

# TABLE OF CONTENTS

<b>1</b>	<b>GENERAL POLICIES</b> .....	<b>1</b>
1.1	ACCESSIBILITY .....	1
1.2	CODE OF BUSINESS CONDUCT AND ETHICS .....	1
1.3	CORPORATE COMPLIANCE POLICY .....	4
1.4	GOVERNING DOCUMENTS.....	4
1.5	IMMIGRATION REFORM AND CONTROL ACT OF 1986 .....	5
1.6	INFORMATION SYSTEMS: INTERNET, COMPUTER, AND EMAIL USAGE.....	5
1.7	INTERNAL SECURITY .....	7
1.8	MEDIA .....	8
1.9	RECORD RETENTION.....	8
1.10	RISK MANAGEMENT .....	10
1.11	SMOKING .....	11
1.12	SOLICITATION AND DISTRIBUTION.....	11
1.13	VISITORS .....	11
1.14	VOLUNTEERS.....	11
1.15	WASTE, FRAUD, ABUSE AND OTHER WRONGFUL CONDUCT .....	12
1.16	WEAPONS.....	13
1.17	WORKPLACE VIOLENCE PREVENTION .....	13
1.18	CONFIDENTIALITY .....	14

# 1 GENERAL POLICIES

## 1.1 ACCESSIBILITY

Revised 10/06

Community Living, Inc. will promote accessibility for customers, applicants and employees through the identification of architectural, attitudinal, communicative, transportation and other barriers. Community Living, Inc. will remove barriers when possible or make reasonable accommodations as needed to facilitate access to services and/or employment. Community Living, Inc. will also advocate for participants' barrier-free access to their community.

Annually, the accessibility plan is reviewed and revised, and must be approved by the Board of Directors. This plan includes:

- identified barriers
- timelines for completion of changes
- responsible parties

## 1.2 CODE OF BUSINESS CONDUCT AND ETHICS

Revised 5/16

**Community Living is committed to manage and operate its programs using the highest business, ethical and moral principles. All agency representatives contribute to achieving these principals by conducting business activities for the agency with integrity and high ethical standards.**

**Exercising good judgment and being a good example to one's peers and people receiving services assists in creating a positive workplace environment in which compliance and ethical business conduct are expected. All Community Living representatives are expected to strive towards and comply with the following standards and expectations:**

- Community Living representatives must ensure that persons with disabilities and other service recipients always be treated with the highest degree of dignity and respect. Services must center on their individualized needs, preferences, and desired outcomes and they must be given continuous opportunities for input into their service program.

- Community Living representatives respect the rights of all individuals served and under no circumstances will engage in personal relationships with clients that may be construed as an intimate relationship or in any sexual activities or sexual contact with clients whether such contact is consensual.
- Community Living representatives will respect the privacy of clients and hold in confidence all information obtained in the course of employment or association with the agency. Agency representatives will not discuss client affairs, program activities or unusual incidents with any other staff or persons, unless it is within the context of the client's treatment/service/plan goals and objectives.
- Community Living representatives will under no circumstances financially exploit clients by borrowing, stealing money, or accepting gifts of any value.
- Community Living's organization and business and financial practices will be conducted in accordance with solid and recognized ethical business practices, all funds accruing to the agency will be accounted for, and regular financial reports will be developed, maintained, and reviewed by the finance committee and the board of directors.
- Community Living representatives have a primary business responsibility to the agency and are expected to avoid any activity that may interfere or have the appearance of interfering with their performance. Conflicts of interest arise when an employee's personal activities conflict with the employee's responsibilities, loyalty and actions in his or her capacity as an employee of Community Living. Agency representatives are expected to exercise good judgment and be mindful of how their personal relationships and outside activities may be affecting the agency.
- Community Living representatives are encouraged to freely discuss and raise questions to their supervisors or to appropriate personnel about situations they feel are in violation of this Code or any other system policy or procedure. Any employee who makes a good faith report of a potential violation or fraud, waste or abuse shall be protected from retaliation, harassment or discrimination of any kind.
- Community Living ensures that all products and services are marketed in a manner which does not diminish nor disrespect the persons receiving services. Marketing materials will accurately reflect the agency's

philosophy, services available and all licensures as appropriate. The staff and board will use person first language when referring to persons receiving services in both written and oral discourse, and efforts to solicit business will not depict persons receiving services in ways that are designed to elicit sympathy.

- Community Living's fundraising activities are conducted in the highest standards of accountability and professionalism. We are committed to providing truthful and current information in our solicitation communications, assuring donors that their gifts will be used for the purposes for which they were given, expending funds consistent with the donor's intent and respecting the privacy of our donors. We encourage donors to ask question when making donations and will provide prompt, truthful, and forthright answers. Supports donors to seek competent, independent professional advice when including Community Living in the donor's estate or financial plan. It is our policy to provide donors with a written acknowledgement for all donations received.
- Community Living representatives will not accept or solicit any gifts, money, gratuities or other things of value under circumstances from which it might be reasonably inferred that a certain vendor or person is receiving or attempting to obtain preferential treatment.
- Community Living selections for contractors must always be business decisions based on merit: by comparing and evaluating price, quality, performance, and suitability. Decisions must not be influenced by factors such as personal relationships or gifts.
- Community Living recognizes that personal relationships may exist or develop within the organization and relies upon the professionalism and integrity of its employees. However, should an employee develop a personal relationship with another employee, his/her behavior must be appropriate. Improper behavior, abuse of authority, conflicts of interest, or acts of a biased nature will not be tolerated.

**I understand that all Community Living representatives are expected to comply with the Code of Business Conduct and Ethics and it is important for me to uphold these standards for my own benefit and the benefit of all representatives at Community Living. I am, therefore, signing below to give my personal support to Community Living to manage and operate its**

**programs and services using the highest business, ethical and moral principles.**

### **1.3 CORPORATE COMPLIANCE POLICY**

New 2009

Community Living, Inc., is dedicated to providing services to persons with developmental disabilities in an environment characterized by strict conformance with the highest standards of accountability for administration, clinical, business, marketing and financial management. The leadership of Community Living, Inc. is aware of and fully committed to the need to prevent and detect fraud, waste, abuse, fiscal mismanagement, and misappropriation of funds through the establishment, implementation and maintenance of a formal "Corporate Compliance Program" to ensure on-going monitoring and conformance with all legal and regulatory requirements. The Corporate Compliance Program emphasizes (1) prevention of wrongdoing whether intentional or unintentional, (2) immediate reporting and investigation of questionable activities and practices without consequences to the reporting party, and (3) timely correction of any situation which puts the organization, its leadership or staff, funding sources, or individuals at risk.

The President/CEO has overall responsibility for the Corporate Compliance Program and will designate a Corporate Compliance Officer who will be empowered with all reasonable and necessary authority to maintain this policy.

The Corporate Compliance Program and Policy will be reviewed annually by the Board of Directors.

### **1.4 GOVERNING DOCUMENTS**

Community Living, Inc. shall routinely review the governing documents of the agency.

It shall be the responsibility of the Executive Committee of the Board of Directors, or their designee, to review the governing documents of the

agency, including but not necessarily limited to: policies and procedures, charter, bi-laws, and articles of incorporation.

Such review shall occur at least annually.

## **1.5 IMMIGRATION REFORM AND CONTROL ACT OF 1986**

Only individuals lawfully authorized for employment in the US will be employed by Community Living, Inc. Information and documentation (INS Form I-9 used to determine eligibility for employment) will be used only for compliance with the Immigration Reform and Control Act of 1986, and not for any unlawful purpose. Employees whose authorization changes or terminates after the start date of employment must inform the Human Resources Department immediately.

## **1.6 INFORMATION SYSTEMS: INTERNET, COMPUTER, AND EMAIL USAGE**

Revised 4/10

Community Living, Inc. provides designated employees access to its electronic devices. In this policy “electronic devices” include workstations, PDAs, laptops, tablet PCs, USB Flash drives, backup media, floppy disks, removable hard drives, or any other device that has the capability to store, access, or transmit data.

Community Living, Inc. owns all such devices and its contents and reserves the right to monitor any activity without your permission or knowledge. Therefore, employees should have no expectation of privacy regarding any information contained on electronic devices or the transmission of such data.

Employees have a responsibility to use these devices in a professional, ethical, and lawful manner.

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### **PROCEDURES**

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## **Information Systems and Data**

Employees are assigned specific rights and permissions to managed information systems and or company files. Employees are prohibited from accessing unauthorized systems, destroying or compromising the integrity of data owned by Community Living, Inc. In addition, employees are further prohibited from sharing, posting or disclosing confidential data or information, as addressed in our Confidentiality Policy (1.18)

### **Software**

Employees are prohibited from copying, installing, altering, or removing any software program. Only software licensed through Community Living, Inc. may be installed on electronic devices. All software must be approved and installed by the system administrator.

### **Hardware**

Employees are responsible for the care and safety of all devices. In the event of damage or loss caused by the user's lack of care or negligence, the employee may be subject to disciplinary action and costs associated with replacement of the equipment. Employees are prohibited from connecting personal devices, i.e. flash drives, to company owned equipment.

### **Internet Usage**

Internet use is authorized to conduct company business. Internet use brings the possibility of breaches to the security of confidential information and creates the possibility of contamination to our systems via viruses or spyware. Therefore, Internet usage should be limited to the minimum amount needed to perform job duties. Additionally, under no circumstances may company computers or other electronic equipment be used to obtain, send, view, or reach any pornographic or otherwise unethical websites.

Employees may not access sites which provide streaming video, audio (Internet radio), interactive downloading of screen savers (e.g. web shots) or other features (e.g. hot bar icons) that consume excessive bandwidth.

### **Email Usage**

Community Living, Inc., owns any communication sent via email or that is stored on company equipment. Management and other authorized staff have the right to access any material in your email or on your computer at any time. Please do not consider your electronic communication, storage or access to be private if it is created or stored at work.

Viewing pornography, or sending pornographic jokes or stories via email, is strictly prohibited. In addition, any emails that discriminate against employees by virtue of any protected classification will be dealt with according to the harassment policy.

### **Personal Use**

Limited, occasional, or incidental use of electronic devices for personal, non business purposes is acceptable, but must be done in a manner that does not negatively affect the systems' use for business purposes. Employees are expected to demonstrate a sense of responsibility and not abuse this privilege.

Checking of personal email is permissible, however opening mail attachments is not allowed as they may contain viruses or other spyware that may corrupt the computer system.

Using any Community Living, Inc. electronic devices to make personal purchases through on-line merchants is strictly prohibited.

### **Disciplinary Action**

Community Living, Inc. electronic mail system, Internet access, and computer systems must not be used to violate the laws and regulations of the United States or any other nation or any state, city, province, or other local jurisdiction in any way. Use of company resources for illegal activity can lead to disciplinary action, up to and including termination and criminal prosecution. We will comply with reasonable requests from law enforcement and regulatory agencies for logs, diaries, archives, or files on individual Internet activities, e-mail use, and/or computer use.

## **1.7 INTERNAL SECURITY**

New 12/2005

Under certain circumstances, it may be necessary to restrict entry to a Community Living, Inc. facility to specific individuals.

Executive staff will be apprised of any situation or potential situation. They will determine if notification of law enforcement is appropriate.

The supervisor of the facility or designee is directly in charge of all security. This person will designate who will be permitted to enter the facility, or in some cases, who is specifically prohibited from entering.

In the event that a disallowed person comes directly to the facility, the staff should refer him or her to the main office during business hours, and immediately inform the supervisor.

## 1.8 MEDIA

Revised 1/10

The President/CEO or designee is the ONLY official spokesperson for Community Living, Inc. A Community Living, Inc. employee may not speak to the news media as a spokesperson of Community Living, Inc., make a public appearance, provide a news release or make a public speech representing Community Living, Inc. without the express prior permission of the President/CEO.

A staff person receiving an inquiry from the media should refer them to the Development Director or the President/CEO.

## 1.9 RECORD RETENTION

Revised May 2016

Community Living, Inc. takes seriously its obligations to preserve information relating to litigation, audits and investigations. The information listed in the retention schedule below is intended as a guideline and may not contain all the records Community Living, Inc. may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the President & CEO.

From time to time, the custodian of records may be issued a notice from our organization's legal counsel, known as a "legal hold," suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn, in writing, by the organization's legal counsel.

File Category	Item	Retention Period
<b>Corporate Records</b>	By-Laws and Articles of Incorporation	Permanent
	Corporate resolutions	Permanent
	Board and committee meeting minutes	Permanent
	Conflict-of-interest disclosure forms	4 years

<b>Finance and Administration</b>	Financial Statements	7 years
	Payroll records	Permanent
	Check registers and checks	7 years
	Bank deposits and statements	7 years
	Chart of accounts	7 years
	General ledgers and journals	7 years
	Equipment files and maintenance records	7 years
	Contracts and agreements	Permanent
	Correspondence – general	3 years
	<b>Insurance</b>	Policies
Accident reports		7 years
OSHA reports		7 years
Claims		7 years after settlement
Group disability records		7 years
<b>Real Estate</b>	Deeds	Permanent
	Leases	7 years
	Mortgages	7 years after obligation ends
<b>Tax</b>	IRS exemption determination	Permanent
	IRS Form 990	7 years
	Form 5500	7 years
	Charitable Organizations Registrations	7 years
	<b>Human Resources</b>	Employee personnel files
Employee medical files		30 years
Retirement plan benefits		Permanent
Policies and procedures		5 years after revision
Workers Comp claims		7 years after settlement
Employment applications		1 year
IRS Form I-9		3 years after end of service
Withholding tax statements		7 years
Timesheets		3 years
EEO-1		2 years after report was filed
<b>Technology</b>	Software licenses & support agreements	7 years after obligation ends
	Email retention	3 years
<b>Client Records</b>	Medical Records	7 years
	Financial Records (including Social Security Administration)	7 years
	All other client documentation	7 years
<b>Development</b>	Grants	Permanent kept on computer

YOP & NAP

5 years after project  
period ends  
Permanent  
kept on a donor  
database

Donor Records

### **1. Electronic Documents and Records**

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time.

### **2. Emergency Planning**

Community Living, Inc.'s records will be stored in a safe, secure, and accessible location. Documents and financial files that are essential to keeping Community Living, Inc. operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

### **3. Document Destruction**

The Executive Office Manager is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

### **4. Compliance**

Failure to follow this policy can result in possible civil and criminal sanctions against Community Living, Inc. and its employees. Community Living, Inc., may also take disciplinary action against responsible individuals. The President & CEO and Chairperson of the Board of Directors will periodically review these procedures with legal counsel or Community Living, Inc.'s certified public accountant to ensure that they are in compliance with new or revised regulations.

## **1.10 RISK MANAGEMENT**

New 2009

Community Living, Inc. will establish and maintain a risk management plan that includes the identification, evaluation, and analysis of loss exposures. The plan will include identification of how to: (1) rectify identified exposures; (2) implement and monitor actions to reduce risks; (3) report results of actions taken to reduce risks; (4) include risk reduction in

performance improvement activities; and (5) address such risks during changes in funding or populations.

Annually a risk management assessment will be conducted. The Risk Management Plan will then be reviewed, revised, and approved by the Board of Directors.

### **1.11 SMOKING**

Revised 10/07

Community Living, Inc. offers a smoke free environment to all staff and consumers. Smoking is prohibited inside any Community Living, Inc. facility, garage, or vehicle, including an employee's own vehicle, if transporting participants. Designated outside smoking areas are available at most locations. Smokers are responsible for keeping these areas clean and free of smoking debris.

Community Living, Inc. participants have the right to choose to smoke in their own homes.

### **1.12 SOLICITATION AND DISTRIBUTION**

Trespassing, soliciting, or distributing any literature or goods by anyone outside the agency is prohibited on Community Living, Inc. premises.

### **1.13 VISITORS**

Revised 12/06

Individuals not employed by Community Living, Inc. are not allowed in the homes or programs staffed by Community Living, Inc. without permission of all appropriate parties.

Employees are not permitted to bring family members or friends to visit Community Living, Inc. facilities without prior supervisory approval.

### **1.14 VOLUNTEERS**

Revised 12/06

Community Living, Inc. offers volunteer opportunities for both members of the community and students. Community Living, Inc. employees may

volunteer at Community Living, Inc. sponsored activities; however, non-exempt staff may not volunteer for activities that are normally part of their job, due to labor law rules. Volunteers are not compensated.

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**PROCEDURES**

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Candidates must complete a Volunteer Application form, undergo a reference check, criminal background check, and interview.

When a staff person who also volunteers with Community Living, Inc. ends his or her employment and wants to continue as a volunteer, he or she must complete a screening process that includes formal application, an interview, reference checks, and an orientation session.

All volunteers serve at the discretion of the Volunteer Coordinator, who can terminate the volunteer's relationship with Community Living, Inc. at any time for any reason.

Volunteers may be required to complete orientation and basic safety training.

### **1.15 WASTE, FRAUD, ABUSE AND OTHER WRONGFUL CONDUCT**

New 10/05

Waste, fraud, abuse and other wrongful conduct will not be tolerated. Wrongful conduct is that which evidences: (1) a violation of any law, or (2) mismanagement involving a gross waste of monies, or (3) an abuse of authority. The Community Living, Inc. Chairperson of the Board of Directors is the designated contact person in the aforementioned circumstances.

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**PROCEDURES**

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Anyone wishing to report wrongful conduct will contact the Chairperson of the Board of Directors. Upon receiving a call, the Chairperson will first determine whether or not the issue meets the guidelines listed in the above policy. If the issue does not meet the guidelines, the Chairperson will refer the individual to the appropriate resource. If the issue does meet the guidelines, the Chairperson will gather all pertinent details. He or she will let the person know that their concerns will be addressed and someone will get back to them within ten (10) working days.

The Chairperson will call for an Executive Committee meeting. At this meeting, the Executive Committee will go into closed session. The Chairperson will present the issue. The Executive Committee will take over from there, doing an investigation as deemed appropriate.

The Chairperson is not to be contacted with issues that should be addressed through the regular grievance procedure outlined in Policies and Procedures, e.g., performance appraisals, conflicts with co-workers or supervisors, wage disputes, and the like.

No adverse action will be taken against a Community Living, Inc. employee, volunteer or board member in retaliation for reporting information that they reasonably believe is wrongful conduct.

## **1.16 WEAPONS**

New 12/2003

Community Living, Inc. prohibits the wearing, transporting, storage or presence of firearms or other dangerous weapons at our program sites and offices, on our premises, or at any agency-sponsored event. Any employee in possession of a firearm or other weapon while on our premises or while otherwise fulfilling job responsibilities or any employee who refuses to submit to searches, may face disciplinary action up to and including termination. A visitor who violates this policy may be asked to leave the property and reported to police authorities. Possession of a valid weapons permit authorized by the State of Missouri is not an exemption under this policy. Members of law enforcement are exempt.

## **1.17 WORKPLACE VIOLENCE PREVENTION**

New 1/09

Community Living, Inc. is committed to the prevention of workplace violence. Violence or the threat of violence to oneself or others is unacceptable and will not be tolerated. Community Living, Inc. will respond to workplace violence promptly with appropriate action.

Anytime a person is aware of talk of suicide or threats of violence, the person must immediately share the information with supervisors in chain of command and HR. It is critical that no one acts alone when determining what action to take. Others will be informed on a need-to-know basis.

Discussions related to the events will be documented with date and time of the discussion and who was present.

## **1.18 CONFIDENTIALITY**

New 4/10

Community Living, Inc. employees and board members may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with Community Living, Inc. to any person, other than to persons who have a legitimate need for such information and to whom Community Living, Inc. has authorized disclosure.

At the end of a board member's term in office or upon the termination of an employee's relationship with Community Living, Inc., he or she shall return all documents, papers, and other materials, regardless of medium, which may contain or be derived from confidential information.

This policy is intended to alert Community Living, Inc. affiliates to the need for discretion at all times and is not intended to inhibit normal business communications.

Furthermore, employees who engage in social networking must adhere to the standards in the Social Networking Policy. (2.41)

Employees who violate this policy may be subject to disciplinary action, up to and including termination. Board members who violate this policy may have their association with Community Living, Inc. terminated.

In addition, employees and board members who improperly disclose protected health information may be subject to the imposition of civil or criminal penalties under applicable federal and state law.