



Personnel Policy Manual
Northwest Community Action Partnership



**Northwest
Community
Action
Partnership**

NORTHWEST COMMUNITY ACTION PARTNERSHIP PERSONNEL POLICY MANUAL

Effective Date

May 1, 2024

NCAP Mission: Helping people. Changing lives. Engaging communities to alleviate poverty.

NCAP Vision: We envision a thriving community that works together to empower people through knowledge, opportunity, and resources to improve the quality of their lives.

Board of Directors' Approval -

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Jake Stewart
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4/25/2024

Signature of Board President

Date

Head Start Policy Council Approval -

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4/25/2024

Signature of Policy Council Chairman

Date



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Personnel Policy Manual Policy:

The purpose of this manual is to ensure the proper policies have been developed and approved relating to employment at NCAP. NCAP maintains additional policies such as Fiscal Manual, Personnel Procedures Manual and others. For that reason, if the employee has any questions about a policy in this manual, he/she should address specific questions to the Human Resource Director (HR Director). Neither this manual, other manuals or procedures confer any contractual right, either express or implied, to remain in NCAP's employ. The Personnel Policy Manual and the Personnel Procedures Manual are available on the Agency's website, www.ncap.info, or by contacting Human Resources. It is the responsibility of the employee to review and comply with these policies.

Exceptions and Amendments Policy:

The Board may make exceptions to any of the Personnel Policies in extenuating circumstances. These exceptions may require Policy Council approval. The updates to the Personnel Policy Manual will be reviewed periodically, and changes approved by the Agency's Board of Directors and Policy Council.

Employment At-Will Policy:

Employees are employed at NCAP for an indefinite period of time, unless they have a written employment agreement for a definite period of time. Employees may resign from the Agency at any time. Employees may be terminated by the Agency at any time, for any non-discriminatory reason, and with or without notice.

Equal Employment Opportunity Policy:

NCAP provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, political affiliation, marital or paternal status, military status, limited English proficiency or any other characteristic protected by federal, state or local laws. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfers, leaves of absence, compensation and training.



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Diversity, Equity, Inclusion, and Accessibility Policy:

NCAP is committed to fostering, cultivating and preserving a culture of diversity, equity, inclusion and accessibility.

All employees of NCAP have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other Agency-sponsored and participative events.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the agency's diversity, equity, inclusion and accessibility policy and initiatives should seek assistance from a supervisor or the HR Director.

Affirmative Action Policy:

As part of the Agency's equal employment opportunity policy, NCAP will also take affirmative action as called for by applicable laws and Executive Orders to ensure that minority group individuals, females, disabled veterans, recently separated veterans, other protected veterans, Armed Forces service medal veterans, and qualified disabled persons are introduced into our workforce and considered for promotional opportunities.

Employees and applicants shall not be subjected to harassment, intimidation or any type of retaliation because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity.

Reasonable Accommodation Policy:

The Americans with Disabilities Act (ADA) and its Amendments Act, known as ADAAA, are federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities and that when needed provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

NCAP complies with all state and federal laws concerning the employment of persons with disabilities. It is our policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, and other terms, conditions and privileges of employment in compliance with ADA regulations.



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NCAP will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to NCAP. Contact Human Resources with any questions or requests for accommodation.

Recruitment and Selection Policy:

NCAP maintains consistent and lawful procedures for recruiting and selecting applicants. NCAP recruits and selects the most qualified applicants for available positions, in compliance with all applicable federal and state laws and regulations and funder regulations. The Agency is committed to Equal Employment Opportunity. NCAP provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, political affiliation, marital status, military service, limited English proficiency or any other characteristic protected by federal, state or local laws. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Recruitment and Referral Incentive Policy:

Recruitment and/or Referral Incentives may be available for vacant positions if the position meets the criteria outlined in the Recruitment and Referral procedures. Guidelines and exceptions as outlined in the procedures must be strictly adhered to.

Special hiring Policy:

The Chief Executive Officer (CEO) will be hired by the Board of Directors. The Chief Financial Officer (CFO) and Head Start/Early Head Start Director search and selection will be conducted by the CEO. NCAP will follow other Head Start regulations regarding the hire of key Head Start staff. All other Program Directors will be hired by the CEO without further approval.

Promotions and Transfers Policy:

Each employee should have equal access to opportunities for growth and development. Employees will be given consideration for positions if they have a history of satisfactory performance and meet the job qualifications. In the selection, promotion and/or transfer decisions, NCAP complies with all applicable federal and state laws and regulations and with the Agency's commitment to Equal Employment Opportunity.



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Pre-Employment and On-going Investigation Policy:

To ensure that individuals who join NCAP are well qualified and to ensure that NCAP maintains a safe and productive work environment and remains in compliance with applicable program regulations, it is our policy to conduct pre-employment background checks on all applicants who accept an offer of employment. Background checks may include verification of any information on the applicant's resume or employment application.

As a condition of employment employees and potential employees of NCAP will be subject to background and reference checks. All background checks shall be conducted in compliance with the Americans with Disabilities Act, Federal Fair Credit Reporting Act and antidiscrimination laws. Reports shall be kept confidential and may only be viewed by individuals involved in the hiring process.

If information obtained in a background check would cause NCAP to deny employment, a copy of the report will be provided to the applicant as well a summary of their consumer rights under the Federal Fair Credit Reporting Act.

Volunteer Services - Retired and Senior Volunteer Program will comply with AmeriCorps National Service Criminal History Check (NSCHC) requirements as noted in the NCAP Procedures Manual.

Additional checks, including but not limited to a driving record or credit report may be made on applicants for particular positions if appropriate and job related.

NCAP reserves the right to conduct a background check for current employees to determine eligibility for promotion or reassignment in the same manner described above.

All employees will be subject to a re-check of their background check every 5 years of employment.

HIPPA Medical Privacy Policy:

NCAP's HIPPA Medical Privacy Policy protects the privacy and confidentiality of protected health information (PHI) whenever it is used by Agency representatives. The private and confidential use of such information will be the responsibility of all individuals with job duties requiring access to PHI in the course of their jobs.

PHI refers to individually identifiable health information received by the Agency's group health plans or received by a health care provider, health plan or health care clearinghouse that relates to the past or present health of an individual or to payment of health care claims. PHI information includes medical conditions, health status, claims experience, medical histories, physical examinations, genetic information and evidence of disability.



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Professional Development and Qualification Policy:

NCAP requires certain positions and staff to obtain and maintain all position-specific licenses and certifications. NCAP encourages professional development and has a process for employees to pursue training and educational opportunities. Qualifications set forth in job descriptions shall be used as guidelines in the employee recruitment and selection process. Job descriptions will outline the required qualifications for the position.

Employee Classification Policy:

NCAP employees are designated as either non-exempt or exempt under Nebraska and federal wage and hour laws. These classifications do not guarantee employment for any specified period of time. The following is intended to help employees understand employment classifications and employees' employment status and benefit eligibility.

Non-exempt employees are employees whose work is covered by the Fair Labor Standards Act (FLSA). They are not exempt under the law's requirements concerning minimum wage and overtime.

Exempt employees are generally managers, professionals, administrative or technical staff who are exempt from the minimum wage and overtime provisions of FLSA. Exempt employees hold jobs that meet the standards and criteria established under the FLSA by the U.S. Department of Labor.

NCAP has established the following categories for both non-exempt and exempt employees: orientation, regular, Full-Time Equivalent (FTE) status, temporary, substitutes, consultants and volunteers* according to the Fair Labor Standards Act (FLSA).

*Volunteers: A volunteer is an individual who is giving volunteer time to NCAP in any capacity not in exchange for any tangible benefit. Individuals who volunteer or donate their services, usually on a part-time basis, for public service or humanitarian objectives, not as employees and without contemplation of pay, are not considered employees of NCAP.

Temporary workers, substitutes, consultants and volunteers are not eligible for Agency benefits unless specifically stated otherwise in the Agency policy or are deemed eligible according to plan documents.

Job Descriptions Policy:

Written job descriptions will be developed for each regular position in the Agency. Each job description shall reflect essential duties and responsibilities, supervisory responsibilities, education and/or experience, skills, physical and mental demands and work environment. Job descriptions will be reviewed every 5 years for accuracy and relevance. Job descriptions will indicate whether the position is exempt or non-exempt.



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New Employee Orientation and Training Policy:

NCAP provides all new hires a comprehensive and complete new employee orientation and training. Training will be provided to all new hires, regular employees who have been transferred to a new position as well as on-going training to all employees as part of NCAP's Professional Development and Training Program.

Performance Evaluation Policy:

NCAP will evaluate employee performance in terms of job description and other factors annually. Performance evaluations will be conducted on all employees in a fair and equitable manner. All evaluations will become part of the employee's permanent personnel file.

Employment of Relatives / Nepotism Policy:

NCAP prohibits employment of relatives in a direct reporting relationship to avoid creating or perpetuating circumstances in which the possibility of favoritism, conflict of interest, or impairment of efficient operations may occur.

Disciplinary Action Policy:

The Agency's policy is to treat employees fairly, with dignity and respect. Employees who are not performing their jobs up to expectations, fail to follow Agency policies and procedures and/or exhibit improper behavior may be subject to discipline, up to and including termination.

Termination of Employment Policy:

Either the Agency or employee may terminate the employment relationship for non-discrimination reasons at any time for any reason or no reason at all. Upon termination an electronic exit survey will be sent by HR. Results of surveys will be aggregated and reported to program directors.

Reduction in Force Policy:

There are occasions when it is necessary to reduce the workforce at NCAP. This may occur because of funding reduction or other budget considerations or because changing conditions make it necessary to reorganize a work unit. Staffing and reduction-in-force decisions are to be made on the basis of factors related to the function of the Agency. In order to provide for the most efficient operation of the area(s) affected, the order of employees' reduced-in-force will be determined in accordance with the NCAP Reduction in Force Procedures found in the NCAP Personnel Procedures Manual.



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Benefit Policy:

NCAP provides a broad range of benefits to employees. These benefits will be in accordance with NCAP's Personnel Procedure Manual. For additional information see the Summary of Benefits, distributed at new hire orientation or during any subsequent open enrollment period. Employee benefit includes:

1. *Holidays* - are recognized as paid non-work days for employees.
2. *Vacation Leave* - employees accrue and use paid vacation leave.
3. *Sick Leave* - employees accrue and use paid sick leave.
4. *Contagious Illness Leave* – employees are granted a one-time allotment of leave.
5. *Bereavement Leave* - employees may be entitled to paid leave in circumstances where leave may need to be taken due to a death of a family member.
6. *Administrative Leave Policy* - NCAP may provide Administrative Leave with pay.
7. *Leave of Absence without Pay* - employees may be granted a Leave of Absence without Pay upon discretion of the Program Director and CEO.
8. *Benefit Plan* – NCAP is considered a large employer based on the definition set forth in the Affordable Care Act. NCAP complies with the Affordable Care Act by providing a health insurance plan that meets the minimum essential coverage and affordability criteria. Employees who are classified as above .75 Full-Time Equivalent (FTE) are eligible for the benefit options offered by the Agency. More information regarding benefit enrollment will be presented at new employee orientation and during any open enrollment period.
9. *Civil Leave & Special Leave* - NCAP grants all required leave to employees according to state and federal regulations. NCAP may also grant other special types of leave requested at the discretion of the Program Director and CEO.
10. *Military Leave* - NCAP will comply with all applicable statutes that require reservists and National Guard personnel to be given leave for active duty, training and military funeral exercises under the Uniformed Services Employment and Reemployment Rights Act (USERRA) of 1994.
11. *FMLA* – NCAP will provide leave to employees in compliance with the Family Medical Leave Act of 1993 (FMLA).

Temporary workers, substitutes, consultants and volunteers are not eligible for Agency benefits unless specifically stated otherwise in the Agency policy or are deemed eligible according to plan documents.



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Safety and Injury Policy:

NCAP follows procedures to ensure the safety of all employees in the workplace. NCAP is committed to the prevention of accidents and response to emergencies in all locations, programs and activities. NCAP complies with all state and federal Workers Compensation Laws. NCAP will ensure consistency in the management of injured employees' recovery and rehabilitation. NCAP prohibits all employees and visitors from carrying or possessing a weapon of any kind on Agency premises.

Attendance Policy:

NCAP employees are required to be at their assigned location for every scheduled work day and to report to work on time. Work hours must be performed at the employee's designated work site unless prior approval is given by the Program Director. NCAP does not tolerate off-the-clock work for hourly employees.

Telework Policy:

Telework allows employees to work at home, on the road or in a satellite location for all or part of their workweek as approved. NCAP considers telework to be a viable, flexible work option when both the employee and the job are suited to such an arrangement. Telework may be appropriate for some employees and jobs but not for others. Telework is not an entitlement, it is not an Agency wide benefit, and it in no way changes the terms and conditions of employment with NCAP. Telework arrangements must comply with all outlined NCAP guidelines.

Breastfeeding Policy:

As part of our family-friendly policies and benefits, NCAP supports breastfeeding mothers by accommodating the mother who wishes to express breast milk during her workday.

Compensation Policy:

All employees shall be paid a rate no lower than the state minimum wage. In cases where an employee is subject to both state and federal minimum wage, the employee is entitled to be paid the higher of the two rates. Compensation for a new employee will be based on the current wages at the time of hiring, for the position to which he/she is hired. It is NCAP's policy to comply with the Fair Labor Standards Act (FLSA).

Agency staff may be eligible to receive an incentive compensation based on cost reduction, efficient performance, or other criteria set by the Agency or individual Agency Programs. The payment of incentive compensation will be dependent on the availability of funds. Incentive compensation may be paid or accrued pursuant to an established plan.



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Travel Policy:

NCAP travel costs incurred must be in compliance with the funding source, IRS, and the Fiscal Manual. NCAP processes all reimbursements of expenses and mileage in accordance with IRS and Fiscal Department regulations. NCAP employees and authorized others operating Agency vehicles shall have a valid driver's license, acceptable driving record and be insured under the Agency's insurance plan. Non-employees may be authorized to transport program participants but must have a valid driver's license, acceptable driving record and be insured on the vehicle he/she is driving. With prior approval, NCAP may reimburse for use of personal vehicles.

Agency Vehicle Policy:

Authorized drivers of Agency vehicles must have a current valid driver's license on file and be approved to drive an Agency vehicle. Drivers must pass a motor vehicle background check during their pre-employment screening and are subject to a recheck of their motor vehicle record on an as needed basis. Drivers are required to provide copies of updated and renewed licenses. Drivers must notify their Program Director and Human Resources within 5 days of any traffic accident or violation that takes place in a personal vehicle. Drivers must notify their Program Director and Human Resources immediately following any accident or traffic violation in an Agency vehicle. Drivers shall abide by all safety regulations/laws.

Code of Ethics and Conduct Policy:

NCAP expects all persons involved in the Agency to dedicate themselves to follow the Agency's Code of Ethics policy and work diligently to reduce the effects of poverty by opening up the opportunity for education and training, the opportunity to work; and the opportunity to live in decency and dignity.

Workplace Harassment Policy:

NCAP is committed to maintaining a work environment that is free from harassment where employees at all levels of the Agency are able to devote their full attention and best efforts to the job. Harassment, either intentional or unintentional, will not be tolerated in the workplace. NCAP prohibits, and will not tolerate, any form of harassment of or by any employee or individual within the Agency (whether managerial or non-managerial) based on race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, political affiliation, marital or paternal status, military status, limited English proficiency or any other characteristic protected by federal, state or local laws.

Chronic Infectious Disease Policy:

NCAP complies with federal laws which prohibit unlawful discrimination against persons with contagious diseases when a direct threat to the health and safety of others is not a risk.



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Drug Policy:

NCAP ensures the health and safety of others in accordance with the Drug - Free Workplace Act of 1988. Accordingly, the unlawful manufacture, distribution, dispensing, possession, use, and being under the influence of a controlled substance including cannabis are prohibited on NCAP premises.

Alcohol, Tobacco and Nicotine Use Policy:

The use of alcohol, tobacco and nicotine products including, but not limited to cigarettes, e-cigarettes, cigars, pipes, vapor devices, oral tobacco, or smokeless tobacco, is prohibited on or inside any of NCAP's property, facilities or vehicles.

Under special circumstances and with prior approval from the Board of Directors, serving and use of alcohol on NCAP premises may be approved for special Agency functions.

Child Abuse Policy:

NCAP responds to suspected or known child abuse whether it occurs inside or outside of the program. Each person within the Agency must report child abuse, sexual abuse, and/or neglect in accordance with the provisions of applicable state or local law.

Confidentiality Policy:

NCAP honors and respects our employees' rights to privacy. NCAP has information which should not be discussed with anyone outside the Agency, except when required in the normal course of business. Information concerning the activities or operations of the Agency, or concerning service recipients will be treated as confidential or on a need-to-know basis. The confidentiality of all personal information in the Agency's records will be protected.

Conflict of Interest Policy:

All NCAP employees will avoid conflicts of interest and the appearance of conflicts between their personal interests and those of NCAP.

Political Activity and Representation Policy:

NCAP follows the guidelines of the Hatch Act and any state and federal regulations regarding political activity. NCAP, its management and administration will assure, so far as reasonably possible, that all program activities are conducted in a manner which provides assistance effectively, efficiently and free of any taint of partisan political bias.



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Media Policy:

NCAP regulates all media contact in a way that represents the Agency in a positive manner and prevents potential legal risks from inaccurate statements or misrepresentation of the Agency. All media, graphics, messaging and more will follow NCAP's procedure in the procedure manual.

Electronic Media Use Policy:

NCAP employees are responsible for the proper use of Agency technology (i.e., e-mail, electronic voice and video communication, computers, internet, copy machines, social media and etc).

Dress Code Policy:

As representatives of NCAP, all employees are expected to dress appropriately for the circumstance and business environment. As an overall guideline, employees can dress for their day. Employees should be aware of whom they are going to interact with on a given day and demonstrate good judgment and professional taste in their dress decisions. Appropriate dress can range from traditional business attire (suits) to business casual (slacks, khakis, dresses, skirts, nice jeans, collared shirts, sweaters, etc.). Additionally, employees should notify their colleagues with as much advance notice as is feasible if they have scheduled a meeting in the office that would require the full staff to dress in a specific attire.

Safety and Emergency Policy:

Each work site will follow its Emergency Plan in the event of a serious situation or occurrence that happens unexpectedly and requires immediate action. The Emergency Plan includes a designated site leader, posted emergency telephone numbers, basic response procedures and evacuation plans.

Agency Property and Facilities Policy:

NCAP strives to maintain a safe and secure environment for its clients, volunteers, staff and property. Employees are responsible for the proper use of Agency property and to ensure that facilities are used in accordance with program regulations and OMB CFR 200 and internal control framework and technology (i.e., e-mail, electronic voice and video communication, computers, internet, copy machines, social media accounts, etc.).

Use of Agency equipment, communications equipment, and Agency supplies must be restricted to NCAP staff and those authorized to perform functions of the Agency. Damage caused by unauthorized use or misuse of above referenced items by a staff member may result in personal liability for equipment replacement or reimbursement for use. Employees misusing Agency equipment and supplies as defined above may face disciplinary action up to and including termination.



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Personal use of any NCAP owned vehicle is strictly prohibited. It is the responsibility of the employee to see that his/her assigned vehicle is used only for Agency business. Only Agency employees, or other persons with the employee's Program Director's approval, shall be transported in a NCAP vehicle.

Suspected Misconduct Policy:

Action must be taken for all reported, suspected misconduct committed, encountered, or observed. Investigations of suspected misconduct will be performed in a manner to ensure compliance of federal, state and local laws, the funding source requirements, and OMB Circulars CFR 200.

Records Management Policy:

It is the policy of NCAP to retain, destroy and manage all records in accordance with uniform guidelines, practices and procedures and regulations. All Agency directors, employees, volunteers, agents and other personnel shall manage, protect, and maintain all records in accordance with the records retention and destruction schedule.

Personally Identifiable Information Policy:

NCAP will establish policies and procedures to protect personally identifiable information as required by funders. This policy is intended to follow the law and the requirements of our sponsor and grant in all aspects of reporting.

Security Monitoring Policy:

Selected areas of NCAP properties are equipped with video/audio cameras that are recording at all times. Signs will be posted in appropriate areas, either at the entrance to the area being monitored or in close proximity to the camera informing the public of the usage of cameras. The video security system will be used only for the protection and safety of our consumers, volunteers, employees, property, and policy compliance and to assist law enforcement if necessary. Reasonable efforts will be made to safeguard the privacy of consumers and employees. Cameras will not be positioned in areas where there is a reasonable expectation of personal privacy such as restrooms and most office spaces.

Client / Community Member Grievance Policy:

NCAP provides a process for employees and clients to resolve grievances.

Employee Relations and Conflict Resolution Policy:

NCAP's policy is to be responsive to its employees and their concerns. Therefore, an employee who is confronted with a problem may use the procedure described in the NCAP Procedure Manual to resolve or clarify his or her concerns.



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The purpose of this policy is to provide a quick, effective and consistently applied method for a non-supervisory employee to present his or her concerns to management and have those concerns internally resolved.

Whistle Blower Policy:

In keeping with the policy of maintaining the highest standards of conduct and ethics, NCAP will investigate complaints of suspected wrongdoing occurring within its programs and services; fraudulent or dishonest use or misuse of its resources or property; violations of agency policy; and violations of local, state, and federal law (each, "Suspected Wrongdoing"). Employees, contractors, board members, volunteers, clients, and community members are encouraged to report all suspected wrongdoing pursuant to the procedures set forth below.

This policy supplements, and does not replace, the NCAP's workplace harassment and discrimination policy and/or any other complaint resolution/grievance policy, and any procedures required by law, regulation, or funding source requirements.

Good Faith: A person reporting concerns under this policy must act in good faith and have reasonable grounds for believing that the information reported indicates that Suspected Wrongdoing has occurred. A person who makes an allegation maliciously or with good reason to believe that the allegation was false will be subject to disciplinary action, up to and including termination of employment.

Reporting: A person's concerns about Suspected Wrongdoing should be reported to his/her immediate supervisor. If a person is not comfortable reporting to his/her supervisor, concerns may be reported to NCAP's HR Director or CEO.

Examples of possible violations that could be reported include but are not limited to: Fraudulent reporting on the organization's financial statements, intentional misrepresentations made on organization documents and reports, unreported conflicts of interest, violations of the organization's written policies, including employment and personnel policies, theft or misappropriation of organization property, gaining or allowing others to gain unauthorized access to the organization's confidential files, violations of law, including labor and employment law, tax law, civil rights protections, etc.

If the Suspected Wrongdoing concerns a board member or the CEO, the report should be made to the Secretary Treasurer of NCAP's Board of Directors. If the Suspected Wrongdoing concerns the Secretary Treasurer of NCAP's Board of Directors, the report should be made to the Board President.

Reports of Suspected Wrongdoing should contain the names of the individuals involved, dates, and a description of the actions believed to be Suspected Wrongdoing. At no time should an individual who has reported or is considering reporting Suspected Wrongdoing undertake an independent investigation into the matter to obtain additional information.



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Confidentiality: NCAP encourages anyone reporting Suspected Wrongdoing to identify himself or herself when making a report to facilitate the investigation of the Suspected Wrongdoing. However, reports may be submitted anonymously by mailing a written statement to 270 Pine

Street Chadron, NE 69337. Reports of Suspected Wrongdoing will be kept confidential to the extent possible, but confidentiality cannot be guaranteed in light of the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement.

Investigation: Reports of Suspected Wrongdoing will be promptly reviewed and analyzed by the NCAP's Human Resources. Reports of Suspected Wrongdoing against the Human Resources Department will be investigated by the CEO and/or Board of Directors. Appropriate corrective action will be taken if warranted by the investigation, and findings may be communicated to the reporting person, to the extent reasonably possible and consistent with any privacy and confidentiality limitation. Investigations may be conducted by independent persons such as auditors and/or attorneys at the discretion of the HR Director, with the approval of the NCAP's CEO or the Chairperson of the NCAP Finance Committee (if the investigation involves a board member).

Upon receipt of a good faith report, the HR Director shall promptly notify the individual who reported the Suspected Wrongdoing (to the extent that the individual's identity is disclosed or a return address is provided) that he/she has received the report and will investigate it.

No Retaliation: No employee, contractor, board member, volunteer, client, or community member who in good faith reports Suspected Wrongdoing, or who cooperates in the investigation of Suspected Wrongdoing, shall suffer harassment, retaliation, or adverse employment or other consequences. Any such retaliation should be reported, and NCAP will promptly investigate the report, consistent with the procedures contained in this policy.

Anyone within NCAP who retaliates against another individual for reporting Suspected Wrongdoing or cooperating with an investigation of suspected wrongdoing is subject to discipline up to and including termination of employment.