



Personnel Procedure Manual
Northwest Community Action Partnership



**Northwest
Community
Action
Partnership**

NORTHWEST COMMUNITY ACTION PARTNERSHIP PERSONNEL PROCEDURE MANUAL

Effective Date

June 8, 2026

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 – engaging individuals, families, and partners to build long-term resilience and drive meaningful, systemic change that improves quality of life for all.

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Failure to comply with Personnel Procedures Manual may result in disciplinary action, up to and including termination. For the purposes of this manual Northwest Community Action Partnership will be referred to as “Agency or NCAP” throughout this document.

1. The manual will be posted on the employee portal webpage, www.ncap.info, for viewing by all regular employees of NCAP.
2. The manual applies to employees, volunteers, individuals and organizations under contract or agreement to provide services.
3. The manual is subject to change at any time due to changes in regulations, laws, and specific Agency needs.
4. Suggestions for amendments to the NCAP Personnel Procedures Manual may be submitted to the Chief Executive Officer (CEO) or the Human Resources (HR) Director.
5. Updates and changes to this manual will be communicated to all staff via email and changes will be posted to the Agency’s employee webpage on www.ncap.info.
6. It is the responsibility of each employee to become familiar with and abide by NCAP policies and procedures.

Employment At-Will:

The relationship between NCAP and the employee is an “Employment-At-Will” relationship. No statement contained in NCAP Personnel Policy Manual, Personnel Procedures Manual, Fiscal Manual, employment application, recruiting material, or any other material provided to any employee in connection with his or her employment, shall be construed as contradicting this policy by creating any express or implied contract of employment. NCAP, like the employee, is free to terminate the employment relationship at any time, with or without notice, for any non-discriminatory reason. Completion of an introductory period shall not change an employee’s status as an employee-at-will or in any way restrict the Agency’s right to terminate such an employee.

Equal Employment Opportunity:

1. This applies to recruiting, advertising, hiring, training, appointments, demotions, promotions, transfers, layoffs, dismissals, and compensations and benefits. NCAP will ensure all personnel will be administered without differentiation.
2. The HR Director is responsible for overseeing the administration of the EEO Policy and may act through the CEO as necessary to carry out this policy.



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3. NCAP is responsible for ensuring that it does not illegally differentiate, harass or retaliate in any policy, practice or procedure on the basis of any non-merit factor as outlined in the federal and state laws and regulations.

4. An employee or applicant shall be given the option to file differentiation, harassment or retaliation complaints to the Human Resource Director, or if the complaint involves the HR Director, the employee should file a report with the CEO, or the supervisor with whom they feel most comfortable.

5. The Human Resource Director is responsible for promptly responding to, reporting, and/or investigating any suspected acts of unlawful differentiation, harassment, and retaliation in violation of NCAP's EEO Policy. All employees should immediately report suspected unlawful differentiation, harassment and retaliation to their supervisor, Human Resource, Program Director or to CEO.

6. Employees who submit complaints will not be subjected to retaliation.

Affirmative Action:

1. When recruiting for open positions externally, it is the responsibility of the Human Resource Director to advertise and recruit in media and markets that offer fair access for all.

2. The Human Resource Director reviews hiring records to ensure a varied workforce is being maintained.

3. The Human Resource Director will be responsible for monitoring and maintaining the affirmative action records.

4. All advertisements must be approved by the Human Resource Director, applicable Program Director and CEO.



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Fair Labor Standards Act (FLSA):

Non-Exempt Employee:

1. Employees not meeting the definition of an exempt employee as defined by wage and hour employment law.
 - a. Time worked exceeding forty (40) hours per week is considered overtime (paid leave does not count toward overtime).
 - b. The work week of NCAP begins at 12:00 A.M Saturday and ends at midnight the following Friday. Employees may be required to work hours different from their regular schedule such as evenings or weekends, depending on the needs of the Agency.
 - c. Overtime must have prior approval by the Supervisor.

Exempt Employee:

1. Exempt Employees are not eligible for overtime compensation.
2. Schedules will be agreed upon with the applicable director.

Reasonable Accommodation:

1. NCAP is committed to providing fair and impartial treatment in employment practices. NCAP complies with the Americans with Disabilities Act of 1990, as amended by the Americans with Disabilities Act Amendments Act of 2008 (ADA) and ensures equal employment opportunity for qualified persons with disabilities.
2. Employment opportunities will be provided to individuals who are qualified to perform the essential functions of the job, with or without reasonable accommodations. The Agency will explore reasonable accommodations that do not result in undue hardship on business operations for qualified individuals with disabilities.
3. HR Director will be responsible for implementation of guidelines and operational procedures related to ensuring NCAP in compliance with the ADA.
4. Employees who experience an impairment may be entitled to leave under the Family Medical Leave Act (FMLA) or an extension of their medical leave as a reasonable accommodation under the ADA. Questions regarding leave rights should be directed to the HR Director.
5. NCAP will comply with federal law, state law and regulations that provide persons with disabilities greater protection than the ADA.
6. An employee with a qualifying impairment should contact the HR Director about the process to request an accommodation.



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7. The Reasonable Accommodation Committee will consist of a member of the Executive Committee of the Board of Directors, the CEO, the HR Director and the applicable Program Director. The HR Director will coordinate the request, review and decision process. The committee will meet within 20 days of the accommodation request.

The committee will decide the following:

- a. If the request by a person(s) with an impairment falls in the area of reasonable accommodation.
- b. If the request is granted, would this cause undue hardship to the Agency?
- c. If the accommodation will be granted, not be granted, or decide on another solution which will also accommodate the employee.
- d. The written decision, including justification, will be provided to the employee within five (5) business days of the Committee's decision. This communication will be signed by both the CEO and the Human Resource Director.
- e. It is the responsibility of the Human Resource Director to see that the Committee's decision is carried out in a timely manner or to present the Committee's decision to the Board of Directors if necessary for implementation.

Short-term accommodations may be made for an employee for up to six months, if the employee can; 1) perform part of his/her duties; and 2) provide professional medical documentation listing restrictions with a recommended time frame.

Recruitment and Selection:

1. Human Resources will coordinate all recruitment and selection activities.
2. Qualifications set forth in a job description shall be used as guidelines in the candidate recruitment and selection process. Minimum education and experience qualifications, if any, will be outlined in individual job descriptions.
3. The Program Director, CEO and Human Resource Director will approve the job requisition. If there is a qualified internal candidate, the department may consider a promotion and/or transfer. If there are multiple people in the Agency that have indicated they are interested and/or possess the qualifications for the position, an internal job opening will be posted.
4. No person shall be employed by NCAP while a member of his/her immediate family, or a member of the same household, serves as a member of the Board of Directors or Head Start Policy Council. Immediate family is defined as: spouse, parent, significant other, sibling, child (including step, foster or legal ward), brother/sister in-law, step-parent, or in-law parent.



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5. No person shall hold a position in which a member of his/her immediate family or member of the same household exercises supervisory authority.
6. No person shall be hired if the potential candidate is a member of organization(s) whose objectives include the overthrow of the United States Government by force or violence.
7. Employment at the Agency will not be offered as a reward for the support or defeat of any political party, contending faction, group or candidate for public or party office.
8. Following the job posting plan, job openings may be posted internally and/or externally and may run concurrently.

Internal – If there are no employees that meet the job qualifications, or if there are more than one employee who meet the job qualifications, the job opening may be posted internally in a manner that current employees are notified of the openings. The internal announcement will be posted for a minimum of five (5) business days. To be eligible for an internally posted opening, an employee must have been in their current position for at least 30 days, or at current Program Director's discretion.

Employees interested in applying for an opening should follow the application instructions in the posting. Employees must possess the qualifications listed for the open position to be considered for an interview. Past work history, performance, and other factors may be considered in making the final hiring decision.

External - External job postings will be advertised through multiple media outlets for a time period that would ensure adequate outreach to potential candidates. The external posting may run concurrent with internal posting. Employees will be sent an email with any internal or external job postings for distribution to clients and others. Each job posting notice may include, but is not limited to, the date of posting, job title, department worksite location, job summary and/or qualifications necessary to perform the job, wage or salary, and application instructions.

Employees who have a written disciplinary action within 90 days, or are on probation or suspension, are not eligible to apply for posted openings unless approved by the applicable Program Director(s).

Recruitment and Referral Incentive Program:

Certain positions may be eligible for the Agency's Recruitment Incentive program. Job openings that meet one or more of the listed eligibility criteria will allow for an incentive payout to the new hire.

1. Position is advertised for 2 weeks without any applications from qualified candidates.
2. Position requires an advanced degree or a difficult to obtain certification in a field with a short supply of candidates.



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3. NCAP's position pays less than the comparable wage listed in the Agency's most recent Wage Comparability Study.
4. Position is critical to operations and has been vacant for more than 4 weeks.

Once a candidate is selected and hired, a Recruitment Incentive Agreement will be completed by HR and signed by the new hire and/or referring Agency employee. This will outline the agreed-upon structure and amount of the incentive payment.

Previous NCAP Employees returning within 12 months of previous employment with in the Agency will not be eligible for the Recruitment Incentive. Current NCAP employees are not eligible for this incentive when transferring from one position to another within the Agency. The Recruitment Incentive is applicable only for "regular positions", not temporary, substitutes or other positions that are not considered "regular."

The incentive will be paid in 2 parts - the first payment will be made on the first paycheck following 2 months of employment. The second will be paid on the first paycheck following 6 months of employment.

Current employees may be eligible to receive a Referral Incentive for referring a candidate for a position at NCAP who is hired and stays employed at the Agency for a specified length of time. Supervisors, Program Directors and other management staff are not eligible for this referral incentive. The candidate must list the referring employee on the job application. Only one employee can receive the referral fee for a new hire. An employee may not receive a referral incentive for referring a current NCAP employee (this does not include temporary or substitute positions) for an internal transfer or promotion. This incentive applies to referral of external candidates only. A substitute or temporary employee is considered to be an external candidate.

Promotions and Transfers:

NCAP supports internal promotions and transfers for upward mobility within the Agency. 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.

The HR Director will coordinate the process of all promotions and transfers to ensure a fair and equitable process for all employees.



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Promotion:

1. Two types of advancement opportunities are outlined below:
 - a. Promotion is the movement from one position to another position which may be in a higher compensation. The promotion may involve a wage/salary increase. A promotion may be within the employee's current department or in a different department.
 - b. If significant changes in a position's duties and/or responsibilities occur, a position reclassification may be approved, which may result in a pay and/or hours adjustment and/or title change.
2. Every effort is made to fill vacancies by promoting qualified employees. Program Directors are encouraged to identify employees for promotion. Employees must possess the necessary skills, abilities and knowledge to satisfactorily perform the work of the advanced position. Past work performance will be reviewed in consideration for promotion.
3. Employees are encouraged to seek job opportunities for which they are qualified. An expression of interest in a promotion, either by submitting an application or through discussions with a Program Director, will not have any adverse effect on the status of the employee's current position.
4. The newly promoted employee will be subject to an introductory period.

Transfers:

1. Temporary Transfers: An employee who is transferred temporarily to a higher paying position may be compensated at the rate of the new position for thirty (30) calendar days or more. Temporary assignment constitutes a formal assumption of another position's duties for an established period of time, not the occasional filling in for a job or "helping out."
2. At the request of NCAAP, an employee who is transferred temporarily to a lower paying position may continue to be paid at his or her existing rate for as long as the temporary transfer is in effect.
3. Employees must be in their current position for thirty (30) days before being eligible for transfers, unless otherwise determined by the Program Director and the HR Director.



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Pre-Employment and On-Going Investigation:

1. As a condition of employment, employees and potential employees of NCAP will be subject to pre-employment investigations. Employment will be contingent upon the results of the pre-employment investigation.
2. The Human Resource Director coordinates the pre-employment investigation. The Human Resource Director, including the Program Director if deemed necessary, will evaluate the relevance of any offense in accordance with federal and state laws.
3. An applicant who provides misleading, erroneous, or deceptive information on the application form, resume, or in an interview will be eliminated from further consideration for employment.
4. Once an applicant has been selected as the desired candidate, the applicant will be required to complete all requirements for a full nationwide, state and local background check including, but not limited to, criminal history, motor vehicle reports, reference checks, etc.
5. Staff will be required to report an update for all additional pending criminal charges, arrests, and/or convictions annually. All employees will be required to complete all requirements for a recheck of their Background Check report every five years.
6. In the event that a current employee is charged or convicted of a crime, that employee must tell Human Resources within ten (10) days of the charge or conviction.
7. If an employee leaves the Agency but is re-hired within 90 days, they will not be required to submit to a new background check. Such an employee is required to report any charges or convictions that took place during their time away from the Agency, if any.
8. For all Head Start/Early Head Start employees, after employment has been offered and within 45 days of employment, employees will be required to submit to a TB screening. Periodic re-examinations will also be required.

Professional Development and Qualification:

1. If a position requires a degree, license and/or certifications, an employee must provide appropriate documentation to the Human Resource Director at the time of new employee onboarding. Failure to keep required licenses or certifications current may result in disciplinary action up to and including termination.
2. Program Directors will determine applicability to pay for or reimburse employees for costs of certification/recertification.



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3. Employees receiving any form of training paid for by the Agency are required to complete the Professional Development Training Record (PDTR), including any required documentation following submission guidelines.

Employee Classification:

Job descriptions will indicate if a position is exempt or non-exempt. This classification is determined based on FLSA criteria. Categories are as follows:

Contract Employee - CEO - Subject to the Personnel Policy except as modified by the contract. The CEO will serve under the direction of the Board of Directors.

Regular Employee - All employees, except those hired under substitute or temporary status. Regular employees may be full-time or part-time (part-time employment being based upon a percentage of full-time employment).

Employees are classified as exempt or non-exempt from the overtime provisions of the FLSA (29 CFR Part 541) and State Wage and Hour laws.

Exempt Employee - Employees in exempt positions are:

1. Paid to do the job and must meet the Department of Labor requirements for exemption.
2. Not eligible for overtime pay.

Non-Exempt Employee - Employees in non-exempt positions are:

1. Paid on an hourly basis.
2. Entitled to one and one half times regular rate of pay for hours worked in excess of 40 in a work week.

Temporary Employee - Employees may be hired as a temporary employee for a limited duration of time to temporarily supplement the workforce, to assist in the completion of a specific project, or to carry out the requirements of a grant. Temporary employees are not eligible for any employee benefits.

Substitute Employee - Employees may be hired for substitute purposes to relieve regular employees during times of absence or augment the existing staff during heavy workloads. Substitute employees are not eligible for any employee benefits. Substitute employees will be evaluated yearly for continued employment.

Consultant – A consultant is a person or company who receives compensation for professional or technical services for an agreed upon fee. A consultant is considered an independent



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contractor (or third party contractor) for a specified service and is not an NCAP employee. Consultants will be informed that their compensation will be reported to the IRS and an IRS Form 1099 will be issued for all contracts of six hundred dollars (\$600.00) or more

Job Descriptions:

1. Written descriptions will be developed for each position in the Agency. Each job description shall reflect the authority, responsibilities, FLSA status, FTE status, major duties and qualifications required for the position.
2. New or revised job descriptions shall be approved by the Program Director, Human Resource Director and the CEO.
3. The Board of Directors will approve the CEO's job description.
4. At orientation or upon job description changes, employees will be provided with a copy of the position's job description and sign an acknowledgement of receipt of the same. Job descriptions will be kept in the employee's personnel file.
5. Job descriptions will be reviewed on a regular basis and updated as necessary.
6. Employees are encouraged to thoroughly review their job description and notify their supervisor, program director or HR Director if the duties listed on the description differ significantly from the duties they actually perform.

Onboarding and Training:

NCAP will conduct a thorough new employee training that may include: Agency mission, Personnel Policies and Procedures, including program specific policies and requirements and any other federal or state requirements in relation to employment at NCAP. It is the responsibility of the new employee to fully participate in the orientation and training process and to complete and return the appropriate forms in a timely manner.

[Head Start and Early Head Start Specific]

Fingerprinting

1. All prospective NCAP Head Start and Early Head Start employees who receive a conditional job offer must undergo a fingerprint-based background check before their official start date.
2. Before a person is hired a program must obtain one of the following:
 - (i) State criminal history records, including fingerprint checks; or,



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(ii) Federal Bureau of Investigation criminal history records, including fingerprint checks.

3. NCAP has 90 days after an employee is hired to complete the background check process by obtaining whichever check listed (i) and (ii) was not obtained prior to the date of hire.
4. Employment is contingent on receiving satisfactory clearance from the Nebraska State Patrol/Federal Bureau of Investigation criminal history records. The NCAP HR Director will track and document the status of background checks.
5. Results of the background checks will be maintained in the employee's personnel file, consistent with confidentiality requirements outlined in Head Start Performance Standards.

Promotion/Transfer Onboarding:

1. Transferred or promoted employees who do not meet job requirements in their new position during the orientation period, may be returned to their original job, if a vacancy exists, or may be terminated at the discretion of the Agency.
2. Changes of position within the Agency will be subject to an orientation period of six (6) continuous months. An employee on a promotional/transfer orientation will not forfeit any of their fringe benefits or sick and vacation leave earned while serving in a previous position.

Performance Evaluations:

Annually a performance evaluation will be completed on each regular NCAP employee. Temps, subs, work study students, consultants etc. do not receive annual evaluations. NCAP utilizes a web based system for evaluations called Perform Yard. Below is an outline of the process for annual evaluations:

1. On the yearly employment anniversary date is when the evaluation process begins. HR will begin the process by initiating an invitation to be sent via Perform Yard to both the Employee and their supervisor. A 30 day window is given for completion.
 - a. Summer layoff staff exception who's anniversary falls into May or during the summer months or at the beginning of the upcoming school year; reviews will be completed prior to layoff. IF a percentage raise is granted it will be effective the pay period after the call back date or after the anniversary date.
2. The employee will have 10 days to complete their self-evaluation. The supervisor will then have 10 days to complete their evaluation.
3. Once the employee self-evaluation is submitted, it is first reviewed by the supervisor and then by HR. Once all parties have signed off, this piece is complete.



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4. Once the supervisor's evaluation of the employee is submitted, it is first reviewed by HR and then the employee being evaluated. Once all parties have signed off, this piece is complete.
5. Once both the self-evaluation and supervisor evaluations are complete, the supervisor should set a meeting with the employee to discuss and review the evaluation within 2 weeks of completion.
6. Employees may be considered for a pay increase following the evaluation process, provided that the budget allows. To be eligible, the employee must receive a supervisor evaluation score of 3.5 or higher.
7. If the employee has not completed their portion of the self-evaluation within that 30 day period, unless an extension is approved by their supervisor, a raise may not be granted.

Employment of Relatives/Nepotism:

NCAP prohibits employment of relatives in a direct reporting relationship and other relationships to avoid creating or perpetuating circumstances in which there is the possibility of favoritism, conflict of interest, or potential impairment of efficient operations. .

1. During new hire orientation, all new employees will be required to complete a conflict of interest form. This will require disclosure of relationships to any Board Member, Policy Council or any current employee.
2. Employees are required to update this form with the HR Department if any change in this status occurs during employment with the Agency.

Disciplinary Action:

1. The Agency is committed to treat employees fairly, with dignity and respect, following all policies and procedures. Employees who are not following duties and expectations listed in job descriptions, Agency and programs policies and procedures, or other requirements, and those who break rules, fail to follow Agency policies and procedures, or exhibit improper behavior may be subject to disciplinary action up to and including termination at the discretion of the Human Resource Director, Program Director and the CEO.
2. Documentation of all disciplinary action must be reviewed, and approved by, the HR Director and applicable Program Director prior to being delivered to the employee.
3. Depending on the circumstances involved, disciplinary actions may include a verbal warning, notice of concern, a written reprimand, performance improvement plan, disciplinary action, suspension with or without pay, or termination.



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4. Depending on the nature of the violation and other circumstances including, but not limited to, the employee's past conduct, one or more disciplinary steps may be repeated or skipped.
5. In some cases, immediate termination may result.

Termination of Employment:

1. Prior to involuntary terminations, decisions will be reviewed and made by the Program Director, Human Resource Director and the CEO.
2. All terminations will be coordinated by the Human Resource Director. The Supervisor and/or the Program Director will conduct the termination, with the Human Resource Director as a witness. If the Human Resource Director is unable to attend, the Program Director will assist in the termination.
3. Employees are encouraged to give written notice of voluntary termination to the Agency at least fourteen (14) days prior to the termination date to maintain good standing with the Agency. The last day actually worked will be the termination date of record.
4. Exception: All Indirect personnel and Program Directors are encouraged to give a minimum of twenty-one (21) days' notice prior to the termination date.
5. The CEO may waive such notice and approve a shorter period of notice for any voluntary termination.
6. All employee separations will be reported at the Board of Directors meetings and others as required by regulations.
7. Employees will be compensated for the balance of their accumulated vacation leave within fourteen (14) days of his/her final pay period end date as long as they have completed the initial six (6) month orientation period and all NCAP property is returned.

[HEAD START / EARLY HEAD START SPECIFIC]

1. The involuntary termination of the Head Start/Early Head Start Director, CEO and/or Chief Financial Officer (CFO) must have prior approval of the Board of Directors.
2. All Head Start/Early Head Start employees and employees funded or partially funded by Head Start will be reported to Policy Council at their regular meetings.

Reduction in Force:

There may be occasions when it is necessary to reduce the workforce at NCAP. This may occur because of funding reduction or eliminations, other budget considerations or because changing



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conditions make it necessary to reorganize a work unit. Staffing and reduction-in-force decisions will be based on many factors in order to provide for the most efficient operation of the area(s) affected. The order of employee's reduced-in-force will be determined by:

1. NCAP budgetary and programmatic needs which may include Agency operations and efficiencies.
2. Changes to job specific requirements.

Employees to be affected by the reduction in force will be provided a letter detailing the Reduction in Force information.

Exit Interviews:

Upon termination of employment the Human Resource Director or designee will complete the Exit Termination Board. Once the individual has left employment an exit survey will be sent via email through Monday.com. Exit interview answers will be compiled by the HR Director and trends will be shared with the Directors.

Release of Information:

The following information may be released by NCAP to outside inquirers regarding an employee:

1. Dates of employment.
2. Job title(s) and duties.
3. Confirmation of earnings.
4. If the individual is eligible for future re-hire.
5. Additional information may be released if the individual has signed an Information Release Form.

NCAP complies with all legitimate requests for information filed by federal, state or local authorities, including government agencies, without a signed release from the employee.

To ensure consistency, fairness, accuracy, and to protect NCAP from liability, all managers, supervisors and employees of NCAP must refer any requests for employment information about current or former employees to the Human Resource Department.

Employees are responsible for notifying the Human Resource Director immediately if there is a change in any of the following information:



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1. Legal Name
2. Mailing Address
3. Telephone Number
4. Emergency Contacts
5. Driving record or status of driver's license, if the employee operates Agency vehicles
6. Military or draft status
7. Professional license, if required of the position

Failure to inform of personal data changes may hamper the ability to contact the employee or a family member in the event of an emergency.

Benefits:

The following benefits are available to employees upon completion of the first day of the month following 60 days from the date of hire, or upon the occurrence of a qualifying life event.

Benefits for full-time regular employees are contingent upon program funding availability. It is the responsibility of the HR Director to obtain the "Declined Coverage" documentation if the staff does not choose to participate.

Health Care Benefits: (Policy effective January 1, 2026)

Eligibility:

1. Regular employees (75 - 100% FTE) are eligible to enroll in Agency employee benefits within 60 days from the day of hire and will be effective on the first day of the month following 60 days from hire.
2. Regular employees at less than 75% FTE are not eligible to receive health, dental or vision insurance options.

Retirement Benefits:

1. Regular employees (75 - 100% FTE) and part time employees at less than 75% FTE are eligible to enroll in Agency employee benefits within 60 days from the day of hire and will be effective on the first day of the month following 60 days from hire. Temporary/Substitute employees are eligible for retirement benefits once they have completed 1,000 hours of employment with the Agency. At the time of eligibility all employees will be auto enrolled for a 3% deferral and Agency match. If an employee does not wish to have this benefit taken from their paycheck and received the match they must log into the retirement system to opt out of this option.



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Paid Holidays:

Holiday pay is available to employees immediately upon hire.

The following holidays will be paid for regular employees and will be observed on dates indicated (with the exception as determined by the Program Director or CEO.) In the event there is an additional Federal Holiday the CEO may choose to observe it.

New Year's Day – January 1	Indigenous People's Day 2 nd Monday in October
MLK Day – 3 rd Monday in January	Veteran's Day – November 11 th
Presidents Day – 3 rd Monday in February	Wednesday before Thanksgiving
Memorial Day – Last Monday in May	Thanksgiving Day
Juneteenth - June 19 th	Friday following Thanksgiving Day
Independence Day – July 4 th and 5 th	Christmas Eve Day – December 24 th
Labor Day – 1st Monday in September	Christmas Day – December 25 th
	Day after Christmas - December 26 th

Holidays falling on Saturday will be observed on the preceding Friday, holidays falling on Sunday will be observed the following Monday, unless changed and approved by the CEO.

An employee who has an unauthorized (not approved by supervisor) absence the working day prior to and/or following a holiday will not be paid for that holiday.

Any unpaid/unearned leave taken prior or immediately after a holiday, will not qualify an employee to holiday pay.

Employees will be paid for the holiday for the number of hours that they are regularly scheduled to work, up to a maximum of eight (8) hours per day. Holiday pay will not be counted as hours worked for the purposes of determining overtime. Any extra time worked beyond the employee's normal hours will be deducted from Holiday hours when calculating overtime hours. Holiday hours are to ensure that an employee is able to get paid for all of their regular weekly hours.

Temporary employees do not receive holiday pay.



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Flexible Time-Holidays:

Employees whose position requires work attendance on holidays observed by NCAP will be allowed a paid leave of absence at another time according to a holiday work schedule approved by their supervisor and/or Program Director. Extenuating circumstances are under the discretion of the Program Directors and the CEO.

Vacation Leave:

Vacation leave may be used immediately upon hire, as accrued.

Non-Exempt Employees will receive vacation leave as follows –

1. All regular full-time/part-time hourly employees will accrue vacation leave at the rate of four (4) hours per eighty (80) hours worked upon employment. Accumulated vacation time is capped at 104 hours for employees employed less than 3 years. Employees employed at full year status for more than three (3) years vacation will be accrue at the rate of six (6) hours per eighty (80) hours worked upon employment and are capped at 160 hours. Leave may be taken in quarter hour increments.
2. Employees are strongly encouraged to take at least one week (five (5) consecutive days) of leave per grant year with duties being covered by another employee. To ensure fiscal integrity and promote cross training, the duties of all full-time fiscal employees may be performed by another fiscal employee for five consecutive days during the Agency's fiscal year.

Exempt Employees will receive vacation leave as follows -

1. All regular exempt employees will accrue vacation leave at the rate of four (4) hours per eighty (80) hours worked upon employment. Accumulated vacation time is capped at 104 hours for employees employed less than three (3) years. Employees employed at full year status for more than three (3) years vacation will be accrue at the rate of six (6) hours per eighty (80) hours worked upon employment and are capped at 160 hours. Leave will be taken in full day increments, with the exception of FMLA leave.
2. Employees are strongly encouraged to take at least one week (five (5) consecutive days) of leave per grant year with duties being covered by another employee. To ensure fiscal integrity and promote cross training, the duties of all full time fiscal employees will be performed by another fiscal employee for five consecutive days during the Agency's fiscal year.



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Accumulated Vacation:

1. Temporary employees will not accrue vacation leave.
2. It will be the responsibility of the employee to verify they are receiving the correct vacation leave, and to advise their supervisor when eligible for vacation leave and/or increased leave.
3. The Program Director and supervisors are responsible for coordinating vacation leave for employees under their direct supervision. When scheduling conflicts arise, priority for vacation leave shall be established at the discretion of the Program Director. Leave requests should be submitted through the leave request portal within the electronic timesheet system at least fourteen (14) calendar days in advance of the anticipated leave whenever practical. The supervisor will then have an opportunity to approve or deny the request.

Sick Leave:

Sick leave benefits may be used immediately upon hire, as accrued.

1. All regular full-time/part-time, hourly employees will accrue sick leave at the rate of four (4) hours per eighty (80) hours worked upon employment.
2. Regular exempt employees will accrue sick leave at the rate of four (4) hours per eighty (80) hours worked upon employment.
3. Temporary employees will accrue paid sick time after 80 hours of employment at a minimum of 1 hour paid sick time for every 30 hours worked. This leave earned is capped at 56 hours per year.
4. Sick leave is defined to mean a period in which an employee is incapacitated in their ability to perform job duties by sickness, injury, medical, surgical, dental, optical or mental illness examination or treatment. Also, when by reason of exposure to a contagious disease, presence at the place of work would jeopardize the health of others. Sick time may not be used as additional vacation leave.
5. An employee may receive sick leave to care for an ill member of the immediate family. Immediate family is defined as spouse, parent/guardian, significant other, grandparent, sibling, child, grandchild, or a relative by marriage or significant other-ship of comparable degree to significant other.
6. A total of not more than sixty (60) days or four hundred-eighty (480) hours of sick leave may be carried over from one calendar year to the next. Accumulated sick leave will be capped at four hundred eighty (480) hours.



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7. Sick leave will be requested in advance whenever possible. In case of sickness, injury, emergencies, or any other absence not approved in advance, the employee will advise the supervisor of the circumstances immediately.
8. When the absence, because of illness or injury to self or member of the family, exceeds three (3) consecutive business days, an employee may be required to submit a substantiating medical statement. Employees must maintain contact with their supervisors daily during this type of absence and may be required to use FMLA.
9. Sick leave may be denied when the Program Director and/or CEO determine that an employee is abusing sick leave privileges. Abuse of sick leave provisions will be grounds for disciplinary action up to and including termination.
10. If an absence because of illness or injury, not arising from the course of employment, exceeds the accrued sick leave, additional time will be charged to vacation leave prior to any leave without pay.
11. Employees will not be paid for any accrued sick leave at the time of their separation from the Agency.
12. Employees receiving Workers' Compensation benefits for absences are not entitled to paid sick leave.
13. Every staff member will receive a ONE TIME allotment of 40 hours of paid leave to be used in the event of a contagious illness and when the person does not have enough regular sick leave available.

Contagious Illness Leave:

1. 40 hours of contagious illness leave is granted to each employee ONCE and does not refill once depleted.
2. This leave is designed to prevent the spread of contagious illnesses in the workplace.
3. This leave may only be used in the case of contagious illness. (i.e. COVID, Flu, strep, pink eye, etc.)
4. With the pre-approval of the employee's supervisor, this leave may be used for the care of an immediate family member with a contagious illness (spouse, parent/guardian, significant other, grandparent, sibling, child, grandchild, or a relative by marriage or significant other-ship of comparable degree to significant other).
5. This leave may NOT be used for a medical situation that is not related to a contagious illness (i.e. kidney stones, childbirth, regular medical appointments, mental health etc.).



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Bereavement Leave:

Bereavement leave may be used immediately upon hire.

1. An employee may be granted time off with pay not to exceed three (3) work days per occurrence in the event of the death of his/her immediate family. Immediate family is defined as spouse, parent/guardian, significant other, grandparent, sibling, child, unborn child, grandchild, or a relative by marriage or significant other-ship of comparable degree to significant other.
2. An employee may be granted time off with pay not to exceed one (1) work day per occurrence in the event of the death of his/her extended family. Extended family is defined as aunt, uncle, niece, nephew, first cousin and or relative by marriage or significant other-ship of comparable degree.
3. All bereavement leave must be approved by the Supervisor or Program Director or CEO.
4. Employees will continue to accrue vacation and sick leave during bereavement leave.
5. Bereavement pay is not used in the calculation of overtime.

Administrative Leave:

1. With prior approval of the Program Director and/or CEO, an employee may be granted time off from his/her duties with compensation for the following reasons:
 - a. When a specific local public school closes or has a late start due to bad weather, NCAP sites in that location will follow the same schedule.
 - b. Interrupted service delivery caused by unprecedented incidents such as natural disaster, pandemic and others.
 - c. Other instances determined by the CEO.
2. If an employee has prearranged other leave such as vacation, sick, bereavement, that leave stands and the employee will not be eligible for Administrative Leave.
3. Employees will be paid for the hours that they are normally scheduled to work that day, not to exceed 8 hours per day.
4. Even when an administrative leave day is granted, employees must remain available via phone or email to address timely corrections or duties, such as resolving time sheet discrepancies.



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Leave of Absence without Pay:

1. The Agency offers very generous sick and vacation leave. Employees are encouraged to not abuse the sick and vacation leave afforded to them and hold back some of the leave for unforeseen circumstances and/or emergencies.
2. Employees who have been employed at the Agency for 90 days or less may request a maximum of 3 days of Leave of Absence without pay. Exemptions may be requested in extenuating circumstances and must be approved by the Program Director.
3. NCAP and employees have an at-will employment relationship and NCAP is under no obligation to approve requests for Leave of Absence without pay.

Civil Leave & Special Leave:

Civil Leave:

1. An employee will be granted paid time off to comply with a subpoena to appear in court before a judge, any legislative committee or inquiry, or for jury duty.
2. When an employee receives a summons for jury duty, he or she must present a copy of the summons to their Program Director.
3. Employees are expected to report to work whenever the court schedule permits.
4. When an employee receives compensation from the state, court, or other party for the required duty, he/she is required to return that amount to the Agency, less mileage expense if duty requires out of town travel.
5. An employee attending court as a party plaintiff or party defendant on a personal matter is required to take vacation leave. If vacation leave is exhausted, an employee may request Leave of Absence without Pay.
6. Jury duty pay is not used in the calculation of overtime.
7. Employees will continue to receive and accrue benefits during jury duty including vacation, sick leave, holiday pay and other applicable benefits.

Military Family Leave Entitlements (up to 26 weeks):

Eligible employees are entitled to two types of FMLA leave related to a qualifying family member's military service. This type of FMLA leave is referred to as military family leave.

The military family leave provisions of the FMLA entitle eligible employees of covered employers to take FMLA leave for:



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1. Any “qualifying exigency” arising from the foreign development of the employee’s spouse, son, daughter, or parent with the Armed Forces.
2. To care for a covered service member with a serious injury or illness if the employee is the service member’s spouse, child, parent or next of kin. FMLA leave for this purpose is called “military caregiver leave.”
3. To take qualifying exigency leave, the military member must be the employee’s spouse, parent, or son or daughter. Unlike non-military FMLA leave, for purposes of qualifying exigency leave, an employee’s son or daughter on covered active duty refers to a son or daughter of any age.
4. If an employee will be absent for any of the above reasons for three (3) consecutive weeks for the same illness or situation, the employee may be required to use FMLA benefits.
5. Once an employee has been placed on FMLA, accrued sick and vacation leave must be used prior to taking any unpaid leave.
6. NCAP Procedures Manual will comply with the most current Family and Medical Leave Act of 1993, as amended, (FMLA or Act)

Military Service:

1. NCAP will abide by all the provisions of the Uniformed Services Employment and Re-Employment Act (USERRA) as well as applicable Nebraska law in granting military leave to all eligible full-time and part-time employees. It is the employee's responsibility to inform his/her supervisor as soon as orders for military duty have been received. When requesting a military leave of absence, the employee should present a copy of the orders to duty.
2. Employees will continue to receive full pay while on leave for those military related absences that are two weeks or less. The portion of any military leave of absence in excess of two weeks will be unpaid. Employees may use any available paid time off for the absence.
3. Benefit accruals, such as vacation, sick leave and holiday benefits will be suspended during the USERRA leave and will resume upon the employee’s return to active employment.
4. When an employee returns from military leave, he or she will be assigned to a position as required by law. Military leave time is immediately credited to the employee’s length of service and all benefits would apply as if the employee had never left his or her job. The employee’s salary will be equal to or greater than the salary at the time the leave commenced unless salaries have declined.



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Family Medical Leave Act (FMLA):

Pursuant to the Family Medical Leave Act of 1993 (FMLA) employees are eligible for leave under the Federal FMLA if they have been employed by NCAP for at least twelve months and have worked at least 1,250 hours for NCAP during the most recent twelve consecutive month period. Employees eligible for FMLA may qualify to receive benefit dollars for 12-26 weeks, dependent on the leave qualified for, from the start date of their leave. If eligible, an employee may be able to take up to 26 weeks of unpaid leave during the calendar year (based on a 12-month rolling calendar) for the following reasons:

1. The birth of a child and to bond with the newborn child within one year of birth.
2. The placement with the employee of a child for adoption or foster care and to bond with the newly-placed child within one year of placement.
3. A serious health condition that makes the employee unable to perform the functions of his/her job, including incapacity due to pregnancy and for prenatal medical care.
4. To care for the employee's spouse, son, daughter, or parent who has a serious health condition, including incapacity due to pregnancy and for prenatal medical care.
5. Any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, status.

Advance Notice and Medical Certification:

When possible, employees should notify their Program Director at least thirty days before the date of the anticipated leave. A written request for time off must be completed. In an emergency situation, notice must be given as soon as possible, but no later than 48 hours after the occurrence of the reason for leave. Failure to make timely notification of the need for leave may result in the delaying of leave until proper notification and approval is received. Taking leave may be denied if requirements are not met.

Leave With-Out Pay Premium Balances:

Premium balances can be handled in one of the following ways when leave with-out pay applies:

1. Employees may choose to pay the agency by check every two weeks for the amount that would normally be deducted from their paycheck with a payment schedule provided by the Fiscal Department.
2. Employees may choose to prepay all premiums before the leave begins, using the last paycheck issued during the leave period.

If premium payments are missed, coverage will be cancelled after 30 days.



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Attendance & Hours of Work:

Work Week & Hours of Operation:

1. Employees are required to log actual time worked in NCAP's electronic timekeeping software. Employees will be notified by their supervisors of their approved schedule of work hours.
2. The work week of NCAP begins at 12:00 A.M Saturday and ends at midnight the following Friday. Employees may be required to work hours different from their regular schedule such as evenings or weekends, depending on the needs of the Agency.
3. Employees are required to log time in 15 minute increments using the 7 Minute Rule: It is called the *7 minute rule* because the cutoff is 7 minutes after the expected clock-in time. Under the 7 minute rule, clock in and clock out times on timesheets are rounded to the nearest quarter hour. Example: an employee is scheduled to clock in at 8:00 am. If the employee clocks in at 8:07 am, it is rounded to 8:00 am. But if he/she clocks in at 8:08 am, it is rounded to 8:15 am.
4. Positions requiring flexible work schedules will be approved by the Program Director.
5. The supervisor must approve any overtime. IF overtime exceeds two (2) hours, it must be approved by the Program Director.
6. Non-exempt (hourly) employees scheduled to attend a meeting, training class, workshop or seminar at the request of the Agency will be paid for the hours of the meeting or seminar and the travel time to and from the work site.
7. The Agency retains the option to determine the mode of transportation for which it will pay travel time for any given trip. An employee will not be paid for travel time exceeding the time required for selected mode of transportation.
8. Travel time to and from home is not considered work time.
9. Exempt employees who attend a meeting or class will not receive additional compensation; as training is considered part of their job.
10. Non-exempt employees may only use Agency devices during the time they are clocked in.

Late/Absent:

If an employee anticipates being late or absent from work, they will notify their direct supervisor and/or their work site in advance of scheduled work time.



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Break Time and Lunches:

NCAP maintains work hours in accordance with federal and state regulations and in accordance with workload, program specific requirements and the efficient management of personnel resources.

Nursing Breaks:

1. As part of our Agency's family-friendly benefits, NCAP supports nursing mothers by accommodating breaks for any mother who wishes to express breast milk during her workday. Employees shall be provided a place to nurse or express their milk. An employee lactation area is provided as a private and sanitary place for nursing employees to express their milk during work hours. This space provides an electric outlet, chair and nearby access to running water. If applicable, employees may use their private office area for milk expression.
2. Employees will be responsible for providing their personal equipment and supplies such as a breast pump, bottles, and other supplies needed.
3. A refrigerator will be made available for safe storage of expressed breast milk. Employees may use their own cooler packs to store expressed breast milk, or may store milk in a designated refrigerator/freezer. Any breast milk stored in the refrigerator/freezer must be labeled with the name of the employee and the date of expressing the breast milk. Those using the refrigerator are responsible for keeping it clean. Breast milk must be removed from NCAP premises daily.
4. Employees may use normal break time for expressing breast milk. For additional time beyond normal lunch and breaks, prior arrangements must be made with the applicable Program Director. Employees expressing milk are responsible for ensuring coverage of duties, if applicable.

Telework:

Involuntary Telework: The Agency may require employees to telework in extreme cases such as natural disasters, pandemics, or other cases. Telework ensures operations continue and client services are provided. Employees may be required to provide remote and/or virtual services.

- i. Remote means services provided via the delivery of support and resources, such as delivered food and educational materials.
- ii. Virtual means services provided through technology.

Voluntary Telework: This work alternative allows an employee to work at home or in a satellite location if their position allows and with pre-approval. Telework agreements are determined on a case by case basis based on position. Telework arrangements are to be arranged with their Director.



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Compensation:

Employee responsibilities:

1. Each employee will be responsible for completing a timesheet **on a daily basis**. It is the responsibility of the employee to record and submit an accurate timesheet. Tampering, altering, or falsifying time records or recording time on another employee's timesheet is not allowed. Under no circumstances is an employee allowed to record time for another employee.
2. It is the employee's responsibility to sign time records to certify the accuracy of all time recorded. The supervisor will verify the accuracy of the timesheets.
3. The Fiscal Department will verify the accuracy of the timesheets. Improperly completed timesheets will be returned to the supervisor and/or the Program Director to be corrected.
4. Under no circumstances will a payroll check be prepared and issued unless a completed timesheet, approved by the employee and Supervisor, is first received by the Fiscal Department.

Deadlines:

1. Timesheets are to be submitted to the employee's supervisor by the deadline assigned from the supervisor. Failure to submit timesheets in a timely manner may result in the employee not receiving a check for the time worked until the next pay period unless it is due to an oversight by the supervisor.
2. Supervisors and/or the Program Directors approval of timesheets is to be received by the Fiscal Department by Monday at Noon following the end of the pay period.
3. Pay periods end every other Friday at midnight, with exception of other payroll periods due to funding source regulations or circumstances. The Program Director will notify employees of these exceptions and deadlines associated with these exceptions.
4. Supervisors and/or Directors have the ability to adjust the deadlines as needed.

Direct Deposit:

1. All payroll checks will be directly deposited into a checking and/or savings account designated by the employee, on the designated pay date following the end of the pay period.
2. It is the responsibility of the employee to notify the Fiscal Clerk of any change in banks or bank accounts prior to turning in timesheets to ensure the proper direct deposit of payroll to the employee's account.



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Salary/Wage Increases:

1. Salary/wage increases may be considered if the budget allows, as approved by Program Director, CFO and CEO.
2. Salary/wage adjustments may occur due to funding changes.
3. Salary/wage adjustments will become effective the first day of the pay period following the adjustment PAN.

Step-Up Temporary Increase:

Agency staff may be eligible to receive a Step-up Temporary Wage Increase which must be approved by the Program Director, CEO and CFO, based on the availability of funds. Employees may qualify when they take on additional responsibilities that substantially exceed their regular job duties.

The Program Director is responsible for monitoring the additional duties assigned and ensuring the Step-Up Wage eligibility period is accurately tracked.

Employee Incentive:

Agency staff may be eligible to receive incentive compensation based on cost reduction and program efficiencies according to an approved plan. Incentive compensation will be paid based on availability of funds and pursuant to an established approved plan. Incentive pay will be prorated for leave without pay time (time spent on leave without pay is not considered time worked). Department Incentive Plans must be detailed using approved form and directly relate to cost reduction and program efficiencies. Any employee who has been on a Performance Improvement Plan in the previous 12 months will not be eligible for an incentive. The plan must be submitted within 90 days of the program's major grant funding start date and approved by the CEO, CFO, HR Director and applicable Program Director.

Wage Comparability and Alignment:

A wage comparability study will be completed every three years. If an employee's annual compensation/or total compensation on the Wage Comparability Survey is above the average comparable, the position comparable wages / salary will be assessed for accuracy and relevance. If discrepancies are discovered, new comparable wages / salary will be researched. If the comparable is determined to be accurate, the positions wages/salary will be frozen until such time as the person's annual compensation falls within the average of the comparable on the wage comparability study.



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Cost of Living Allowance (COLA):

Pay increases that are awarded to any or all programs of the Agency if applicable, such as COLA increases, will be retroactive as mandated by the grant program instructions. These pay increases will be available, including retroactive COLA's, to actively employed staff at the time of the award letter for the period of time the employee worked at the Agency. COLA's will be approved by the Board of Directors and Policy Council.

Smart Watch Reimbursement: *(see work place safety)*

[Weatherization Specific]

Work Boot Reimbursement: *(see work place safety)*

Cell Phone Reimbursement:

1. Regular employees (75 - 100% FTE) and part time employees (less than 75% FTE) are eligible for a \$50 cell phone reimbursement per applicable department's budget.
2. Eligible employees must meet at least one of the following criteria:
 - a. The job requires considerable time outside the office or away from workstation (job, need, travel, meetings, etc.) and use of the cell phone facilitates the effective conduct of business operations while away.
 - b. The job requires the NCAP employee to be immediately accessible to receive and/or make frequent business calls outside of working hours.
 - c. Cell phone agreements are determined on a case by case basis based on position. Cell phone arrangements are to be arranged with their Director.

The cell phone reimbursement is intended to reimburse the NCAP employee for the average business use of the cell phone, not to pay the entire phone bill.

Travel:

Employees and other authorized travelers are expected to exercise the same care in incurring expenses that a prudent person would exercise if traveling on personal business. Employees in positions within the Agency which require out of town and/or overnight travel will be reimbursed as outlined in the NCAP Procedures and Fiscal Manual in effect at the time the expenses are incurred. Rooms reserved for employees traveling on Agency business are to be occupied by Agency staff only unless prior approval has been granted by the Program Director and CEO.



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The Agency may consent to GPS tracking of its vehicles by insurance companies or third party vendors when necessary. An employee's driving will only be tracked during the operation of an Agency vehicle as allowed by law.

Area Travel:

1. Area travel means mileage and/or the use of Agency vehicles within the Agency's service area. The Agency's service area includes Box Butte, Cherry, Dawes, Sheridan, and Sioux Counties.
2. The Weatherization Program also serves Banner, Cheyenne, Deuel, Garden, Kimball, Morrill and Scotts Bluff Counties.

Out of Area Travel:

1. Out of area travel is defined as travel outside of the Agency's service area, 12 counties.
2. Employees and other authorized travelers will obtain approval of all out of area travel costs from the Program Director or CEO prior to making travel arrangements.
3. For Air Travel the Agency will purchase one standard economy airline seat per person. Employee is to book the least expensive baggage and flight combination. Any additional purchases or upgrades will be the responsibility of the employee.
4. Any overnight travel will be approved by the Program Director or CEO.

Mileage Reimbursement:

1. It is expected that an employee will use an Agency vehicle for Agency related duties.
2. Prior approval is required for employees to use their personal vehicle for Agency business and request mileage reimbursement by the Program Director or CEO. Acceptable reasons for using a personal vehicle include;
 - a. An Agency vehicle is not available
 - b. Other instances as approved by the Program Director and CEO
3. Individuals may be reimbursed the current IRS mileage rate.
4. In order to be reimbursed for mileage, employees must request approval, receive approval and complete and submit a request for reimbursement to the Program Director.



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Per Diem:

1. Employees will be reimbursed for all necessary business expenses incurred while on travel status.
2. Other aspects relating to reimbursement for meals for overnight travel are as follows:
 - a. First day and Last Day travel will be reimbursed at 75% of the federal rate if the employee is away from his/her home base for less than 12 hours.
 - b. The Agency will use federal per diem rates per city using the website www.gsa.gov/perdiem.
 - c. An employee's per diem may be reduced by the amount of a meal if it is provided as part of a training/conference. If the cost of a meal is required as part of registration, the Agency will not provide the cost of a meal twice by including it in the per diem.

Upon Return:

Within five (5) days of return from travel, the employee must submit a Final Travel Statement and any required documents to the Program Director or CEO.

Agency Vehicles:

Authorized Drivers:

1. Authorized drivers of Agency vehicles must have a current valid driver's license on file in the Human Resource Director and be approved to drive an Agency vehicle. Drivers shall abide by all safety regulations/laws.
2. The employee must be at least twenty-one (21) years of age to operate an Agency vehicle.
3. Driving records will be checked by the Human Resource Director through the Nebraska Motor Vehicle Department:
 - a. At time of hire a driver's license check will be completed on all employees required by their job description to have a valid driver's license or those employees who may need to travel for business.
 - b. On an as needed basis.
4. Human Resource will advise Program Directors when an employee is hired that is not authorized to drive a vehicle for Agency business.
5. Employees must notify the Human Resource Director if they have a suspension on their driver's license or if it has been revoked.



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6. Employees must provide the Human Resource Director with a copy of their driver's license upon renewal.

7. Employees must inform their Program Director, who will notify the CFO or HR Director of any accidents or traffic violations, while using their personal vehicle, within five (5) business days.

Vehicle Usage:

1. Agency vehicles must be used for the purpose of conducting official business of the Agency and are not authorized for the personal use of any individual.

2. Employees using Agency vehicles will complete the mileage log located in the vehicle for every trip.

3. The driver is prohibited from using a cell phone for either phone calls or texting while the vehicle is in motion. Texting while driving is prohibited by state law.

4. No smoking, vaping, nicotine products, or alcoholic beverages (opened or closed) are allowed in any Agency vehicle at any time. Employees may not operate an Agency vehicle within 8 hours of consuming alcohol.

5. No personal business, i.e., transporting own children to or from school or daycare, may be conducted while in Agency vehicle. Exceptions may be given when the child(ren) is enrolled in Head Start/Early Head Start and they are being transported as a result of a Head Start/Early Head Start activity.

Vehicle Fueling:

Employees will follow the instruction for fueling that can be found in each vehicle.

Vehicle Repairs/Maintenance:

All work orders for HS/EHS vehicle repairs will be submitted using the Monday.com work order process. All other work orders for vehicle repairs will be determined by the Program Director.

In the Case of an Accident:

The driver of the Agency vehicle must:

1. Notify proper law enforcement authorities and ambulances, if needed.
2. Obtain names, addresses, and insurance information of individuals involved and any witnesses.



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3. If possible, take pictures of all damages, weather conditions and any other pertinent factors.
4. Immediately notify supervisor and Program Director.
5. The Program Director must report the accident to the Human Resource Director, CFO and CEO within two hours.
6. Submit to a drug test if deemed necessary.
7. Obtain a copy of the police report.
8. Within 24 hours, complete the Accident Report form for the Agency's insurance company and file with the Fiscal Department.

School Bus Drivers:

Drivers of school buses must pass and/or maintain a Commercial Driver's License (CDL), a school bus endorsement, and meet school bus requirements. School bus drivers must pass CDL, health, physical, pre-employment and random drug tests. Drivers of school busses must be at least twenty-five (25) years of age.

Code of Ethics and Conduct:

Employees will:

1. Respect and value the individuality of all Agency clients, ensuring no assumptions are made based on personal characteristics or attributes protected by applicable laws at the federal, state, or local level.
2. Recognize that the chief function of NCAP is to serve the best interests of the low income, thereby serving the best interest of all people.
3. Accept as a personal duty the responsibility to keep up to date on emerging issues and to conduct ourselves with professional competence, fairness, impartiality, efficiency and effectiveness.
4. Effectively use all of one's skills and knowledge to assist low-income citizens in their efforts to attain the greatest level of self-sufficiency.
5. Keep the community informed about issues affecting the low income; facilitate communication between the low income and locally elected public officials and the private sector.
6. Conduct themselves with positive leadership exemplified by open communication, creativity, dedication, and compassion.
7. Conduct themselves with respect, concern, courtesy and responsiveness, recognizing that service to the low income is beyond service to oneself.
8. Demonstrate the highest standards of personal integrity, truthfulness, honesty and fortitude in activities in order to inspire confidence and trust.
9. Respect privileged information and adhere to the strict confidentiality to which the employee has access in the course of duties.
10. Strive for professional excellence and engage in professional development as available.



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11. Respect the structure and responsibilities of the Board of Directors and uphold and implement policies adopted by the Board of Directors.
12. Conduct themselves in a safe manner so as not to endanger the life or safety of another person.
13. Complete all duties in a satisfactory manner.
14. Not engage in discriminatory behavior.
15. Not act in an insubordinate manner or refuse to obey instruction issued by supervisor or Program Director pertaining to job responsibilities and performance.
16. Not threaten, intimidate or coerce fellow employees at any time, for any purpose.
17. Not engage in an act of sabotage; negligently causing the destruction or damage of Agency property, or the property of persons involved in NCAP in any manner.
18. Not falsify, omit, lie or misrepresent information either verbally or in any written form.
19. Not create or contribute to unsanitary conditions.
20. Not retaliate against any worker who reports or participates in an investigation of a possible violation of any Agency policy.

[HEAD START SPECIFIC]

1. A child may not be left alone or unsupervised while under the program's care.
2. Two (2) qualified staff must be present in the rooms at all time, supervising the children.
3. Only one (1) child is allowed to be in a bathroom stall at one time.
4. Employees are required to use positive methods of child guidance and are strictly prohibited from engaging in corporal punishment, emotional or physical abuse, or humiliation. Additionally, employees must not use isolation, food as a punishment or reward, or denial of basic needs as methods of discipline.
5. Head Start staff are required to follow all Head Start Performance Standards.

Violation of the Code of Ethics and Conduct may result in disciplinary action, up to and including termination. Employees will be trained on Code of Ethics and Conduct annually. All employees upon employment will sign a statement confirming they have read and understand the Code of Ethics and Conduct which will be kept in their personnel file.

Workplace Harassment:

Sexual Harassment:

1. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other physical or verbal conduct of a sexual nature when it meets any of the following:
 - a. Submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment.



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- b. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such an individual.
- c. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive workplace.

2. Examples of sexual harassment include, but are not limited to:

- a. Physical assault.
- b. Direct or implied threats that submission to sexual advances will be a condition of employment, work status, or promotion.
- c. Direct propositions of a sexual nature and/or subtle pressure for sexual activity that is unwanted and unreasonably interferes with a person's work.
- d. Sexual comments or inappropriate references to gender, gender identity or physical characteristics.
- e. Sexually explicit statements, questions, jokes or anecdotes regardless of the means of communication (verbal, written, electronic, etc.).
- f. Unwanted touching, patting, hugging, brushings against a person's body, or staring.
- g. Inquiries and comments about sexual activity, experience, or orientation.
- h. The display of inappropriate sexually oriented materials in a location where others can view them.

Other Harassment:

1. All persons involved in the Agency are entitled to work in an atmosphere free of harassment of any kind. Individuals may occasionally make statements or use words, objects, or pictures that others could interpret as being insulting or derogatory towards persons based on skin color, cultural background, religion, age, national origin, protected veteran status, political affiliation, marital or paternal status, military service, limited English proficiency, or any other characteristic protected by federal, state, or local laws. Such conduct may make a reasonable person uncomfortable in the work environment or could interfere with an employee's ability to perform his or her job. Comments or actions of this type, even if intended as a joking matter among friends, are always inappropriate in the workplace and will not be tolerated.
2. Reporting any individual, regardless of position, who has a concern of, or who witnesses, harassment by anyone has a responsibility to immediately bring the matter to the Program Director or the Human Resource Director. If you are not satisfied with the handling of the concern, the complainant must provide a written description of the complaint to the Human



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Resource Director. If the concern or complaint relates to the Human Resource Director you may bring the matter to the CEO.

3. If an employee reports a concern or files a written complaint, the Human Resource Director and/or the CEO will be responsible for immediately investigating the alleged incident.

4. After initial investigations, if a suspected violation may have occurred, the Human Resource Director or CEO will convene a panel of supervisors to make a determination and a corrective action plan.

Chronic Infectious Disease:

Any employee known to have a chronic infectious disease which may be communicated in the workplace must inform the Human Resource Director immediately or upon diagnosis. Instructions will be provided to the employee regarding safety procedures.

Drug & Alcohol:

1. NCAP follows all federal, state and local laws regarding Workplace Drug and Alcohol use. Employees are required to immediately notify the Human Resource Director of any criminal conviction under a drug or alcohol statute for a violation.

2. NCAP has the right to require blood and/or urine samples following NCAP Drug Policies.

a. Agency Transportation Drivers will be subject to the Drug Policy requirement of the Department of Transportation. Head Start Bus Drivers will be subject to the Agency Drug Policy in accordance with Head Start regulations.

b. A current employee involved in any accident involving injury or damage to Agency property while on duty.

c. NCAP has reasonable suspicion that an employee's behavior is being influenced by one or more illegal drugs, alcohol, or misuse of a controlled substance.

3. Employees refusing to submit to a test or testing positive for drugs or alcohol will be subject to disciplinary action up to and including suspension/termination. NCAP will determine, on a case-by-case basis, whether first-time offenders will be allowed to seek counseling/rehabilitation as an alternative to suspension/ termination.

4. Any employee testing positive has the right to appeal the results and have the original sample re-tested at his or her own expense.



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Tobacco and Nicotine:

NCAP is committed to providing a safe and productive work environment for the benefit of our staff and clients.

All NCAP work environments will be nicotine free. This includes all property owned, leased, or borrowed by NCAP, its buildings, offices, parking lots, company vehicles, personal vehicles while on applicable property and while used in the completion of work duties, walkways, client properties and all facilities used for off-site meetings or business. This policy applies to all employees, contractors, vendors, clients and guests with no exceptions.

Nicotine free means the use of any tobacco product is prohibited including electronic smoke or smokeless, nicotine or other inhalation devices.

Child Abuse:

1. All NCAP staff must report child abuse, neglect and/or sexual abuse "Abuse" refers to acts such as beating or excessive punishment. "Neglect" refers to a lack of action such as failure to provide food, emotional, medical or dental care.
 - a. The incident must be reported to the Nebraska Child Abuse Hot Line at 1 (800) 652-1999 by the employee observing/suspecting the abuse, neglect, or sexual.
 - b. In the event an NCAP employee should suspect child abuse, neglect and/or sexual abuse it should be immediately reported to the Program Director.
 - c. The employee directly observing/suspecting the abuse, neglect, or sexual abuse will document all observations of the incident and e-mail it to the Family and Community Partnerships Coordinator and/or the Head Start Director the day of the incident.
 - d. Employees of the Agency will preserve the confidentiality of all records pertaining to child abuse or neglect in accordance with applicable state laws.
2. Employees will not make any statements to the media and must adhere to the media policy.
3. NCAP Head Start will make every effort to retain in the program children allegedly abused or neglected.
4. Training: NCAP provides orientation and annual training, which fosters a helpful rather than a punitive attitude toward potential abusing or neglecting parents and other caretakers, for staff on the identification and reporting of child abuse and neglect. NCAP Head Start staff provides training for Head Start parents, which fosters a helpful rather than a punitive attitude toward abusing or neglecting parents and other caretakers, on the need to prevent abuse and neglect and provide protection for abused and neglected children.
5. Every measure will be taken to protect the child.



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Confidentiality:

1. All information pertaining to NCAP clients is confidential, and must not be discussed with or divulged to anyone, unless the performance of their official duties requires access to the information. Even the presence of a particular client should not be acknowledged to others without proper authorization.
2. Information about the Agency's confidential activities and business will not be released to individuals outside the Agency without authorization. Such information will not be discussed outside the Agency and particularly in public locations where conversations can be overheard.
3. If an employee leaves the Agency, the employee must surrender all information and items in their possession, whether or not containing confidential information, including but not limited to, storage media, notebooks, reports, office supplies, technology, documents, files, etc.
4. Confidential information is to be used only in connection with legitimate functions of an employee's job duties. The release of confidential information other than in the treatment of clients shall occur only with proper authorization. If contacted personally about confidential information, the employee should direct the inquiring party to his or her supervisor. Client files should not be removed from the offices of NCAP except when authorization is received.
5. The Human Resource Director bears the responsibility for the orientation and training of employees and the Program Director bears responsibility for enforcement of confidentiality policy. Agency employees will be required to acknowledge the Agency Confidentiality Policy, by signature, as part of the new employee orientation.
6. All employees upon employment will sign a statement confirming they have read and understand the Confidentiality Policy and Procedures which will be kept in their personnel file. Employees are subject to Agency Disciplinary Action if policy and procedures are not followed.

Conflict of Interest:

1. For purposes of this policy, relatives are defined as "immediate family" meaning wife, husband, son, daughter, mother, father, brother, sister, cousin, grandparent, significant, other or in a dating relationship, or any in-law of the same degree or significant other-ship.
2. Employees are expected to report conflicts of interest by completing a Conflict of Interest form and submitting it to Human Resources. Examples of conflicts of interest are listed below, but are not limited to:
 - a. A relationship with an outside business interest that competes with the activities of the Agency.



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- b. A relationship with an outside business that is a purchaser or supplier of goods or services to the Agency.
 - c. An outside business involvement or employment that interferes with the ability to devote necessary attention to the responsibilities at the Agency.
 - d. A relative or a person with a significant relationship employed by, or has a business interest in companies that compete with, sell to, or buy from the Agency.
 - e. Accepting purchase inducements (gifts, premiums, money, goods, or services) from vendors that benefit the employee personally (directly or indirectly) or are unauthorized or questionable in nature.
3. No employee or member of a governing body shall vote or participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved, including personnel matters.
 4. Employees must provide full disclosure before decisions are made if a conflict would arise when the employee, or member of his/her immediate family, his/her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial interest in the firm selected for an award or business.
 5. No Employee shall have any outside employment or provision of outside services, current or planned, which may pose a conflict of interest.
 6. No employee shall accept personal gifts or favors from people with whom the Agency has a business relationship are prohibited. Gifts of more than \$50.00 should be tactfully declined or returned to avoid any appearance or suggestion of improper influence.
 7. NCAP expects employees to conduct business in accordance with relevant policies, procedures, and laws and to refrain from any illegal, dishonest, or unethical conduct.
 8. All employees upon employment will sign a statement confirming they have read and understand the Conflict Interest Policy and Procedures which will be kept in their personnel file.

Political Activity & Representation:

An NCAP employee may not:

1. Use his or her official authority or influence for the purpose of interfering with or affecting the result of an election, nomination for office; or legislation.
2. Directly or indirectly coerce, attempt to coerce, command, or advise a state or local officer or employee to pay, lend, or contribute anything of value to a political party, committee, organization, Agency, or person for a political purpose; or



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3. Be a candidate for elective public office in a partisan election
4. Carry out programs in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting in or resulting in the identification of such programs with:
 - a. Any partisan or nonpartisan political activity or any other political activity associated with a candidate or contending faction or group, in an election for public or party office;
 - b. Any voter registration activity, or any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election; or
 - c. Any effort intended to finance labor or anti-labor organizations or activities or related activity.

NCAP accepts without reservation the basic democratic principle that all employees are free to make their own individual decisions in civic and political matters. No employee's status with the Agency will be affected, in any way whatsoever, because of participation or nonparticipation in lawful civic and political activities. Participation in civic and political activities is considered to be a personal matter and, as such, is to be carried on outside of normal working hours. Vacation leave may be arranged if needed.

Voting:

NCAP encourages all eligible employees to vote. Employees are encouraged to use hours before or after scheduled workday, break or lunch time for this purpose. If this cannot be arranged, the employee's supervisor may approve time off at a reasonable time to vote.

Image and Branding:

All marketing materials, social media, emails and any media pieces will conform to the Agency's Image, Branding and Style Guide, including font, colors, voice, feel and more.

Media:

1. No employee shall make public statements, respond to requests from media, either written or oral, or provide any information to the press or public about the Agency and its business unless that employee has specifically received authorization from the CEO.
2. All press releases will conform to the Agency's Image, Branding and Style Guide, including any graphics.
3. If any employee suspects that there will be any publicity regarding the Agency regardless of the incident or issue, the employee must inform the Program Director and then the CEO.
4. All NCAP employees will refer media requests to the CEO. All news and press releases, informational statements and media interviews will have prior approval by the CEO.



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Electronic Media Use:

Privacy Disclosure: NCAP recognizes that the principles of freedom of speech and privacy of information hold important implications for electronic mail and Internet services. NCAP cannot and does not guarantee user privacy. NCAP, at its discretion, reserves the right to monitor and access any matter created in, received through, or sent from the internet, email or other electronic Medias.

1. NCAP's electronic resources are available to employees of NCAP for the performance and fulfillment of the Agency's mission and individual responsibilities, research support, and professional communication. Employees are expected to conduct themselves ethically, and be mindful of all applicable federal, state and copyright laws and regulations.
2. The internet, email, website and other electronic Medias are for business purposes. Personal uses of these resources are prohibited.
3. Unacceptable uses of technology resources include but are not limited to:
 - a. Distribution of offensive or harassing statements, transmission of defamatory, obscene, offensive or harassing messages or messages that disclose personal information without authorization.
 - b. Distribution of incendiary Statements which may provoke violence or describe or promote the use of weapons or devices associated with terrorist activities.
 - c. Distribution or solicitation of sexually oriented messages or images.
 - d. Any use of a resource for commercial purposes, product advertisement, or "for-profit" personal activity.
 - e. Any sexually explicit use, whether visual or textual.
 - f. Any use for religious or political lobbying.
 - g. Any unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the internet is expressly prohibited.
 - h. Downloading materials and attachments from the internet from unknown sources, as they may contain viruses.
 - i. Wasting resources by, for example:
 1. Printing/copying using unnecessary amounts.
 2. Disrupting the use of Agency resources.



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3. Storing information or software which is not authorized.
4. Security violations include, but are not limited to:
 - (a). Accessing accounts within or outside your computer for which the employee is not authorized or does not have a business need.
 - (b). Copying, disclosing, transferring, examining, renaming, or changing information or programs belonging to another user unless the employee is given express permission to do so by the person responsible for the information/program.
 - (c). Transmitting confidential information without proper security and authority.
 - (d). Any use that ruins or damages the equipment.
4. Some electronic devices have acceptable usage agreements that employees must sign and honor.
5. Employees should never disclose individual or system passwords to anyone other than authorized personnel.
6. The System Administrator will keep a log of all computer station passwords. Employees are required to notify the Computer Support Specialist when a password change is made to electronic equipment (except phones).

NCAP Email System:

1. Employee signature lines on their work email will meet the branding and image guidance for the Agency. No employee is allowed to change the signature line without prior approval by the CEO.
2. All employees will be issued an Agency email account upon hire. Employees must use this email for all Agency correspondence only; emails should not be personal in nature. Each employee is responsible for messages that are sent from his or her computer.
3. Employees' e-mail and voicemail messages may be read or heard by someone other than the person to whom they are sent and someday may be disclosed to outside parties or to a court in connection with litigation. Accordingly, please create and send messages that are courteous, professional and business-like.
4. NCAP purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, neither NCAP nor any of its employees may reproduce such software for use on more than one computer.



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5. All equipment and property are here for business purposes. Supervisors have the right to access and inspect them. Any employee that suspects misuse of the informational resources should contact the applicable Program Director.

Personal Telephone/Cell Phone:

1. Personal calls and text messages may be made and received on a very limited basis. Personal telephone usage privileges are subject to change or revocation at any time.

2. All personal phone calls are prohibited in the classroom, meetings, staffing and trainings unless a prior request for specific reasons and it has been approved.

Social Media:

1. This policy is not intended to interfere with the right to participate in concerted activity under the National Labor Relations Act (NLRA).

2. All posting on social media must comply with NCAP confidentiality, code of ethics, harassment, nondiscrimination and other policies.

3. Employees are responsible for what is written or present on their social media sites. Employees can be sued by other employees or any individual that views your social media posts as defamatory, harassing, libelous, or creating a hostile work environment.

4. If an employee posts any comment about our Agency, the employee must clearly and conspicuously state that the opinion is being posted in the employee's individual capacity and that the views posted are theirs alone and do not represent the views of our Agency.

5. Unless given written consent, employees may not use NCAP or any grant funding Agency's logo on your posts.

6. Employees are encouraged to use caution when using social media communications regarding work related matters. Employees should remember that social media postings are "public". Employees must not post anything about co-workers or supervisors that could be viewed as defamatory, harassing, libelous, or creating a hostile work environment.

Agency Property & Facilities:

1. Agency property includes but is not limited to desks, storage areas, work areas, file cabinets, computers and accessories, office telephones, copy machines and vehicles.

2. When using Agency property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards and guidelines.



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3. NCAP property and equipment is available to employees only for the intended use of Agency business.
4. Improper, careless, negligent, destructive or unsafe use or operation of equipment and/or facilities may result in disciplinary action.
5. Please notify the supervisor immediately if any property or equipment appears to be damaged, defective or in need of repair and return to Central Office as soon as possible.
6. Employees that lose, steal, or misuse Agency property or equipment may be personally and/or financially liable for replacing or repairing the item.

Workplace Injury/Illness:

Employee Responsibilities:

1. Employees are responsible for immediately reporting to their direct supervisor, and Human Resource Director, all work-related accidents/illness no matter how small, even if no medical treatment is being sought.
2. Prior to the end of the day of the injury/illness, the employee is responsible to complete the Injury Report Form, sign and return it to the Human Resource Director. If incapacitated, the report may be submitted on the employee's behalf.
3. The employee must submit a completed Form 50 designating their selected physician if any medical treatment is sought.
4. The employee must remain in close contact with the HR Director, their supervisor and Program Director regarding any work restrictions, time off related to the workplace injury or illness.
5. The employee must submit to the HR Director any documentation from their treating physician including documentation on work restrictions, physician recommended time missed from work, etc.

Tetanus, Flu and Coronavirus shot reimbursement:

1. NCAP employees are eligible for reimbursement, if the budget allows, for vaccinations under the following conditions:
2. Employees must provide proof of vaccination from a licensed healthcare provider (includes pharmacies). The vaccination must be administered within the current calendar year.



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3. Employees must submit an itemized receipt showing the cost of the vaccination along with proof of payment to the Chief Financial Officer.
4. The reimbursement amount will cover the cost of the vaccination, up to the maximum allowable limit set by NCAP annually.
5. Reimbursement requests will be processed on the following payroll or as soon as administratively possible. NCAP does not require these vaccinations and is not legally responsible for administering vaccinations.

Direct Supervisor's Responsibilities:

1. Assess injury or illness for necessary medical treatment. In the case of emergencies, arrange for immediate medical care for employees, up to and including transportation to medical facilities if needed.
2. Even if no medical treatment is required, the injury must be reported to the Human Resources Director by immediately filling out the Employee Injury Form.

Program Director's Responsibilities:

1. Program Directors will review the Return to Work Recommendations Form with employees and the Human Resource Director and work diligently to place an employee in meaningful, productive work to meet the restrictions.
2. Review and monitor employee's work responsibly in relation to the work recommendations.

Modified Duty Return to Work:

1. NCAP's modified duty program is designed to allow placement of employees, in most instances, on temporary, modified duty jobs providing that they are not hospital confined, bed confined or quarantined. It is the employee's responsibility to accurately inform the medical representative of the availability of this type of work for them.
2. The employee must obtain a Return to Work Recommendation form from the HR Director and obtain physicians completion of form. The completed form should then be submitted to the HR Director.
3. If the employee is released to work with documented medical restrictions, they are to work within these restrictions only.
4. It is the employee's responsibility to fully communicate with the Workers' Compensation Claim Representative and HR Director.



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5. After every medical evaluation, immediately return all necessary forms to Human Resources.
6. If the employee is released to work, with or without restrictions, and feels their injury/ illness is preventing them from performing duties, they must immediately notify the HR Director, who will help arrange for medical treatment and evaluation as required.

Workplace Safety:

1. It is the responsibility of each supervisor to ensure that the safety of employees is an integral part of his/her management function.
2. Employees of NCAP attend mandatory safety meetings and complete on-line safety training following Occupational Safety and Health Administration (OSHA) guidelines.
3. The Employer will pay an allowance to each weatherization employee a maximum of two hundred dollars (\$200.00) annually upon receipt of purchase of boots that have at least a 1/2 inch sole. The receipt must be legible and contain enough information to audit the sole requirement. The allowance is intended as reimbursement for the purchase of work boots, as required, for all seasons.
4. The employer will pay a one-time allowance to all NCAP employees a maximum of two hundred dollars (\$200.00), upon receipt of purchase of a smart watch.
5. Employees are expected to assist management in accident prevention activities.
6. Unsafe conditions must be reported to the employee's immediate supervisor.
7. Employees who violate safety standards, cause hazardous or dangerous situations or who fail to report, or where appropriate, remedy such situations, may be subject to disciplinary action up to and including termination.

Weapons:

1. NCAP prohibits all employees and visitors from carrying or possessing a weapon of any kind on Agency premises. This does not pertain to authorized security or law enforcement personnel.
2. All individuals are encouraged to report incidents of threats or acts of physical violence of which he/she is aware.
3. If an employee believes that another person possesses a weapon on NCAP premises, the employee will:
 - a. Remain calm. The employee should not confront the person directly.



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- b. Report the details to the CEO for guidance immediately, if safe to do so. If the circumstance is such that you are unable to safely report to the CEO, call 911.
- c. Failure to report knowledge of the presence of any weapon in NCAP buildings or on premises may result in disciplinary action.

4. UNDER NO CIRCUMSTANCES should any employee take any unnecessary risks or compromise his/her safety by enforcing this policy.

Workplace Emergencies:

- 1. Emergency is defined as a serious situation or occurrence that happens unexpectedly and demands immediate action.
- 2. Emergencies include, but are not limited to, natural or manmade disasters, injuries, health complications, violence, bomb threats, fire, and vehicle accidents.
- 3. Each work site has an Emergency Plan which includes a designated site leader, posted emergency telephone numbers, basic response procedures, and evacuation plans.

Suspected Misconduct:

NCAP faces many risks associated with fraud, abuse, and other forms of misconduct. The impact of these acts, collectively referred to as misconduct throughout this policy may include, but not be limited to:

- Financial losses and liabilities
- Loss of current and future revenue and clients
- Negative publicity and damage to NCAP's good public image
- Loss of employees and difficulty in attracting new personnel
- Deterioration of employee morale
- Harm to relationships with clients, vendors, bankers, and subcontractors
- Litigation and related costs of investigations, etc.

NCAP is committed to establishing and maintaining a work environment of the highest ethical standards. Achievement of this goal requires the cooperation and assistance of every employee and volunteer at all levels of the Agency.



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Definitions:

For purposes of this policy, misconduct includes, but is not limited to:

1. Actions that violate NCAP's Code of Conduct (and any underlying policies) or any of the financial policies included in this manual, NCAP's Policy Manual and/or NCAP's Fiscal Manual.
2. Fraud is further defined to include, but not limited to:
 - a. Theft, embezzlement, or other misappropriations of assets (including assets of or intended for NCAP, as well as those of our clients, subcontractors, vendors, contractors, suppliers, and other with whom NCAP has a business relationship)
 - b. Intentional misstatements in NCAP's records, including intentional misstatements of accounting records or financial statements.
 - c. Authorizing or receiving payments for goods not received or services not performed.
 - d. Authorizing or receiving payments for hours not worked.
 - e. Forgery or alteration of documents, including but not limited to checks, timesheets, contracts, purchase orders, receiving reports
3. Destruction, alteration, mutilation, or concealment of any document or record with the intent to obstruct or influence an investigation, or potential investigation, carried out by a department or Agency of the federal government or by NCAP in connection with this policy.
4. Disclosure to any external party of proprietary information or confidential personal information obtained in connection with employment with or service to NCAP.
5. Unauthorized personal or other inappropriate (non-business) use of equipment, assets, services, personnel or other resources.
6. Acts that violate federal, state, or local laws or regulations.
7. Accepting or seeking anything of material value from contractors, vendors, or persons providing goods or services to NCAP. Exception: gifts less than a normal value (\$50 or less).
8. Impropriety of the handling or reporting of money in financial transactions.
9. Failure to report known instances of misconduct in accordance with the reporting responsibilities described herein (including tolerance by supervisory employees of misconduct of subordinates).



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10. NCAP prohibits each of the preceding acts of misconduct on the part of any employee, volunteer or anyone acting on behalf of NCAP.

Reporting Responsibilities:

Every employee, officer, is responsible for immediately reporting Suspected Fiscal Misconduct to their supervisor, HR Director, or CEO. When supervisors have received a report of Suspected Fiscal Misconduct, they must immediately report such acts to the Program Director, the HR Director and the CEO. If the Suspected Fiscal Misconduct involves either the CEO or the CFO the report must be received by the HR Director; the HR Director is to immediately report to the Executive Committee of the Board.

Investigative Responsibilities:

Due to the sensitive nature of suspected misconduct, supervisors and Program Directors should not, under any circumstances, perform any investigative procedures. The procedures in this manual must be followed in order for an investigation to be properly conducted.

1. The HR Director has the primary responsibility for investigating suspected misconduct involving employees below the CEO and senior management level. The HR Director shall provide a summary of all investigative work to the Finance Committee.
2. The Finance Committee has the primary responsibility for investigating suspected misconduct involving CEO and senior management level positions, as well as board members and officers. However, the Finance Committee may request the assistance of the HR Director in any such investigation.
3. Investigation into suspected misconduct will be performed without regard to the suspected individual's position, length of service, or relationship with NCAP.
4. In fulfilling its investigative responsibilities, the Finance Committee shall have the authority to seek the advice and/or contract for the services of outside firms, including but not limited to law firms, CPA firms, forensic accountants and investigators, etc. these services may or may not be allowable under federal awards. Guidance of CFR 200 should be followed for proper payment.
5. Members of the investigative team (as authorized by the Finance Committee) shall have free and unrestricted access to all NCAP records and premises, whether owned or rented, at all times. They shall also have the authority to examine, copy and remove all or any portion of the contents (in paper or electronic form) of filing cabinets, storage facilities, desks, credenzas and computers without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of an investigation into suspected misconduct or related follow-up procedures.



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6. If members of the investigative team find it necessary to copy and remove all or any portion of the contents (in paper or electronic form) of filing cabinets, storage facilities, desks, credenzas and computer, an inventoried list must be made before removal and sent to the auditor.
7. The existence, the status or results of investigations into suspected misconduct shall not be disclosed or discussed with any individual other than those with a legitimate need to know in order to perform their duties and fulfill their responsibilities effectively.

Disciplinary Action:

Based on the results of investigations into allegations of misconduct, disciplinary action may be taken against violators. Disciplinary action shall be coordinated with the HR Director. The seriousness of misconduct will be considered in determining appropriate disciplinary action, up to and including termination, reimbursement of losses or damages or referral for criminal prosecution or civil action. This listing of possible disciplinary actions is for information purposes only and does not bind Northwest Community Action Partnership to follow any particular policy or procedure.

Confidentiality:

1. The Finance Committee and the CFO treat all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the CFO or the Finance Committee Chair immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected misconduct (see **Reporting Procedures** section above).
2. Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is underway. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect NCAP from potential civil liability.
3. An employee who discovers or suspects fraudulent activity may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual(s), his or her attorney or representative(s), or any other inquirer should be directed to the Finance Committee or legal counsel. No information concerning the status of an investigation will be given out. The proper response to any inquiry is "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference
4. The reporting individual should be informed of the following:



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- a. Do not contact the suspected individual in an effort to determine facts or demand restitution.
- b. Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by NCAP legal counsel or the Finance Committee.

Disclosure to Outside Parties:

Allegations of and information related to allegations of suspected misconduct shall not be disclosed to third parties except under the provisions described in this policy (such as disclosure to outside investigators hired by NCAP to aid in an investigation). However, all known frauds involving the CEO, senior management, or members of the Board of Directors, as well as all material frauds involving employees below the senior management level, shall be disclosed by the Finance Committee to the Northwest Community Action Partnership's external auditors and the Federal Awarding Agencies.

Record Access:

1. To ensure proper record keeping, NCAP complies with federal, state, and local regulations on record keeping. If program regulations require more detailed recordkeeping policies, the individual programs maintain additional policies.
2. Personnel files are the property of NCAP, and access to the information contained within is restricted. Generally, only supervisors and management personnel of NCAP who have a legitimate reason to review information in a personnel file are allowed to do so.
3. Current and former employees who wish to review their own personnel file should contact the Human Resource Department. With reasonable advance notice, employees may review their own personnel files in the Human Resource offices in the presence of the HR Director.

Protection of Records – Federal Matters:

1. NCAP prohibits the knowing destruction, alteration, mutilation, or concealment of any record, document, or tangible object with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any department or Agency of the United States government, or in relation to or contemplation of any such matter or case.
2. Violations of this policy will be considered violations of NCAP's Code of Ethics and subject to the investigative, reporting, and disclosure procedures described earlier in this Policy on Suspected Misconduct.



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Records Management:

1. "Records" means all documents, files, or records created by any Agency personnel while acting within the course and scope of his or her duties pertaining to the Agency business or operations, including but not limited to: computer records, electronic mail (email), voice mail messages, handwriting, photographs, photocopies, or facsimile, regardless of the manner in which the record has been stored. Specific categories and types of Records are contained in the Retention and Destruction Schedule.
2. All Records required to be retained to document Agency legal compliance, or otherwise required by law, rule, and regulation to be retained, shall be retained for the periods required by law as described in the fiscal manual and further detailed in the Retention and Destruction Schedule. Records will be destroyed within one year of destruction date.
3. All Records pertaining to the Agency business maintained or created by NCAP personnel including any records retained off site are subject to the requirements of this policy.
4. This policy is to be administered by the HR Director, Program Directors and the CFO. The destruction of records will be coordinated by Directors.
5. Paper records shall be destroyed by shredding. Electronic records shall utilize a method to ensure the electronic records are completely destroyed and not retrievable from any storage media. Due to the backlog of records, past records may take up to two years to destroy.

(See the Fiscal Manual for specific records management regulations)

Personally Identifiable Information:

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.

Physical records containing personally identifiable information will be kept in a locked cabinet. Digital personally identifiable information will be protected by computer auto-lock and password. Personally identifiable information is defined as information that can be used to uniquely identify, contact, or locate a single person. In the unlikely event of a breach of any personally identifiable information.

Security Monitoring:

1. Selected areas of the property are equipped with video/audio cameras that are recording at all times:
 - a. To assist in the daily operations in providing a safe and secure environment for our clients, volunteers and staff;



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- b. To provide training opportunities for professional development for staff;
 - c. To identify person or persons for policy violations, criminal activity or actions considered disruptive to normal operations; AND
 - d. To ensure policy-compliant operation.
2. NCAP recognizes the need to strike a balance between the individual's right to be free from invasion of privacy and the Agency's duty to promote a safe environment for clients, volunteers and staff and to protect the Agency's property.
3. It is also recognized that each location has unique needs and practices. While each location's specific requirements will be considered, it is necessary to standardize our procedures in order that all staff might have an expectation of consistency, regardless of where the equipment is utilized.
4. 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.
5. The video security system will be used only for the protection and safety of clients, volunteers, employees, property, policy compliance, and to assist law enforcement if necessary.
6. Reasonable efforts will be made to safeguard the privacy of clients and employees. Cameras will not be positioned in areas where there is a reasonable expectation of personal privacy such as restrooms and in most office space. The cameras will be positioned to record only those areas specified by the director and will not be changed or added without the permission of the applicable Program Director.
7. Only the Program Director and/or employee designated by the Program Director are authorized to operate the video security system. Access to video records will be limited to authorized employees, who will only access such records during the course of their regular duties. Such persons will not violate any laws relevant to this policy in performing their duties and functions related to the video security system.
8. In certain circumstances, recordings may be transferred to and maintained by the central office with HR. NCAP will retain recorded images for the period necessary to meet operational and administrative needs. Typically, images will not be routinely monitored in real-time, nor reviewed, except when specifically authorized by the CEO or other authorized employee. Any records produced by the video security system will be kept in a secure manner, and managed appropriately by NCAP to protect legal obligations and evidentiary values.



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Employee Relations & Conflict Resolution:

1. Many employee concerns can be resolved informally in the course of day-to-day communications between the employee and his/her immediate supervisor. Employees are expected to make reasonable attempts to resolve concerns informally.

2. In cases in which an employee is unable to resolve their concerns informally, he/she can follow the formal complaint and grievance procedure as follows:

Step 1: Discuss the situation with the Program Director. In speaking with the Program Director, make sure that he/she understands that you are taking the first steps of the Formal Grievance Resolution process. The Program Director will make all reasonable attempts to resolve the grievance.

Step 2: If the complainant is not satisfied with the resolution, they may file a grievance complaint form to the HR Director. Please include in the written statement all steps and action taken up to that point. A response to the grievance will be given within ten business days.

Step 3: If the grievance has not been satisfactorily resolved in step two, the grievance will be submitted to the CEO. The decision of the CEO shall be final. If the concern relates to the CEO, a written statement should be given to the HR Director which will be shared with the President of the Board of Directors.

No employee will be penalized, formally or informally, for voicing a complaint in a reasonable, professional manner, or for using the Formal Grievance Resolution Process.

Client/Community Members Grievance:

1. Client/Community members wishing to file a complaint will do so in writing by completing the Client/Community Members Grievance form, which can be obtained from the HR Director. The Agency will work on a resolution and contact the Client/Community Member that filed the complaint within five (5) business days.

2. If the complaint is not resolved at the site the Program Director will conduct an investigation.

3. In the event that the concern is not resolved at the Program Director level, the concern will be directed to the CEO for resolution within five (5) business days.

4. If the Client Community Member is still unsatisfied, the concern will be brought to the Governing Body Committee which will include three members of the Board of Directors and may include an equal number of members of the Policy Council if the concern/complaint is Head Start related.



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5. If the concern is not resolved by the recommendation of the Governing Body Committee within ten (10) business days, all of the written proceedings will be reviewed by a Board of Mediators. The Board of Mediators will consist of:

- a. One unrelated community person selected by the Client/Community Member.
- b. One community person selected by the CEO
- c. One community person acceptable to both parties

6. The decision of the Board of Mediators will be binding. No further steps will be available. The applicable governing bodies will be notified. All Client/Complaint forms will be stored in the CEO's office.

Whistleblower Protection:

In keeping with the policy of maintaining the highest standards of conduct and ethics, Northwest Community Action Partnership, "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 unlawful 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



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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.

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 Department. 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 HRs 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.

In the event a report of Suspected Wrongdoing is made concerning the designated compliance officer, the report will be investigated by the CEO and/or Board of Directors.