential or privileged information outside of the Archdiocese of Louisville without written permission.

Broadcasting of e-mail messages to all agency personnel is to be limited to official archdiocesan business.

Failure to comply with this policy may result in the removal of e-mail and Internet access from an employee's computer. Severe violations may result in disciplinary action, including dismissal.

b) Other Office Equipment

Personal use of equipment such as copy machines and postage machine may be allowed in certain circumstances upon supervisor approval. Use cannot be excessive, to conduct activities which counter agency or Archdiocesan policy, or for outside business purposes.

The cost of materials used will be reimbursed to the agency.

4. Technology and Data Security

The Archdiocese of Louisville and Catholic Charities of Louisville maintain a secure network for entering and storing electronic information on behalf of the agency. All computers and laptops will be password protected and set to lock within five (5) minutes of use.

Login credentials will be provided by the Archdiocese and/or agency staff. Staff will not provide these credentials to any other person except a network administrator to gain access to a local machine or the network.

The Agency and/or Archdiocese is responsible for maintaining firewall security for all machines on the diocesan wide area network (WAN) and maintaining up to date anti-virus software. Agency Administration will provide the same service for any local area networks (LAN)s that are not connected to the archdiocesan WAN.

Servers maintained offsite or in secure areas will be backed up daily Monday through Friday.

Electronically transmitted client data is to comply with all applicable legal standards and requirements. Because of stringent HIPPA regulations for coding client medical information before it may be sent via email, all Agency staff will refrain from this practice. Please see Section V. Programs, Section A. Confidentiality of this manual regarding Client Data Technology.

Any third party software or hosted data sites (i.e. web-based client data software) which maintains client data will adhere to these policies as well.

B. Facilities

1. Access and Use

Employees will be provided the necessary keys and security codes at the time of hire to access the facility spaces required for their job functions. Program Directors should request this from the Facilities Manager as they complete the New Hire Checklist.

a) Conference Rooms

Conference rooms are available for employee meetings and other functions. They are reserved through the Archdiocesan Outlook Calendar on a first-come first-served basis. If your function requires a special set up such as chairs and tables, a request needs to be made to the Facilities Manager at least one week prior to your meeting or event.

b) Break Rooms / Kitchens

It is the responsibility of staff to help maintain clean break areas and kitchens. The Agency's cleaning services are not responsible for washing dishes or removing old food from refrigerators. Staff are expected to wash any dishes they use and remove any perishable food from agency refrigerators on a weekly basis.

c) Personal Use

At the discretion of the Chief Executive Officer or designee, agency meeting rooms may be scheduled for personal use if it does not interfere with agency business. Requests may be made to the Director of Administration or the Facilities Manager. Facilities are expected to be cleaned after use and the agency may require proof of liability insurance or purchase of a supplemental policy through Catholic Mutual by the staff personal accessing the facility.

2. Requesting Service for Issues/Damage

A service request log (Appendix B) will be available at each facility for regular maintenance requests such as:

- Replacing light bulbs

- Moving furniture or hanging items
- Other minor repairs that do not pose an immediate safety hazard to clients or staff

Complete the log in the next available service line. These requests will be monitored and performed on a daily basis as the maintenance schedule allows.

If you notice a potentially hazardous or damaging facility issue such as loose or missing safety equipment, non-functioning mechanicals, leaking water, etc., notify the Facilities Manager or Director of Administration immediately.

3. Security and Safety

Catholic Charities of Louisville place the highest priority on the safety and well-being of its clients and staff. The Agency will strive to maintain a safe and secure environment and educate its staff on common safety measures as well as be proactive in identifying security concerns.

- The Facilities Manager will regularly inspect and maintain all safety equipment (fire extinguishers, security alarms, lighting, etc.) is in working order.
- Main entrances which remain open during business hours will maintain a staffed reception area. Other entrances to facilities will remain locked and secured. Locations with alarm systems will ensure staff are trained in its use.
- Reception areas will be staffed during normal business hours. After hours, staff will keep reception areas locked and will admit client only after proper screening and sign-in.
- Staff working before or after normal working hours will inform their supervisor and keep entrances/exits locked and secured.
- Whenever possible, staff should leave the premises in pair after normal business hours.
- All staff will be trained in identifying security risks and contacting emergency personnel (e.g. calling 911) if an imminent security threat arises.
- Staff will bring security concerns to the attention of the Facilities Manager or Director of Administration who will take corrective action as necessary.
- Security incidents that occur on-site, or that involve a staff member off-site, will be notated with an incident report and submitted to their Administrator/Supervisor within 24 hours.
- Each facility will maintain a security team headed by the Facilities Manager to disseminate pertinent safety and security information.
- All external keypad locks will have their codes changed every three months.

4. Evacuation Plans

Each building shall have evacuation routes posted in prominent locations in the event of fire or other types of emergencies. These will be updated on an annual basis.

5. Inclement Weather

Offices will be open except in the most severe conditions as determined by the Archdiocese. Radio and television announcements of Catholic school closings do not apply to Catholic

Charities. Staff should use their own personal judgment to determine the safety of traveling conditions.

If the Archdiocese closes offices prior to the start of the workday, it will be posted on the Archdiocesan website. Additionally, when the agency is notified, an all-staff email will be sent and the Leadership Team will inform program directors who can then notify employees. It is recommended that departments develop a phone tree or another method to communicate this and other important information to staff outside of office hours.

Should weather conditions cause severe hazardous driving during the work day, it may become necessary to close agency offices early. Early closings will be announced by the Archdiocese through the various building receptionists.

If you arrive late due to poor driving conditions, there will not be any penalty for the first hour. Likewise, if offices are closed early, you will receive a full day's pay. If you choose to stay home when offices are open, please inform your supervisor that you will be taking a vacation day or personal day.

C. Agency Vehicles

Supervisors and managers will select employees who will utilize agency vehicles with care. No employee shall drive an agency vehicle unless the employee's supervisor ensures he or she has been placed on the agency's approved driver's list. This requires:

1. Having a copy of the employees driver's license on file
2. Having a copy of the employees personal insurance on file, as applicable
3. A completed driving record check performed by Human Resources
4. Watching the Catholic Mutual Auto Safety Training Video

Company vehicles are currently assigned to departments and/or team. (Example: An agency van is assigned to Migration and Refugee Services and utilized by the Reception and Placement Team). While the program director or manager is ultimately responsible for the vehicles assigned to his or her department, a designee(s) may be appointed to monitor the day to day operation of vehicles and address any issues or service needs.

Each driver's privilege to operate a vehicle on official business extends only as long as the driver operates the vehicle in a safe and efficient manner. A record of "preventable" accidents shall result in appropriate disciplinary action.

1. Driver Responsibility

The drivers of agency vehicles and/or teams carry the majority of responsibility for the overall condition and safe operation of their assigned vehicle(s). Staff should only drive vehicles when they are in sound operational condition. As such, Catholic Charities of Louisville requires drivers

to regularly check their vehicles for possible defects and report them according to policy (Section D). This includes but is not limited to:

1. Non-working headlights, turn signals, brake lights, etc.
2. Any dash warning indicators (check engine, check brakes, etc.)
3. Low or flat tires
4. Non-working windows or other electrical components
5. Any issues while driving (grinding brakes, engine problems, etc.)

Additionally, drivers shall take care in maintaining the appearance of the vehicle. After each use, staff shall inspect the interior of the vehicle to ensure it is free of any trash and that staff and/or clients have not left any articles behind.

2. Operation and Use

Careless, negligent, destructive, or unauthorized operation of agency vehicles will not be tolerated. Improper operation as well as excessive or avoidable motor vehicle violations will result in disciplinary action. Employees shall operate all vehicles that they use for Catholic Charities of Louisville business safely and economically. To accomplish this, employees must comply with the following practices:

1. All drivers will have a valid state driver's license for the vehicles they operate.
 - a. Employees performing work that requires the operation of an agency vehicle must notify their immediate supervisors if their license is expired, is suspended, or is revoked. Failure to report shall be cause for disciplinary action.
2. Employees will comply with all applicable motor vehicle laws. The vehicle operator is responsible for any traffic citations.
3. Staff shall ensure a mileage log is in the vehicle and record the mileage before and after each trip. The Program Director or designee(s) is responsible to forward this information to the Grants Manager at least once per month.
4. Generally only staff and clients should be in an agency vehicle. Catholic Charities of Louisville prohibits unauthorized passengers or drivers to either operate or ride in the vehicle.
5. The driver and all passengers, whether staff or clients will always wear seatbelts.
 - a. Any child under 40 inches tall must be in an infant/child seat.

- b. Any child who is under seven years of age and between 40 and 50 inches tall must be in a child booster seat. These will be located in common areas and available for staff who transport young clients.
6. Employees will report and participate in the investigations of all vehicle collisions or property damage accidents according to policy (Section E).
7. Employees will use Catholic Charities of Louisville vehicles for official use only.
8. Employees may not take home agency vehicles overnight except as follows:
 - a. Employees may take home a vehicle for one night when job duties take place late at night after normal working hours or early in the morning before normal working hours with consent of department head or designee.
 - b. Employees may take home a vehicle for more than one night only if the department head specifically authorizes it in writing.
9. Catholic Charities of Louisville vehicles shall always be available for agency business.
 - a. Employees may use agency vehicles for travel to lunch or similar activities if they are on business or in a location where driving to obtain their personal vehicle would result in an extra and unnecessary expenditure of time and money.

a) *Personal Vehicles*

Employees should only use their personal vehicles to transport clients if there is no agency vehicle available. Staff utilizing personal vehicles for agency business acknowledge that in doing so their personal auto insurance will act as the primary carrier for liability in the event of an accident. It is recommended that an employee check with his or her insurance company regarding using their personal vehicle for business, as it may affect insurance premiums. To offset this and other operational costs, employees will be reimbursed for this use. Refer to section IV. D. 1. Use of Personal Vehicle of this manual for reimbursement policies.

3. Maintenance and Reporting Issues

Operations and Facilities Management will maintain a set schedule for each agency vehicle to receive regular maintenance. This will happen approximately every 12 to 16 weeks based on usage. Employees and/or teams which are assigned vehicles will be notified of regular service dates and should have ample time to adjust their schedule to accommodate a vehicle being unavailable for regular service.

In addition to regular maintenance, it is understandable that vehicles will experience unforeseen mechanical problems. As soon as an issue (please refer to Section B. Driver Responsibility) is discovered, it should be immediately reported to the employee's supervisor.

The supervisor or other staff person responsible for the daily oversight of the vehicle will notify Operations or Facilities Management, detailing the problem with the vehicle. The Director of Operations in conjunction with Facilities Management and the team to which the vehicle is assigned will make the determination regarding the urgency of the need of repair and if the vehicle is still safe to operate or not until the issue can be addressed. If service is required and the vehicle is drivable, the assigned team may make arrangements to transport the vehicle to an approved repair facility. While not required, this could expedite down time for the vehicle as Facilities Management may not be able to immediately transport the vehicle.

4. Reporting Accidents

Employees shall report all vehicle accidents, even if it is a single vehicle accident with minor damage.

Following an automobile accident (major single vehicle damage or any accident with another party):

1. Employees must first ensure the safety of him/herself, any passengers, and any other parties involved.
2. If medical attention is required 911 Emergency Services should be contacted immediately.
3. Contact the police department 502-574-7111 so an officer can be dispatched to generate a police report.
4. Staff should then immediately notify his or her immediate supervisor of the accident.
5. Do not leave the scene unless medical attention is required. Staff should collect all of the information on the Accident Report. This should include the personal and insurance information from the other driver, police report information, and the names and telephone numbers from any witnesses. This should be submitted to the immediate supervisor and Human Resources as soon as possible within 24 hours of the accident.

Following a minor accident (single vehicle with no injuries and minor damage):

1. Complete an Accident Report and submit to supervisor within 24 hours.
2. Supervisors will notify Operations or Facilities Management to assess damage.

Each agency vehicle shall contain a packet with the following (it is also recommended that staff possess copies while using a personal vehicle for business use):

1. Informational Cover Sheet - detailing what to do if in an accident.
2. An Accident Report Form - to be completed and returned to the employees supervisor within 24 hours of the accident.

3. An Incident Report Form - to be completed and submitted according to policy, page 15 of the Catholic Charities of Louisville Policy and Procedure Manual.
4. An agency gas card assigned specifically to the vehicle. Staff who are authorized to drive agency vehicles will be assigned a PIN from the Director of Administration.

IV. Community Engagement

A. Advocacy

Catholic Charities of Louisville, Inc. is called to advocate for justice in social structures. The agency's advocacy work operates out of the Mission Advancement Office. CCL carries out the advocacy agendas of the United States Conference Catholic Bishops, (USCCB), Catholic Conference of Kentucky (CCKY), Catholic Charities USA (CCUSA), & Catholic Relief Services (CRS).

Program directors and staff are to submit 'opportunities for advocacy' such as legislative advocacy, community organizing, etc., to the Director of Mission who will determine if and how the agency will proceed.

B. Volunteers

Catholic Charities of Louisville, Inc. as part of its mission invites and engages qualified volunteers to enhance its ability to serve the community.

Program Directors and designated staff work in collaboration with the Mission Team, particularly the Volunteer Coordinator on behalf of the Agency for recruitment, orientation, selection, assignment, training, supervision, evaluation and recognition of volunteers.

1. Recruitment and Screening

Program staff will identify needs in which volunteers may assist and work with the Volunteer Coordinator to develop specific opportunities for engagement. When potential volunteers are identified, they will be referred to the Volunteer Coordinator for assessment, screening, and assignment.

The Volunteer Coordinator will perform all appropriate screenings and will maintain volunteer records for seven (7) years after conclusion of service.

Volunteers eighteen (18) years of age or older must complete the following paperwork:

a) *Catholic Charities of Louisville, Inc. Volunteer Application*

Volunteers are required to complete a Volunteer Application which includes a statement of confidentiality on behalf of our clients. Applications must be completed before completion of Criminal Background Check. Applications are accessible on the Catholic Charities website or from the Volunteer Coordinator.

b) Criminal Background Check

Volunteers are required to have a Criminal Background Check run by selection.com a program designated by the Archdiocese of Louisville. No other form of Criminal Background Check is acceptable.

c) Safe Environment Training

Volunteers working with children must attend Safe Environment Training hosted by the Archdiocese of Louisville. The dates and location of trainings are maintained by the Archdiocese of Louisville and posted on their website. Catholic Charities of Louisville only accepts volunteers who attend the Archdiocese of Louisville's Safe Environment Training. Other dioceses or programs are not acceptable.

d) Transportation Acknowledgement

Volunteers who will be transporting clients are subject to the same policies and procedure as staff who transport clients and shall be placed on the agency's approved driving list, which requires a copy of the volunteer's license and proof of insurance being

2. Orientation and Nature of Service

Volunteers must attend an agency Volunteer Orientation as part of their engagement with the agency. These are scheduled at regular intervals throughout the year by the Volunteer Coordinator. Additional Program Orientations and training may be required as well.

The Volunteer Coordinator will track and maintain all screening related documents and will notify staff when a volunteer is approved to begin service.

Volunteers will not be assigned tasks that are beyond the scope of their abilities. Additionally, volunteers may not supervise employees within the agency, nor may they assume managerial responsibilities. They may not be involved in the evaluation of paid employees or with decisions concerning the promotion, demotion, lay-off, suspension, termination or transfer of paid employees. An exception is the Board of Directors evaluating the performance of the Chief Executive Officer.

No person under Court Order to provide community service may fulfill the obligation by serving the agency.

3. Time Keeping and Supervision

Program Directors will be responsible for maintaining a Volunteer Sign-In Sheet to record volunteer hours. Program Directors will be responsible for submitting these sheets to the Volunteer Coordinator who will input information into the database.

Each month departments must send their volunteer log of hours via inter-office mail to the Volunteer Coordinator office by the 5th of the following month.

Staff will monitor volunteer's work and report any issues to the Volunteer Coordinator.

Volunteers under the age of eighteen (18) must complete a Catholic Charities of Louisville, Inc.

Volunteer Application. Volunteers under the age of eighteen (18) must work under the direct supervision of an adult agency volunteer or employee. Parent or Guardian must sign the appropriate section of the Volunteer Application.

4. Volunteer's Using Personal Vehicle

Volunteers transporting clients in their personal vehicle need to be informed and understand that their individual automotive policy bears the primary responsibility in regard to liability. Volunteers transporting clients must sign the Volunteer Transportation Acknowledgement form and provide a copy of driver's license and proof of insurance.

5. Grievance and End of Service

Any client grievance against a volunteer of Catholic Charities of Louisville shall be handled according to the agency's CLIENT RIGHTS POLICY. (Section V. C. - page 48 of this manual)

Catholic Charities of Louisville reserves the right to terminate any volunteer.

Program Directors and designated staff are responsible for notifying the Volunteer Coordinator (PCEVC) in writing of the conclusion of any volunteer, be it voluntary or involuntary.

C. Communications

All employees have the right to express their personal opinions at any time. Employees must be aware, however, that they have a responsibility to make a distinction in their communication as to whether they are speaking or writing as a private individual or as a representative of Catholic Charities. When communicating as a representative of Catholic Charities, employees have a responsibility to verify that their statements are accurate and reflect the attitude and position of Catholic Charities:

1. **Mission Statement** – Catholic Charities of Louisville, Inc., as a member of Catholic Charities USA and an apostolate in the Archdiocese of Louisville, provides services for people in need, advocates for justice in social structures, and calls the entire Church and others of goodwill to do the same.
2. **Positioning Statement** – Catholic Charities puts Catholic Social Teaching into practice through communally responding to individual and societal needs
3. **Key Statements**
 - Catholic Charities is an essential community resource providing care and assistance to those in need
 - Catholic Charities welcomes all those in need, and serve regardless of faith tradition.
 - Catholic Charities strives to be the agent of change for the archdiocesan community.
 - Tag Line – Providing Help. Creating Hope
Welcome Empower Strengthen

1. Internal Communications

All communications between staff, whether written or verbal, shall be conducted courteously and professionally. Responses to other staff inquiries should be completed in a timely manner.

- All written communication regarding agency policy or procedure must be cleared, prior to release, with the Chief Executive Officer and/or designee, through the writer's own Program Director.
- Any mass communication directed to all staff, such as seeking or providing information and general announcements should be directed to the Communications Department to be distributed via the agency website. Any communication directed to all staff affecting policy, procedure or expressing the writer's opinion regarding agency business must be cleared, prior to release, with the writer's supervisor. If the item is time sensitive and the writer's supervisor is unavailable, forward to the Communications department for approval.
- All staff are responsible to monitor the agency website's employee page for news, events, and changes in policies or procedures.

Any questions regarding appropriate communication within the agency should be directed to the Director of Mission Advancement.

2. External Communications

All communication between staff and any individual or organization outside the agency, whether written or verbal shall be conducted courteously and professionally. Responses to outside inquiries, either voicemail or email, should be responded to in a timely manner, preferably within one business day. If a staff member will be away from the office for an extended period of time, he or she is responsible for taking the appropriate action to ensure inquiries missed in his or her absence are answered in a timely manner.

All employees, as private citizens, have the right to personally communicate with the mass media as established by the First Amendment of the Constitution of the United States of America and within the bonds established by law. Excluding the exemptions outlined in these procedures, however, no employee shall represent himself or herself as a spokesperson for Catholic Charities of Louisville, INC. in any manner while expressing personal opinions through speech or any other form of communication. Under no circumstances may any employee use agency stationery and/or any such identifiable materials or equipment to publicly communicate his or her personal opinions on any subject.

If a staff member receives any threatening or obscene communication from a client or the public, they should refer the incident to his or her Program Manager or Director.

a) *Written Mass Communication*

As applicable to program operation and service, staff may direct mass communication outside the agency to individuals and groups having an established relationship and/or past

participation with program. The Communications department is available for consultation and assistance with these communication needs.

Any unsolicited mass communication directed outside the agency shall be submitted to the Communications department for review and approval.

b) Public Relations Material

All printed materials including brochures, newsletters, stationery, signage or any other tool used to communicate to the public must comply to branding standards to create a unified image of the agency. The official logo must appear on all public relations materials.

The Communications staff should be consulted when brochures, signage or other materials are being developed or changed for review and approval.

The Catholic Charities logo and other approved graphic images are available on the employee page of the agency's website or from the Communications department.

Programs that wish to gather photos for promotional materials can make their own arrangements for obtaining the photos as needed. A media release form available through the Mission Advancement department must be signed by the subject photographed and kept on file for the duration of its use.

Under no circumstances shall the identities of clients be revealed without prior written permission from themselves or legal guardian. Photographs or any recognizable facsimiles are also governed by these procedures. Staff shall inform clients that signing such releases is strictly voluntary. Staff members also have a responsibility for advising clients and/or legal guardians of possible future consequences of signing release forms.

The Communications department will keep copies of all media release forms on file.

c) Website

Staff members are responsible for periodically reviewing their departmental and/or program information on the website and notifying the Mission Advancement Department of any changes required.

Any additional information to be included on the website such as upcoming events, announcements, or posted resources, shall be forwarded to the Communication and Event Coordinator for review and posting.

The Catholic Charities website should be included in all communications materials. Official website address: www.cclou.org

d) Speaking Engagements

Staff members invited to speak public engagements on behalf of Catholic Charities must do so as a representative of the agency, expressing its values and beliefs. Staff participating in

speaking engagements and/or public presentations should submit the amount, topic(s) to the Mission Advancement Department on a monthly basis for reporting purposes

When speaking to the public, if a staff member is asked a question beyond the scope of his or her knowledge, he or she should not attempt to answer to avoid potentially misleading information. It is perfectly acceptable to refer the questions to the appropriate program or to the Mission Advancement Department for a response at a later time.

Any staff member receiving a stipend or contribution for providing this service as a representative of Catholic Charities must turn in such payments to the Mission Advancement department to be processed as a donation to the agency.

If a staff member is invited to a speaking engagement, and has questions regarding whether, said engagement fits with the mission of Catholic Charities this engagement should be submitted to the Mission Advancement Department for review and approval.

e) Mass Media

(1) Incoming Communications

All inquiries from radio and television stations, newspapers, magazines, etc. received by the front desk should be forwarded to the CEO or designee. In the event program staff are contacted directly with routine or factual inquiries, the Program Director or staff may respond as appropriate and must inform the CEO or designee as soon as possible. All responses to media inquiries must respect the confidentiality of clients and employees.

The CEO or designee department must be notified in advance of scheduled interviews or guest appearances requested of staff.

With respect to media inquiries that are not of a routine or factual nature, the staff person contacted must immediately refer the caller to the CEO or designee and not provide any substantive response regarding agency policy, position, or controversial issues.

(2) Outgoing Communications

Any press release, media alert, public service announcement or other communication originated from staff shall be reviewed by communications staff. All such materials shall be cleared with the Program Director in advance when specific areas of service are involved.

Invitations to the media or outreach to government officials, politicians, etc. shall be coordinated through the Communications Department. Any press conference to be held on Catholic Charities' premises or elsewhere must have prior approval of the CEO and/or the Communications Department.

f) Social Media

Any social media use for agency business must be approved by the CEO or designee. In addition, only employees designated by the Communications Department may use social media to post communications on behalf of the agency.

Employees utilizing social media for agency business must always conduct themselves in a professional manner and only promote information and interactions furthering the mission of the agency and ministry of the Archdiocese of Louisville

It is prohibited to use agency technology for personal social media. For more information regarding personal social media, please refer to the Archdiocesan Social Media Policy, please refer to page 7 of the Archdiocesan Policies and Procedures Manual for Parishes, Schools, and Agencies.

g) Scheduling Special Events

Any contract other than regular budgeted activities for space or additional event related services are to be forwarded to the CEO for review and approval. Only the CEO can sign contracts on behalf of the agency.

To avoid potential conflicts and ensure best practices staff will confer with the Events Coordinator.

Secure approval for the event from the applicable Program Director and Mission Advancement Department. The following information should be communicated.

- Description, purpose, and who is responsible for coordinating the event
- Anticipated date, time and location of event
- Anticipated cost and sources of funding

Communication by the Event Coordinator will ensure accurate release of information and proper referral of inquiries about the event. Written notification with pertinent details about the event should be forwarded to the reception desk for proper routing of inquiries.

h) Copyrighted Material

All employees must be mindful of copyright protections in connection with printed materials, photographs artwork, etc. or uses any videotaped or recorded image, voice, statement, music, etc. that originate outside of the agency. Each employee is responsible to investigate and secure permission for such material. If there is any question regarding materials you wish to use, consult with the Communications Department.

D. Development

1. Gift Solicitation and Acceptance

Donations will be accepted from individuals, partnerships, corporations, organizations, government agencies or other entities—unless the agency determines acceptance of a specific gift is inconsistent with the organization’s beliefs, values and mission.

Donors are encouraged to support areas reflecting their interests. When gift restrictions are detailed in a donor pledge, it will be honored and detailed in the donor's gift or commitment letter

A proposal must be submitted and approved by the Director of Advancement if supporters or volunteers wish to raise funds for the benefit of Catholic Charities or one of the departments or services of the Agency. All activities must adhere to the Agency's gift solicitation standards.

2. Gifts In-Kind

Catholic Charities of Louisville accepts gifts-in-kind that support its mission, are consistent with its policies and are properly accounted for and acknowledged. A gift-in-kind is an item such as furniture, a vehicle or hygiene items that a donor voluntarily transfers to Catholic Charities of Louisville without charge or consideration.

Donors are free to itemize their donation to whatever extent they wish, using a detailed list or just categorizing. The choice is up to the donor. If the donor inquires, he/she should be informed of the following: for a donation of \$250-\$500, the IRS requires a "reasonable" description and for a donation of \$500 and over, the IRS requires a "detailed list." The donor should be instructed to place a "fair market value" (FMV) on the donation. The FMV is what the item can be sold for in the thrift shops in the item's present condition. If a donor asserts a value over \$5,000, an independent professional appraisal needs to be included.

3. Donor Privacy Policy

Catholic Charities of Louisville is committed to respecting the privacy of donors. The types of donor information that it collects and maintains are as follows:

- Contact information: name, address, telephone number and email address
- Giving information
- Information on events attended, publications received and special requests for program information
- Information provided by the donor in the form of comments and suggestions

Catholic Charities of Louisville uses donors' information to understand their interests in its mission and to update them on the organization's plans and activities. It is shared with staff, board members, and volunteers only on a "need-to-know" basis. Donors who do not wish to be included on our mailing list may contact the Agency to have their names removed.

Catholic Charities of Louisville also assures donors that their information will not be shared with any third party (excluding the Archdiocese of Louisville) unless permission has been granted.

V. Programs and Services

The following are general policies and procedures applicable to all programs and services. Due to the broad range of services provided by Catholic Charities of Louisville, individual programs may need to

develop supplemental policies and procedures based on requirements in relation to funding sources, regulatory agencies, and the work performed.

A. Client Confidentiality

Staff and volunteers will safeguard Personally Identifiable Information (PII) of clients. The agency adheres to the uniform regulations outlined by the U.S. Department of Health and Human Services stated in 45 CFR 75 - Title 45 Public Welfare Part 75 Uniform Administrative Requirements, Cost Principles and Audit Requirements for HHS Awards.

1. Handling of Confidential Information

Catholic Charities of Louisville respects the privacy of its clients and expects all staff to maintain client confidentiality. All information contained in client files and any other written or verbal communication containing personal or identifiable information regarding clients and services being received is confidential between the agency and the client.

The client must be informed of who is required to receive information; who may request information, and who may access information only with the client's informed consent. However, client files can be reviewed by funding sources without permission from the client. Catholic Charities auditors may also have access to case files when reviewing federal, state, or locally funded programs. Law enforcement agencies do not have the right to access client files unless they have a court order.

Staff and volunteers shall only discuss client and any other case information as may be required to address client need, and should not discuss client information with family, friends, or former staff. At times, employers, attorneys, financial institutions, or academic institutions may request client information to which they are not entitled. If you are unsure, ask your supervisor.

Confidential information will only be provided to an outside party without the consent of the client under certain conditions:

- If the client is a threat to the wellbeing of others or to him/herself.
- If you have reason to suspect a person is being sexually, physically, or psychologically abused, the Agency is required by law to report the situation to law enforcement, Child or Adult Protective Services.
- If client files are subpoenaed by a court of law.

a) Storage of Records

All hard copies of records, case files, and other sensitive client documents maintained by the Agency must be kept in a locked file cabinet or a secure office after business hours.

Staff should not leave digital client records open or allow them to be visible to others on their computer or laptop screen, this includes local and web-based applications.

They Agency's network and credential security policies as outlined in section III. A. 4. Technology and Data Security are also applicable to digital client data.

(1) Record Retention

Programs which are required to maintain client records shall develop departmental procedures adhering to the funder's requirements regarding retention and destroying of confidential client information.

2. Release of Information

At times it may be necessary to share client information with outside organizations or individuals for collaborative services. In order for client information to be shared outside of the agency, a release of information (Appendix D) must be completed and signed by the client after he or she is informed of all consequences, as well as benefits, and be supported to give or withhold his or her consent.

3. Protected Health Information

In light of HIPAA and HITECH requirements (45 CFR. §164.316(a)) included in the HIPAA Security Final Rule, as amended by The HITECH Act, Catholic Charities of Louisville, Inc., in operating as a Business Associate, will enact and adhere to its procedures in regard to HPI.

Please see Appendix D for specific HIPPA and HITECH information.

4. Using Client's image/voice

Staff will obtain the informed written consent before any audio-taping or video-taping of clients. Consent should also be obtained for the use of client cases/material for training purposes including the observation of services by another.

See Catholic Charities USA Code of Ethics IV Ethical Standards, 1.04 Informed Consent (e), 2007 and NASW Code of Ethics as approved by 1996 NASW Delegate Assembly and revised by 2008 NASW Delegate Assembly, 1.03 Informed Consent (f). These documents are available on-line through an Internet search.

5. Client Access to Records

Catholic Charities clients have the right to access their own records in accordance with funding source guidelines as well as HIPAA's Privacy Rule grant every individual a "right of access" -- to inspect and obtain a copy of all protected information. That right of access excludes:

- Information related to mental health and mental health therapies
- In cases when requested documentation is related to a case that involves domestic violence

Catholic Charities staff are to make a good faith effort only to deny access to the parts of the record that meet these denial grounds, while providing the rest. Because some information is "dangerous" or "tainted" does not mean that there are grounds for denial of the entire request.

Catholic Charities will deny access, but with an opportunity to appeal. When a staff member in charge of the case, in the exercise of professional judgment, determines that the requested

access is reasonably likely to endanger the life or physical safety of, or cause substantial harm to, the individual or another person.

Clients must make their access requests in writing. The Agency will respond to a request within 30 days of receiving it, either by providing the access specified or in a written response stating the reason (s) for denial. If the request is denied, the individual's right to seek review must also be outlined in the response by the program director or Director of Programs.

B. Client Interaction

Staff members must take care in maintaining appropriate professional relationships with the clients we serve, especially in the case of active clients. An active client is a person whose case is still open and to whom services are still being provided.

1. Conflict of Interest

A staff member must not engage in any activity that would lead to benefit from a personal or business relationship with an active client. If a staff member has a business or if a family member owns a business the nature of which is to serve walk-in customers, (i.e. a store open to the public) the staff member must not solicit or advertise that business to an active client.

If unsolicited business interactions occur, staff and supervisors shall be vigilant to safeguard clients from any possible exploitation or harm.

2. Appropriate Communication and Contact

Staff shall maintain professional relationships with active clients. Personal contact outside the scope of agency business is prohibited. Examples of inappropriate contact may include, but are not limited to:

- Any romantic or sexual relationship
- Sharing extensive personal details
- Inviting a client to a personal residence or giving a client a personal phone number
- Interaction through personal social media
- Arranging a social meeting with a client

Any staff person found to have engaged in any inappropriate communication or contact with an active client will be subject to disciplinary action up to and including termination.

If you are unsure regarding what may be considered inappropriate client contact, please consult with your supervisor or Program Director.

C. Client Rights Policy

The respect and dignity of clients will be maintained at all times and staff will provide services in a fair and professional manner

This policy and subsequent procedures is designed as a means for the Agency's applicants and clients to bring forth problems or concerns regarding service received to the management of the Agency and reach an agreeable resolution.

Filing a grievance shall not result in any repercussions to the client in further service delivery.

1. Notification

Agency staff will notify all clients that these procedures exist either as part of the intake process or any time it becomes evident that the client is not satisfied with the service being provided.

2. Timing

A client may present a grievance concerning a continuing practice or condition at any time. A grievance concerning a particular instance should be brought within thirty (30) days after the act or occurrence. If a legitimate reason exists for the failure to file a grievance within the thirty-day limit, the Agency may still accept the filing at its discretion.

3. Definitions

Client - Any individual with an open case to receive services or benefits.

Applicant - Any individual who has applied for services or benefits.

Case Handler - Any staff person who is providing services, making decisions regarding benefits, or interacting with a client in any way.

4. Types of Grievances

a) Denial of Benefits and/or Services

An applicant who has requested benefits or services and has been denied enrollment for those benefits or services may file a grievance regarding such decision.

b) Dissatisfaction with Services Provided

A client or applicant may file a grievance for a lack of fairness or professional treatment while interacting with staff or in the handling of his or her case.

5. Grievance Procedures

The following represents a due process procedure to be utilized in the absence of an established grievance procedure as provided by a funding source.

a) Denial of Services

Within fifteen days of the denial of services, the applicant may request a review of his or her request for enrollment in services and/or benefits. This may be done in writing or communicated in any way that accommodates the applicant and is effective in communicating the complaint.

b) Dissatisfaction with Services - Informal Procedure

1. Communication with Case Handler

The client should initially attempt to resolve any problem by communicating complaints to the staff handling his/her case. This can happen through a face-to-face or phone discussion or by written communication.

2. Communication with Supervisor

If the discussion with the case handler does not result in a satisfactory resolution of the client's complaint, the client should next ask to speak with, or write to, the case handler's supervisor. For complaints about case handling, the appropriate supervisor is the Team Leader of the team to which the case was assigned. If the supervisor was involved in the action or decision that is the subject of the complaint, or for any other reason feels she/he cannot objectively review the complaint, s/he shall refer the complaint to his/her supervisor for review.

The supervisor will listen to the complaint, review the proceeding from the client point of view, review the case with the case handler, and review the case file. If the supervisor finds that there is merit to the client's complaint, the supervisor will develop and present to the client a plan for resolving the client's dissatisfaction. This may be done in person, by phone, or by letter.

If the client continues to be dissatisfied, he or she will be advised of further appeal rights, i.e. the right to file a formal grievance with ten (10) working days of receipt of the informal grievance decision. The client will be advised to file a formal grievance to the appropriate department director.

3. Communication with a Department Director

To ensure impartiality neither the client nor staff should communicate with the Program Director in charge of the case or the Director of Programs at any time during the informal grievance procedure s about the substance of the complaint.

c) Dissatisfaction with Service Provided - Formal Procedure

If a grievance cannot be solved informally, a client may present the grievance to the Program Director under a formal procedure.

Content and Time Limits

The formal grievance must be submitted within ten (10) working days of the informal finding if submitted in writing. In instances when the client cannot write, a formal grievance meeting may be requested. The meeting must be requested within ten (10) working days of the informal finding.

Rejection of Grievance

A Program Director may reject the grievance if it was not filed within the time limits specified for filing.

d) Appeal

Conduct of the Hearing

A client may file an appeal to the Director of Programs of Catholic Charities. The Director of Programs and the client will meet at a time and place mutually convenient for the both parties for the purpose of hearing the appeal. Catholic Charities will provide an interpreter to the client.

The Director of Programs will consider all documents, testimony, and evidence related to the grievance, including statements of the complainant. The Director of Programs may exclude anyone from the hearing (including the complainant) for a conduct or behavior that obstructs the hearing.

Decision

The Director of Programs will issue a decision within ten (10) working days of the hearing. Prior to issuing the decision, the Program Director will consult and receive approval from the Chief Executive Officer. The decision of the Program Director is final.

D. Assessment and Reporting

Assessment of our work is necessary to ensure efficient and effective service provision, that internal and external policies and regulations are being followed, and to confirm that work continues in the spirit of the agency's mission. Programs will be internally audited by the Director of Administration in collaboration with the Director of Programs to determine each is operating within agency and funding guidelines as well as achieving program goals and objectives. For programs that are audited by a funding or oversight agency, the internal audit will supplant the external audit.

1. Internal Monitoring

The main purpose of monitoring is to ensure that a program is adhering to both agency and funder policies. Each Program will be monitored based on a monitoring schedule developed in the last quarter of the calendar year and disseminated to program managers by January 1.

The structure of annual reviews will vary based on the nature of the program and services provided. Refer to the Administrative operating procedures for timelines and components.

2. Evaluation

The purpose of evaluation is to determine the overall effectiveness to which the program is achieving its stated goals, and to inform strategic and budget planning. In coordination with the Programs Committee of the Board of Directors and the Director of Programs, each program will be evaluated annually on the following criteria:

- **Execution** - the level of service provided based on client surveys, appropriate numbers and skill sets of staff, results of internal and external monitoring.
- **Outcomes** - number of clients served, measures of impact on clients/community, use of data for program improvement.
- **Need** - the extent to which this service is distinctive in the community, demonstrated need for services is established.
- **Financial** - diversity and security of funding, fiscal responsibility of agency resources.

3. Reporting

Programs which are required to report to outside agencies shall establish departmental reporting procedures. These procedures will designate the responsible reporting staff member(s) and ensure requested information is reported accurately and timely based on the funder's requirements.

VI. Budget and Finance

This section contains an overview of fiscal policies applicable to all programs. For detailed information regarding these and other financial policies, please consult the Catholic Charities of Louisville Fiscal Policy and Procedure Manual.

A. Financial Planning

It is the policy of the agency for Program Managers/Directors to have to have input in the development and oversight of their departmental budgets. Each year the Director of Finance will develop, distribute, and follow a budget process that allows for such input.

1. Internal Reporting and Monitoring

By the 15th day of the month, Program Managers/Directors will be provided a detailed financial report from the finance department.

The Monthly Report will include per fund account:

1. Current month's expenditures
2. Cumulative expenditures year to date
3. Amount budgeted per each line item
4. Variance of each line item, actual to budget.

2. Exceptions and Amendments

Program Managers/Directors must receive prior approval from the Director of Programs or CEO and the Director of Finance before expending funds for an activity not included in the Agency's approved budget. The request must be in writing and applies to all out-of-budget requests for equipment, new positions, renovation projects, contractual services, or program changes that require additional unfunded expenditure of Agency resources.

A request may be approved if the Director of Finance and the Program Director successfully identify a source of funds.

B. Time and Effort Reporting

It is the responsibility of the Program Director of any program that receives grant funding to be aware of and implement the funder's policies as well as any other external protocols regulating an award. Below are policies that affect most staff in grant funded programs. For more detailed information regarding grant management, refer to the Catholic Charities of Louisville Fiscal Policy and Procedures.

Certain employees of Catholic Charities of Louisville must document their time and effort to ensure charges to Federal awards, and other funding sources are based on records that accurately reflect the work performed. These charges include compensation for salaries and fringe benefits. Such documentation is required by the following employees:

- Who work on more than one Federal award
- Paid by a Federal award (s) and non-Federal award (s)
- Paid both directly and through the indirect cost pool
- Participating in an unallowable activity and a direct or indirect cost activity.
- Whose salaries are being used to meet cost sharing or matching requirements
- Paid solely through non-federal sources, such as foundations, state and local awards, and other grants that require such documentation.

1. Monthly Activity Report

There is no prescribed or standardized method to document work activities for the agency therefore each department must determine the best method of documentation appropriate for their department. Program directors and grants accountants should work closely together to ensure the method provides sufficient documentation to support the distribution of salaries and fringe benefits and accounts for the total activity of the employee.

Once a particular method or methods has been determined, employees within the department are required to document work activities in a similar manner.

The activity reports should be reflective of the actual activity the employee put forth, not the budgeted amount. Budget estimates or other distribution percentages determined before the services are performed do not qualify as support; reports must be after- the- fact.

Written procedures are required for each department describing the method to document work activities. These procedures will remain in place unless revisions are submitted by the program director. Procedures should be maintained with the respective grants accountant.

Monthly Personnel Activity Summary Report:

The monthly summary report is an agency-wide standardized report. The employee, using their monthly personnel activity report as a guide, distributes their time daily assigning their

hours to the appropriate funding sources. This report when completed automatically summarizes the employee activities by percentage specific to their funding streams for the month. Detailed instructions to complete the Monthly Personnel Activity Summary Report are provided.

Procedure:

1. The grants accountant prepares the Monthly Personnel Activity Summary Report for each employee. These reports include the funding streams with percentages (budget estimates) that comprises 100% of the employee's funded activities. The percentages updated by the grants accountant as needed, serves only as a reference for the employee. Each month the grants accountant will enter the calendar dates for the month and preload any hours for Catholic Charities Holidays and all-staff meeting dates as applicable.
2. The Grants Accountant will send an email to their assigned employees informing them the monthly reports are ready. These reports are maintained in the cloud allowing employees access to their reports throughout the month. For example, the grants accountant should send an email no later than March 31st, informing their employees that the April report, effective April 1st is ready.
3. The grants accountant should ensure the monthly personnel activity summary reports are prepared in advance if they will not be in the office near the end of the month.
4. Once the report is ready, the employee can begin to enter their hours per funding source any time throughout the month. Employees will enter in their vacation, sick, personal days etc. when applicable.
5. The report should be completed by the employee no later than COB of the first business day of the month. For example, a summary report due on May 1st reports the distribution of activities that occurred from April 1st to April 30th.
6. The supporting documentation (monthly personnel activity reports) should be saved in the same folder in the cloud as the monthly summary report.
7. If the employee will not be in the office on the 1st business day of the month due to vacation, business trip, etc. then s/he should complete the summary report prior to their departure to ensure the report is completed and available to the grants accountant on the due date.
8. Nonexempt employees (hourly) paid by in part, or in whole by Federal Awards must ensure that the number of hours indicated on the monthly summary reports is the same number of hours reflected in Paycor for the same report period.

2. Allowable/Unallowable Costs

Program Directors will ensure staff are aware of allowable and unallowable costs for the program's various funding sources and must ensure that all expenditures are allowable. Catholic Charities of Louisville adheres to 2 CFR 200 for the definitions of reasonable and allocable costs.

There will be a column available in monthly summary reports to assign hours to these unallowable activities when applicable.

- Funding raising
- Lobbying
- Entertainment or social activities
- Preparation for any new grant applications, otherwise known as pre-award activities.
- Any activity that is not necessary and/or not incurred specifically for a Federal award

Employees funded through non-federal funding sources, such as private foundations and local awards should review the terms and conditions of their awards to determine if similar or different exclusions apply.

3. Internal Control

- New employees must be trained by program directors, supervisors and grants accountants to ensure that s/he understands what activities can or cannot be charged to the awards that cover their salary.
- Supervisors must review the monthly summary reports and the monthly activity reports of any new employee for the first two months of their employment to ensure the information is accurate. The supervisor should continue to review these reports longer than two months if needed.
- Employees should be encouraged to document their activities in their personal activity report at the end of each workday and not wait until the end of the month try to document all their activities throughout the reporting period.
- Supervisors should review employee activity reports and monthly summary reports periodically to ensure documentation is accurate, and if needed provide additional training
- Grants Accountants, supervisors, program managers are prohibited from revising the monthly detail report and/or the employee's personal activity report once it has been submitted. If revisions need to be made the employee who submitted the documentation must make the revisions themselves and resubmit the document.

C. Purchasing and Procurement

Employees may make budgeted purchases for program needs. Please note that all planned or unplanned equipment, services and supplies are governed by the agency's procurement policy. Please refer to Catholic Charities of Louisville's Fiscal Policy Manual, Procurement, for further information.

1. Purchase Requests

Purchase Requests (Appendix E) are used to make a planned, budgeted purchase. Examples of these purchases include:

- Computers or other equipment

- Office furniture or supplies
- Program Materials

Staff must complete the purchase request and forward to his or her supervisor for approval and submission to the finance department for processing.

2. Agency Credit Cards

Employees may be issued an agency credit card based on job function and needs as determined by the employee's supervisor or department director. Please refer to the Catholic Charities of Louisville's Fiscal Policy Manual, Agency Credit Cards, for further information.

D. Employee Expense Reimbursement

1. Use of Personal Vehicle

Refer to section III. 2. (a) Personal Vehicles of this manual regarding policies of staff utilizing a personal vehicle for business purposes.

Refer to page 14, V. Local Travel of the Catholic Charities Travel policy for further information regarding mileage calculation from alternate worksites and other allowable expenses.

If employees drive their personal vehicle for a legitimate business purpose, they will be reimbursed at a standard rate per mile as established annually by the Internal Revenue Service.

Examples of legitimate business purposes include, but are not limited to:

- Traveling between agency locations for work related activities
- Attending business related meetings, functions away from the employee's normal worksite

A mileage log must be completed stating the date, destination, reason, and distance of the business travel. (Appendix E) This form must be approved by the employee's supervisor and submitted to the finance department for processing no later than the 5th for the previous month's travel. Reimbursement is provided on the 15th of each month and is not considered taxable income.

2. Miscellaneous Business Purchases

a) Petty Cash

The agency does not maintain a petty cash fund. Small, unexpected purchases should be made with an agency credit card. Each Program Director has access to an agency credit card for these types of purchases.

b) Business Purchase with Personal Funds

While this practice should be avoided, under rare circumstances a staff member may need to utilize personal funds for a business purchase. This may include if there is an issue with a company credit card or an immediate need for program materials and an agency credit card is unavailable.

Staff must ensure the purchase is for legitimate business purposes and seek prior approval from his or her supervisor if possible. A purchase request must be completed and submitted to the finance department. The agency is under no obligation to reimburse unapproved or unallowable business purchases made with personal funds.

3. Cell Phones

Catholic Charities of Louisville recognizes that certain job responsibilities may require the use of a cellular phone as determined by Program Managers. Staff may receive a stipend for the use of a cell phone for regular business purposes.

Your supervisor or Program Manager/Director will determine if a particular staff member is eligible for this reimbursement. For more information about cell phone stipends, refer to the Catholic Charities Fiscal Policy Manual, Employee Reimbursement.

VII. Appendices

A. Personnel

JOB DESCRIPTION

JOB TITLE: Office Manager - Administrative Assistant

EXEMPT STATUS: Non-exempt

EEO CODE: A

JOB GRADE: 3

REPORTS TO: Director of Administration / Human Resources Manager

GENERAL SUMMARY:

This position manages the front desk operations and performs general office management for the agency's 4th St. facility, as well as administrative support to Human Resources Manager and Director of Administration.

ESSENTIAL DUTIES AND TASKS:

1. Manage front desk activities and ensure coverage and supervise front desk staff and/or volunteers
2. Inventory and order office supplies and new employee materials
3. Prepare invoices for departmental approval and payment
4. Process and electronically deposit incoming checks
5. Maintain lists for cleaning, repairs and maintenance requests in the building for maintenance staff; schedule appointments for outside vendors
6. Track and maintain vehicle files and registrations
7. Provide Human Resources Administrative support, i.e submit criminal background checks, contact job applicants to schedule interviews.
8. Provide Administrative support to the Director of Administration
9. Follow policies and procedures of Catholic Charities.
10. Perform other tasks and duties as assigned.

WORKING CONDITIONS:

This work is performed in a busy office setting with moderate noise and activity due to computers, printers, phones ringing, clients entering and exiting the building and people moving about.

EFFORT:

- Ability to sit and stand for extended periods of time
- Ability to communicate effectively verbally and in writing
- Ability to accurately analyze and act appropriately to information

MACHINES, TOOLS, EQUIPMENT:

computer, printer, copy machine, postage machine, fax machine, telephone switchboard **EDUCATION AND EXPERIENCE:**

Must have a high school diploma or equivalent with a minimum of 1 year of office experience in a similar position.

Reasonable accommodations may be made to those who are able to perform the essential duties of the job. The incumbent must be able to maintain the confidentiality of any information s/he encounters.

SPECIALIZED SKILLS AND KNOWLEDGE:

- Must be proficient in Microsoft Office programs, especially Word and Excel
- Must be proficient in using online technology for ordering materials and making deposits
- Must be able to exercise good judgment and adapt to a change
- Must be people oriented and relate to a varied ethnic population
- Must have excellent phone manner and professional personal appearance
- Must be able to multi-task and work under pressure
- Must be ethical
- Must be able to work a varied, flexible schedule during normal business hours

Approved:

 Employee Date Supervisor Date

*** The Agency reserves the right to revise this Position Description as it deems necessary.**

Employee Statement:

I have read this job description and a copy has been provided to me. My signature below certifies that I am able to perform the essential functions of this position.

Employee Signature _____ Date: _____

CATHOLIC CHARITIES NEW HIRE CHECKLIST
Human Resources

NAME: _____

HIRE DATE: _____

PRE-EMPLOYMENT REQUIREMENTS	Employment Application/Resume	
	Interview	
	Criminal Background Check Results	
	Reference Check/Previous Employment Verification	
	Online Driving Test Results (if applicable)	
	TB Test Results (if applicable)	
	Safe Environment Training	
	Catholic Social Teaching Training	
	New Hire Letter	

ORIENTATION ITEMS GIVEN, COPIED AND/OR COMPLETED	I.D. Badge	
	PAYCOR Access	
	Job Description (signed by employee and supervisor)	
	I-9 Form (with appropriate documentation)	
	IRS W-4 Form	
	Kentucky/Indiana Tax Form	
	Direct Deposit Form (with voided check attached)	
	Driver's License & Proof of Insurance (if applicable)	
	Copy of HS Diploma/GED/Degree(s)/Transcripts	
	Confidentiality Agreement Acknowledgement	
	Client Confidentiality Acknowledgement	
	MRS Protection from Sexual Exploitation and Abuse	
	Policies & Procedures Acknowledgement	

BENEFITS	Humana Large Group Employee Enrollment Form	
	Archdiocese Benefit Enrollment Form	

HR ACTION	Enter employee info/emergency info into database	
	Give Employee Information to Payroll	
	Send Email Announcing New Employee to Staff	
	Send benefits paperwork to Chancery	
	Send benefits paperwork to Humana	



Catholic Charities of Louisville
2911 South 4th Street
Louisville KY, 40208

Request for Vacation/Personal Days

Employee Name: _____

Number of Days: _____

Record As: Vacation: _____ **Personal:** _____

Dates: _____

Employee's Signature: _____ **Date:** _____

Supervisor's Approval: _____ **Date:** _____

Revised by: Malika Madsen Date: March 11, 2016

Appendix C

Personnel Policies and Procedures

Page 1

Employee Corrective Action Form

Employee Name:		Date:	
Job Title:		Supervisor:	
Level of Corrective Action			
<input type="checkbox"/> Verbal Warning/Counseling <input type="checkbox"/> Written Warning/Reprimand <input type="checkbox"/> Suspension <input type="checkbox"/> Termination			
Facts:			
Objective:			
Solution(s):			
Action Taken:			
Comments:			
Re-evaluation meeting scheduled for			
Employee signature		Date	
Supervisor signature		Date	
Director of HR signature		Date	
A copy of this corrective action will be placed in your personnel file for reference.			

B. Facilities, Equipment, and Workplace Conditions

Maintenance Request

Date: _____

Submitted by: _____

Location: _____

Issue: _____

Facilities Staff:

Date Acknowledged: _____

Date Completed: _____

Maintenance Staff Signature: _____

C. Programs and Services



CATHOLIC CHARITIES OF LOUISVILLE, INC. CONSENT TO RELEASE CONFIDENTIAL INFORMATION

I, the undersigned and current client of Catholic Charities of Louisville, Inc., hereby authorize the release of confidential information pertaining to myself for the sole purpose of enhancing services to me and to avoid duplication of services of collaborating agencies. I understand that all records and information will be protected by the regulations that govern the exchange of confidential information and that this disclosure will be limited to the staff at Catholic Charities of Louisville, Inc. and within the organizations indicated on this form and will not be released to anyone else without my consent.

Catholic Charities of Louisville, Inc., has my written consent to share the following confidential information:

- | | | |
|---|--|--|
| <input type="checkbox"/> Medical records and information pertaining to medical history, physical condition, services rendered and treatment given | <input type="checkbox"/> Treatment, service or education plans | <input type="checkbox"/> Financial, employment, or other demographic information pertaining to service eligibility |
| <input type="checkbox"/> Medical records and information pertaining to mental health | <input type="checkbox"/> Social and educational history and observations | <input type="checkbox"/> Other: _____ |
| | <input type="checkbox"/> Court and legal proceeding records | _____ |

This information will/may be release to or received from:

- | | | |
|---|---|--|
| <input type="checkbox"/> US Department of Health and Human Services | <input type="checkbox"/> Louisville Metro Department of Housing and Family Services | <input type="checkbox"/> Seven Counties Services |
| <input type="checkbox"/> US Department of Agriculture | <input type="checkbox"/> Louisville Metro Department of Public Health and Wellness | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> KY Cabinet for Health and Family Services Division of Family Support | <input type="checkbox"/> Jefferson Co. Public Schools | _____ |

I understand that:

- I do not have to sign this authorization and that my refusal to sign will not affect my ability to obtain treatment or services
- I may cancel this authorization at any time by submitting a written request to Catholic Charities of Louisville, Inc., except where a disclosure has already been made in reliance on my prior authorization
- If the person or facility receiving this information is not covered by privacy regulations, the information could be re-disclosed
- If the authorized information is protected by Federal Confidentiality Rules 42CFR, Part 2, it may not be disclosed without my written consent unless otherwise provided for in the regulations
- Release of HIV-related information requires additional information
- This authorization will expire exactly one year from the date signed

I have read the contents of this form; I have received a copy and I agree to its provisions.

Client Name (Print)

Client or Legal Guardian Signature

Date

Witness / Staff Signature

Date

Release of Information 4/09

Catholic Charities of Louisville, Inc.

Policy on

Protected Health Information

It is the policy of Catholic Charities that:

PROTECTED HEALTH INFORMATION POLICY:

In light of HIPAA and HITECH requirements (45 C.F.R. §164.316(a)) included in the HIPAA Security Final Rule, as amended by The HITECH Act, Catholic Charities of Louisville, Inc., in operating as a Business Associate, will enact and adhere to its procedures in regard to PHI. All staff members are expected to understand the importance of client confidentiality and use their best efforts to safeguard both personal and health related information which can readily identify a client.

Recommended by the Program Committee: July 28, 2014

Approved by the Board of Directors:

CATHOLIC CHARITIES OF LOUISVILLE, INC.

PROTECTED HEALTH INFORMATION POLICIES AND PROCEDURES

INTRODUCTION:

Catholic Charities of Louisville (CCL) holds the confidentiality of its clients in the highest regard. These PHI Policies and Procedures are meant to supplement the current Client Confidentiality Policies and Procedures located on Page 6 of the Employee Procedure Manual.

CCL is not a Covered Entity, meaning we neither directly treat or otherwise provide health services, nor process PHI during the course of our regular business. We are, however, considered a Business Associate by rule, due to the fact several programs may share PHI in conjunction with Covered Entities as part of service provision, as well as maintain client files which contain PHI.

TERMS:

HIPAA - Health Insurance Portability and Accountability Act of 1996. The goal of the law is to make it easier for people to keep health insurance, protect the confidentiality and security of healthcare information and help the healthcare industry control administrative costs.

HITECH - Health Information Technology for Economic and Clinical Health Act. This is part of the American Recovery and Reinvestment Act of 2009 which is intended to stimulate the use of Electronic Healthcare Records.

PHI - Protected Health Information. This includes any individually identifiable health information transmitted or maintained in any form or medium. In other words: any information relating to physical or mental health, the provision of or the means of payment for healthcare which easily identifies the client. It includes both paper and electronic copies, as well as spoken and recorded (generally voicemail) conversations.

Breach - the unauthorized acquisition, access, use, or disclosure of Protected Health Information which compromises the security or privacy of such information, except where an unauthorized person to whom such information is disclosed would not reasonably have been able to retain such information.

Covered

Entity - defined as Health Care Providers, Health Plans, and other organization which process non-standard healthcare information.

Business

Associate - A person/organization who performs functions or activities on behalf of, or certain services for, a covered entity that involve the use or disclosure of protected health information.

PROTECTED HEALTH INFORMATION POLICY:

In light of HIPAA and HITECH requirements (45 C.F.R. §164.316(a)) included in the HIPAA Security Final Rule, as amended by The HITECH Act, CCL, in operating as a Business Associate, will adopt the following procedures in regard to PHI. All staff members are expected to understand the importance of client confidentiality and use their best efforts to safeguard both personal and health related information which can readily identify a client.

PROTECTED HEALTH INFORMATION PROCEDURES:

1. Confidential Information Designee (CID)

- a. CCL will designate the Director of Operations in coordination with the Director of Programs to enact CCL’s PHI Policy and ensure compliance to PHI procedures throughout the agency. The CID will act on behalf of and report to the agency’s Executive Director. Any questions regarding PHI, shall be directed to the Confidential Information Designee.

2. Managing Protected Health Information

- a. Handling of Paper Files
 - i. All hard copies of identifiable client information, including PHI, will be handled in a confidential manner at all times. Client files shall be stored either in locked file cabinets or secured offices when not in use.
 - ii. While transporting paper files, either on or offsite, staff will continue to manage these files in a confidential manner. If the potential exists for client files to be left unattended, they should be stored in a secure holder, such as a lockable briefcase.

- b. Handling of Electronic Files (ePHI)
 - i. CCL’s current data systems are password protected and meet current HIPPA/HITECH requirements. Staff shall follow all security protocols of these systems and not disclose their login credentials with anyone.
 - ii. Staff who maintain PHI files on their workstations or laptops shall:
 - 1. Follow the Archdiocese of Louisville Network Security Protocols
 - 2. Password lock the workstation/laptop when leaving it unattended
 - 3. Situate the monitor so the screen is not easily accessible to others in its vicinity. iii. If staff transport ePHI on a device such as a flash drive, the device must be minimally encrypted with a password. If the device is not capable of password protection, the individual files saved on the device shall require a password for access.
 - iv. It is recommended that staff do not transmit PHI via email, text, or other unsecure electronic transmission. Staff are also discouraged to not maintain PHI (documents, voicemails, etc.) on cellular phones for an extended period of time (longer to conduct necessary business). If a staff member determines that this mode is necessary for their normal course of business, he or she should consult with the CID to determine appropriate security protocols.

- c. Disposal of PHI
 - i. All client records will be maintained for the period of time in accordance with the guidelines which manage the particular program. When files are eligible for

disposal, staff shall place them in the secure bins to be properly destroyed by our vendor.

- ii. Individual forms or other surplus copies containing PHI can either be manually shredded (each facility should have a cross-cut shredder) or placed in the secure bins for disposal.
- iii. ePHI should be completely deleted from workstations, laptops, or other storage devices. Consult the CID or our IT Consultants to ensure proper removal.

3. Training

- a. As part of general employment orientation, all staff will be trained in regard to client confidentiality and PHI to ensure minimum standards are maintained throughout the agency. Documentation stating the employee's understanding of this training will be maintained in the employees file.
- b. Staff members who utilize PHI on a consistent basis through the course of their normal work will receive additional training in regard to PHI. This training will be facilitated by the Human Resources Manager and documentation on participation will be maintained in the client's file.
 - i. Staff to be included: Long-Term Care Ombudsman staff, Refugee State Health Coordinator, Refugee Special Needs staff, Pregnancy and Adoption staff, Rescue and Restore Victims of Human Trafficking staff.

4. Assessing and Reporting a Breach

- a. The term "breach" does not include:
 - i. any unintentional acquisition, access, or use of protected health information by an employee or individual acting under the authority of a covered entity or business associate if
 - 1. such acquisition, access, or use was made in good faith and within the course and scope of the employment or other professional relationship; and
 - 2. such information is not further acquired, accessed, used, or disclosed by any person; or
 - ii. any inadvertent disclosure from an individual who is otherwise authorized to access protected health information at a facility operated by a covered entity or business associate to another similarly situated individual at same facility; and
 - iii. any such information received as a result of such disclosure is not further acquired, accessed, used, or disclosed without authorization by any person.
- b. Depending on the nature of a breach, CCL, as a business associate, may be required to inform the covered entity, the individual(s) whose information is involved, and in extreme instances, the media.
 - i. At the time a staff member determines that the potential of a breach exists, he or she should immediately inform his or her supervisor and/or the CID.

- ii. The CID in conjunction with staff will utilize the Breach Assessment Tool [Attachment 1] to determine if the HIPAA Privacy Rule has been violated [Attachment 2 - HHS OCR Policy Brief: Summary of HIPAA Privacy Rule] and govern the agency’s course of action. iii. If it is determined that a breach of PHI has occurred, agency staff will follow the guidelines as outlined in the HIPAA Breach Notification Rule, 45 CFR §§ 164.400-414.

Resources are available at:

<http://www.hhs.gov/ocr/privacy/hipaa/administrative/breachnotificationrule/>

CCL PHI Policy and Procedures Attachment 1

Breach Risk Assessment Tool

For acquisition, access, use, or disclosure of PHI to constitute a breach, it must be a violation of the Privacy Rule

QUESTION	Yes – Next Steps	No – Next Steps
Unsecured PHI		
Was the impermissible use/disclosure unsecured PHI (e.g.. not rendered unusable, unreadable, indecipherable to unauthorized individuals through the use of technology or methodology)?	Continue to next question	Notification not required. Document decision
Minimum Necessary		
Was more than the minimum necessary for the purpose accessed, used or disclosed?	Continue to next question	Potential low risk / no notification. Document decision
Was there a significant risk of harm to the individual as a result of the impermissible use or disclosure?		
Was it received and/or used by another entity governed by the HIPAA Privacy & Security Rules or a Federal Agency obligated to comply with the Privacy Act of 1974 & FISA of 2002?	Potential low risk / no notification. Document decision	Continue to next question
Were immediate steps taken to mitigate an impermissible use/disclosure (ex. Obtain the recipients’ assurances the information will not be further used/disclosed or will be destroyed)?	Potential low risk / no notification. Document decision	Continue to next question
Was the PHI returned prior to being accessed for an improper purpose (e.g., A laptop is lost/stolen, then recovered & forensic analysis shows the PHI was not accessed, altered, transferred or otherwise compromised)?	Potential low risk / no notification. Document decision	Continue to next question
What type and Amount of PHI was involved in the impermissible use or disclosure?		
Does it pose a significant risk of financial, reputational, or other harm?	Higher risk – should report	Potential low risk / no notification. Document decision

Did the improper use/disclosure only include the name and the fact services were received?	Potential low risk / no notification. Document decision	Continue to next question
Did the improper use/disclosure include the name and type of services received, services were from a specialized facility (such as a substance abuse facility), or the information increases the risk of ID Theft (such as SS#, account#, mother's maiden name)?	High risk – should report	Continue to next question
Did the improper use/disclosure not include the 16 limited data set identifiers in 164.514(e)(2) nor the zip codes or dates of birth? Note: take into consideration the risk of re-identification (the higher the risk, the more likely notifications should be made).	High Risk – should report	Potential low risk / no notification. Document decision
Is the risk of re-identification so small that the improper use/disclosure poses no significant harm to any individuals (ex. Limited data set included zip codes that based on population features doesn't create a significant risk an individual can be identified)?	Potential low risk / no notification. Document Decision	Continue to next question
Specific Breach Definition Exclusions		
Was it an unintentional access/use/disclosure by a workforce member acting under the organization's authority, made in good faith, within his/her scope of authority (workforce member was acting on the organization's behalf at the	Potential low risk / no notification. Document	Continue to next question
time), and didn't result in further use/disclosure (ex. billing employee receives an e-mail containing PHI about a patient mistakenly sent by a nurse (co-worker). The billing employee alerts the nurse of the misdirected e-mail & deletes it)?	decision	
Was access unrelated to the workforce member's duties (ex. did a receptionist look through a patient's records to learn of their treatment)?	High risk – should report	Continue to next question
Was it an inadvertent disclosure by a person authorized to access PHI at a CE or BA to another person authorized to access PHI at the same organization, or its OHCA, and the information was not further used or disclosed (ex. A workforce member who has the authority to use/disclose PHI in that organization/OHCA discloses PHI to another individual in that same organization/OHCA and the PHI is not further used/disclosed)?	Potential low risk / no notification. Document decision	Continue to next question
Was a disclosure of PHI made, but there is a good faith belief than the unauthorized recipient would not have reasonably been able to retain it (Ex. EOBs were mistakenly sent to wrong individuals and were returned by the post office, unopened, as undeliverable)?	Potential low risk / no notification. Document decision	Potential low risk / no notification. Document decision
Was a disclosure of PHI made, but there is a good faith belief than the unauthorized recipient would not have reasonably been able to retain it (ex. A nurse mistakenly hands a patient discharge papers belonging to a different patient, but quickly realized the mistake and recovers the PHI from the patient, and the nurse reasonable concludes the patient could not have read or otherwise retained the information)?	Potential low risk / no notification. Document decision	Document findings
Burden of Proof: Required to document whether the impermissible use or disclosure compromises the security or privacy of the PHI (significant risk of financial, reputational, or other harm to the individual).		

Adapted from Breach Risk Assessment Tool Health Insurance Portability and Accountability Act Collaborative of Wisconsin © 2009 HIPAA COW

D. Budgets and Finance



PURCHASE REQUISITION FORM

Complete the information and obtain approvals below. Forward the completed and approved form to purchasing.

Requisitioner Info: Date _____ Name _____ Department _____ Account(s) to be charged: _____ _____ PO# or VISA _____ <small>(Finance Use Only)</small>	Recommended Vendor Info: Name _____ Address _____ _____ Phone _____ Fax _____ Attn: _____
--	--

Item #	Quantity	Description	Unit Price	Total

Special Instructions:

Department Approval: _____ Finance Approval (if applicable) _____

Signature _____ Date _____ Signature _____ Date _____

MILEAGE REIMBURSEMENT FORM

NAME: _____ **MONTH:** _____

DATE:	DESTINATION:	DEPT.	MILES	PARKING
		TOTAL	0.00	

0 Miles @ .545 per mile \$0.00
PARKING \$0.00
TOTAL REIMBURSEMENT \$0.00