Employee Handbook

Supersedes all previous versions
Approved by the Board of Directors
December 13, 2011
Child Advocates San Antonio

TABLE OF CONTENTS

Introduction iv
History of Child Advocates San Antonio v
Vision Statement vii
Mission Statement vii
Child Advocates Philosophy vii
Employee Acknowledgement Form viii

SECTION 1 - THE FOUNDATION

Organizational Structure 1
Board of Directors 1
Business Operating Hours 1
Emergency Procedures 2
Grievance Procedures 3
Responsible Stewardship 5

SECTION 2 - FEDERAL AND STATE COMPLIANCE

Americans Disability Act 6
Consolidated Omnibus Budget Reconciliation Act 9
Equal Employment Opportunity 10
Fair Labor Standards Act 11
Immigration and Compliance 12
Open Door/Problem Resolution 13
Pregnancy Discrimination Act 14
Religious Discrimination 15
Safe Harbor 16
Sexual Harassment 17
Workers’ Compensation 21

SECTION 3 - EMPLOYMENT PRACTICES

Cellular Telephone Usage 24
Code of Ethics 25
Code of Personal Conduct 26
Conditions of Employment 27
Confidentiality 28
Conflict of Interest 29
Diversity & Inclusion 30
Document Retention 31
Driver’s Record and Liability 32
Employment Status 33
Employment Status Changes 34
Inclement Weather 35
Internal Recruiting 36
Job Abandonment 37
Nepotism 38
New Hire Orientation 39
CASA Network Policy 40
### SECTION 7 – PERFORMANCE AND RECOGNITION

- Awards and Recognition Program 124
- Service Awards 127
- Job Descriptions 128
- Performance Evaluation 129
- Performance Management 130
- Performance Standards and Ratings 131
- Training and Development 132

### SECTION 8 - SALARY ADMINISTRATION

- Salary Administration 133
- Job Classification 135
- New Positions 136
- Revised Positions 137
- Salary Ranges 138
- Salary Reviews & Adjustments 139

### SECTION 9 - SAFETY COMPLIANCE

- Accidents in the Workplace 141
- Equipment Safety 143
- Family & Visitors in the Workplace 144
- Safety 145
- Violence in the Workplace 148
- Weapons 149
- Workplace Security 150
INTRODUCTION

Welcome to Child Advocates San Antonio (CASA)! We are happy you have joined our team. This handbook outlines personnel policies. To ensure your success with CASA, please read the handbook carefully. If you have any questions, ask your supervisor.

It is CASA’s policy to comply with Federal and State equal employment laws and to provide equal employment opportunities to all employees and qualified applicants without regard to race, religion, color, gender, age, national origin, disability, or other protected class.

Statement of Purpose

The Chief Executive Officer (CEO) and the Board of Directors of Child Advocates San Antonio (CASA), has adopted the following personnel policies and procedures addressed in this handbook. Its purpose is to promote understanding among staff, reduce the need for personal decisions regarding policy, and standardize procedural matters. It will govern in its relationship with its employees and applies to all employees and all issues relating to personnel administration, unless otherwise stated.

This policy and procedures handbook supersedes all prior policies. Additions and amendments, which have been board-approved, will be added to the handbook when appropriate. The policies in this handbook are subject to change by the CEO and the Board of Directors and are not intended to be a contract of employment. All employees in the state of Texas are considered “employees at will” whose employment may be terminated at any time. Termination of employment of employees is in accordance with the policies stated herein.

Statement of Responsibility

It is the responsibility of the CEO to ensure that each manager receives a copy of this handbook. It is the responsibility of the Human Resources Coordinator to distribute employee handbooks to all employees during “New Hire Orientation,” obtain the signature of each employee attesting to the fact that they have read and understand the enclosed handbook, and agree to abide by it. It is the responsibility of the CEO and managers to administer and follow these policies and procedures in a consistent and impartial manner and for all employees to adhere to them.

No one, other than the CEO and/or Board of Directors, has authority to alter or amend the provisions of the manual through oral or written statements or promises. Any agreement or promise, which contradicts or alters these policies and procedures in this Employee Handbook, is limited to writings signed by the CEO.

The Employee Handbook is not an employee agreement or contract
History of Child Advocates San Antonio

Child Advocates San Antonio (CASA) is one of over 1,000 programs in 50 states affiliated with the National Court Appointed Special Advocate Association. The local names of these programs vary, to include: Court Appointed Special Advocates, Guardian Ad Litem, Voices for Children, and Child Advocates.

The original Guardian Ad Litem program was established in 1977 in Seattle, Washington. Judge David Soukup conceived of the idea that individual citizens could serve as representatives of the community to advocate for children who have no one to stand up for them once they are removed from their families because of abuse or neglect. A trained force of volunteers was designed to serve one case at a time as the eyes, ears, and legs of the court to inform it about the child's circumstances. The volunteers are to see that the child’s best interests are served by recommending placement of the child as soon as feasible with his family or one in which he or she could attain adulthood in a safe, nurturing environment.

The phrase “permanency planning” refers to this kind of plan. The goal of the child welfare/justice system process is to avoid lengthy stays in one foster family after another, which frequently occurred before reforms at the federal level were instituted. As a result of a variety of studies, it was noted that a high proportion of juvenile offenders had been abused, neglected, placed often in foster families, and alienated in general through the lack of an opportunity to feel a sense of belonging and identity.

During the late 70s and early 80s, the concern for what happens to children left in the limbo of a temporary situation in foster care led to federal reform. Model laws were developed at the national level. Every state now has laws modeled after the national laws so that they can be eligible for federal funds. In all states when children are removed from their families by the court and placed in foster care, someone is appointed to advocate for their best interests.

Usually this appointed person is an attorney Ad Litem, but in some states, he/she may be a Court Appointed Special Advocate. There must be a judicial review at least every 5-7 months on each case, and the state child protection agency must review its case plan for each child every 5-7 months. In 1984, Public Law 96-272 was implemented. This mandates that the Child Protective Service caseworkers must show the judge that an effort was made to avoid long-term removal of the child from his family and that a case plan discussed with the family sets forth the expectations the family must satisfy to ensure return of their children.

The National Council of Juvenile and Family Court Judges responded to the growing awareness of the problem of “foster care drift” by teaming up with the Edna McConnell Clark Foundation to seek reforms in the child welfare system. This foundation granted funds to the national office of the National Council of Jewish Women to set up five pilot programs modeled after the Kings County Guardian Ad Litem program in Seattle. In 1979, it was demonstrated in Dallas, TX; Harrisburg, PA; Worcester, MA; Jacksonville, FL; and St. Louis, MO that the Seattle program could be duplicated. A start-up manual was published. Similar programs were instituted in other localities: some funded by the court system, some by the Junior League and National Council of Jewish Women and, increasingly, some through federal grants. The national organization first met in 1982 with 25 groups represented and was named “Court Appointed Special Advocate.” Since then, the movement has spread throughout the country. Child Advocates San Antonio began as a community service project of the local section of the National Council of
Jewish Women. The first volunteers were assigned in February 1984 and in 1988, became a freestanding agency with its own Board of Directors. The agency is supported by charitable organizations, corporate donations, government grants, individual donations, private foundation grants, and special events.

When appointed its first volunteers in 1984, the abuse and neglect judicial docket was rotated every four months among 11 civil district court judges. In 1994, County Commissioners appointed a special Associate Judge to hear these cases. Associate Judge Peter Sakai held the position from 1994 – 2005. In 2005, with the leadership of District Court Judge John Specia and the support of the Hidalgo Foundation, Bexar County created a state-of-the-art Children’s Court. In response to the growing number of abuse and neglect cases in Bexar County, the court opened and accommodated two judges to hear these child abuse and neglect cases.

In Texas, there are now over 69 established programs and more are in the planning stage. There is a state organization called Texas CASA, which serves as a state network, encourages the growth of new programs, and works on legislative issues as well. In 1985, the state legislature passed a bill giving volunteers with court approved training the right to represent abused and neglected children in court. This bill appears as a line in the Texas Family Code along with a provision for immunity from liability if work is done in good faith.
VISION STATEMENT

Improving the lives of all abused and neglected children in state protective custody in Bexar County.

MISSION STATEMENT

The mission of Child Advocates San Antonio (CASA) is to recruit, train, and supervise court-appointed volunteer advocates who provide constancy for abused and neglected children and youth while advocating for services and placement in safe and permanent homes.

PHILOSOPHY

Any organization, in order to survive and be successful, must have a sound values system on which all policies and procedures are based. CASA is prepared to meet new challenges and progress with time, but always in accordance with our basic principles, which are as follows:

Integrity – Adhering to the principles of the organization

1. Being honest with yourself and others
2. Being reliable, accountable, consistent
3. Acting in an ethical manner
4. Demanding the highest ethical behavior

Commitment – Building a legacy of positive achievement

1. Demonstrating loyalty
2. Pursuing a shared vision
3. Demonstrating a mutual desire to succeed
4. Assuming truth before judgment

Professionalism – Maintaining a standard of excellence

1. Building individual and organizational skills and knowledge
2. Being responsible for effective performance
3. Exhibiting leadership through our actions, words, and appearance

Compassion – Nurturing a caring environment

1. Acting in an open, nonjudgmental fashion
2. Acknowledging the needs of others
3. Embracing change, challenge and diversity
EMPLOYEE ACKNOWLEDGMENT OF RECEIPT

I have received my copy of the CASA Employee Handbook. I understand and agree that it is my responsibility to read and familiarize myself with the policies and procedures contained in the Handbook.

I understand that CASA reserves the right to change any and all policies or practices and my hours, wages, benefits and working conditions. Other than the CEO, no manager, supervisor, or representative of CASA has the authority to enter into any agreement, expressed or implied, for employment for any specific period, or to make any agreement for employment other than at-will. Only the CEO has the authority to make such an agreement.

I understand and agree that nothing in the Employee Handbook creates or is intended to create a promise or representation of continued employment and that my employment at CASA is at-will; CASA is free to discharge individuals "for good cause, or bad cause, or no cause at all," and the employee is equally free to quit or otherwise cease work.

My signature below acknowledges that CASA may withhold any sums due to me in the form of wages for any and/all amounts owed by me to CASA, or for my failure to return CASA company property.

I specifically agree to all terms and conditions described in the text of these guidelines.

Employee’s Printed Name          Employee’s Signature          Date
SECTION 1

<table>
<thead>
<tr>
<th>Policy No.</th>
<th>1-1</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Organizational Structure</td>
<td>√ Board of Directors</td>
</tr>
<tr>
<td>Revised Date:</td>
<td>5/19/11</td>
<td>√ Exempt</td>
</tr>
<tr>
<td></td>
<td></td>
<td>√ Non-exempt</td>
</tr>
</tbody>
</table>

CASA’s organizational structure consists of management and operational departments. Listed below are the following departments:

1. Executive
2. Program
3. Operations
4. Development
5. Volunteer Advocates

The organizational structure will be documented in an organization chart and the structure and chart will be designed to:

- Outline areas of authority and responsibility;
- Promote and increase efficiency in providing services and responding to the general public; and
- Inform employees of their place or role in the overall organization.

<table>
<thead>
<tr>
<th>Policy No.</th>
<th>1-2</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Board of Directors</td>
<td>√ Board of Directors</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Board of Directors serves as the governing and policy-making entity and approves all policies and related regulations necessary to assist CASA in exercising its responsibilities.

<table>
<thead>
<tr>
<th>Policy No.</th>
<th>1-3</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Business Operating Hours</td>
<td>√ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td>√ Non-Exempt</td>
</tr>
</tbody>
</table>

The CASA office is open from 9:00 a.m. – 5:00 p.m., Monday through Friday, except for employees who are working a special schedule. CASA may require employees to work other than regular office hours during training, fund raising events, or special events. A 40-hour workweek for full time employees may be from Sunday – Saturday. The CEO may modify these periods when necessary, in order to accommodate a special work schedule.

<table>
<thead>
<tr>
<th>Policy No.</th>
<th>1-4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy 1-4 was incorporated into other parts of this handbook on 12-15-11 revision.</td>
<td></td>
</tr>
</tbody>
</table>
Emergency Evacuation

In the event of an emergency where evacuation is required, all occupants will leave the building by the closest exit available in an orderly manner. The Administrative Assistant will take visitor sign-in and out sheets in order to account for all persons in the building. If the Administrative Assistant is not in the building, the Operations Manager will be responsible for taking the sign-in and out sheets. Should both be out of the building and an emergency occurs, the Vice-President of Programs (VPP) or the CEO will collect the sign-in and out sheets.

All employees will meet at the additional parking lot behind the Annex for headcount. If emergency personnel are on-site, follow their directions for gathering. A headcount will be collected by the Administrative Assistant before anyone is allowed to go home or reenter the building.

If a training session is taking place, the VPP or staff point person for the training event, will take the training roster or sign-in sheet in order to account for all persons.

Employees are expected to become familiar with the posted evacuation routes.

Fire

If containable (i.e., extinguishable within thirty (30) seconds):

1. Extinguish the fire with the fire extinguisher.
2. Use intercom to announce building evacuation (Press # 0 to use intercom).
3. Fire extinguishers are located in various locations, see map at the end of the handbook.

If uncontainable:

1. Call the Fire Department - 911. Give complete address and your name and telephone number.
2. Use intercom to announce building evacuation.

Medical Emergency

1. If needed, dial 911 for an ambulance. Give complete address, location, your name, and telephone number.
2. Use intercom to announce building evacuation.
We believe that open, direct communication contributes to the creation of a positive work environment for everyone. In support of this principle, and to assure that employees receive fair and consistent treatment, CASA strongly encourages employees to utilize the grievance procedures to address concerns, before they escalate into problems. CASA intends that, whenever feasible, complaints be resolved at the lowest possible administrative level. Sometimes, an employee may not feel comfortable discussing certain issues with his or her manager. One of the primary functions of the Human Resources Coordinator is to assist employees in resolving issues.

Eligibility

Any employee may file a grievance. All grievances must be in writing. A grievance may be filed by an employee, as defined below based on one or more of the following grounds:

- Improper application of rules, regulations, and procedures.
- Unfair treatment, including coercion, or reprisal.
- Disciplinary actions taken against him or her without proper cause.
- Improper application of benefits
- Improper working conditions.

Time Limits for Filing and Response

To be considered, a grievance must be filed in writing within seven (7) calendar days from its occurrence, exclusive of holidays, unless it is beyond the control of the employee. If the employee fails to meet the seven (7) calendar days filing time limit, the grievance will be considered null and void. The employee should retain a copy of the grievance. All copies will note the date the grievance was typed or written and time the grievance was received.

Resolution Procedures

Level One

The employee will meet with the Human Resources Coordinator within seven (7) calendar days of the time the employee first knew, or should have known, of the event or series of events causing the complaint. At this meeting, the employee will submit the complaint in writing.

The Human Resources Coordinator will investigate and respond verbally and in writing to the employee within seven (7) calendar days of grievance receipt.

If the outcome of Level One is not to the employee’s satisfaction, the employee may submit a written request to the CEO within three (3) days.

Level Two

To resolve the grievance, the CEO will investigate the complaint thoroughly. Grievance hearings are not judicial in nature, and, therefore, rules of civil procedure will not be followed. The employee or person against whom the grievance is filed may represent him or herself or have a designated internal
representative present. The CEO will establish a mutually agreeable date and time, within seven (7) days of receipt of level two grievance, for the hearing to be conducted when all witnesses can be present and when it is not disruptive to the work patterns of CASA. All parties will be notified in advance. Loud and abusive language by any party, at these proceeding, will not be allowed and will be grounds for disciplinary action or dismissal from the hearing.

The employee or his/her representative will be allowed to present pertinent facts or witnesses to testify. The alleged offender will also be allowed to present his or her facts or witnesses, with the grievant or the representative allowed cross-examining. After the conclusion of the hearing, the CEO or his designee will have five (5) calendar days, exclusive of holidays, to make a written determination of the hearing.

*Level Three (Policy Committee)*

If the outcome of Level Two is not to the employee’s satisfaction, an employee may submit a written request to the CEO to place the matter on the agenda of a future Policy Committee’s meeting. The request will be submitted no later than seven (7) calendar days after receiving the response from the CEO.

*Level Four (Board of Directors)*

If the outcome of Level Three is not to the employee’s satisfaction, an employee may submit a written request to the CEO to place the matter on the agenda of the upcoming Board of Director’s meeting. The CEO will inform the employee of the date, time, and place of the meeting. The Board President may set reasonable time limits on complaint presentations. The Board of Directors will listen to the complaint, but it is not required to respond or take any action on the matter. The Board of Directors may read or listen to presentations from others with information relevant to the complaint. All decisions of the Board of Directors are final.

**In no way does this communication process override our at will employment relationship.**
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>1-7</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Responsible Stewardship</td>
<td>✓ Board of Directors</td>
</tr>
<tr>
<td>Revised Date:</td>
<td>✓ Exempt</td>
<td>✓ Non-exempt</td>
</tr>
</tbody>
</table>

All funds will be dispersed by the Board of Directors in a manner consistent with the Mission Statement. Appropriate allocations will be made for programs, facilities, competent staff, internal controls, accounting, and reporting. Reasonable allocations will be authorized for fundraising. Funds will not be accumulated excessively. Designated funds will be dispersed in accordance with the donors’ wishes and consistent with the Mission Statement.
CASA is committed to complying fully with the Americans with Disabilities Act (ADA), including all approved amendments, and ensuring equal opportunity in employment for qualified persons with disabilities. Pre-employment inquiries are made regarding only an applicant’s ability to perform the essential functions of the position. Reasonable accommodation is available to all disabled employees in situations where their disability affects the performance of job functions. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual. Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as job assignments, classifications, organizational structures, position descriptions, lines of progression, and seniority lists. Leaves of all types will be available to all employees on an equitable basis. CASA is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. CASA will follow any state or local law that provides individuals with disabilities greater protection than the ADA. This policy is neither exhaustive nor exclusive.

Definitions

1. Disability: Under federal law, a disability includes a physical or mental impairment that substantially limits one or more of the major life activities of that individual.

2. Reasonable Accommodation: Reasonable accommodation is any modification or adjustment to a job, an employment practice, or the work environment that makes it possible for a qualified individual with a disability to perform the essential job functions or enjoy an equal employment opportunity that does not impose undue burden on CASA.

Types of Accommodation

May include but is not limited to:

1. Restructuring the job by eliminating non-essential functions or exchanging or reassigning job duties.

2. Acquiring or modifying of equipment or devices.

3. Providing qualified readers or interpreters.

Factors to Consider

1. The nature and net cost of the accommodation.

2. The financial resources involved in the provision of the accommodation.

3. The impact that the accommodation will have on other employees and on the operations of CASA.

Direct Threat

Direct threat is a specific, current, significant risk of substantial harm to the health or safety of the individual, fellow employees, or the public that cannot be removed or reduced by reasonable accommodation. The determination of whether or not the individual poses a direct threat will be based on
objective medical or factual evidence regarding the individual’s present ability to safely perform essential job functions.

**CASA’s Responsibilities**

1. The Human Resources Coordinator notifies the CEO upon receiving a request for a disability accommodation. The original medical documentation, the employee’s request for an accommodation, and any other documentation pertaining to the request for an accommodation are maintained in the Human Resources Office.

2. The Human Resources Coordinator and the employee’s supervisor review the job duties with the employee to determine what the barriers are to performing the essential functions of the job and to solicit possible options for accommodating the employee’s disability.

3. The Human Resources Coordinator recommends specific modifications in job duties, schedules, or work environment, if any are required, to the CEO. The CEO must approve such action before implementation takes place.

4. The CEO reviews the specific modified duties, schedule or work environment, if any, to be made. These modifications will be confirmed in writing, signed by the employee and the CEO. This documentation will be forwarded to the physician to ensure that the modifications will not aggravate the employee’s physical or mental condition.

5. When the physician’s approval is requested, such approval must be obtained in writing by the employee within two (2) weeks of the request and forwarded to the CEO for inclusion in the employee’s confidential health and benefits file.

**Employee Responsibilities**

1. The employee who reports that he/she has a physical or mental disability and needs an accommodation will report to appropriate medical personnel for evaluation of work-related disabilities, limitations, and restrictions. The employee will provide this documentation to the Human Resources Coordinator. CASA reserves the right to send the employee to a medical provider of CASA’s choosing for a second opinion. If a second opinion is requested, that medical visit will be paid for by CASA.

2. Employees who have requested an accommodation will report any changes in their condition, or change in work-related restrictions, which may affect their ability to perform essential job functions to their supervisor within 24 hours of the medical visit. The information must be documented in a written statement prepared by qualified medical personnel.

3. Employees will comply with restrictions set and/or follow the prescribed course of treatment as recommended by their qualified medical personnel. Failure to comply with such restrictions or treatment recommendations where such failure affects the employee’s performance may be cause for disciplinary action.

**If an Accommodation Cannot Be Made**

1. If no reasonable accommodation exists in the employee’s current position, the employee will be considered for reassignment to vacant lateral positions in the same pay range for which the employee is qualified to perform the essential job functions with or without reasonable accommodation.

2. If no reasonable accommodations can be identified, or such accommodations would create an
undue hardship on CASA, or the individual poses a direct threat that cannot be removed or reduced by reasonable accommodation, or there are no vacant lateral transfers available for which the employee is qualified, the employee will be terminated and encouraged to apply in the future for vacancies for which he/she is qualified with or without reasonable accommodation.
The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) provides employees and their qualified beneficiaries the opportunity to continue health insurance coverage. Some common qualifying events are termination of employment, death of an employee, a reduction in an employee’s hours or a leave of absence, an employee’s divorce or legal separation, an employee’s qualification for Medicare, and a dependent child no longer meeting eligibility requirements.

The VP of Finance and HR notifies the current health insurance carrier of a qualifying event; Humana provides each eligible employee with a written notice describing the employee’s rights and obligations granted under COBRA.
Policy No. 2-3

This policy applies to:

| Policy Name: Equal Employment Opportunity | Board of Directors ✓ |
| Revised Date: 5/19/11 | Exempt ✓ |
| | Non-exempt ✓ |

It is CASA’s policy to provide Equal Employment Opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin/ancestry/citizenship, age, disability, status in the United States military and/or veteran status, marital status, sexual orientation, gender identity, or any other protected class status. Our EEO policy applies to all areas of employment, including in part: recruitment and hiring, compensation and benefits, promotion and transfer, training and development, discipline and discharge, and recreational and social activities.

CASA sustains these principles by ensuring decisions affecting your employment are made based on your individual performance and demonstrated abilities. Effective utilization of qualified, available personnel requires more than just a statement of policy.
CASA is subject to Federal Wage and Hour regulations regarding time reporting and payment of overtime on non-exempt employees. The law requires that all employees be correctly classified according to the Fair Labor Standards Act (FLSA) criteria. The FLSA assumes that all employees are subject to minimum wage and overtime requirements (i.e., “non-exempt”) unless they are specifically shown to be “exempt”.

The Human Resources Coordinator collaborates with the CEO and the Board of Directors to ensure that each job is correctly classified for Wage and Hour law purposes. In cases where it is uncertain whether a job satisfies the criteria of the exemption tests, the position will be classified as non-exempt. The legal penalties are severe for exempting a job that should be eligible for overtime.

**Exempt**

Exempt employees are typically managers, executives, supervisors, professional staff, technical staff, outside sales representatives, officers, directors, owners, and others whose duties and responsibilities allow them to be “exempt” from overtime pay provisions.

**Non-Exempt**

Overtime is paid to non-exempt employees at the rate of time and one-half of all hours worked in excess of 40 hours per work week.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>2-5</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Immigration and Compliance</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td>✓ Non-Exempt</td>
</tr>
</tbody>
</table>

CASA is committed to employing only United States citizens and aliens who are authorized to work in the United States. CASA does not discriminate based on citizenship or national origin. In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9, and present documentation establishing identity and eligibility to work in the U.S.

The I-9 form will be completed within three days of first reporting to work. Former employees who are rehired must also complete the form if they have not completed an I-9 with CASA within the past three years, or if their previous I-9 is no longer retained or valid.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>2-6</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Open Door/Problem Resolution</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td>✓ Non-exempt</td>
</tr>
</tbody>
</table>

Misunderstandings or disagreements may arise in any organization. CASA values and wishes to promote an amiable and cooperative work environment. Our open door, problem resolution policy is reflective of our commitment to our values and providing you with the best possible working conditions. CASA encourages an open and direct atmosphere where concerns, suggestions, and questions can be discussed. We strive to ensure consistent and honest treatment of all employees. Employees are expected to treat each other with mutual respect, and value diversity of ideas. Many problems can easily be resolved simply by discussing them openly.
Policy No. 2-7

This policy applies to:

<table>
<thead>
<tr>
<th>Policy Name:</th>
<th>Pregnancy Discrimination Act</th>
<th>☑ Exempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revised Date:</td>
<td></td>
<td>☑ Non-Exempt</td>
</tr>
</tbody>
</table>

The Pregnancy Discrimination Act of 1978 prohibits discrimination because of pregnancy, childbirth, or related medical conditions. Women incapacitated by pregnancy, childbirth, or medical conditions related to pregnancy or childbirth must be treated the same as individuals incapacitated by other disabilities, including receiving benefits and being allowed to perform “light –duty” work.
CASA will not discriminate against applicants or employees based on their religion. For purposes of this law, religion includes religious observance and practice as well as belief. It also includes individual moral and ethical beliefs sincerely held with the strength of traditional religious views. CASA will make reasonable accommodations for the religious beliefs of their employees unless an accommodation would cause undue hardship on the organization. Factors such as the nature of the employee’s job, the feasibility of transferring job duties or changing work schedules, and the amount of employee cooperation affect the reasonableness of an accommodation. Some reasonable accommodations and limits on accommodations might be the following:

1. Whenever possible, CASA will try to accommodate an employee’s request to take time off for religious holidays. This could be done by allowing the employee to use Paid Time Off (PTO) or a day off without pay.

2. CASA will try to accommodate an employee’s scheduling needs for certain days or shifts to accommodate the employee’s religious practices or beliefs. This can be done by having a flexible work schedule or by allowing employees to swap shifts. However, CASA is not required to make accommodations that would involve more than minimal cost, such as by hiring another employee or paying premium wages to other employees as substitutes.

3. CASA will try to accommodate an employee’s religious practices with respect to the way the employee dresses. However, CASA need not do this if the particular mode of dress would create a safety hazard.
The CEO will follow all rules pertaining to the Federal Labor Standards Act (FLSA) to classify the status of all employees. If there is a misclassification, CASA will take immediate steps to reimburse employees for any improper deductions and make a good faith commitment to comply in the future.

Employees with questions or seeking more information on classification issues are encouraged to contact the Human Resources Coordinator. Employees may raise questions or complaints about FLSA compliance without fear of reprisal.
The policy of CASA is to provide employees a workplace free from sexual harassment. Sexual harassment in any manner or form is expressly prohibited. All claims of sexual harassment will be promptly and thoroughly investigated. Anyone who violates this policy is subject to disciplinary action commensurate with the severity of the offense up to and including immediate termination.

Definitions and Explanations

Sexual harassment may take numerous forms. It includes verbal or physical conduct, such as sexual advances or requests for sexual favors that are unwelcome.

There are two types of sexual harassment:

1. "Quid pro quo" sexual harassment occurs when sexual favors are required or demanded of an employee as a condition of employment or as the basis for employment decisions affecting that employee.

2. A "hostile work environment" occurs when verbal or physical conduct of an offensive sexual nature permeates the work environment to the extent that it interferes with the employee’s work performance and seriously affects his or her psychological well-being.

In addition to sexual advances or a demand for sexual favors, the following may also constitute sexual harassment:

- **Verbal**: Sexual innuendoes, suggestive comments, or sexual jokes.
- **Non-verbal**: Display of sexually suggestive objects or pictures or obscene gestures.
- **Physical**: Unwanted physical contact of any kind.

Sexual harassment does not refer to socially acceptable speech or behavior such as an occasional compliment or a friendly pat on the shoulder. The key is whether the speech or conduct is unwelcome and offensive to the recipient, regardless of the speaker or actor’s true motivation. Would a “reasonable” person – male or female- find it acceptable at work? Remember that what may be acceptable in a purely social environment may not be acceptable in the business environment. Sexual harassment is also forbidden at social functions that are sponsored by CASA or related to CASA’s work, regardless of location.

**Notification**

Any individual who feels that he or she has been subjected to sexual harassment should immediately notify his or her immediate supervisor and the Human Resources Coordinator. Employees who observe sexual harassment are encouraged to report it, even if it is directed at a co-worker. Timely reporting is essential; we cannot correct the problem unless we know of it. Any supervisor or manager who receives a complaint of sexual harassment must immediately report it to the Human Resources Coordinator. All reports of sexual harassment or other forms of harassment will be treated seriously. False or frivolous accusations of sexual harassment can have devastating effects on innocent individuals. CASA trusts that all personnel will act responsibly when dealing with the subject of sexual harassment.

**Investigation**
All complaints will be handled promptly and will be kept as confidential as a full investigation will permit. Except as it may be necessary in connection with an investigation, or when required by applicable law, information concerning the investigation of a complaint will not be released by CASA to third parties or to anyone within CASA who is not involved in the investigation. No one involved in the investigation will be permitted to discuss the subject outside the investigation, unless permitted or required by law.

**Disciplinary Action**

If the investigation reveals that the complaint is valid, CASA will take prompt action to stop the harassment immediately and to prevent its reoccurrence.

**Non-Retaliation**

CASA will not tolerate any discrimination or retaliation against any individual who in good faith makes a complaint under this policy, files a formal charge of sexual harassment or who assists in any investigation of a claim of sexual harassment, including testifying or other participation in any hearing or other legal proceeding.

**Complaint Procedures**

CASA is aware of the special concerns of a sexual harassment investigation to include:

1. Increased need to protect the privacy of those involved.
2. Greater need to protect against retaliation.

By taking prompt remedial action when a sexual harassment complaint is received, we send the following messages to our employees, the courts and the EEOC:

1. Undertook a timely and thorough investigation;
2. Made a decision based upon factual information
3. Took appropriate corrective action; and
4. Followed up to ensure the behavior is not repeated.

The goals for establishing Sexual Harassment Complaint procedures:

1. Determine whether unlawful harassment, in fact, occurred.
2. Improve the factual basis for decision-making.
3. Develop a thorough record to justify a decision.
4. Reveal employee(s) conduct that violates CASA policies.
5. Identify employee(s) who have violated the policy or law.
6. Set the stage for defense of potential litigation.
7. Limit CASA liability.
8. Prevent the loss of talent.

Listed below are the steps taken, when sexual harassment is alleged.

1. The Human Resources Coordinator briefs the CEO on the alleged harassment.
2. The CEO meets with the complainant and identifies the need for an investigation.
3. The CEO discusses the information with the VP of Finance and Human Resources and the Human Resources Coordinator who set a date for the formal investigation.
4. The CEO informs the complainant of the impending investigation. He/She also informs the
alleged offender of the complaint.

5. The VP of Finance and HR and the Human Resources Coordinator interview the complainant, alleged offender, and witnesses of both employees who work in areas where alleged misconduct occurred.

6. The VP of Finance and HR and the Human Resources Coordinator reviews policies and procedures, memoranda or notes about the incident, logs or diaries, communications to employee’s prior complaints and manager’s notes and files.

7. The Human Resources Coordinator gathers and organizes physical, documentary, and testimonial evidence.

8. Based on the information gathered during the investigation, the VP of Finance and HR and the Human Resources Coordinator provide a signed report for the CEO, confirming or not confirming sexual harassment with a recommendation for action(s).

9. The CEO briefs the complainants on the outcome of the complaint and the complainant signs the complaint form and annotates whether or not the complainant was satisfied that the allegations were addressed.

10. The Human Resources Coordinator stores the complaint for safekeeping.

11. The Human Resources Coordinator will follow up on the complaint within a reasonable period of time, no later than 6 months from the conclusion of the investigation.

To ensure timeliness and the confidentiality of materials gathered the following steps are taken:

1. All sexual harassment and harassment investigations will be complete within ten (10) workdays.

2. A “chain of custody” will be established for all documentation and evidence.

3. A file will be created for each complaint and maintained in a secure area separate from personnel files.

4. Making copies of the investigation for distribution is not allowed.

Responsibilities

CEO

1. Ensure the sexual harassment policy is carried out and enforced.

2. Ensures all employees are advised of the sexual harassment complaint procedures during their New Hire’s Orientation.

3. All employees are able to present complaints without fear of retaliation.

4. Encourages employees to discuss problems and complaints with their supervisor, manager, Human Resources Coordinator or the CEO.

5. Act at once to determine if an allegation of sexual harassment is valid (by calling on the Human Resources Coordinator for assistance).
6. Notifies the insurance carrier of any lawsuit or Charge of Discrimination.

7. When sexual harassment is confirmed:
   
   (a) Ends the discrimination.

   (b) Takes appropriate action no later than five (5) days after discrimination is confirmed.

8. Assists, as much as possible, in providing a remedy for the effects of discrimination.

9. Reviews all aspects of each complaint and signs the complaint form.

10. When discrimination is alleged but is not confirmed, address any management deficiencies uncovered through the examination of the circumstances and take the appropriate corrective action(s).

11. Briefs the complainant of the action(s) taken and annotates whether or not the complainant was satisfied that the allegations were adequately addressed.

**Human Resources Coordinator**

1. Investigates all sexual harassment complaints: Interviews complainant, alleged offender, and witnesses. Coordinates the interview schedule for complainant(s), alleged offender(s), and witnesses.

2. Provides a report of all allegation of sexual harassment for the CEO’s signature. Briefs the findings of the investigation to the CEO to include recommended course(s) of action(s).

3. Assigns tracking numbers for all complaints. Maintains a secure area for all complaints separate from personnel files. Provides follow-up on all sexual harassment complaints.

4. Advises the CEO on sexual harassment matters and helps the CEO anticipate, prevent, and eliminate or neutralize those factors that detract from a healthy work environment.

If a complainant is not satisfied that the allegations were adequately addressed, he or she may appeal in writing to the CEO within five (5) workdays of the complaint. A decision regarding the complaint will be conveyed in writing to the employee within two (2) workdays.

If the employee is not satisfied with the CEO’s decision, the employee may request a hearing before the Policy Committee. The Policy Committee will consider the employee’s appeal of the CEO’s decision at its next regularly scheduled meeting. The CEO must submit all information available to the Policy Committee Chairperson. After review of the information, the Committee may decide to further investigate the complaint and reconsider the decision or they may uphold the decision reached by the CEO. The final decision by the Committee will be determined by a majority vote with a quorum present. The Committee’s decision will be conveyed in writing to the employee within two (2) workdays following the conclusion of the appeal. All documentation will be kept with the original complaint file.
CASA makes every effort to provide a safe work environment for all employees and hopes that no employee will be injured while on the job. However, when accidents happen, we provide Workers’ Compensation insurance for employees. Workers’ Compensation provisions cover any employee who is injured at work. The injury or illness “must arise out of and be in the course and scope of employment.” It must occur within not only the time and place of employment but also must arise out of activity that is an inherent part of the employment and that directly or indirectly furthers the employer’s interests.

Employees that are injured on the job and are unable to return to work within a six (6) month period may be replaced and/or placed in an “inactive status”. The inactive status means that the employee will not accrue any of the normal benefits he/she is entitled to, nor will seniority increase because of this absence. Additionally, it may be necessary for CASA to assess the business necessity of that position and make a decision accordingly. In doing so, the employee will be notified of his/her employment status with CASA.

**Basic Coverage**

**Benefits Paid**

Workers compensation provides replacement income, medical and rehabilitation expenses to employees who suffer work-related injuries or illnesses. Benefits may also extend to the survivors of workers who are killed on the job. Typically, a worker receives two-thirds of his or her average wages up to a fixed ceiling since these payments are tax-free; a worker who receives average wages fares reasonably well.

Under Texas Law, compensation is not payable for the first week of disability. Benefits begin to accrue on the eighth day of disability, unless the disability last four weeks or longer. Payment is due weekly, with the first payment no later than the seventh day after the insurer has received notice of the injury stating the employee has suffered eight days of disability.

Employees may receive lump sum benefits if they have a total disability or a permanent partial disability. Employees are not permitted to use group health plans for injuries or illnesses covered under the Workers’ Compensation Act. Employees are not allowed to use accrued leave time, at the same time they are receiving workers’ compensation benefits.

**Medical Benefits**

An injured employee is entitled to all healthcare reasonably required by the nature of the injury. Medical benefits are payable from the date of injury. The employee is entitled to healthcare that cures or relieves the effects of the injury, promotes recovery, or enhances the workers ability to return to employment. The employee does not receive compensation for pain and suffering or mental anguish.

Healthcare includes reasonable and necessary medical aid, examinations, treatments, diagnoses, evaluations, and services, including: medical, surgical, chiropractic, podiatric, optometric, dental, and nursing services; physical therapy; physical rehabilitation; psychological services prescribed by a doctor; hospital or other healthcare facility services; prescription drugs or medicines; and medical or surgical supply, appliance, brace, artificial member, or prosthesis.

When the absence from work is due to a Workers’ Compensation injury or medical disability, CASA will maintain the employee in an active leave without pay status for a period up to three (3) months for the purpose of continuing such benefits as hospitalization, etc. The benefits will then cease until the employee is authorized to and returns to work, at which time the benefits will be reinstated.
Note: Employees who unjustifiably refuse to accept recommended medical treatment might be denied compensation or have their compensation suspended.

**Employees' Responsibilities**

*Notification*

An injured employee or the employee’s representative must notify the Human Resources Coordinator who will provide written notification to the Operations Manager within forty-eight (48) hours of the injury. The supervisor must also provide an investigative report within forty-eight (48) hours of the injury. An employee’s failure to notify the Human Resources Coordinator may relieve the employer of liability for benefits, unless the Human Resources Coordinator had actual knowledge of the injury, or CASA determines that good cause existed for the employee’s failure to give notice, or the insurance carrier does not contest the claim. If you are involved in or witness an accident at work involving a customer or employee, notify a member of management immediately, regardless of the severity. You should report every accident or injury to management, even if the employee indicates that it is unnecessary to do so.

**Injuries and job-related illnesses not covered under workers’ compensation:**

1. Accidents resulting from “horseplay” or willful misconduct.
2. Injuries occurring while traveling from and to work in a company vehicle due to reckless or unsafe driving.
3. Injuries occurring while traveling to or from work unless the employee was on an errand for CASA.
4. Injuries resulting from the influence of drug or alcohol.
5. Injuries or illnesses resulting from violation of known safety rules.
6. Injuries resulting from voluntary participation or attendance, such as athletic events during work time.
7. Injuries occurring at parities, picnics, and similar functions.

Employees should be aware that filing a fraudulent Workers’ Compensation claim is illegal, and CASA will take appropriate disciplinary and legal action to include termination as well as imprisonment and fines.

**Choice of Physician**

The employee makes the initial selection of a physician, but must choose a physician from the carrier’s approved list. A doctor who renders emergency treatment is not considered the employee’s selection. An employee who is dissatisfied with the initial choice of a physician may notify the carrier in writing, stating the reason for dissatisfaction, and request authority to select an alternate doctor. Notification may be by telephone when a medical necessity exists for immediate change.

**Child Advocates’ Responsibilities**

In addition to ensuring they have the best type of coverage available; CASA has specific responsibilities when employees notify them of work-related accidents or illnesses:

1. Take every accident report seriously.
2. Respond to the employee’s needs.
3. Provide information on available insurance.
4. Document the incident.
5. File an accident report.
6. Designate an employee contact person.
7. Investigate the accident.
8. Based on accident circumstances, notify medical care provider of the necessity to screen for alcohol and/or drugs.
Return to Work Program

CASA will offer jobs of responsibilities that are in need of completion to an injured worker. These jobs may be of less physical requirements than the employee’s regular job. The employee’s physician must approve the physical characteristic of the job. The job offered to an employee recovering from an occupational illness or injury need not be the same job the employee was performing at the time he or she left work. It can be lighter work or at different hours. CASA will not create a job for an injured worker.

The job must be productive and benefit CASA. An employee cannot collect benefits if he or she continues to refuse a job, unless a judge rules that the refusal is justified.
All Cell Phone Usage

Employees must adhere to all federal, state, or local rules and regulations regarding the use of cell phones while driving. Accordingly, employees must not use cell phones if law, regulation or other ordinance prohibits such conduct.

Cell Phone Reimbursement

Employees required to use their personal cell phones for business purposes will be reimbursed $25 per month. Employee will be notified during orientation if their position qualifies for reimbursement.

Guidelines

If cellular phone use is necessary in the building, please follow the guidelines below:

- Turn cellular phone ringer off or set to “silent” upon entering the building.
- Be courteous to others by keeping your voice at a low volume.

Disruptions

Though cellular phone use is allowed, it is important to remember that using cellular phones in a loud or disruptive manner is prohibited. When disruptive behavior is identified, a supervisor or the CEO will take the appropriate steps to discontinue the disruption.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-2</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Code of Ethics</td>
<td>✓ Board of Directors</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td>✓ Exempt</td>
</tr>
<tr>
<td></td>
<td></td>
<td>✓ Non-exempt</td>
</tr>
</tbody>
</table>

In order to foster the highest professional standards and behavior and exemplary service, CASA’s Board of Directors, the CEO and all employees will adhere to a Code of Ethics. If there is knowledge of an employee’s involvement in or association with circumstances reasonably construed to reduce public confidence in CASA, such knowledge may be sufficient cause for the disciplinary actions adverse to the employee.

All employees must avoid any action(s) that might result in, or create the appearance of:

- Using position for private gain.
- Giving preferential treatment to any person.
- Losing complete independence or impartiality.
- Making a CASA decision outside official channels.

**Personal Gifts, Entertainment and Favors**

An employee must not seek, solicit or accept, directly or indirectly for his or her self any gifts, gratuity, favor, entertainment, loan, or any thing of monetary value from a person(s) who:

- Has or is seeking to obtain, contractual or other business or financial relations with CASA.
- Conducts operations or activities that are regulated by CASA.
- Has interest that may be affected by the performance or nonperformance of the employee’s official duties.

**Interested Directors or Employees**

Directors and employees of CASA, during his/her tenure or for one year after, cannot acquire any interest direct or indirect, in any project or plan or to be included in any project to be used in connection with CASA. If any Director or employee owns or controls an interest direct or indirect, in any planned project, he/she must immediately disclose the information in writing to CASA. Failure to disclose the information will constitute misconduct in the office.

**Financial Interest**

Employees will not have a direct or indirect financial interest that conflict substantially, or appears to conflict substantially, with CASA’s duties and responsibilities. A violation of the Code of Ethics by any employee, while employed by CASA, will be cause for disciplinary action, which in addition may include to any penalty prescribed by law.
CASA will conduct its relationships and operations in accordance with its mission and uphold its fundamental commitment to serving abused and neglected children. CASA’s employees are committed to the highest standards of responsibility and conduct and subscribe to the following guidelines in regards to its responsibilities and actions:

1. To practice and maintain the highest standards of sound management practices including efficiency, integrity, and economy of operations.

2. To observe the highest standards of personal conduct at all times and ensure that board members, employees, and volunteers are treated in a professional, business-like manner.

3. To avoid impropriety and/or the appearance of impropriety in all activities, business and personal.

4. To practice standards of conduct which promote community confidence in the values and mission of CASA.

5. To strictly uphold the laws, bylaws, rules, policies and regulations relating to the operation of CASA.

6. To guard against the use of a position within CASA for personal or financial advantage or special privilege.

7. To avoid conflicts of interest with CASA’s policies and operations that result from either business or personal relationships with board members, volunteers, employees, vendors, business associates, political affiliations and other charitable organizations. This includes any conflicts, either perceived or real, and that may not be intentional.

8. To promote and protect always the best interests and reputation of CASA and avoid and resist influences and practices, which are detrimental to, its mission.
The first ninety days (90) days of continuous employment at CASA is a trial period. During this time, the employee will learn his/her responsibilities, become acquainted with fellow employees, and determine whether they are happy with the job. In addition, during this time, the supervisor will monitor the employee’s performance. Upon completing the trial period in a satisfactory manner, the employee is retained as a full time employee by CASA. Successful employees are entitled to benefits offered by CASA. After an employee has successfully completed the trial period they will be credited the accrued paid-time-off from their date of employment.

Time spent as a temporary, monthly, or hourly employee may be counted as trial when considering an employee in this status for a regular full-time position.

Duration of Employment
At CASA, employment is at-will, that is, the employee or CASA may terminate with or without cause and with or without notice at any time. Nothing in this handbook or in any document or statement will limit the right to terminate employment at-will. No manager, supervisor, or employee of CASA has the authority to enter into an agreement for employment for any specified period or to make an agreement for employment other than at-will. No manager, supervisor or employee of CASA, other than the CEO, has the authority to enter into an agreement for employment for any specified period.

Policy Changes
The Employee Handbook contains the employment policies and practices of CASA. All previously issued handbooks and any inconsistent policy statements or memoranda are superseded. CASA reserves the rights to revise, modify, delete, or add to any and all policies, procedures, or benefits stated in this handbook or in any other document. Any written changes to this handbook will be distributed to all employees so they will be aware of the new policies or procedures. No oral statements or representations can in any way change or alter the provisions of this handbook. Changes will be maintained in a “master file” by the Human Resources Coordinator and reviewed in a monthly staff meeting. It is the responsibility of each employee to ensure they obtain information from missed staff meetings.

Age Requirement
Persons under the age of eighteen years (18) will be considered for regular or temporary employment for administrative positions and the operations and development programs. Per Texas CASA standards, persons must be twenty-one years (21) to supervise advocates. Persons under the age of eighteen years (18) that are covered under an approved government-sponsored youth training program are exempt from this provision.

Non-Qualification
Probationary employees may be separated from CASA at any time during the trial period when: their performance and/or quality of work are judged insufficient to merit continuation in the position, and/or when insufficient work is available to warrant an additional employee.

Appeal
Newly hired employees that fail the trial period have no right to the appeal process, except on grounds of illegal discrimination, harassment or retaliation, in which case the employee may appeal to the CEO within fifteen (15) days following notice of failure to qualify.
<table>
<thead>
<tr>
<th>Policy Name: Confidentiality</th>
<th>Board of Directors</th>
<th>✓</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revised Date:</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Exempt</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Non-exempt</td>
<td>✓</td>
</tr>
</tbody>
</table>

Part of the responsibilities of a CASA employee requires that all information provided regarding the child(ren) and families will be held in strictest confidence. Failure to comply with this confidentiality can be grounds for immediate dismissal from the CASA program.

Guidelines for maintaining confidentiality include:

- Keeping all written records in a secure place.
- Not discussing the case with anyone other than those parties approved by CASA.
- Returning all case records to the CASA office within ten (10) days of case closure or resignation from the case or program.

The law that governs the confidentiality of our case files is in the Texas Human Resources Code (40.005) which provides that, a person who is authorized to receive confidential information will maintain its confidentiality and will prevent disclosure of the information to a person who is not authorized to receive the information. It is a Class A misdemeanor to disclose, without authorization, confidential information contained in the Texas Department of Family and Protective Services records, papers, files, or communications.

Employees are prohibited from directly or indirectly using or allowing the use of official information obtained through or in connection with CASA employment, which has not been made available to the public.

Any employee who discloses confidential business information will be subject to disciplinary action (including possible termination) and legal action, even if he or she does not actually benefit from the disclosed information.

*Note: All medical information and records are confidential information under State and Federal laws. Any employee who disseminates such confidential information concerning a victim or suspected of communicable disease is in violation of such laws and could be subject to serious disciplinary and/or civil action.*
Members of the Board of Directors, employees, and volunteer advocates of CASA are expected to act in good faith and in the best interests of CASA at all times. Each member will subordinate her or his personal interests to the welfare of the Mission.

All parties will avoid any actual conflicts of interest and situations, which might give rise to the appearance of a conflict of interest or other impropriety (regardless of whether or not a conflict of interest or other impropriety actually exists). Conflicting interests can be financial, personal relationships, status, or power. Not all parties will use their association with CASA to promote personal gain or to avoid any type of penalty.

Each conflict of interest will be disclosed as it arises and prior to discussion or votes on the matter, that poses conflict. Any situation involving a potential conflict of interest, including any relevant information pertaining to the possible conflict, will be disclosed to the management of CASA, and put in writing to the Board of Directors.

Directors and staff will weigh carefully all circumstances in which there exists the possibility of accusations of competing interests. Those involved in the possible conflict may not participate in any decision-making process related to the matter. Furthermore, involved parties will excuse themselves from the room when there is any deliberation and decision on the matter of interest. The minutes of the board and or committee meetings will reflect that the conflict of interest was disclosed and that the interested person was not present during the deliberation and decision on the matter of interest.

It is recognized that Directors, staff, and volunteers may be offered gifts or similar favors from persons utilizing the services of CASA and common courtesy may require the acceptance thereof. However, gifts should not be accepted if they are offered (or appear to be offered) as an inducement to perform an act inconsistent with the best interest of CASA or if acceptance, directly or indirectly, places the recipient under any obligation to the donor. In no event should a person accept: 1) cash payments or 2) gifts or similar favors having a value in excess of $50, or a total annual value of $250.

Purchases will be made based upon maximum open and free competition, to obtain the best value in return for financial resources. The CEO or designated employee will compare a minimum of three quotes or bids on purchases over $500. Once a vendor demonstrates the best value in return for financial resources, the vendor may be used repeatedly by CASA.

Not withstanding the above, the Board of Directors may waive the foregoing restrictions and allow a Director or staff member with a conflict of interest to join in such portion of the discussion on the matter of interest as the board deems appropriate.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-7</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Diversity &amp; Inclusion</td>
<td>✓ Board of Directors</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td>✓ Exempt</td>
</tr>
<tr>
<td></td>
<td></td>
<td>✓ Non-exempt</td>
</tr>
</tbody>
</table>

Child Advocates is strongly committed to promoting diversity and inclusion. All Board, employees, and volunteers performing work on behalf of CASA are expected to adhere to the laws and regulations that apply to their work activities and demonstrate ethical behavior in all their decisions and interactions. CASA is committed to acknowledging and valuing employee differences and to creating an environment in which every individual’s unique strengths and abilities are developed and valued.

All CASA employees share in the responsibility for creating this environment, and are expected to demonstrate mutual respect and acceptance in the workplace. At CASA, we believe that utilizing our employees’ uniqueness enhances communication, problem-solving and decision-making skills, thereby improving organizational productivity and performance. We also believe that if our Board, employees, and volunteers mirror the diverse make-up of our communities and our clients, we will be able to understand, and more effectively respond to our community.
The organization will comply with the various document retention requirements, which generally are the result of federal guidelines related to income tax law or because of our receiving federal or state funds of certain programs. Although federal and state law allows that some documents are retained for only three (3) years, many documents must be retained for up to seven (7) years. Therefore, in order to lessen confusion, our policy is to retain financial and grant documents for seven (7) years from the end of the fiscal year to which the document relates.

Documents may be retained in either original form (paper), or may be stored electronically if such a storage system is available to our organization. An electronic storage system is one used to prepare, record, transfer, index, store, preserve, retrieve, and reproduce books and records by either electronically imaging hard copy documents to an electronic storage media or transferring computerized books and records to an electronic storage media that allows them to be viewed or reproduced without using the original program.

**Case and Volunteer File Retention**

CASA will save case and volunteer files in paper and/or electronic form for a minimum four (4) years. Destroyed documents will be shredded and disposed of by a document destruction company.
All employees using personal cars for CASA business will be required to provide a copy of their current driving record from the Texas Department of Public Safety if information is not available on the Public Data website used to conduct background checks. Employees required to provide a comprehensive driving record will be notified in writing. Costs associated with obtaining this document are the responsibility of the applicant. All employees using personal cars for CASA business will be required to demonstrate proof of insurability. A copy of the current Texas vehicle insurance identification card may serve as sufficient proof. Employees are expected to maintain an insurable driving record.

All employees whose job involves driving for CASA may be investigated on an annual basis. A combination of three (3) moving violations and/or accidents in a three (3) year period is the maximum allowed by most insurance carriers, any driver who reaches this point will be subject to disciplinary action and/or placed on probation.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-10</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Employment Status</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td>Non-exempt</td>
</tr>
</tbody>
</table>

It is the intent of CASA to clarify the definitions of employment classifications so that employees understand their employment status and benefit eligibility. These classifications do not guarantee employment for any specified period. Each employee will belong to one employment category:

**Full-time (hourly):** employee works 40 hours a week and is paid an hourly wage for all hours worked.

**Full-or part-time (salaried):** employee works agreed upon schedule each week and is paid based on a periodic salary.

**Temporary, and/or Seasonal:** employee performs various or specialized tasks of a temporary nature and are hired for a specific period of time and/or job.

**Independent Contractor:** The individual is not an employee. CASA provides no benefits. The CEO is guided by Section 3401 of the Internal Revenue Code and other applicable laws and regulations.
Policy No. 3-11

<table>
<thead>
<tr>
<th>Policy Name: Employment Status Change</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revised Date: 5/19/11</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td></td>
<td>✓ Non-Exempt</td>
</tr>
</tbody>
</table>

An employee’s employment status can change based on the following conditions:

- Administrative Leave
- Demotions
- Disability
- Promotions
- Suspension
- Transfer
- Termination
- Workers’ Compensation
- Termination

Supervisors must gain approval from a Vice President before informing the Human Resources Coordinator of the change. An “Employee Status Change Form” is completed by the Human Resources Coordinator and maintained in employee records.

For new or re-classified positions, Vice Presidents or the CEO must complete the New Position or Position Re-Classification Form and deliver to the Human Resources Coordinator no later than the deadline for expense report reimbursement.
It is our policy to maintain essential services and operations during any severe weather or emergency condition while providing for the protection, safety, and health of all employees. Severe weather/emergency conditions are defined as ice accumulations, floods, snowstorms, hurricanes, or tornado damage that significantly affects the normal operations of CASA. However, the CEO has the final decision to close the offices, to cancel schedules, or to take other appropriate actions in response to severe weather conditions.

Weather Advisory

An advisory will be issued when weather conditions are such that some employees could have trouble in getting to and from the office and or job sites. However, the majority of the employees would be able to maintain their normal schedule. During an advisory, the offices will not be closed and CASA will continue to operate on a normal schedule.

Actions to Be Taken When Severe Weather Occurs

When severe weather conditions escalate, the City Manager of San Antonio may authorize City business closures for the safety of employees and the public. Changes to the City’s regular business schedule during weather emergencies will be announced on the city employee HOTLINE, 207-2255, and can be found by calling 311. CASA employees are required to consult these sources and to verify if attendance at work is required. In this case, the employee will be paid for the normal time they would have worked during the closure. An employee on paid-time-off the day before or the day after his/her work schedule is altered due to severe weather will use paid-time-off, as appropriate. The CEO may authorize facility closing even if the City does not, if the risk is too great.

Safety is essential. If travel conditions exist that endanger the safety of an employee, the supervisor should be made aware of such situations immediately. Personnel scheduled for work subsequent to weather advisory should report to work as usual. Each employee will individually determine if the weather is such that they cannot get to work safely. If it is determined that due to weather or traffic conditions, they cannot report to work, they must contact supervisory personnel. Management then knows that the employee will be absent and is not experiencing travel problems en route. The employee may request to use PTO for the time missed. If conditions are such that employees should not report to work, employees will be advised via announcements over local radio and television stations. If severe weather emergencies develop during the workday but CASA remains open for operation, employees should contact their supervisor or designated representative for permission to leave work. Non exempt work time for those leaving early will be charged to PTO.

If severe weather emergencies force cancellation of work schedules during the day, employees can leave to go home. Employees are eligible for pay for those hours normally worked during the period of closure.
CASA provides employees the opportunity to indicate their interest in open positions and advance within the organization according to their skills and experience. Job posting is a way to inform employees of openings and to identify qualified and interested applicants who might not otherwise be known to the Human Resources Coordinator and hiring manager.

When appropriate, notices of job openings are posted for five (5) calendar days before advertised externally. CASA reserves its discretionary right not to post a particular opening.

CASA recognizes the benefit of developmental experiences and encourages employees to talk with their department managers about their career plans. Department managers are encouraged to support employees' efforts to gain experience and advance within the organization, even if that means, “losing” an employee to another department.

**Job Posting**

Job openings will be posted in binders located in the Human Resources Coordinator’s office. Each job posting notice will include job title, department, location, required qualifications, essential duties, and required education, skills, experience and abilities, job grade, and salary range.

**Eligibility**

To be eligible to apply for a posted job, an employee must have performed for at least 180 calendar days in his or her current position, unless otherwise authorized by the CEO. The employee must submit a CASA Internal Application to the Human Resources Coordinator. The Human Resources Coordinator will notify the responsible hiring departmental manager of the employees who have expressed interest in a position and who meet the minimum requirements for the position for consideration and possible interview. Internal candidates will be considered for vacant positions for which they are qualified. Other recruiting sources may also be used to fill open positions in the best interest of CASA. CASA retains the right to use its sole discretion to determine the most appropriate candidate for the position. The Human Resources Coordinator will notify internal candidates who are not selected.

Employees who change jobs within the organization retain their original start date for benefits purposes. However, changes in benefits may occur when an employee moves between positions, if there is a change in benefit eligibility associated with the new position, for instance from full-time to part-time or vice versa.
An employee who fails to appear for work for one (1) day and does not contact his/her supervisor will be considered to have voluntarily resigned. On the second day of absence, the supervisor must notify the Human Resources Coordinator of any employee who has resigned by abandonment. The Supervisor will make reasonable attempts to contact the individual. If the employee returns to work before the second-day period has expired, and it can be determined that notification was not possible for reasons beyond the employee’s control, the employee can be reinstated with the approval of the department manager and the CEO. If the employee is not reinstated, he/she will not be considered in good standing or eligible for rehire.

When abandonment occurs, the Human Resources Coordinator will complete the following steps:

1. Complete an Employee Status Change Form, which shows the resignation date as the last actual day worked.

2. Complete a termination checklist.

3. Notify the former employee of benefits to which he/she is entitled.

4. If the former employee has property belonging to CASA, the Human Resources Coordinator will contact the former employee in an attempt to recover the property. If the property is not returned, the price of the property will be deducted from the employee’s last check.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name</td>
<td>Nepotism</td>
</tr>
<tr>
<td>Revised Date</td>
<td>May 1, 2010</td>
</tr>
</tbody>
</table>

This policy applies to:  

<table>
<thead>
<tr>
<th>Board of Directors</th>
<th>✔</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exempt</td>
<td>✔</td>
</tr>
<tr>
<td>Non-exempt</td>
<td>✔</td>
</tr>
</tbody>
</table>

CASA is concerned with ensuring that the best-qualified people are hired to staff employment openings. Occasionally, the best candidate may be a relative of a current employee. When this happens, the following rules apply:

- Individuals may not be hired, transferred, or promoted into a position immediately under the direct supervision of a relative, within the reporting line of a relative or to the same peer reporting level of a relative without prior approval from the CASA Board of Directors and the CEO.

- Situations creating the opportunity for influence, or that are clearly in conflict with the necessary checks and balances of good business operations are not permitted.

These rules hold true for staffing in all positions whether regular or temporary, full-time, part-time, or contractual. It is CASA’s intention to eliminate situations where undue consideration may be given to hiring a relative, or where family relationships may interfere with adequate performance of a job and/or the objective evaluation of performance.

Note: For purposes of this policy, the term “relatives” includes individuals sharing a familial relationship, whether by blood or marriage, and individuals sharing a spousal relationship or intimate co-habitation or other relationships where a supervisor’s objectivity may be impaired.
All new employees of CASA are required to attend a New Employee Orientation Program. The orientation provides new employees orientation regarding its mission purpose, policies and services including, but not limited to:

1. Information about confidentiality laws and the employee’s responsibility to abide by these laws.

2. Information about the CASA program’s structure, service mandates, relationship to the court and professional ethics including sexual harassment and non-discrimination policies.

3. Lines of accountability and authority within the program.

4. Information about pertinent laws, regulations, and policies.

5. Information about the mission and purpose of CASA programs, on local, state and national levels.

6. Demographics of community and children served.

7. Employee’s job responsibilities and description.

When appropriate for the position, OSHA regulations will also be explained during orientation.

Payroll and other employment forms (including tax withholding statement (W-4), form I-9, will be completed. The employee will be asked to provide his/her Social Security number. A personnel file will be initiated for each new employee that includes the proceeding forms: the original job application form, job description, any necessary certification documents, licenses, and employee record, completed by the Human Resources Coordinator. In addition, the employee will be asked to provide 3 references which will be contacted and documented by the hiring manager.

Orientation is generally held as needed. Notification is sent to each new employee notifying him or her of the time and place of his or her orientation session.
Policy No.  3-17  This policy applies to:
 Policy Name:  CASA Network Policy  Board of Directors
 Revised Date:  8/14/11  Exempt

CONFIDENTIALITY

All data stored on CASA servers is Confidential Information. Confidential Information includes, but is not limited to, the identification of children who are or were assigned to Child Advocate Volunteers, and all records, including school, protected health information or psychological records and other information deemed confidential pursuant to any Court Order appointing a Child Advocate Volunteer and/or Texas Human Resources Code section 40.005. Employees should take all necessary steps to prevent unauthorized access to this information.

Keep passwords secure and do not share accounts. Authorized users are responsible for the security of their passwords and accounts. System level passwords should be changed every six months, user level passwords should be changed every year. The sharing of passwords with unauthorized users is subject to discipline, up to and including, termination.

All PCs, laptops and workstations should be secured with a password-protected screensaver with the automatic activation feature set at 10 minutes or less, or by logging-off (control-alt-delete for Windows XP and Vista users) when the host will be unattended. Because information contained on portable computers is especially vulnerable, special care should be exercised.

ELECTRONIC COMMUNICATIONS

CASA provides email, voice mail, instant messaging, electronic communications and Internet access in order to enable you to communicate more efficiently and to provide an effective resource for the operation of the business.

You may use electronic communications during work time for business-related reasons only. You are permitted to access the Internet and email system for personal use during designated meal and rest periods, and before and after work hours. The following guidelines must be followed regardless of whether the communication is business-related or personal:

☐ All communications composed or sent through CASA’s systems must be written in a professional manner, regardless of the mode in which the correspondence is transmitted. This includes messages sent outside CASA and all internal communications.

Inappropriate Communication- Involves any language that is unnecessarily loud or degrades or berates others, including, but not limited to, racial, religious, or sexual comments or jokes, sexual innuendoes, or threats of any kind, whether communicated verbally, in writing, or electronically.

☐ Use of the CASA electronic communication equipment must not disrupt the operation of CASA network or interfere with an employee’s productivity.

☐ All CASA policies, including the Equal Employment Opportunity and Harassment policies, must be followed while using CASA equipment. No abusive, profane, or offensive language or pictures may be transmitted by employees.

☐ Internet sites that contain offensive material may not be visited under any circumstances. Offensive material includes, but is not limited to, anything sexual, pornographic, or racially derogatory.
CASA equipment may not be used for any non-work-related solicitations.

All email messages must have your name attached. Messages may not be transmitted under an assumed name and you may not attempt to obscure the origin of any message.

You are not authorized to retrieve or read any email messages that are not sent to you (unless your job requires you to review messages for regulatory purposes).

CASA equipment may not be used to send or receive copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization from an officer of CASA.

Employees' personal information stored electronically on CASA equipment is not confidential. Even when a message is erased from a computer system, it is still possible to retrieve and read that message. The use of passwords for security does not guarantee confidentiality.

All messages composed, stored, sent, or received on CASA equipment are the property of CASA. CASA reserves and intends to exercise the right to review, audit, intercept, access, and disclose all communications produced or transmitted on CASA equipment. All communications including text and images can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver. Employees sending messages to non-employees should inform them that information contained in or sent to the computer system of CASA is CASA property and may be accessed and intercepted for review at any time.

**WORKPLACE MONITORING AND SEARCHES**

CASA has the express right to access CASA property including, but not limited to, desks, lockers, computers, files, email, voice mail, other electronic communications, and other property owned or operated by CASA, including devices owned by you but connected to CASA’s network, phone line, or any other CASA communication system.

All such property and communications are subject to being monitored, intercepted, reviewed, and/or searched at CASA’s discretion for business purposes such as monitoring compliance with CASA policies and procedures; investigation of business security issues, disclosure of confidential business or proprietary information, or personal abuse of the system; or monitoring work flow or productivity. Any such searches or monitoring will be performed in compliance with all applicable laws and regulations.

**CASA PROPERTY AND SERVICES**

Fax machines, copiers, computers, and other office equipment and services, including devices owned by you but connected to CASA’s network, phone line, or any other CASA communication system, are for CASA business purposes and are not to be used for any unauthorized purposes. It is your responsibility to exercise appropriate care of office equipment and to inform management of any equipment that is not working properly.

All inventions, copyrights, trademarks, ideas, methods, discoveries, designs, developments, and improvements made or conceived by employees which pertain to the products, processes, or business of CASA are the sole property of CASA. You must promptly and fully disclose and provide all such information and technology to CASA.

**TELEPHONES**
The telephone is a vital instrument used to conduct day-to-day business. All employees should present a courteous and thoughtful impression when answering the telephone.

All telephones should be answered promptly. Employees answering the telephone should properly identify themselves by name. If the person for whom the call is intended is unavailable, the employees should try to be of assistance, transfer the call to an appropriate person who can help, or offer to take a message. Every effort should be made to avoid transferring a client multiple times.

CUSTOMER QUALITY ASSURANCE MONITORING

CASA reserves the right to access electronic communications, including telephone conversations, between employees and customers in order to be assured that a high level of professionalism and quality customer service is being provided. This monitoring may occur on a time-to-time or ongoing basis. All such monitoring is intended to promote the highest level of professionalism between our employees and our customers.

COMPUTER SOFTWARE

It is the intent of CASA to comply with copyright laws and software licensing agreements when acquiring, installing, and using software on personal computers owned by CASA. Unless the license specifically allows otherwise, a given software package may be used on only one computer and CASA must have an original software license on file for each computer where a given software package is installed. Although most software titles may actually be shared on multiple computers if those computers are attached to a network, it is a violation of the copyright to do so unless:

- The package was specifically designed to run on a network, and CASA is not exceeding the number of users as designated by that package and the software license contained in that package.
- CASA has a site license for that product.

The Operations Manager is responsible for maintaining records of software licensing agreements for CASA.

In order to ensure compliance with copyright laws and software licensing agreements, and to help prevent computer viruses from being transmitted through the system, you are not permitted to install or download any software onto CASA’s computer system without prior approval from management, and after consulting the Operations Manager. It is illegal to make or distribute copies of copyrighted material without the written authorization of the copyright owner (the only exception being the right of the user to make a backup copy for archival purposes). The copyright law makes no distinction between duplicating software for sale or for free distribution. Unauthorized duplication of software, often referred to as “piracy,” is a federal crime. You are not permitted to make, acquire, or use unauthorized copies of computer software.

You may use software only in accordance with the terms and conditions of the license included with the software. If you are unwilling to comply with the terms and conditions contained in the software license agreement, you must not use or install the software and should notify your manager of the situation.

SOLICITATIONS AND CONTRIBUTIONS
CASA reserves the right to prohibit employee solicitation and distribution activities that are not protected by law at its discretion.

CELL PHONES AND MOBILE DEVICES

Individuals may be provided with a cellular phone or reimbursed for personal cellular phone usage for business-related reasons.

While at work you are expected to exercise the same discretion in using personal cellular phones as is expected for the use of CASA phones. Placing calls or receiving calls on your personal cellular phones should be kept to a minimum. Employees who are issued cellular phones and/or mobile devices for business use, or who are allowed to connect personal mobile devices to CASA’s network, phone line, or any other CASA communication system should use these devices for business reasons only. Communication logs may be audited to ensure no unauthorized use has occurred.

SOCIAL NETWORKS

You are a representative of CASA. The CASA employee handbook provides the foundation for CASA’s policies and guidelines for social computing. The same principles and guidelines that apply to CASA’s activities in general, apply to CASA’s activities online. This includes forms of online publishing and discussion, including blogs, wikis, file-sharing, user-generated video and audio, and social networks.

In general, what you do on your own time is your personal business. However, activities in or outside of work that affect your CASA job performance, the performance of others, or CASA’s business interests are a proper focus for company policy.

If CASA wishes to communicate publicly as a company—whether to the marketplace or to the general public—it has well established means to do so. Only those officially designated by CASA have the authorization to speak on behalf of CASA in regards to the on-line presence.

Managers and executives take note: This standard disclaimer does not by itself exempt CASA managers and executives from a special responsibility. By virtue of their position, they must consider whether personal thoughts they publish may be misunderstood as expressing CASA’s positions. And a manager should assume that his or her team will read what is written. Social Networks is not the place to communicate CASA’s policies to CASA employees.

Protecting confidential and proprietary information. Social computing is vague in regards to many of the traditional boundaries between internal and external communications. Be thoughtful about what you publish—particularly on external platforms. You must make sure you do not disclose or use CASA confidential or proprietary information or that of any other person or company in any online social computing platform. For example, ask permission before posting someone’s picture in a social network if related to any CASA BUSINESS.

Consequences to what you publish. If you're about to publish something that makes you even the slightest bit uncomfortable, review the suggestions above and think about why that is. If you're still unsure, and it is related to CASA business, feel free to discuss it with your manager. Ultimately, however, you have sole responsibility for what you publish in any form of online social media.

| Policy No. | 3-18 | This policy applies to: |
CASA has no objection to an employee holding another job as long as he/she can effectively meet the performance standards for her/his position with CASA. Child Advocates will hold all employees to the same standards of performance and attendance requirements and cannot make exceptions for employees who hold outside jobs. All employees are prohibited from holding other employment that creates a conflict of interest or even the appearance of a conflict of interest for CASA.

Employees may not receive any income or other material gain from individuals outside CASA for materials produced or services rendered while performing their jobs. Employees are prohibited from using any of CASA's equipment, materials, or supplies for personal gain.

If due to outside employment an employee's work at CASA suffers, resulting in poor performance, conflict of interest, absenteeism, tardiness, or refusal to work overtime when ordered to for the maintenance of essential functions, CASA can terminate employment.

Employees will notify the CEO of any outside employment. The CEO will notify the Board of Directors of outside employment that represents a conflict of interest.
The Human Resources Coordinator maintains personnel records for each employee. It is important that these records be as accurate as possible. It is the employee’s responsibility to inform the Human Resources Coordinator within thirty (30) days of changes, such as your home address, telephone number, marital status, or number of dependants. Benefits, in particular, may be affected by any changes in the employee’s status. Failure to maintain accurate records could affect an employee’s benefits eligibility.

Employees are allowed to examine their personnel files, but only under the supervision of the Human Resources Coordinator. Employees are not allowed to copy or remove original documents from a personnel file. If an employee wishes to review his/her file, he/she must make arrangements with the Human Resources Coordinator. The Human Resources Coordinator may provide copies upon receiving a written request for $1.00 per page. The employee will be invoiced and upon receipt of payment, the employees’ file will be copied and mailed to the address on record.

If an employee disagrees with anything in the personnel file, the employee may request in writing that information be added. If the Human Resources Coordinator agrees that the information is incomplete, incorrect or has no relevance to the file, the information will be added. An employee may also make and have submitted to the file any written statement documenting the employee’s position on any information included in the employee’s personnel file.

The contents of the personnel records are as follows:

- Application/Resume
- Commendation(s)
- Disciplinary actions
- Documentation of all record checks
- Employee Handbook Acknowledgement
- Employee Status Change(s)
- Job Description
- Performance Evaluations
- Proof of eligibility to work in the U.S. (I-9 form)
- Reference documentation
- Termination summaries
- Training records
- Verification of education
Employees must not use their positions for political purposes, solicit or receive political contributions from other employees, be candidates for election to partisan public office or take an active part in political campaigns, or use political influence in connection with their employment status. Employees are free to vote as they choose.

The Restrictions

The use of official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office; directly or indirectly coercing, attempting to coerce, commanding, or advising a state or local officer or employee to pay, lend, or contribute anything of value to any party, committee, organization, agency, or person purposes is prohibited.

Participation in the following types of political activities is prohibited: soliciting political contributions from co-workers or subordinates; soliciting political support for a party faction or candidate from co-workers or subordinates; becoming a candidate for nomination or election to any public office, which is to be filled in an election in which party candidates are involved.
All employees are expected to abide by CASA rules and regulations. Disciplinary actions up to and including termination, may be imposed for a variety of reasons, including the offenses or violations described below. CASA may take into consideration all of the circumstances involved, including the type and severity of the offense and the employee’s work history with CASA.

CASA maintains a disciplinary procedure so that employees understand that certain conduct or unsatisfactory performance is considered unacceptable and will result in disciplinary action. This policy applies to all employees.

**Disciplinary Procedures**

The disciplinary procedure is designed to give employees who have successfully completed their initial ninety (90) day trial period advance notice, if possible, of problems with their conduct or performance in order to provide an opportunity to correct these problems. The disciplinary procedure generally will be progressive involving verbal warning or counseling, written warning(s), suspension and termination. However, it should be understood that the disciplinary procedures are intended as guidelines. As a result, CASA may determine that the nature of the offense, the employee’s performance record, or other circumstances warrant immediate suspension or termination. An employee may submit a written response to any disciplinary action covered by this policy to the Human Resources Coordinator. The response will be placed in the employee’s personnel file. Listed below are the various forms of disciplinary actions.

**Verbal Warning**

The supervisor will review the facts in private with the employee involved. The supervisor will advise the employee what action will be taken if another violation occurs.

**Written Warning**

The supervisor will review the facts in private with the employee involved and give the employee a copy of the written warning. The employee will be asked to sign the written warning to indicate that she/he received a copy. The supervisor will inform the employee what action(s) will be taken if another violation occurs. A record of the meeting, stating the facts that were reviewed with the employee and the action taken or to be taken will be noted on the warning.

The supervisor will submit the documentation of the warning with the employee’s signature to the Human Resources Coordinator to be placed in the employee’s personnel file.

**Demotion**

The employee is placed in a lower paying position, if the employee has been found unsuitable for his/her present position but may be qualified or able to give satisfactory service in a lower paying position. An employee may be demoted if the position has been either abolished or reallocated to a lower paying level and he/she cannot be transferred to a position of equal pay.

**Suspension or Discharge**
The supervisor will discuss the facts with the department manager and the Vice President or CEO before any action is taken. When immediate action is necessary, the Vice President or CEO will tell the employee she/he is suspended, is subject to disciplinary action, and will be notified of the decision after a review of the facts have been completed, normally within a two-week period. This review will include a meeting with the employee, the department manager, and the Vice-President and/or CEO. After review, the Vice President or CEO will reach a decision. In cases where impending action presents a risk to CASA in the judgment of the CEO, the decision will be reviewed by the Board of Directors prior to implementing.

The notice of suspension is permanently retained in the employee’s official personnel file. An employee suspended for disciplinary reasons will not accrue paid-time-off during the period of suspension. Suspension can be with or without pay.

If a suspension is decided upon, the following steps will be taken:

1. The employee will be advised of the action to be taken and if suspended, will be given a written memorandum of suspension.
2. When the Vice President or CEO has immediately suspended an employee, but the review absolves the employee, payment or accrual will be made for time lost.

If a discharge is decided upon, the following steps will be taken:

1. The Vice President or CEO will tell the employee the decision reached.
2. The Human Resources Coordinator will inform the discharged employee of options relative to employee benefits conversion at the time of termination. The Human Resources Coordinator will complete an Employee Status Form to remove the terminated employee from the payroll.

General Provisions

As stated previously, employment could be terminated at any time, at the employee’s option or the option of CASA. The offenses meriting disciplinary action listed in this policy provides an illustrative list of offenses, but are not intended as a complete list of offenses. In the event of defalcation, misuse of CASA funds or other irregular activities, the CEO will conduct a review of the facts.

Offenses Meriting Disciplinary Action

Examples for progressive discipline include, but are not limited to:

- Poor performance or behavior;
- Excessive absences/ tardiness;
- Leaving work without permission;
- Unauthorized telephone usage;
- Use of profane or abusive language;
- Breach of policies outlined in handbook;
- Posting and/or removing material from CASA’s bulletin boards without proper authorization.

Examples for immediate discharge include, but are not limited to:

- Insubordination;
- Theft;
- Dishonesty;
- Fighting on property;
- Unauthorized photographing or copying of projects or other confidential material;
- Misrepresenting or withholding pertinent facts in securing employment;
- Reporting to work under the influence of alcohol, illegal drugs or controlled substances;
- Sale or possession of illegal drugs or controlled substances;
- Falsification of records (timesheets, false expense reports);
- Unreported absence;
- Failure to obtain permission to leave work for any reason;
- Sleeping or malingering on the job;
- Working overtime without authorization;
- Discourteous or abusive conduct toward any customer;
- Taking action without program or court approval that endangers the CASA child or is outside the CASA program role;
- Engaging in ex-parte case or volunteer related communication with the court.

Violations of CASA’s policies and rules may warrant immediate termination. Nevertheless, CASA may in its discretion utilize forms of discipline that are less severe than termination in certain cases. Examples of such less severe forms of discipline include verbal warnings, suspension, written warnings, probationary action, and demotion. Although one or more of these steps may be taken in connection, no formal order or system is prescribed.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-22</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Public Statement</td>
<td>✓ Board of Directors</td>
</tr>
<tr>
<td>Revised Date:</td>
<td>✓ Exempt</td>
<td>✓ Non-exempt</td>
</tr>
</tbody>
</table>

The CEO of CASA or the President of the Board will handle all statements made to the media. The President can designate others to speak to the media if so warranted.
CASA strives to recruit, hire, transfer, and promote accomplished individuals who can further CASA’s mission:

- by selecting the individual with the experience and qualifications that best meets the needs of,
- by enhancing opportunities for internal mobility and promotion of qualified candidates, who are current employees,
- by enhancing opportunities for employment of women and minorities in areas where they are underrepresented, and
- by considering candidates without discrimination based on race, color, national and/or ethnic origin, gender, marital status, sexual orientation, handicap/disability, religion, veteran’s status, age, or any other unlawful factor.

**Advertising**

Each job announcement will include: job title, job description, qualifications, essential duties, salary range, and the open and closing date. The job announcement will also include a statement affirming CASA’s commitment to equal employment opportunity. When appropriate, open positions will be advertised internally for five (5) calendar days before external recruiting begins. Other advertising sources may include external web sites, newspaper, community centers, and job fairs. To achieve consistency and economy, all advertisements for staff positions will be placed through the Human Resources Coordinator. Paid advertising will be used only if the budget permits.

**Applications**

All applicants should complete the application before the interview process is completed, but no later than before an offer of employment is extended. In addition to the Employment Application, applicants must provide any vital information, resume, or other written material required. The application must include the applicant’s education, employment, references, and experience working with children. CASA relies upon the accuracy of information contained in the employment application as well as the accuracy of other data provided by the applicant throughout the hiring process. Any misrepresentation, falsification or material omission in any of this information will result in the exclusion of the individual from further consideration or, if the person has been hired, termination of employment. If the applicant refuses to sign the release of information or submit to any of the checks required, CASA will automatically reject the application.

An EEO Inquiry Form must be requested of all candidates. The candidate has the option to complete or decline to complete this form. It is used for applicant tracking purposes only and is neither maintained with the applicant file nor considered as part of the hiring decision.

**Interviewing and Testing**

The hiring supervisor selects from among candidates expressing an interest in a position whose skills, education, and experience suit the position. The following steps are followed:

- Conduct a thorough review of the applicant’s written résumé or application.
- Have at least one in-person interview.
- Contact each of the applicant’s three references, by mail or telephone, to ascertain appropriateness
for the position.

Candidates will be invited to interview with the hiring supervisor, and others as necessary and appropriate. Where applicable, work sampling and other valid testing will be conducted in a consistent manner to allow applicants the opportunity to demonstrate relevant skills and abilities.

Any offer of employment made to job applicants whose work will require driving for CASA must be made contingent upon the applicant's meeting special safety requirements.

**Background Check**

CASA strives to provide the safest possible environment for employees, volunteers and clients. In an effort to maintain a safe environment CASA will conduct criminal background checks on all applicants that are finalist for any position with CASA. An applicant who declines to consent to the criminal background check will not be allowed to continue the employment process.

Potential and existing staff is required to cooperate with a complete criminal record investigation through the Texas Department of Family and Protective Services (DFPS) and any agency or entity CASA may utilize to assist in the investigation annually. No person is considered qualified who has had prior convictions for child abuse or neglect, or related acts that would pose a risk to children or to the program's credibility.

The CEO will determine the necessity of subsequent background checks for employees who have a background check on file and who are being promoted or transferred to a new position. Factors to be considered will be previous background check and duties and responsibilities of the new position. Circumstances may also arise for which background checks of current employees will be necessary in order to determine whether their employment status with the organization should be changed. This process is necessary to ensure that individuals are selected or retained who possess the qualifications to perform the duties of the position most effectively and who are best able to serve CASA.

Background checks may include but not be limited to: confirmation of the individual's identity; child abuse registry records, credit information; review of an individual's criminal conviction record, if any; verification of any license, certificate, or degree required for the position. The CEO will designate what checks are necessary based upon the position being filled.

Individuals will be made aware of the background check procedures during the application process. Background checks will not be conducted without written consent of the applicant. CASA secures the records checks in any area in which the person has resided in the previous five years – of the prospective employee has lived in another state within the past five years. Appointment to or continued employment in a specified position is contingent upon an acceptable background check.

**Candidates for staff will be eliminated for consideration based on, but not limited to, the following guiding principles:**

- Zero tolerance for all registered sex offenders.
- Zero tolerance for all convictions of crimes against children.
- Zero tolerance for all convictions of violent acts.
- Felony convictions involving a motor vehicle in the last ten (10) years or misdemeanor DWI offense in the last ten (10) years.
- Any other offense that could hurt the credibility of the CASA organization will be considered on a
case-by-case basis.

- CASA will not employ applicants if they have been convicted, or have prior charges, or have charges pending for a felony or misdemeanor involved in a sex offense, violent act, child abuse or neglect or related acts that would pose risks to children or the CASA program’s credibility.

The CEO will determine a list of the types of checks that will be required of the specified positions based upon the responsibilities of the position. The Human Resources Coordinator will maintain the list. Only those types of checks where there is a clear connection between the duties or nature of the position and the need for this information will be requested. Some positions for which a credit and/or criminal background check might be appropriate are those where the employee would handle currency; have access to confidential information and/or the capability to create, delete or alter records; have routine access to building master control and key systems; or, work in an area of which CASA has been designated as a security-sensitive area.

The Human Resources Coordinator is responsible for ensuring that the Disclosure and Authorization form (Background Investigation Consent form) required by the Fair Credit Reporting Act (FCRA) is completed. No credit background check may be requested until this form is completed. If the candidate/employee refuses to sign the Disclosure and Authorization Form, no further consideration for employment will be given to this individual.

The Human Resources Coordinator will send, via the internet, the background check request to Public Data.com and the Department of Family and Protective Services, and/or the current background check agency of record. The hiring manager will review and evaluate all information obtained in the Background Investigation.

If adverse action is to be taken based in whole or in part on the information obtained from the background check, additional provisions must be followed. Prior to taking adverse action, the Human Resources Coordinator must provide the candidate/employee with a copy of the background check report. Information will be shared with the hiring department manager and/or supervisor of current employee and the Human Resources Coordinator.

Any discrepancy between information provided by the applicant on application materials and the information obtained during the background investigation must be explained and documented. The candidate/employee must sign a statement of explanation, which is then attached to the background investigation paperwork and put in the applicant’s personnel file. If an applicant has reason to believes that ethical standards were not adhered to in deriving the criminal background check, he or she may appeal in writing to the CEO within fourteen (14) calendar days of receiving the notice of the results.

**Motor Vehicle Check**

The Motor Vehicle check is not only a pre-employment condition, but also a continuing employment condition for all employees who by job classification are required to operate a vehicle while conducting CASA business. All employees who operate privately owned vehicles in the service of CASA must maintain both an appropriate valid Texas driver’s license and personal liability insurance coverage that meet the least minimum liability coverage standards that are mandated by the laws of the State of Texas. A motor vehicle check will be conducted annually. Failure to maintain a favorable driver’s record is cause for termination.

**References**
It is the policy of CASA to check the employment references of all prospective employees to ensure that individuals who are employed by CASA are well qualified and have a strong potential to be productive and successful. Candidates must submit the names of three (3) or more references at least two (2) of whom are unrelated to the applicant.

The hiring manager conducts telephone reference checks before an offer of employment is extended. Telephone reference checks will be documented on CASA’s Telephone Reference Form. At the CEO’s option, employment can be delayed awaiting written reference information. Where applicable, the Human Resources Coordinator also checks transcripts to verify educational credentials.

**Employment Offers**

Offers of employment, including starting salaries and other terms, will be coordinated through the Human Resources Coordinator. In no case should a supervisor, manager, or department enter into a formal or informal contract of employment with a prospective employee by making promises, oral or written, which would negate CASA’s employment-at-will status.

**Notice to Previous Employer**

External candidates should be encouraged and allowed to give appropriate notice to their current employer, when applicable. An internal candidate who accepts another position in CASA must provide the current department with a minimum of two weeks advance notice before transfer to the new position. Exceptions may be made by agreement of the current and new departments.

**EEO Applicant Summary**

Prior to making an offer to the candidate selected, the Human Resources Coordinator will fill out an EEO Applicant Summary Form indicating the applicants who were considered, the applicant selected, and the reason the rejected applicants were not chosen.

**Unsolicited Applications and Resumes**

CASA does not accept unsolicited applications and resumes.
Supervisors wishing to hire an employee who terminated employment with CASA in the previous year must obtain approval from the CEO. The Employee Status Form must indicate “reinstatement” so that the employee’s hire date will be adjusted and benefits reinstated, if applicable. CASA may reinstate an employee who has resigned his/her employment and returns within one (1) year. In these cases, the employee will retain his/her original employment date and length-of-service for benefit and leave purposes. Reinstatement may be at the same or a different position and/or salary. An employee who terminates and withdraws funds from CASA’s retirement plan during the time he/she is not employed with CASA is not eligible for reinstatement of vesting schedules, but may be rehired.

Upon reinstatement, the following applies:

- If a trial period has been completed, the employee will not be required to serve another trial period, provided he/she is being re-employed in the same or similar position.

- Time previously served toward a periodic salary increase will be credited, provided he/she returns to a position of like or lower classification and grade.

- The assigned salary rate may be above entry level for the grade.
CASA employees, volunteers, and board members are expected to report any suspicion of child abuse. Texas law requires you to report abuse immediately. Professionals, such as you, must report suspected abuse within 48 hours.

1. Child abuse and neglect are against the law in Texas, and so is failure to report it.

2. If you suspect a child has been abused or mistreated, you are required to report it to the Texas Department of Family and Protective Services at 1-800-252-5400.

3. If you observe a child being abused or mistreated, you are required to call local law enforcement or call 911.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-26</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Resignation and Termination</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td>6/13/11</td>
<td>✓ Non-exempt</td>
</tr>
</tbody>
</table>

We hope you will find a rewarding and enjoyable employment experience with CASA; however, we realize that for one reason or another, sometimes the employment relationship must end.

**Resignation**

There are many reasons why some people choose to leave their employers. If you decide to leave CASA, here are a few things you might like to know:

Although not required, CASA would like you to provide your supervisor at least two weeks written notice of your intention and reasons (at your discretion) to leave. This notice will allow CASA time to review the circumstances, consider alternatives, prepare final paychecks, and begin arranging for your replacement.

Depending on the circumstances, during the two-week notice period CASA may choose to:

1. Enlist your support in maintaining your position and possibly in training a replacement;
2. Reassign your duties and request your attention on other projects; or
3. End the working relationship at any time during the notice period.

CASA’s actions will be based on the nature of your position, your past performance, your performance, and actions demonstrated after notice is given, and the business needs of CASA. At any rate, it should be understood that the only legal obligation CASA has is payment for hours actually worked. Your date of separation will be determined based on the last day you are actively at work. Paid-time-off will not be used to extend your period of employment.

The following rules apply to resignation:

1. A last day coinciding with a CASA observed holiday will be considered effective the last day actually worked preceding the holiday.
2. CASA does not pay holiday pay for holidays occurring after separation of employment.
3. To expedite the delivery process of the final pay check promptly submit expense reports, time cards, equipment, credit cards, identification cards, keys, proprietary documents, manuals, property, and any other property belonging to CASA.
4. Ensure the Human Resources Coordinator has your correct mailing address for the final paycheck and future W-2.
5. If you have been covered under CASA’s group health benefits and insurance plans, you may have conversion rights and, in most cases, eligible for COBRA. These rights allow you to purchase benefits or insurance protection from our group health plan or present insurance providers without providing evidence of insurability.

**Termination**
This is an end of the employment relationship initiated by the employer. Since employment with CASA is at-will, both the employee and CASA have the right to end the employment relationship with or without cause, and with or without notice.

Employees leaving CASA are responsible for returning all company property such as but not limited to calendars, manuals, keys, and files.

**Exit Interviews**

Upon leaving CASA’s service, you may be asked for your comments concerning your period of employment. Your input helps us to evaluate our policies, procedures, benefits, work environment, and other variables affecting your employment experience with us. Exit interviews are scheduled with the Human Resources Coordinator. In addition to soliciting input on the employment experience as a whole, the employee will be contacted by CASA’s third party administrator regarding information such as continuation of health insurance under COBRA.

**References and Recommendations**

It is the policy of CASA not to provide references regarding former employees, unless given written authorization and release from the former employee. CASA will only verify dates of employment, the position held, and rate of pay. Requests for references should be directed to the Human Resources Coordinator or the CEO. If you have any questions or concerns, please see the Human Resources Coordinator.
An employee must not solicit a contribution from another employee for a gift to an official superior, make a donation as a gift to an official superior, or accept a gift from an employee receiving less pay than him. However, this does not prohibit a voluntary gift of nominal value or donation in a nominal amount made on a special occasion such as marriage, illness, birth of a child, or retirement. An employee will not be required to contribute to any fund or collection. No solicitation or office collection may proceed without the approval of the CEO.

Solicitation of funds by CASA employees for anything of value for any purpose is permitted on the job, as long as it is on voluntary basis. No employee may be required to contribute or be penalized in any way for his or her response to the solicitation.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-28</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Substance Abuse</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td>3/17/11, Board approved</td>
<td>✓ Non-exempt</td>
</tr>
</tbody>
</table>

The purpose of this policy is to assure worker fitness for work and to protect our Board of Directors, volunteers, employees and the public from risks posed by the misuse of alcohol and use of prohibited drugs.

Child Advocates San Antonio (CASA) is committed to maintaining a safe and productive work environment. The abuse of alcohol and drugs can impair employee performance and jeopardize the safety of employees and other persons. The purpose of this policy is to help ensure the work environment remains free of alcohol, drug use and abuse. CASA is also dedicated to providing a healthy, satisfying, drug-and-alcohol-free work environment for its employees, volunteers, and clients. These obligations are severely jeopardized by an employee or volunteer who is unfit for work due to drug or alcohol usage.

Drugs and/or alcohol usage can cause work performance problems such as accidents and excessive absenteeism. It can cause sickness and workplace injuries resulting in higher health care and workers’ compensation premiums. Drug and/or alcohol usage is also the cause of workplace accidents, damage to property and equipment, threats to public safety, including passengers and the general public and poor workplace decisions. Finally, drugs and/or alcohol usage can cause significant harm to CASA’s public image.

The Substance Abuse Policy mandates discipline up to and including discharge, depending upon circumstances. CASA’s Substance Abuse Policy has been adopted by the Board of Directors. This policy applies to the Board of Directors, all employees, paid part-time employees, volunteers, contract employees and contractors when they are on CASA property or when performing any CASA business. This policy applies to off-site lunch periods or breaks when an employee is scheduled to return to work.

**PROHIBITION**

**Manufacture, Trafficking, Possession and Use**

All CASA employees are prohibited from engaging in the unlawful manufacturing, distribution, dispensing, possession or use of prohibited substances or an unprescribed controlled substance(s) while performing CASA business. The effect of this abuse on an employee’s job performance is costly to the employee, his/her family and to the employer. In place is a testing procedure whose purpose is to ensure a drug-free and alcohol-free workplace. Employees who violate this provision will be terminated. Law enforcement will be notified, as appropriate, where criminal activity is suspected.

**Intoxication/Under the Influence**

Any individual who is reasonably suspected of being intoxicated, impaired, under the influence of a prohibited substance, or not fit for work will be suspended from job duties pending an investigation and verification of condition. Employees who fail to pass a drug or alcohol test will be removed from work. A drug or alcohol test is considered positive if the individual is found to have a quantifiable presence of a prohibited substance in the body above the minimum thresholds. Employees found unlawfully using, impaired by, or under the influence of, controlled substance(s) in the workplace will be immediately discharged.

60
**Alcohol Use**

The serving and controlled consumption of alcoholic beverages or products at CASA authorized events, or the possession of unopened alcoholic beverages or products in an employee’s personal vehicle while on CASA time, property or work location is not prohibited.

No employee should report for work or remain at work when his/her ability to perform assigned duties is adversely affected by alcohol or when his/her breath alcohol concentration is 0.04 or greater. No employee will use alcohol while at work.

The use of beverages containing alcohol or substances including any medication, mouthwash, food, candy or any other substance such that alcohol is present in the body while performing business is prohibited. The concentration of alcohol is expressed in terms of grams of alcohol per 210 liter of breathe as measured by a breathe-testing device.

**Legal Drugs**

The appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. However, the use of any substance which carries a warning label that indicates that mental functions, motor skills, or judgment may be adversely affected must be discussed by employees with their appropriate health care professional before performing work-related duties. Educational information regarding prescription and over-the-counter medications should be obtained from either a health care professional or pharmacist. Employees are urged strongly to seek and obtain medical advice prior to using prescription or over-the-counter drugs that may adversely affect his/her ability to safely operate or maintain vehicles.

A legally prescribed drug means that the individual has a prescription or other written approval from a physician for the use of a drug in the course of medical treatment. If the employee tests positive for drugs, he/she must provide within 24 hours a valid prescription. A valid prescription includes the patient’s name, the name of the substance, quantity/amount to be taken and the time period of the authorization. The misuse or abuse of legal drugs while performing business or on the premises is prohibited.

**PRE-EMPLOYMENT SCREENING**

All candidates who have been conditionally offered employment may be screened and tested for drugs as part of CASA pre-employment screening. Pre-employment drug tests may be administered only after the applicant has signed a consent form. Failure of a pre-employment drug test will disqualify an applicant for employment at CASA. Any attempt to tamper with a urine sample will disqualify an applicant for employment at CASA.

**POST-ACCIDENT TESTING**

Any employee involved in a work-related accident causing a fatality, bodily injury, property damage or any other incident which results in harm or damage will be required to submit to alcohol and drug testing as directed by the CEO. Refusal by an employee to submit to post-accident testing will be considered grounds for termination of employment.
Following an accident, the employee will be required to submit to a drug and alcohol test. Post-accident testing will be done as soon as possible and no later than (8) eight hours after the accident for alcohol testing and (32) thirty-two hours after the accident for drug testing. An employee involved in an accident must not use alcohol until after the employee undergoes alcohol testing or eight hours have elapsed, whichever comes first.

**COMPLIANCE WITH TESTING REQUIREMENTS**

All employees will be subject to urine drug testing and breathe alcohol testing. Any employee who refuses to comply with a request for testing will be removed from work, and consequences will be assessed. CASA will consider the test refusal to be a positive test. Any employee who is suspected of providing false information in connection with a test, or who is suspected of falsifying test results through tampering, contamination, adulteration, or substitution will be required to undergo an observed collection. Verification of these actions will result in the employee’s removal from work and his/her employment terminated. Refusal can include an inability to provide a sufficient urine specimen or breathe sample without a valid medical explanation, as well as, a verbal declaration, obstructive behavior, or physical absence resulting in the inability to conduct the test.

**REASONABLE SUSPICION TESTING**

All employees may be subject to a fitness-for-work evaluation, urine and/or breathe testing when there are reasons to believe that drug or alcohol use is adversely affecting job performance. When, in the opinion of CASA management or supervisory personnel, there is reasonable suspicion that alcohol or drugs have been brought into the workplace, an investigation will be conducted. Appropriate disciplinary action will be taken if it is determined that violations of CASA policies have occurred.

When, in the opinion of CASA management, there is reasonable suspicion that an employee is under the influence of alcohol or drugs, he/she will be relieved from work, taken to a medical facility or CASA specimen collection site, and screened for alcohol and/or drugs by trained personnel. The employee will be suspended with pay until test results are received. The test results will be provided to the CEO who will inform the employee’s department manager and initiate appropriate action if necessary. The refusal by an employee to submit to testing under these circumstances will result in termination of employment.

A reasonable suspicion referral for testing will be made on the basis of specific, contemporaneous, and articulable observations concerning appearance, behavior, speech, or body odors of the employee consistent with possible drug use or alcohol misuse. An employee is reasonably suspected of prohibited drug use or alcohol misuse when a trained supervisor or other CASA authorized official can:

- Substantiate specific behaviors that may indicate drug use or alcohol misuse.
- Identify job performance problems that may indicate prohibited drug use or alcohol misuse.
- Actually observe physical indications that prohibited drug use or alcohol misuse may be occurring.

A supervisor or other CASA authorized official must make reasonable suspicion referrals. To make reasonable suspicion determinations, supervisors must be trained on the facts, circumstances, physical evidence, physical signs and symptoms, or patterns of performance and/or behaviors associated with drug use and/or alcohol misuse. One
supervisor will complete CASA’s “Reasonable Suspicion” form, but two or more trained supervisors may participate in the reasonable suspicion determination process. A copy of the completed form will be given to the employee.

RANDOM TESTING

The selection of safety-sensitive employees for random drug and alcohol testing will be made using a scientifically-valid method that ensures each covered employee that they will have an equal chance of being selected each time selections are made. The random tests will be unannounced and spread throughout the year at full discretion of the organization. All employees will be placed in a common selection pool. Each employee in this pool will be matched with a unique random selection number. Through the use of a computer-based random number generation program, the required number of persons will be selected for each testing cycle throughout the year. All employees in the pool will remain in the random selection pool at all times throughout the year regardless of whether or not they have been previously selected. The CASA Designated Employer Representative (DER) will access the selection pool numbers. Notification will be made to those who must submit a specimen or complete an alcohol breath test. The test may be completed prior to, during or after the employee’s work shift. Employees are required to proceed immediately to the collection site upon notification of the random selection. As soon as the urine specimen is collected or breath test is completed the employee will be required to return to work, unless the breath test is not negative. The refusal by an employee to submit to random testing will result in termination of employment.

RETURN TO WORK TESTING

All employees who previously tested positive on a random drug or alcohol test must test negative (below 0.02 for alcohol) and be evaluated and released to work by an external Substance Abuse Professional before returning to work. The return to work results will be provided by the external Substance Abuse Professional to the CASA DER. The employee will also be required to submit to unannounced follow-up testing for a period designated by following his/her return to work. If an employee refuses the return-to-work test or follow-up testing he/she will be considered as having a second positive drug or alcohol test and his/her employment with CASA will be terminated.

EMPLOYEE SEARCHES

CASA may conduct searches of employees, their personal possessions and/or vehicle if brought into CASA work areas or onto CASA property when reasonable suspicion exists in the opinion of CASA management or supervisory personnel that illegal activity such as, but not limited to, theft or possession, sale or use of a prohibited substance is occurring or has occurred. Except under emergency conditions, searches of employee possessions and/or vehicle will only be made in the presence of the employee. Employees who refuse to consent to reasonable search under the provisions of this policy are subject to disciplinary action, up to and including termination of employment.

CORRECTIVE AND DISCIPLINARY ACTION

Any employee who is determined to be involved in manufacturing, consuming, distributing, possessing, dispensing, or selling drugs or who tests positive for drugs will be terminated from employment. Positive test for drugs means that a controlled substance for which there is no licensed physician’s prescription for its legal use has been detected by
laboratory tests in excess of the tolerances noted in Section XIII.A.3. An employee, who switches, adulterates or in any way tampers, or attempts to tamper with any urine sample submitted for drug testing will be terminated from employment. Furthermore, any employee for which the external Medical Review Officer (MRO) and/or the testing laboratory has designated a urine sample as canceled and/or invalid because of tampering, CASA management may require additional testing and may also result in disciplinary action, up to and including termination of employment.

An employee who fails to notify CASA of any conviction under criminal drug statutes within five days of the conviction will be terminated from employment.

An employee who (1) refuses to consent to drug testing or submit a urine sample for drug testing when directed by CASA; or (2) refuses to sign the CASA acknowledgment form agreeing to abide by this policy and procedure; or (3) refuses to complete and sign the drug testing custody and control form after submission of a urine specimen; or (4) fails to report for a drug test after being notified and directed to do so and lacks a credible reason/explanation for not reporting for testing will be terminated from employment.

An employee who tests at 0.04% Breath Alcohol Content (BAC) but under 0.10% for post accident or reasonable suspicion for a first offense will immediately be counseled by supervision and relieved from work without pay in accordance with the CASA Policy for Administration of Discipline. A second offense occurring within 60 months of the first offense will result in immediate removal from work without pay and the employee will be placed on probation. A third offense occurring 60 months from the first offense will result in termination from employment unless the employee agrees to participate in a local substance abuse program referred by CASA. Any subsequent testing that results in 0.04% BAC or above within 60 months of the first offense will result in termination of employment.

An employee who tests at 0.10% and above BAC for post accident or reasonable suspicion testing will be terminated unless he/she agrees to participate in and successfully completes a local substance abuse program referred by CASA. Upon completion of the substance abuse program, any subsequent test occurring within 60 months of acceptance in the substance abuse program resulting in 0.04% and above BAC will result in termination.

If an employee fails to provide an adequate amount of breath for alcohol testing and/or the test is determined to be canceled and/or invalid, CASA Management may require that evaluation by an external MRO be conducted to determine the medical ability and/or the medical condition that has precluded the employee from providing an adequate breath sample. If none is found, the employee will be required to be tested again, and may be subject to disciplinary action, up to and including termination from employment.

An employee, who consumes alcohol while considered to be on work, including break or meal periods, will be subject to disciplinary action up to and including termination from employment.

Disciplinary action for the use of alcohol under this policy will not preclude disciplinary action pursuant to other CASA policies.

CONSEQUENCES OF A POSITIVE TEST
CASA maintains a zero tolerance policy for the following types of tests: Pre-employment, post-accident, and reasonable suspicion. A verified positive test for either post-accident or reasonable suspicion will result in an employee’s immediate termination of employment with CASA.

DEFINITIONS

The following definitions apply to terms used in this policy:

- "Drug" means any controlled substance or dangerous drug, including inhalants as defined by State and Federal laws and regulations.

- "Reasonable suspicion" means a suspicion that would be held by an ordinary and prudent person in the same circumstances as the individual who obtains information or evidence that a violation of this policy has occurred.

- "Test positive for drugs" means that a controlled substance for which there is no licensed physician's prescription for its legal use has been detected by laboratory tests in excess of the following:

<table>
<thead>
<tr>
<th>Drug</th>
<th>Initial Test</th>
<th>Confirmatory Test</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amphetamines</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Methamphetamine</td>
<td>1000 ng/ml</td>
<td>500 ng/ml</td>
</tr>
<tr>
<td>Amphetamine</td>
<td>1000 ng/ml</td>
<td>500 ng/ml</td>
</tr>
<tr>
<td>Cocaine Metabolites</td>
<td>300 ng/ml</td>
<td>150 ng/ml</td>
</tr>
<tr>
<td>Marijuana Metabolites</td>
<td>50 ng/ml</td>
<td>15 ng/ml</td>
</tr>
<tr>
<td>Opiates</td>
<td>300 ng/ml</td>
<td>300 ng/ml</td>
</tr>
<tr>
<td>Codeine</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Morphine</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phencyclidine</td>
<td>25 ng/ml</td>
<td>25 ng/ml</td>
</tr>
</tbody>
</table>

Illegally used controlled substances include any drug not approved for medical use by the U.S. Drug Enforcement Administration or the U.S. Food and Drug Administration. Illegal use includes use of any illegal drug, misuse of legally prescribed drugs and use of illegally obtained prescription drugs.

PROCEDURES

Not Negative Alcohol Test

If an employee tests between 0.02 and 0.04 on an alcohol test, the employee will be removed from work for eight hours or unless a retest results in a concentration less than 0.02. This absence will be considered an unexcused absence subject to CASA’s disciplinary procedures.
Proper Application of the Policy

CASA is dedicated to assuring fair and equitable application of this substance abuse policy. Therefore, supervisors/managers are required to use and apply all aspects of this policy in an unbiased and impartial manner. Any supervisor/manager who knowingly disregards the requirements of this policy, or who is found to deliberately misuse the policy in regard to subordinates, will be subject to disciplinary action, up to and including termination of employment.

Voluntary Treatment

CASA encourages employees to seek treatment voluntarily. An appropriate leave of absence may be granted for treatment and rehabilitation. Employees who do not have health insurance coverage are responsible for the entire cost of any recommended/referred treatment or rehabilitation services.

Voluntary requests for treatment must be made prior to any pending drug/alcohol test or disciplinary action. Employees will not be disciplined for requesting treatment, but will be expected to observe job performance standards and work rules as they apply to every employee. Any decision to seek help through CASA will not interfere with an employee’s eligibility for promotional opportunities. Confidentiality of information will be maintained at all times.

Confidentiality

CASA affirms the need to protect individual dignity, privacy and confidentiality throughout the testing process. Laboratory reports or test results will not appear in an employee’s general personnel file. Information of this nature will be contained in a separate confidential medical folder that will be kept under the control of the Human Resources Coordinator. The reports or test results may only be disclosed without an employee’s consent when:

1. The information is compelled by law or by judicial or administrative process;

2. The information has been placed at issue in a formal dispute between the employee and employer.

The employee must sign releases any time substance-testing information is to be released to the employee, union representatives, subsequent employers, and to any other third party designated by the employee.

Testing Procedures

Urine drug testing and breathe testing for alcohol may be conducted when circumstances warrant or as required by federal regulations. All employees will be subject to drug testing prior to employment, for reasonable suspicion, random and following accidents while on the job. Testing will be conducted in a manner to assure a high degree of accuracy and reliability and using techniques, equipment and laboratory facilities that have been approved by the U.S. Department of Health and Human Services (DHHS).

The drugs that will be tested for include marijuana, cocaine, opiates, amphetamines, and phencyclidine. An initial drug screen will be conducted on each urine specimen. For those specimens that are not negative, a confirmatory Gas Chromatography/Mass Spectrometry (GC/MS) test will be performed. The test will be considered positive if the amounts present
are above the minimum thresholds established. In instances where there is reason to believe an employee is abusing a substance other than the five drugs listed CASA reserves the right to test for additional drugs under CASA’s own authority using standard laboratory testing protocols.

All drug testing laboratory results will only be released to and reviewed by a qualified external MRO in order to verify and validate test results. The external MRO will release findings only to a CASA DER. An external MRO will be a licensed physician who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an individual’s confirmed positive test result.

The external MRO will review and interpret an individual’s medical history, including any medical records and biomedical information provided; affording the individual an opportunity to discuss the test result; and decide whether there is a legitimate medical explanation for the result, including legally prescribed medication.

Tests for breath alcohol concentration will be conducted utilizing a National Highway Traffic Safety Administration (NHTSA) approved evidential breath-testing device (EBT) operated by a trained breath alcohol technician (BAT). All breath alcohol test results will be reported only by an external MRO or BAT to a CASA DER. If the initial test indicates an alcohol concentration of 0.02 or greater, a second test will be performed to confirm the results of the initial test. A safety-sensitive or non-safety-sensitive employee who has a confirmed alcohol concentration of greater than 0.02 but less than 0.04 will be removed from his/her position for eight hours unless a retest results in a concentration measure of less than 0.02. The inability to perform a safety-sensitive or non-safety-sensitive work due to an alcohol test result greater than 0.02 but less than 0.04 will be considered an unexcused absence or lose out subject to CASA’s disciplinary procedures. An alcohol concentration of 0.04 or greater will be considered a positive alcohol test and in violation of this policy employees. Any employee that has a confirmed positive drug or alcohol test will be removed from his/her position, informed of educational and rehabilitation programs available and referred to a Substance Abuse Professional (SAP) for assessment.

**Compensation for Testing**

CASA will pay employees for drug or alcohol testing according to the following:

**Paid Testing:** (random, reasonable suspicion, follow-up, post injury and post-accident testing). In the case of drug testing, employees will be paid from the time they are notified of the testing and relieved of job duties or from the time they leave CASA’s property until such time as they are released by the supervisor escorting the employee.

In the case of alcohol testing at CASA the employee will be paid from the time they report to the appropriate office until they have completed the test.

**Unpaid Testing:** (pre-employment, pre-promotion or transfer, and return-to-work) Pre-employment, pre-promotion or transfer and return-to-work testing will not be compensable.

**Follow-Up Testing**

Employees that have tested positive on a random test will be required to undergo frequent, unannounced random urine and/or breathe testing following their return to work after a positive drug/alcohol test and treatment. The follow-up testing will be performed for a period of one to five years based on the SAP’s recommendations, however, a minimum of six tests to be performed the first year.
Designated Employer Representative (DER):

Human Resources Coordinator
Address: 406 San Pedro Ave., San Antonio, TX 78212
Telephone Number: 210-225-7070

Attachment A
Alcohol Fact Sheet

Alcohol is a socially acceptable drug that has been consumed throughout the world for centuries. It is considered a recreational beverage when consumed in moderation for enjoyment and relaxation during social gatherings. However, when consumed primarily for its physical and mood-altering effects, it is a substance of abuse. As a depressant, it slows down physical responses and progressively impairs mental functions.

Signs and Symptoms of Use

- Dulled mental process
- Lack of coordination
- Odor of alcohol on breath
- Possible constricted pupils
- Sleepy or stupor use condition
- Slowed reaction rate
- Slurred speech

(Note: Except for the odor, these are general signs and symptoms of any depressant substance.)

Health Effects

The chronic consumption of alcohol (average of three servings per day of beer (12 ounces), whiskey (1 ounce), or wine (6 ounce glass) over time may result in the following health hazards:

- Decreased sexual functioning
- Dependency (up to 10 percent of all people who drink alcohol become physically and/or mentally dependent on alcohol and can be termed “alcoholic”)
- Fatal liver diseases
- Increased cancers of the mouth, tongue, pharynx, esophagus, rectum, breast and malignant melanoma
- Kidney disease
- Pancreatitis
- Spontaneous abortion and neonatal mortality
- Ulcers
- Birth defects (up to 54 percent of all birth defects are alcohol related).

Social Issues

- Two-thirds of all homicides are committed by people who drink prior to the crime.
- Two to three percent of the driving population is legally drunk at any one time. This rate is doubled at night and on weekends.
- Two-thirds of all Americans will be involved in an alcohol-related vehicle accident during their lifetimes.
- The rate of separation and divorce in families with alcohol dependency problems is 7 times the average.
- Forty percent of family cases are alcohol problem related.
- Alcoholics are 15 times more likely to commit suicide than are other segments of the population.
- More than 60 percent of burns, 40 percent of falls, 69 percent of boating accidents, and 76 percent of private aircraft accidents are alcohol related.

The Annual Toll

- 24,000 people will die on the highway due to the legally impaired driver.
- 12,000 more will die on the highway due to the alcohol-affected driver.
- 10,000 will die due to alcohol-induced brain disease or suicide.
- Up to another 125,000 will die due to alcohol-related conditions or accidents.

Workplace Issues

- It takes one hour for the average person (150 pounds) to process one serving of an alcoholic beverage from the body.
- Impairment in coordination and judgment can be objectively measured with as little as two drinks in the body.
- A person who is legally intoxicated is 6 times more likely to have an accident than a sober person.
Substance abuse, the misuse of drugs and alcohol, is not a new issue, but it is one of growing concern to employers. Substance abuse is a problem in the workplace. Research has shown that substance abuse affects organizations, as evidenced by increased medical benefit claims, increased absenteeism, increased worker’s compensation claims, and decreased productivity. Substance abuse poses serious safety and health risks not only to the user, but also to those who work with or come into contact with the user. As a result, employers have become even more concerned about the misuse of drugs and alcohol by employees.

**Alcohol Facts**

Alcohol, when consumed primarily for its physical and mood-altering effects, is a substance of abuse. As a depressant it slows down physical responses and progressively impairs mental functions. Signs and symptoms of use include dulled mental processes, lack of coordination, odor of alcohol on the breath, slowed reaction rate, and slurred speech. The chronic consumption of alcohol over time may result in decreased sexual functioning, dependency, fatal liver disease, kidney disease, and birth defects.

**Amphetamine Facts**

Amphetamines are central nervous system stimulants that speed up the mind and body. Signs and symptoms of use include hyper excitability, restlessness, confusion, panic, talkativeness, inability to concentrate, and heightened aggressive behavior. Regular use produces strong psychological dependence and increasing tolerance to the drug.

Low-dose amphetamine use will cause short-term improvement in mental and physical functioning. With greater use, however, the effect reverses and has an impairing effect. Hangover effect is characterized by physical fatigue and depression, which may make operation of equipment of vehicles dangerous.

**Cocaine Facts**

Cocaine is abused as a powerful physical and mental stimulant; the entire central nervous system is energized. Signs and symptoms of use include financial problems, increased physical activity and fatigue, isolation and withdrawal from friends and normal activities, unusual defensiveness, anxiety, agitation, and wide mood swings. Cocaine use caused the heart to beat faster and harder and rapidly increases blood pressure. Cocaine causes spasms of blood vessels in the brain and heart and can lead to ruptured vessels causing strokes or heart attacks. Extreme mood and energy swings create instability. Work performance is characterized by forgetfulness, absenteeism, tardiness and missed assignments.

**Marijuana Facts**

People use marijuana for the mildly tranquilizing, mood altering and perception altering effects it produces. Signs and symptoms of use include reddened eyes, slowed speech, chronic fatigue, and lack of motivation. Chronic smoking of marijuana causes emphysema-like conditions. Regular use can cause diminished concentration, impaired short-term
memory, impaired signal detection, and impaired tracking (the ability to follow a moving object with the eye).

**Opiates (Narcotics) Facts**

Opiates (also called narcotics) are drugs that alleviate pain, depress body functions, and when taken in large doses, cause a strong euphoric feeling. Signs and symptoms of use include mood changes, impaired mental functioning, depression and apathy, impaired coordination, and physical fatigue and drowsiness. IV needle users have a high risk for contracting hepatitis and AIDS due to sharing of needles. Unwanted side effects of opiates such as nausea, vomiting, dizziness, mental clouding, and drowsiness place the legitimate user and abuser at higher risk for an accident. Workplace use may cause impairment of physical and mental functions.

**Phencyclidine (PCP) Facts**

Phencyclidine acts as both a depressant and a hallucinogen, and sometimes a stimulant. Signs and symptoms of use include impaired coordination, severe confusion and agitation, extreme mood shifts, rapid heartbeat, and dizziness. The potential for accidents and overdose is high due to the extreme mental effects combined with the anesthetic effect on the body. PCP use can cause irreversible memory loss, personality changes, and thought disorders.
Acknowledgement and Receipt of CASA
Policy and Procedure for Drugs and Alcohol Use and Abuse

I hereby acknowledge that I have received a copy of the above mentioned policy and procedure and understand its contents. I agree to abide by the requirements and provisions of this policy and procedure.

_________________________________________  _________________________________
Employee Name (Print)                      Employee Number

_________________________________________  _________________________________
Job Title (Print)                            Social Security Number

_________________________________________  _________________________________
Employee Signature                          Date (Month/Day/Year)

_________________________________________  _________________________________
Supervisor's Signature                      Date (Month/Day/Year)

NOTE: Please return this acknowledgement form to Human Resources within five (5) days from the date the policy is provided to you.
Authorization for Testing and Release of Medical Reports and Records

I recognize the need for CASA to ensure employee safety by maintaining a work environment that is free of the effects of the use and abuse of alcohol, drugs, and other controlled substances. Therefore, I hereby consent to let any necessary samples of urine, breath and/or blood be taken and tested to determine the presence or absence of drugs and alcohol in my system. I also authorize the release of the results of these tests to the CASA Medical Review Officer or Substance Abuse Professional and authorized CASA personnel.

I understand that this information will be used for the purpose of determining compliance with the CASA Policy for Drugs and Alcohol Use and Abuse and eligibility for job-related injury benefits.

________________________________________________________________________
Employee Name (Print)

________________________________________________________________________
Employee Signature                                      Date  (Month/Day/Year)

________________________________________________________________________
Witness Signature                                       Date  (Month/Day/Year)
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>3-29</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Transporting Children</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td>6/14/11</td>
<td>✓ Non-Exempt</td>
</tr>
</tbody>
</table>

When transporting CASA children or their family members, it is extremely important to consider their safety as well as your own safety. All applicants must provide a copy of a valid current driver’s license and adequate personal automobile insurance.

The following guidelines must be adhered to when transporting CASA children or their family members:

1. Only employees with valid current driver’s license are allowed to transport children and family members.

2. A CASA employee should only transport a child when there is liability insurance coverage for such activity.

3. The employee must have written permission of the child’s legal guardian or custodial agency before transporting a child.

4. The employee must obtain permission of the supervisor or director.

5. The employee must be knowledgeable of the potential personal risk of liability and choose to accept the responsibility.

6. CASA employees who have received three (3) or more traffic citations (moving or non-moving) in the last three (3) months or who have been involved in three (3) or more vehicular accidents in the last twelve (12) months are prohibited from transporting children or family members.

7. Employees who have been convicted of DWI or DUI (Driving While Intoxicated or Driving under the Influence) within the last ten (10) years will not be permitted to serve as Court Appointed Special Advocates and may not transport a CASA child or family member.

8. CASA employees transporting a CASA child or the child’s family member(s) will abide by all Texas Department of Transportation laws.

9. The employee must have written permission from the Texas Department of Family and Protective Services.

CASA employees are responsible for the passengers in their vehicle. The driver will not begin to transport any person(s) until such person(s) have complied with the safety guidelines detailed below:

1. All adult passengers (over the age of 18 years old) must wear seat belts.

2. All children ranging in age from birth to two (2) years old must be securely fastened into a child safety car seat. Be sure that the child safety seat is securely fastened in the vehicle.

3. Children ranging in age from two (2) to eight (8) years, unless the child is taller than four feet, 9 inches or one hundred pounds, and must keep the child secured during the operation of the vehicle in a child passenger safety set system according to the instructions of the manufacturer of the safety seat system. Once children outgrow their booster seat (usually at 4’9”, 100 pounds) they should use
the adult safety belt.

4. Any child twelve (12) years old and younger may not ride in the front seat of a vehicle while the vehicle is being operated and must be secured by their own safety belt in the rear seat.

5. Once children outgrow their booster seat (usually at 4’9”, 100 pounds) they should use the adult safety belt. All children between the ages of eight (8) years old and eighteen (18) years old must wear their own seat belts, and must not sit on an adults’ lap.

6. A child(ren) may never be transported in an open-bed pickup truck or an open flatbed truck or trailer.

In the event that an employee chooses to transport, it is their responsibility to safely transport CASA children and their family members. All CASA employees must maintain current proof of insurance for their vehicle and provide the CASA office with current copies of proof of insurance, which will be filed in the Employee’s file.

**Accident Protocol**

*Protocol 1: Accident involving CASA staff and children*

Child Advocates San Antonio has established the following guidelines for staff/volunteers to adhere to during business travel in the event an automobile accident occurs involving staff and/or children served by CASA. CASA staff will be required to complete and submit an Accident Report to the Human Resources Coordinator for an accident involving children and staff within 24 hours of the accident, and within 48 hours of an accident involving only staff.

1. Remain at the scene of the accident.

2. Dial 911 to contact the Police and/or EMS if medical attention for any passenger is required.

3. While waiting for the Police and/or EMS to arrive, remain calm as you assess the nature of the accident and the immediate needs of the children and/or other passengers in your vehicle. Gather important documents such as driver’s license, medical cards, insurance cards, and important phone numbers.

4. Once the Police and/or EMS arrive, remain calm so that you can provide as much detail as possible. Maintain a copy of the police report as supporting documentation.

5. Notify your immediate supervisor as soon as possible, but no later than 24 hours of the accident.

6. Submit a formal Accident Report and/or a copy of the Police report to the Human Resources Coordinator at CASA within 24 hours of the accident. A copy of the Accident Report is in the Volunteer Policy Manual. The Human Resources Coordinator will use the Police report as a temporary report until the formal report can be submitted, if you are unable to submit a report due to serious injury.

7. Please **do not** communicate with the media and/or parents/guardian regarding the accident. All communication with the media and issues of a serious nature are handled by the CEO of CASA.

8. If your vehicle is damaged, please contact your insurance company to file a claim of the accident. You are responsible for all damages associated with this claim.
Protocol 2: Accident involving CASA Staff only

1. Remain at the scene of the accident. Dial 911 to contact the Police and/or EMS if medical attention for any passenger is required.

2. Maintain a copy of the police report as supporting documentation.

3. Notify your immediate supervisor of CASA as soon as possible, but no later than 48 hours of the accident.

4. Submit a formal Accident Report and/or a copy of the Police report to the Human Resources Coordinator at CASA within 48 hours of the accident. A copy of the Accident Report is in the Employee Handbook. If you are unable to submit a report due to serious injury, the Human Resources Coordinator will use the Police report as a temporary report until the formal report can be submitted.

5. If your vehicle is damaged, please contact your insurance company to file a claim of the accident. You are responsible for all damages associated with this claim.
Travel must be in the best interests of CASA. Examples include, but not limited to the following: travel for training purposes, travel to attend meetings or conferences and travel to make presentations. All travel must be related to CASA business. Every effort will be made to minimize travel costs. All travel will be subject to the availability of funds in approved budgets.

**Travel and Expenses**

CASA reimburses employees expenses related to travel while on business. These expenses include:

- Tolls
- Parking
- Rate per mile
- Meals

While on CASA business, travel in private automobiles is reimbursed at the current federal reimbursement rate per mile.

Employees traveling out of town on authorized business, at the request of CASA, will be reimbursed for meals and other pre-approved expenses. Pre-travel meetings will be held to determine the exact meal allowance, and other approved expenses. Original receipts must be provided in order to be reimbursed.

**Meals**

Meal expenses may vary from city to city; therefore, expense maximums will be provided to employees prior to out of town travel. Periodically, meals may be reimbursed for local travel, training, or other events. Employees will be advised in advance if they may expense the cost of meals for local travel.

False or misleading documentation may result in disciplinary action or may result in termination.
Volunteers and staff will be trained in assisting crime victims and their non-offending family members in applying for Crime Victim Compensation. The training is part of our initial training and is included as a part of in-service training sessions. Applications and brochures explaining the program are kept in the CASA office and each volunteer is given a supply during training. The following procedures are to be followed:

1. When a volunteer is assigned a case, they need to determine if the child or family members might be qualified for Victim's Compensation.

2. When reading the child’s file at the Texas Department of Protective and Regulatory Services, note if the crime victim’s application is complete and in the file. If not, make note and follow up to ensure the Child Protective Services (CPS) caseworker completes the application.

3. If action is not taken by the caseworker, give the child (if old enough), the foster parent, or the non-offending family member the application. Explain the application process to the party and assist them in filling out the form if necessary. Make sure that all required supporting documentation is submitted with the application.

4. Follow up with the child or family member to see if they have received an answer on the application.

5. After resolution of the case, let the permanent placement for the child know that an application has been filed and they may be eligible for assistance. Provide follow up contacts and application copies if necessary to permanent placement.
The Board will ensure the Board and the CEO of CASA reflect the high ethics and strong reputation of CASA, correct each other when judgment errors occur and, if necessary, seek to remove offending members in accordance with the Bylaws. Problems that can threaten the reputation of CASA will be reported to the Board President and the CEO. No retaliation will be permitted by or to any person for reporting a problem or potential problem. This formal Whistleblower policy has been adopted by CASA and is aligned with the Internal Control policy 4-3.

A whistleblower is an employee who informs a supervisor or the CEO of CASA or President of the Board about an activity which that person believes to be fraudulent or dishonest.

**Whistleblower Protection**

CASA will protect whistleblowers as defined below.

1. CASA will use best efforts to protect whistleblowers against retaliation, as described below. It cannot guarantee confidentiality, however, and there is no such thing as an “unofficial” or “off the record” report.

2. CASA will keep the whistleblower’s identity confidential, unless

   a) the person agrees to be identified;

   b) identification is necessary to allow CASA or law enforcement officials to investigate or respond effectively to the report;

   c) identification is required by law; or

   d) the person accused of violations is entitled to the information as a matter of legal right in disciplinary proceedings.

CASA employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the CEO of CASA or President of the Board, if retaliation is from the CEO of CASA. A proven complaint of retaliation will result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Whistleblowers must be cautious to avoid baseless allegations.

**Procedures**

If any employee reasonably believes that policy, practice, or activity of CASA is in violation of law, that employee must file a written complaint with the CEO of CASA or the Board President, if the violation concerns the CEO.

It is the intent of CASA to adhere to all laws and regulations, which apply to it, and the purpose of this
policy is to support CASA’s goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of CASA and provides CASA with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

CASA will not retaliate against an employee who, in good faith, has made protest or raised a complaint against some practice of CASA, or of another individual or entity with whom the CASA has a business relationship, based on a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

CASA will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of CASA that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

Rights and Responsibilities

Supervisors are required to report suspected fraudulent or dishonest conduct to the CEO of CASA or President of the Board. In addition, supervisors are responsible for maintaining a system of management controls, which detect and deter fraudulent or dishonest conduct. Failure by a supervisor to establish management controls or report misconduct within the scope of this policy may result in adverse personnel action against the supervisor, up to and including dismissal.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations.
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation.
- Violations of a person’s rights under law.

Accordingly, a supervisor faced with a suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution.
- Should not discuss the case with anyone other than the CEO or President of the Board or a duly authorized law enforcement officer.
- Should direct all inquiries from any attorney retained by the suspected individual to CEO or President of the Board and direct all inquiries from the media to the CEO.
An employee who resigns his/her employment in good standing (giving at least two (2) weeks or ten (10) working days notice) will be paid in a lump sum for any accumulated paid time off, less any debts owed to CASA. The final paycheck will also include any compensation due in salary. In order to receive a final paycheck without additional deductions an employee must return, to his/her supervisor, any items or equipment that he/she has been issued. This includes equipment, badges, manuals, literature, keys, written confidential information, or other valuables supplied for the purpose of assisting the employee in the performance of his/her work. Payroll will deduct the cost of any missing items from the final check if not all items are collected.

At separation, an employee can expect CASA to pay the following items:

1. Base pay and/or overtime for all hours worked through your last day of work.


3. Reimbursement for outstanding expense reports that are in good order, have been approved by management, and are received by the immediate supervisor or the Human Resources Coordinator within 30 days of your separation date in accordance with CASA policy.

Note: Final compensation and expense report payments will be made in conjunction with the normal accounting policies and procedures associated with those items, or based on state law for involuntary separation. CASA reserves the right to offset any amounts due and owed to CASA from employees at separation of employment.
Policy No. 4-2

This policy applies to:

<table>
<thead>
<tr>
<th>Policy Name: Financial Internal Control</th>
<th>✔ Board of Directors, All Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revised Date: 7-18-11</td>
<td>✔ Exempt, Non Exempt</td>
</tr>
</tbody>
</table>

Internal control procedures are established to help minimize risk and safeguard the agency’s physical assets. Internal control checks the accuracy and reliability of the agency’s accounting data, promotes operational efficiency and encourages adherence to prescribed managerial policies.

**General**

- The fiscal year for CASA will be July 1 to June 30.
- CASA uses a modified accrual method of accounting for annual financial statements in conformity with generally accepted accounting principles.
- CASA prohibits personal loans to any staff member or members of the Board of Directors.
- The Financial Internal Control policy is reviewed annually by the Board Finance Committee and submitted to Board Policy Committee for inclusion during the annual review of Employee Handbook. The Board of Directors approves the Employee Handbook.

**Financial Information System Controls**

- The financial system is password protected. Assigned personnel granted daily access to financial system include the CEO and the Finance Manager.
- Each user has a unique password, assigned by the CEO.
- Passwords are changed annually by the CEO.
- Each user is given access to only those areas of the financial information system pertinent to completion of assigned duties.
- The Treasurer and Board President have access to passwords in the event of loss of key personnel via the Executive Succession planning document.

**Monthly Board Financials**

The following financial reports are distributed and approved by the Board of Directors monthly:

- Profit and Loss showing actual to budget figures year-to-date;
- Balance Sheet,
- Revenue Results to annual budget, and;
- Cash Flow Projections.

**Board Approved Annual Budget**

- CASA staff shall prepare and present to the Finance Committee of the Board of Directors, an annual proposed budget no later than the last working day of May of each year.
- The Treasurer, as chair of the Finance Committee, will present the annual budget to the Board of Directors for approval at June meeting.
• CASA staff will continually reforecast and seek approval of Finance Committee and Board for any budget changes.

**Grant Administration**

• Applicable financial and administrative guidelines relating to specific grants will be followed.

• The CEO reviews monthly the expenditures and supporting documents charged to individual grants to ensure grant compliance. **The Finance Manager** reviews those grants requiring Treasurer signature with the Treasurer monthly; the Treasurer's signature will indicate approval to submit to grantor.

• Grant Resolutions will be approved by the Board of Directors at time of grant submission, unless otherwise instructed by grantor/contractor. Unless otherwise indicated by grantor/contractor, grant resolutions give the authority to apply for, reject, and accept grant funding to the CEO.

• The Board Finance Committee receives training on state and federal grant compliance guidelines annually.

• CASA will provide all required monthly reports to grantor no later than the date specified in contracts. We will submit all final client reports, fiscal reports, and all required deliverables within the required number of days, as specified in the grant contracts.

• CASA maintains, in confidence, all information pertaining to grant projects or other information and materials prepared for, provided by, or obtained by the grantor. (Includes reports, information, project evaluation, project design, data, or other related information.)

• City, County, State and Federal funds are not used to contribute to or conduct political activities for any candidate for elective public office. Other grant contracts requiring the same are followed.

• Grant documents are available for review by the Board Treasurer and Board President.

**Property and Equipment**

• All property and equipment will be adequately safeguarded against fire, loss, theft, physical deterioration or misuse.

• Insurance protections for such are reviewed annually by the Board of Directors.

• Equipment purchased via grant funds from the City of San Antonio, or other contractors requiring same, will not be disposed of without prior approval of grantor.

• Equipment purchased with grant funds will be documented in grant file, on depreciation schedule if over $500, and property inventory records. Records will include:
  o Description of equipment, including model and serial number, if applicable;
  o The date of acquisition;
  o Cost;
  o Procurement source;
  o Purchase order number, if applicable;
  o Vendor number, if applicable;
An indication of whether the equipment is new or used;
- The location of the property; and
- A list of disposed items.

- Lost, disposed of, stolen, damaged, or destroyed equipment is tracked via property inventory records. As applicable, police or FBI will be notified for theft of property and grant contractors will be notified within 72 hours.

**Receivables**

- The division of duties in the handling of cash and checks is one of the most effective ways to gain control over this asset. No one individual is to have complete control in the handling of donations or receivables. Specifically, no one individual’s duties include the handling and oversight of money, recording receipt of money, depositing, and the reconciliation of bank accounts.

- Two persons, Administrative Assistant and Operations Manager, will open mail and log incoming donations and other receivables. Should one of the above named individuals be unavailable, the CEO or Vice-President of Programs can assist as the second person to complete this responsibility. Two persons are required to initial the receivables log as proof of receipt. The receivables log is a black binder located in the bookcase near the reception area.

- Collections made in the field are documented upon entry of the CASA facility. The employee bringing the item into the building and the Administrative Assistant will log in and initial the receivable log.

- Incoming cash must be made a matter of record as soon as possible. When cash is received at CASA, the donation is logged into the receivable log. It is placed in an envelope and deposited in the locked financial room or “secured area.” Cash is protected by the use of locks, and kept in an area of limited access.

- A secure area is established for the safeguarding and processing of cash received. Access to the secured area is restricted to authorized staff only. The secured area is locked when not occupied.

- Documents enclosed with currency are date stamped by the Administrative Assistant opening the mail.

- Checks received for donations are immediately endorsed “for deposit only.”

- One copy of the check is placed in an envelope with the donation and placed in the secure financial room.

- Additional copies are forwarded to Finance Manager or VP of Development for donor acknowledgement and filing in appropriate grant or donor file.

- Deposits are prepared by the Finance Manager. Receipts are deposited intact weekly by the CEO who reviews all supporting documentation. A copy of the deposit slip and supporting documents are retained in an established secure area. The CEO reconciles the bank statements and reconciles the receivables log monthly to actual deposits made as listed on the banking statement. The CEO reviews bank statement deposits to financial system deposits monthly as part of “End of Month” checklist documentation.
When required by funding sources, restricted funds are deposited to separate bank accounts.

All employees are required to take at least 5 days of PTO annually, and other employees perform cash receipt functions.

**Receivables – Credit or Debit Card**

- At this time Child Advocates San Antonio does not have a credit or a debit card.

**Disbursements**

Controls are established to ensure that all payments are made on a timely basis and in accordance with all invoices and contracts.

- The responsibility for disbursement is assigned to the **Finance Manager**.

- Original invoices (or authorized facsimiles), stamped with received date and totaling the amount of the disbursement, are to be attached to each check request before payment. Executed contracts can be used in lieu of original invoice in case when down payment is needed to secure an event location, etc.

- Each cash disbursement must be approved by the department director (VP of Programs, **Finance Manager**, VP of Development, or VP of Development and CEO) responsible for the budgeted item. The CEO reviews the requests, approves and signs checks, giving final approval for disbursement.

- Authorized check signers are independent of voucher preparation.

- Disbursements are typically made by check and invoice numbers are entered into the financial system, when provided.

- From time to time, with approval of the CEO, accounts will be authorized for automatic withdrawal. The CEO authorizes the electronic disbursement monthly and the VP of Finance and HR will complete an ACH request form.

- Dual signatures are required for all checks over $5,000 (excluding rent), including any two of the following signatures: Board President, Treasurer, Past President and CASA CEO. Dual signatures are considered a best practice on checks written in the name of the CEO or **Finance Manager**.

- Financial institutions where CASA accounts are maintained are notified immediately of any changes in check signers, following the transition of officers or changes in staff with check signing responsibilities. Check signers are authorized by the Board of Directors via officer elections.

- Blank checks are kept in locked storage under the control of the **Finance Manager**. Access to blank checks is limited to this employee. In case of emergency, the **Finance Manager** also has access to check stock.

- Voided checks are recorded in Quickbooks. The check is then marked with VOID, signature line is cut off and instrument is filed in voided check file.
- Bank checks are pre-numbered and used in sequence.

- Prior to disbursement, the Finance Manager documents the date of disbursement, check number, and amount of check on the check request. The Finance Manager ensures that checks match invoice and mails disbursements.

- Signing of blank checks is prohibited.

- Signature stamps or electronic signatures may never be used to sign checks.

- Fixed assets under $500 will be expensed; fixed assets over $500 will be capitalized. The CEO/President can make exceptions to this policy based on “disposability” of the item purchased.

- Purchases shall be made based upon maximum open and free competition, to obtain the best value in return for financial resources, and the conflict of interest policy must be followed in the purchase of all goods, services, property and equipment. CASA maintains a commitment to use small, minority, or woman-owned businesses when they demonstrate best value in return for financial resources.

- Checks are made payable to specific payees and never made payable to cash or bearer.

- Payroll disbursements are made primarily via direct deposit; although employees may choose to receive a check. Payroll is reviewed and authorized by the CEO prior to disbursement.

- All employees working with disbursements are required to take at least 5 days of PTO annually, and other employees perform cash disbursement functions.

**Disbursements – Employee Out of Town Training and/or Conferences**

Formally adopted, written internal policies and procedures are established to control the costs of meals and light refreshments at out of town training and/or conferences. These guidelines can be found in section 3-31.

Procedures for out of town training or conferences are as follows:

- The employee responsible for the registration of all external training opportunities is the Finance Manager who submits documentation for either a check disbursement or use of credit card to pay for registration fees and lodging, when applicable.

- Prior to conference/trainings, the Finance Manager will meet with all attendees to provide appropriate travel and registration information. At this meeting discussion on meal and travel allowances and reimbursements procedures are clarified.

- Training travel expense vouchers are signed by the employee and approved by their respective manager within 48 hours of return from training or conference. When necessary, employees may receive an advance to help cover out of pocket travel costs associated with training and/or conference opportunities. Documentation on expenditures along with any “unused” advance is to be submitted immediately upon return from training.
Disbursements - Credit Card

At this time Child Advocates San Antonio does not have a debit or credit card in the name of CASA.

Unclaimed Funds

Every 90 days all outstanding checks will be reviewed and individuals will be contacted informing them of the outstanding monies. All unclaimed funds per the Title 6 law, which requires all Texas businesses to remit as of June 30 of each year all such amounts which are 3 years old and unclaimed, will be reported to the State Comptroller’s Office.

Reconciliation

- Bank accounts are reconciled within 15 days after bank statement arrival.
- The CEO receives unopened bank statements, and documents the date the statement was opened and reviewed on the statement.
- The CEO notes on the “End of Month Checklist” that the statement was reviewed for altered signatures, payee names, and out of sequence checks.
- CEO completes the bank reconciliation.
- The reconciliation procedures for all bank accounts include the following with respect to deposits:
  - Comparison of dates and amounts of daily deposits as shown on the bank statements with the financial system;
  - Comparison of bank statement deposits with receivables log;
  - Investigation of bank transfers to determine that both sides of the transactions have been properly recorded on the books; and
  - Investigation of items rejected by the bank.
  - Monthly the CEO reviews the financial system reconciliation report and documents on the “End of Month Checklist” that deposits are accurate.
- Reconciliation procedures for all bank accounts include the following with respect to disbursement:
  - Comparison of canceled checks with the disbursement journal as to number, date, payee, and amount;
  - Account for sequence of check numbers;
  - Examination of canceled checks for authorized signatures;
  - Examination of canceled checks for alterations; and
  - Review of voided checks.
  - Monthly the CEO reviews the financial system reconciliation report and documents on the “End of Month Checklist” that disbursements are reconciled and reviews uncleared checks to ensure compliance with the unclaimed funds policy.
- Employees with bank reconciliation duties are required to take vacations and other employees are required to perform those functions when an employee is absent.
Reconciliation – Credit Cards

- The VP of Finance and HR reconciles the daily summary of credit card receivables with the deposit summary provided by the merchant account.
- The merchant account summary is used each month to reconcile the general ledger to the batch deposits reported on the bank statement.

Audit

- An annual financial audit will be conducted by a qualified outside auditor who is an independent certified public accountant.
- For Texas CASA/CVC and VOCA grants, a separate schedule of those funds is required.
- The audited financials will include a Statement of Functional Expenses.
- The Finance Committee of the Board of Directors, the CEO, and the Finance Manager shall make up the Audit Committee. The Audit committee will monitor the auditor relationship for effectiveness, expertise, and independence, and change firms when performance is deficient. In addition, the Audit Committee will oversee the performance of the independent auditor, confer with the auditor to ensure that the affairs of the organization are in order, and recommend approval of the annual audit report to the full board.
- The audit firm prepares the audit report, Form 990 and presents to the CEO and Board Treasurer. The CEO and Board Treasurer review the documents ensuring accuracy and present the final version to the Board of Directors for approval.
- The audit will be conducted within nine months of the end of the fiscal year.

In-Kind Donations

In-Kind donations will be documented and tracked for financial purposes as well as best practices for the organization.

- In-Kind donations include:
  - Items donated to CASA;
  - Professional time donated to CASA to train staff, Board or volunteers;
  - Volunteer Advocate and Board time spent on CASA work; and
  - Volunteer Advocate and Board mileage used on CASA work.

- All items donated to CASA will be tracked using the following procedure:
  - Staff member receiving donated item(s) should log items in the “In-Kind tracking binder” found on the bookshelf in the front office area.
  - The donor should be given an In-Kind donation receipt for tax purposes.
  - Items that are received in the mail will be logged in by the two individuals who opened the mail.
  - Staff member in charge of disbursement of donated items such as gift cards, event tickets, and gifts for children will update the log to indicate the persons/clients who received the donated item to include item name, quantity, recipient name and method in which item was delivered.
• Mass appeals for donated items for silent auction/fundraising events will be logged by the appropriate Development employee. The spreadsheet of items received and auctioned off will be added to the “In Kind tracking binder”, post event. Influenced in-kind donations will be tracked in the same manner but will also include the name of the individual whom influenced the donation. Example: board member who procures a donation/sponsorship through their place of employment would receive soft credit for that said donation.

• Mass items received for holiday gifts for children will be documented in bulk. For example, Marine Auxiliary donated approximately $300 worth of toys, picked up by volunteers for children.

• Any items that are donated to CASA that cannot be used by CASA clients will be disposed of periodically. All items that can be donated to another agency will and those items that cannot, will be taken to Goodwill. Disposal of those items will be documented in the “In Kind tracking binder.”

• A receipt will be obtained from receiving nonprofit organization or Goodwill for CASA recordkeeping.

• Unused or expired items such as unused sport event tickets will be shred and destruction documented.

**Document Destruction**

• Financial and grant documents will be kept for 7 years.

• Destroyed documents will be shred and disposed of by a document destruction company.

**Fraud, Waste & Abuse**

CASA is committed to maintaining public trust and the financial integrity of the program. To this end, internal controls have been implemented to safeguard CASA assets and to ensure that CASA funds are spent in strict accordance with policies and the annual budget adopted by the Board.

To help safeguard CASA assets and ensure financial integrity, the Board and CEO offer an avenue for reporting suspected financial fraud, waste and abuse to CASA by completing and submitting the information below. Your report will be submitted directly to the finance committee and Board of Directors for review and appropriate investigation.

CASA will investigate any possible fraudulent or dishonest use or misuse of CASA resources or property by management, staff, volunteers, or members of the Board. Anyone found to have engaged in a fraudulent or dishonest conduct is subject to disciplinary action by CASA, up to and including civil or criminal prosecution when warranted.

All members of the CASA community are encouraged to report possible fraudulent or dishonest conduct (i.e., a whistleblower). An employee should report his or her concerns to a manager. If for any reason an employee finds it difficult to report his or her concern to a manager, the employee can report it directly to the CEO or the President of the Board.

Managers are required to report suspected fraudulent or dishonest conduct to the CEO or the President of the Board.
For more information about definitions, rights and responsibilities, procedures, and contacts read the following:

The Fraud, Waste and Abuse Reporting System should be used to report the following:

- Theft of CASA assets (property or money)
- Misuse of CASA assets
- Conflicts of Interest
- Waste/abuse of organization resources

The Fraud, Waste and Abuse Reporting System should NOT be used to report the following:

- Personnel grievances (salaries, discrimination, workplace conditions, etc.), these issues should be reported in accordance with Board Policy, Employee Complaints/Grievances.
- Sexual harassment complaints. Sexual harassment complaints should be reported in accordance with Board Policy, Sexual Harassment/Reporting Procedures.

**Definitions**

**Baseless Allegations:** allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to institutional disciplinary action and/or legal claims by individuals accused of such conduct.

**Fraudulent or Dishonest Conduct:** a deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- forgery or alteration of documents
- unauthorized alteration or manipulation of computer files
- fraudulent financial reporting
- pursuit of a benefit or advantage in violation of the CASA’s conflict of interest policy
- misappropriation or misuse of CASA resources, such as funds, supplies, or other assets
- authorizing or receiving compensation for goods not received or services not performed

**Whistleblower:** an employee who informs a supervisor or the CEO or President of the Board about an activity which that person believes to be fraudulent or dishonest.

**Rights and Responsibilities**

**Managers**

Managers are required to report suspected fraudulent or dishonest conduct to the CEO or President of the Board. In addition, supervisors are responsible for maintaining a system of management controls, which detect and deter fraudulent or dishonest conduct. Failure by a supervisor to establish management controls or report misconduct within the scope of this policy may result in adverse personnel action against the supervisor, up to and including dismissal.
Reasonable care should be taken in dealing with suspected misconduct to avoid:

- baseless allegations
- premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- violations of a person's rights under law.

Accordingly, a manager faced with a suspected misconduct:

- should not contact the person suspected to further investigate the matter or demand restitution
- should not discuss the case with anyone other than the CEO or President of the Board or a duly authorized law enforcement officer
- should direct all inquiries from any attorney retained by the suspected individual to CEO or President of the Board
- should direct all inquiries from the media to the CEO.

Whistleblower Protection

CASA will protect whistleblowers as defined below.

- CASA will use best efforts to protect whistleblowers against retaliation, as described below. It cannot guarantee confidentiality, however, and there is no such thing as an "unofficial" or "off the record" report. CASA will keep the whistleblower's identity confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow CASA or law enforcement officials to investigate or respond effectively to the report; (3) identification is required by law; or (4) the person accused of Fraud Policy violations is entitled to the information as a matter of legal right in disciplinary proceedings.
- CASA employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the CEO or President of the Board. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).
Fraud, Waste and Abuse Reporting Form

Complainant Contact Information:

*Required Information

*I wish to remain:   □ Anonymous   □ Confidential   □ Not Applicable

First Name: ____________________________________________________
Middle Name: __________________________________________________
Last Name: _____________________________________________________
Street Address: _________________________________________________
City: __________________________________________________________
State: _________________________________________________________
Zip: ___________________________________________________________
Phone Number: _________________________________________________
Email Address: _________________________________________________

Complaint Information:

*Name of Individual(s) suspected of fraud, waste, or abuse:
____________________________________________________________________________
____________________________________________________________________________
____________________________________________________________________________

*Department involved in the suspected of fraud, waste, or abuse:
____________________________________________________________________________
____________________________________________________________________________
____________________________________________________________________________

*Description of the suspected of fraud, waste, or abuse:
____________________________________________________________________________
____________________________________________________________________________
____________________________________________________________________________

Location of any evidence or records that might support the allegation:
____________________________________________________________________________
____________________________________________________________________________
____________________________________________________________________________

Names of Witnesses or others who may have knowledge of the allegation:
____________________________________________________________________________
____________________________________________________________________________
I. **Introduction**

Purpose of this Policy Statement

*This Investment Policy is intended to be a summary of short and long term investment philosophies that provides guidance for the Board of Directors (“Board”) and other parties interested in the management of these assets. It is understood that there can be no guarantees about the attainment of the goals or investment objectives outlined here.*

This policy statement outlines the goals and investment objectives of Child Advocates San Antonio’s (CASA’s) Endowment Investment Portfolio (“the Portfolio”) and Short-Term Endowment Account. This document is intended to provide guidelines for the Board of Directors, the Investment Committee and their Investment Consultant, for managing the assets of the Portfolio. It also outlines specific investment policies which will govern how the portfolio may be managed in pursuit of those goals. This statement:

- Describes an appropriate risk posture for the investment of the assets,
- Specifies the target asset allocation policy,
- Establishes parameters for separating all or a portion of unrestricted endowment funds to meet short term liquidity requirements,
- Establishes investment guidelines regarding the selection of investment managers, permissible securities and diversification of assets,
- Specifies the criteria for evaluating the performance of the investment managers and of the Portfolio as a whole,
- Defines the responsibilities of the Board of Directors, Investment Committee, their Investment Consultant for the management of the assets

The Board of Directors of CASA believes that the policies described in this statement should be dynamic. These policies should reflect the investments’ current status and the Board’s philosophy regarding the investment of assets. These policies will be reviewed at least annually, and revised periodically, to ensure they adequately reflect any changes related to CASA and/or the capital markets.

II. **Information about Child Advocates San Antonio**

CASA is a private not for profit organization according to Internal Revenue Code Section 501(c)3. Accordingly, the income and earnings of the Portfolio are tax-exempt.

In 1977, Seattle Judge, David Soukup, founded “Court Appointed Special Advocates” (CASA) that trains community volunteers to serve as “eyes and ears” to the courts and voices for children in need. Today, over 1000 programs operate nationwide in the United States.

Child Advocates San Antonio (CASA) was founded in 1984. It became a United Way agency in 1988. For 25 years, Child Advocates San Antonio has successfully provided abused and neglected children in Bexar County a unique service that no other agency in Bexar County provides through sound planning and management. CASA addresses the root causes of child abuse and provides intervention, advocacy, education, and referrals to other community agencies that result in safer childhoods and long-lasting impact. CASA is making a difference and helping to reverse the cycle of abuse one child at a time.
CASA’s mission is to recruit, train, and supervise court appointed advocates who provide constancy for abused and neglected children and youth while advocating for services and placement in safe, permanent homes.

CASA revenues come from grants and donations of corporations, individuals, and other types of entities. This revenue is subject to fluctuating economic conditions and may or may not cover operating expenses.

III. Responsibilities of the Board of Directors

While the Board of Directors of CASA has the ultimate responsibility for the Portfolio, they have delegated oversight responsibilities to the Investment Committee. The Board has the following responsibilities:

- Reviewing the capital and operating budget needs of CASA and establishing and reviewing an appropriate spending policy for the Portfolio,
- Appointing and overseeing the Investment Committee,
- Being familiar with any regulatory laws including, but not limited to, the Uniform Prudent Management of Institutional Fund Act (UPMIFA).

IV. Responsibilities of the Investment Committee

The Investment Committee will consist of active members of the Finance Committee and any other members of the Board of Directors who wish to participate. New members of the Investment Committee must become familiar with this Investment Policy and participate in an orientation session about their duties and responsibilities. The Investment Committee and Consultant will conduct this training on an as-needed basis.

As aforementioned, the Board has delegated oversight responsibility of CASA’s financial assets to the Investment Committee. This includes the responsibility for defining the investment objectives and policies for all portfolios and determining strategic asset allocation parameters for approval by the Board. It is expected that the objectives and policies described herein will be used as the criteria for selecting and evaluating the investment managers for the Portfolio. The Investment Committee is responsible for:

- Developing a long-term strategic investment plan for all Endowment funds of CASA,
- Making recommendations regarding the Investment Policy to the Board,
- Approving any deviations to the Investment Policy upon written request from investment managers,
- Monitoring investment performance of the portfolio and the managers,
- Selecting or terminating the investment consultant, investment managers, and custodian for the Portfolios’ assets,
- Reporting the Portfolio’s investment performance to the Board,
- Reporting to the Board any changes of investment managers, deviation from the stated asset allocation constraints, as outlined in the Investment Policy, or other significant developments affecting the administration of the Portfolio. This communication will be done at the Board meeting immediately following the Investment Committee meeting at which such changes have been made,
- Being familiar with and adhering to any regulatory laws including, but not limited to, UPMIFA.

Within the scope of this Investment Policy, the Treasurer is the primary liaison between the Investment Committee, Finance Committee, Board of Directors and Investment Consultant and should timely notify the Investment Committee of any material change in status of CASA’s Endowment Investment Portfolio and Short-Term Endowment Account.
V. **Responsibilities of the Investment Consultant**

The Investment Consultant is responsible for:

- Assisting the Investment Committee with strategic planning and adherence to regulatory laws and changes including but not limited to UPMIFA,
- Meeting with and providing a formalized report to the Investment Committee quarterly and the Board of Directors bi-annually,
- Providing assistance with writing and reviewing the Investment Policy,
- Providing assistance with establishing long term strategic asset allocation strategy,
- Providing tactical asset allocation recommendations, when appropriate,
- Overseeing investment manager structure, manager searches and recommended manager changes,
- Providing third party investment manager and total account performance reporting, including return analysis, benchmark comparisons, risk analysis, and attribution analysis,
- Monitoring investment managers to ensure they stay within their stated investment guidelines with regard to asset allocation and style,
- Monitoring investment managers for change of: ownership, key personnel, financial condition, or other pertinent facts and report changes within reasonable time period,
- Serving as custodian of assets,
- Providing monthly statements showing valuations, transactions, cash receivables, and disbursements,
- Executing trades, as directed by the investment managers, at best execution,
- Being familiar with and adhering to any regulatory laws including, but not limited to UPMIFA.

VI. **Responsibilities of the Investment Managers**

*It is the intention of the Portfolio to utilize separately managed accounts with various investment management firms. However, mutual or other commingled funds may be used to implement the investment strategy of the Portfolio. For mutual and other commingled funds, the prospectus or Trust documents of the fund(s) will govern the investment policies of the fund investments. The following guidelines apply to separately managed accounts:*

**Fiduciary Responsibilities**

Each investment manager is expected to manage the Portfolio’s assets in a manner consistent with the investment objectives, guidelines, and constraints outlined in their profile and in accordance with applicable laws. This would include discharging responsibilities with respect to the Portfolio consistent with “Prudent Investor” standards, and all other fiduciary responsibility provisions and regulations. Each investment manager shall at all times be registered in good standing as an investment adviser under the Investment Advisers Act of 1940 (where applicable). The Portfolio’s assets will be managed by experienced investment management firms.

**Security Selection/Asset Allocation**
Except as noted below, each investment manager shall have the discretion to determine their portfolio’s individual securities selection.

The Portfolio is expected to operate within an overall asset allocation strategy defining the Portfolio’s mix of asset classes. This strategy, described below, sets a long-term percentage target for the amount of the Portfolio’s market value that is to be invested in any one asset class. The allocation strategy also defines the allowable investment shifts between the asset classes, above and below the target allocations.

The asset allocation strategy for each investment manager's portfolio can deviate from the overall Portfolio’s asset allocation, however, the Committee is responsible for monitoring the aggregate asset allocation, and the Committee may re-balance to the target allocation on a periodic basis.

Proxy Voting

Each investment manager is responsible and empowered to exercise all rights, including voting rights, as are acquired through the purchase of securities, where practical. The investment managers shall vote proxies according to their established Proxy Voting Guidelines. A copy of those guidelines, and/or summary of proxy votes shall be provided to the Committee upon request.

The Committee has the responsibility to vote proxies for any mutual funds selected by the Committee according to the best long-term interests of the Portfolio’s participants and their beneficiaries. The Treasurer shall vote proxies according to the instructions of the Committee.

VII. Investment Objectives

CASA may establish two separate investment portfolios: one will be for operating reserves and short term assets (Short-Term Endowment) and the second will be an investment portfolio (Endowment Investment Portfolio) to be structured for long-term growth. This Investment Policy applies to both. The investment objective of the Endowment Investment Portfolio is to achieve long-term investment returns that exceed inflation, while the Short-Term Endowment should protect principle and provide liquidity. It is expected that the Portfolio would achieve this objective through a balanced approach that earns total returns comprised of capital appreciation and current income.

The Committee, with the assistance of the Investment Consultant, will review the Portfolio and Short-Term Endowment’s performance on a quarterly basis. The Committee will evaluate each investment manager’s contribution toward meeting the investment objectives outlined below and in their specific policy guidelines (that are attached) over a five-year time period, unless otherwise noted.

**Primary Benchmark:** It is desired that the Endowment Investment Portfolio produce a level of return in excess of the "market", as represented by a benchmark index or mix of indexes reflective of the Portfolio’s return objectives and risk tolerance. This benchmark or "Policy Index" is to be constructed as follows: 30% S&P 500, 15% Morgan Stanley Capital International Europe, Australia, and Far East (MSCI EAFE) International Stock Index, 15% Russell 2500 Stock Index, 40% Barclay’s Aggregate Bond Index, and 0% US Treasury Bills. The Portfolio is expected to exceed the average return of this benchmark on a risk-adjusted basis over a five-year rolling time period and a full market cycle.

**Secondary Performance Targets:** The Portfolio’s financial goal over the long-term is to earn the real return target for the Portfolio, which is CPI plus 4%. The Portfolio is expected to meet or exceed the policy index return and the real return target, each measured on a compound annual return basis after the deduction of investment management fees and annualized over a five-year rolling time period and a full market cycle.
VIII. **Cash Flow Requirements**

It is expected that the Endowment Investment Portfolio will not be needed to provide any cash distributions to the operating budget for the foreseeable future. Additionally, gifts and bequests, as well as, gift annuities and donor advised funds may be added.

IX. **Risk Tolerance**

*This section describes the external factors that CASA considered in establishing the Investment Policy. This explicit treatment of external factors is important as a communication device to the Investment Consultant, Investment Managers, regulatory authorities, and new members of the Board or Investment Committee.*

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return that can be expected in an investment program. In general, higher risk (*i.e.* volatility of return) is associated with higher return. Given this relationship between risk and return, a fundamental step in determining the Investment Policy for the Portfolio is the determination of an appropriate risk tolerance. The Committee examined two important factors that affect the Portfolio’s risk tolerance:

**Financial Ability** to accept risk within the investment program and,

**Willingness** to accept return volatility.

The Committee examined its risk tolerance by considering several relevant factors. Positive factors that contribute to a higher risk tolerance are:

- The financial strength of CASA,
- The long-term time horizon of the Portfolio,
- The Board’s willingness to accept short-term fluctuations in market value,
- The lack of cash needs from the Portfolio for the foreseeable future.

Offsetting these are the following:

- The assets represent a significant portion of the financial resources of CASA,
- While not anticipated, the Portfolio may need to make up for any operating shortfalls of CASA,
- The difficulty of replenishing these assets in the event of large losses,
- Uncertainty of donations.

The Committee has analyzed the behavior of the Portfolio’s assets within different economic environments and is comfortable with a risk level of the Portfolio as measured by volatility (standard deviation) that is similar to the volatility level of the policy index when measured over a five-year rolling time period and a full market cycle.
X. Asset Allocation Strategy

In line with the Portfolio’s return objectives and risk parameters, the mix of assets should be generally maintained as follows (percents are of the market value of the Portfolio):

<table>
<thead>
<tr>
<th>Asset Class</th>
<th>Minimum</th>
<th>Target Allocation</th>
<th>Maximum</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic Large/Medium Capitalization Stocks</td>
<td>24%</td>
<td>30%</td>
<td>36%</td>
</tr>
<tr>
<td>Small/Medium Capitalization Stocks</td>
<td>11%</td>
<td>15%</td>
<td>18%</td>
</tr>
<tr>
<td>International Stocks</td>
<td>11%</td>
<td>15%</td>
<td>18%</td>
</tr>
<tr>
<td>Total Equity</td>
<td>44%</td>
<td>60%</td>
<td>66%</td>
</tr>
<tr>
<td>Domestic Investment Grade Fixed Income</td>
<td>32%</td>
<td>40%</td>
<td>48%</td>
</tr>
<tr>
<td>Cash and Cash Equivalents</td>
<td>0%</td>
<td>0%</td>
<td>10%</td>
</tr>
</tbody>
</table>

Rebalancing Procedures

Since capital appreciation (depreciation) can result in a deviation of the overall Portfolio’s asset allocation, the aggregate asset allocation will be monitored by the Committee and its Investment Consultant on a quarterly basis. If an asset class becomes 20% or more out of balance, from its target weight (i.e., 20% of a 30% target is 6%), the Committee will rebalance the Portfolio within allocation parameters, unless it is prudent not to do so. The Investment Committee may elect to rebalance more often if desired.

To achieve the rebalancing of the Portfolio, the Committee may re-direct contributions and disbursements from individual investment managers as appropriate, in addition to shifting assets from one investment manager to another.

Each investment manager will be expected to maintain the asset allocation of their portfolio consistent with the target asset allocation established for their portfolio.

Tactical Asset Allocation

In general, the Board and Investment Committee believe the long-term strategic asset allocation of the Portfolio should be maintained. However, there may be situations due to the capital markets, where short and/or intermediate term tactical calls may be appropriate. With the assistance of the Investment Consultant, the Committee may go to the outer bounds of the target allocation. Exceeding established terms of the target allocation requires a written amendment to the Investment Policy and must be approved by the Board.

Short Term Liquidity

If additional liquidity is needed for CASA, a transfer of funds out of the investment portfolio into a separate Endowment account can be proposed by the Investment Committee, authorized by the Board, and executed by the Investment Consultant at the direction of the Treasurer or Treasurer Delegate.

The obligations of this separate Short-Term Endowment account are to ensure sufficient liquid assets to meet projected liquidity demands. Consequently, the Short-Term Endowment should have a bias towards principle protection and availability. The assets for this account should be invested in accordance with sound investment practices that provide as much return as feasible while ensuring the protection of the
principle balances. It is expected that this objective be obtained through the use of short-term, investment grade instruments such as money market funds, treasuries, and other government-insured bonds.

Consistent with the Short-Term Endowment’s investment objective, the Short-Term Endowment should not invest in the following types of transactions:

- Investment in the equity of public or private companies
- Investment in high-yield or junk bonds
- Short Sales
- Purchases of letter stock, private placements, or direct payments
- Leveraged transactions
- Purchases of securities not readily marketable
- Commodity transactions
- Purchases of futures, swaps, or forward contracts
- Puts, calls, straddles, or other option strategies
- Purchases of real estate and natural resource properties such as oil and gas or timber investments
- Investments in limited partnerships
- Investments by the investment managers in their own securities or of their affiliates, or subsidiaries (excluding money market or other commingled funds as authorized by the Board of Directors)

Additionally, the Board of Directors must approve any other Short-Term Endowment security transaction not specifically authorized in this policy statement. Requests by investment consultants to execute transactions not currently authorized in this policy should be made prior to executing such transactions.

XI. Investment Strategy

The Investment Committee will select and terminate investment managers with the advice and guidance of the Investment Consultant. In so doing the following criteria shall be used:

*Criteria for Selecting Investment Managers*

Investment managers shall be chosen using the following criteria:

- The Investment Consultant shall prepare a comprehensive search analysis and include at least three choices per asset class,
- Past investment performance will be considered relative to other investments having the same investment objective. Consideration shall be given to both consistency of performance and the level of risk taken to achieve results,
- The investment style and discipline of the investment manager,
- How well the manager’s investment style or approach complements other investment managers (or funds) in the Portfolio,
- Level of experience, financial resources, and staffing levels of the investment manager,
- Length of service of at least five years,
- Level of management expenses charged by the investment manager or mutual fund,
- An assessment of the likelihood of future investment success, relative to other opportunities.
Criteria for Terminating Investment Managers

Issues that may cause the termination of a manager include:

- Change of ownership or control of the company,
- Key personnel leaving the organization,
- Change in investment philosophy,
- Assets under management become too large for the underlying investment style,
- Deviating from stated investment philosophy,
- Under-performance - The Investment Committee clearly understands that all investment managers will have periods of out-performance and periods of under-performance. While performance will be monitored, underperformance to benchmarks and universes is not a sole criterion for terminating a manager. However, if a manager underperforms for a three-year period, it will cause a “heightened review” of said manager to determine if there is an underlying problem causing poor performance, or if the investment style is simply out of favor.

Investment Manager Structure

The Portfolio will utilize a multi-manager structure of complementary investment styles to invest the Portfolio’s assets. The investment managers retained are:

<table>
<thead>
<tr>
<th>Investment Manager/Fund</th>
<th>Investment Objective/Style</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large Cap Value Manager</td>
<td>Large Cap Value Domestic Equity</td>
</tr>
<tr>
<td>Large Cap Growth Manager</td>
<td>Large Cap Growth Domestic Equity</td>
</tr>
<tr>
<td>International Manager</td>
<td>International Equities</td>
</tr>
<tr>
<td>Small / Mid Cap Manager</td>
<td>Mid Cap Core</td>
</tr>
<tr>
<td>Fixed Income Manager</td>
<td>Domestic Fixed Income</td>
</tr>
<tr>
<td>Custodian</td>
<td>Cash Reserves</td>
</tr>
</tbody>
</table>

Any mutual funds retained by the Committee shall be registered investment companies as defined in the Investment Company Act of 1940.

XII. Exclusions

For separately managed accounts, the assets in the Portfolio may not be used for the following purposes:

- Short Sales,
- Purchases of letter stock, private placements, or direct payments,
- Leveraged transactions,
- Purchases of securities not readily marketable,
- Puts, calls, straddles, or other option strategies,
- Purchases of real estate and natural resource properties such as oil & gas or timber investments except for Real Estate Investment Trusts and Master Limited Partnerships,
- Investments in limited partnerships,
- Investments in tax-exempt securities,
- Investments by the investment managers in their own securities or of their affiliates, or subsidiaries (excluding money market or other commingled funds as authorized by the Committee).
Additionally, any other security transaction not specifically authorized in this policy statement, must be approved, in writing, by the Committee. Requests by investment managers to execute transactions that are not currently authorized in this policy should be made prior to executing such transactions.

XIII. Investment Transactions

Since the Committee expects to contract with a consulting firm to provide consulting and investment management services for the Portfolio (through Morgan Stanley Smith Barney), that firm shall execute all transactions for those assets placed in the portfolio with no commission or mark-up.

XIV. Meetings and Communication

As a matter of course, each investment manager should keep the Committee through the Investment Consultant apprised of any material changes in the investment manager’s outlook, Investment Policy, and tactics. It is the responsibility of the Committee to keep the Board informed of any material events that may affect the management of the Portfolio.

CASA’s Investment Consultant will provide written performance reports to the Committee not less than quarterly. The custodian should provide monthly statements of assets and transactions.

XV. Performance Evaluation

As noted above, the Committee and the Investment Consultant will monitor the Portfolio’s performance on a quarterly basis. The Committee will evaluate the Portfolio’s success in achieving the investment objectives outlined in this document over a five-year time horizon and a full market cycle. The Committee realizes that most investments go through cycles and therefore there will be periods of time in which the investment objectives are not met or when some investment managers fail to meet their expected performance targets. Recognizing the cyclicality of performance, the Committee acknowledges the principle that the investment managers should be given an opportunity to make up for poor periods and that unless there are extenuating circumstances; patience will often prove appropriate when performance has been disappointing.

The Portfolio’s (and investment manager’s) performance should be reported in terms of rate of return, both on a time and dollar weighted basis, and change in dollar value, and both gross and net of fees. The returns should be compared to appropriate market indexes, for the most recent quarter and for annual and cumulative prior time periods.

The Portfolio’s asset allocation shall be compared to the guidelines in the Policy and should be reported on a quarterly basis.

Risk as measured by volatility, or standard deviation, should be calculated after adequate performance history has accumulated. An attribution analysis should also be performed (for the separately managed accounts), to evaluate how much of the Portfolio’s investment results are due to the investment managers’ investment decisions, as compared to the effect of the financial markets. It is expected that this analysis will use the “policy index” as the performance benchmark for evaluating both the returns achieved and the level of risk taken.

Each investment manager’s performance will also be evaluated in a similar fashion according to the performance standards outlined in their individual policy statements.
XVI. **Approval**

*Deviations from the investment policies and constraints outlined in this document may be authorized in writing by the Investment Committee.*

*It is understood that this Investment Policy is to be reviewed periodically by the Investment Committee to determine if any revisions are warranted by changing circumstances including, but not limited to, changes in financial status, risk tolerance, or changes involving the investment managers.*
CASA, a not-for-profit organization organized under the laws of the State of Texas, encourages the solicitation and acceptance of gifts for purposes that will help the organization to further and fulfill its mission. The following policies and guidelines govern acceptance of gifts made to CASA for the benefit of any of its programs.

Use of Legal Counsel
CASA shall seek the advice of legal counsel in matters relating to acceptance of gifts where appropriate. Review by counsel is recommended for:
- Review of closely held stock transfers that are subject to restrictions or buy-sell agreements
- Review of documents naming CASA as Trustee
- Review of all gifts involving contracts, such as bargain sales or other documents requiring Child Advocates to assume an obligation
- Review of all transactions with potential conflict of interest that may invoke IRS sanctions
- Other instances in which the use of counsel is deemed appropriate by the Board of Directors.

Restrictions on Gifts
CASA will accept unrestricted gifts, and gifts for specific programs and purposes, provided that such gifts are not inconsistent with its stated mission, purposes, and priorities. CASA will not accept gifts that are too restrictive in purpose. Gifts that are too restrictive are those that violate the terms of the corporate charter, gifts that are too difficult to administer, or gifts that are for purposes outside the mission of CASA.

Credibility of the Organization
CASA will decline any gift that could be perceived to hurt the credibility of the organization.
Employees should report the loss of a paycheck to the VP of Finance and HR. An immediate replacement of a paycheck is not possible. Once CASA has verified that the check has not been cashed, another paycheck can be produced. Reissued checks generally take five (5) to seven (7) workdays. Payroll will make every effort to expedite replacing lost paychecks. Employees are responsible for the cancellation check fee assessed by CASA’s financial institution.

CASA encourages employees to use the automatic payroll direct deposit program. With direct deposit, paychecks are never lost because pay is automatically deposited in the employee’s bank account. In addition, pay can be transmitted electronically in the event of a disaster or emergency closing.
As required by law, all non-exempt employees are paid time and one-half for any hours worked in excess of 40 hours in a workweek. Time paid but not worked such as holidays and paid-time-off will not count as hours worked toward overtime. Non-exempt employees should not:

- Begin working prior to the employee’s scheduled starting time.
- Work after their scheduled stop time.
- Take work home, without prior authorization from their supervisor to work extra time.

**Overtime work must always be approved before it is performed.**
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>4-7</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Paydays</td>
<td>✓ Exempt</td>
</tr>
<tr>
<td>Revised Date:</td>
<td>7-18-2011</td>
<td>✓ Non-Exempt</td>
</tr>
</tbody>
</table>

Exempt employees will be paid once per month on the last business day of the month, and non-exempt employees will be paid semi-monthly, on the 15th and the last business day of each month.

Any questions regarding your paycheck should be addressed to the VP of Finance and HR. An employee who resigns will receive his/her paycheck on the regular payday for that period. An employee who is terminated will receive his/her final paycheck no later than six (6) days after the employee is terminated. Normally, pay will not be distributed prior to the authorized payday. In the event that a regularly scheduled payday falls on a holiday, employees will be paid on the day before the regularly scheduled payday.

*Note: Any erroneous overpayment does not confer the right of retention and will be automatically adjusted from any accrued pay whenever such error is detected or through a collection process if employment has since terminated.*
CASA takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday. In the event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of his/her supervisor and the VP of Finance and HR so that corrections can be made. Errors will be corrected on the next scheduled payroll or as soon as administratively possible.
The law requires CASA to make certain deductions from every employee’s compensation. Among these are applicable federal income taxes. CASA also must deduct Social Security and Medicare taxes on each employee’s earnings unless the employee provides visa documentation, which indicates partial or full tax totalization agreement. CASA matches the amount of Social Security/Medicare taxes paid by each employee.

CASA offers programs and benefits beyond those required by law. Eligible employees may voluntarily authorize deductions from their paychecks to cover the costs of participation in these programs. If you have questions concerning why deductions were made from your paycheck or how they were calculated, the VP of Finance and HR can assist you. Before any deductions from employees’ wages are made (other than mandated deductions), employees must authorize the deduction in writing. Forms for authorizing a deduction are available in the Human Resources Coordinator’s office. No deduction will be made without written authorization.

Payroll deductions

1. Federal Income Tax
2. FICA/Medicare
3. Other deductions required by law

Optional deductions as authorized in writing by the employee:

1. Life insurance premiums
2. Health insurance premiums
3. Contributions to United Way
4. 403–B contributions
Accurately recording time worked is the responsibility of every staff employee. Federal and state laws require CASA to keep an accurate record of time worked in order to calculate employee pay and benefits. Time worked is all the time actually spent on the job performing assigned duties.

**Non-Exempt Employees**

All non-exempt employees must maintain a bi-monthly time record (time sheet) to certify the accuracy of all time worked each day. Non-exempt employees are required to use the computer time log to record accurately all hours worked. Employees must record the actual number of hours worked less unpaid breaks and other time taken whether paid or unpaid, such as paid time off, holiday, and inclement weather.

At the end of each bi-monthly period employees must sign the time sheets to recertify its accuracy. The supervisor will review and then sign the time record before submitting it for processing. In addition, if corrections or modifications are made to the time record, both the employee and the supervisor must verify the accuracy of the changes by initialing the time record. All signed time sheets will be turned in by the employee to their immediate supervisor. The supervisor will forward the time sheets to the VP of Finance and HR by the deadline provided. In order to ensure that payroll records are legally correct, no time sheet will be processed for payment until it is properly authorized.

**Exempt Employees**

Exempt employees must maintain a monthly payroll PTO record and an Activity Log that records actual time worked and total hours by task. The Activity Log ensures to our funders that employees paid by a particular grant for particular work are in compliance with the grantors wishes. These sheets often accompany request for reimbursement by particular grantors. Employees must record the actual number of hours worked less unpaid breaks and other time taken whether paid or unpaid, such as paid time off, holiday, and inclement weather.

Employees must sign the PTO record and Activity Log to recertify its accuracy. The supervisor will review and then sign the records before submitting it for processing. In addition, if corrections or modifications are made, both the employee and the supervisor must verify the accuracy of the changes by initialing the record. All signed records will be turned in by the employee to their immediate supervisor. The supervisor will forward the record to the VP of Finance and HR by the deadline provided. In order to ensure that payroll records are legally correct, no time sheet will be processed for payment until it is properly authorized.

Time and attendance reports and related documents will be maintained on all employees by the Human Resources Coordinator. Records will be made available for inspection by the employee, if requested. The documents are legal records of CASA. Altering, falsifying, or tampering with a time record is a serious matter that will result in termination of employment.

Your record of time worked is a legal document. No one, but you, may sign your time sheet. At no time should you, for any reason, sign another employee’s time sheet. If you have any question regarding how to record time worked, speak with your supervisor.
CASA makes available group health, short term disability, and life insurance for all employees scheduled to work an average of 31 or more hours per week, annualized. Employees are eligible for health insurance benefits after ninety (90) days of successful continuous employment. CASA uses the designated benefits provider as determined by the United Way’s current carrier.

Insurance programs are subject to change by CASA at any time. New employees are eligible for coverage in accordance with the enrollment guidelines of the current carrier. CASA will pay up to $360 per month for standard employee benefits coverage. There is no compensation for employees that opt out. Any difference in billing will be deducted from the employee’s paycheck the month prior to coverage. Coverage for dependent medical and life insurance is available at the employee’s expense.

Every year, all employees have the opportunity to add, delete, or change health and welfare benefits during open enrollment. Retirement plan changes may be made at any time. Updated information about the various benefits plans is contained in the Benefits Guide booklet distributed during open enrollment. The Benefits Guide is also available for more detailed information about specific provisions of the benefits plans as well as the Summary Plan Descriptions for each plan, which are available in hard copy in the Human Resources Coordinator’s Office.

CASA offers a competitive benefits package for its employees.

- Group Medical Insurance
- Retirement Plan
- Paid Holidays
- Paid time off
- Life Insurance

**Continuation of Medical Insurance (Subject to COBRA laws)**

Under State and/or Federal law, employees, employee’s spouses and/or dependents who have group medical insurance may have the right to continue their group medical insurance coverage after it would otherwise terminate due to the termination of employee’s employment, a reduction in the employee’s hours, divorce, or the death of the employee. The employee, spouse, and dependents must notify the office of any divorce and of their desire to retain insurance coverage after any divorce, death, or termination of employment or loss of insurance coverage. Further details are available from Human Resources Coordinator.

**Changes in Insurance and Benefits**

CASA reserves the right to change or terminate its voluntary or optional insurance programs and other benefits at any time. Employees do not have contract or property rights to benefit programs. All CASA procurement involving employee benefit plans will be subject to the procurement requirements and limitations of the federal, state, and local regulations. Unless regulated by law, CASA contributions to employee benefit plans will be subject to the availability of funds.

**403B Retirement Plan**
Employees are eligible to participate after 90 days of continuous employment.
Employees may contribute to a voluntary 403B retirement plan.
CASA will match 50% of the employee’s contribution, up to 3% of monthly salary.

The following schedule indicates eligibility to receive matched funds from date of hire:

- Less than 2 years, 0%
- 2 years, 25%
- 3 years, 50%
- 4 years, 75%
- 5 years, 100%

For additional information about eligibility, benefits, on how to file a claim, please refer to the benefits carrier plan description booklet or contact the Human Resources Coordinator.

<table>
<thead>
<tr>
<th>Policy No.</th>
<th>5-2</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Holidays</td>
<td>✓</td>
</tr>
</tbody>
</table>
CASA follows the Bexar County holiday schedule as designated annually by the Bexar County Commissioner’s Court. Hourly employees must be on the payroll for 30 days before they are eligible for paid holidays. Holidays will be paid at straight time, not to exceed eight (8) hours. Anyone regularly scheduled to work less than 16 hours per week will not be paid for holidays. Hourly part-time employees are eligible only for paid holidays that fall on regularly scheduled days of employment, and these part-time employees will receive holiday pay for the number of hours the employee would regularly have been scheduled to work that day.

<table>
<thead>
<tr>
<th>County Holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Year’s Day</td>
</tr>
<tr>
<td>Martin L. King’s Birthday</td>
</tr>
<tr>
<td>President’s Day</td>
</tr>
<tr>
<td>Good Friday</td>
</tr>
<tr>
<td>Battle of Flowers Day</td>
</tr>
<tr>
<td>Memorial Day</td>
</tr>
<tr>
<td>Independence Day</td>
</tr>
<tr>
<td>Labor Day</td>
</tr>
<tr>
<td>Veteran’s Day</td>
</tr>
<tr>
<td>Thanksgiving Day</td>
</tr>
<tr>
<td>Friday after Thanksgiving</td>
</tr>
<tr>
<td>Christmas Day</td>
</tr>
</tbody>
</table>
An employee absent due to jury duty or court summons will notify their Supervisor upon receipt of notice for appearance in Court and will receive pay in full for the period of such duty.

On any day or half-day you are not required to serve, you will be expected to return to work.

In order to receive jury duty or court summons pay, you must present a statement of jury service or summons and pay to your manager. This document is issued by the court.

You may also donate your jury pay to the Child Welfare Board as provided as an option by the courts.

Time off work for court appearances to serve as a witness in any civil or criminal litigation, unless related to a CASA case, will not be compensated by CASA. The employee must arrange for time off work without pay or use paid time off.

Payment by the Court or litigants to the employee for travel expense at the prevailing rate, or other compensation, may be retained by the employee.
Most of the financial resources for CASA dictate that funding goes for direct service, which means that CASA does not possess the financial resources to grant extended leaves or to provide personnel to cover extended unpaid leaves. However, in urgent situations, requests will be considered if submitted in writing ten (10) days in advance, except for emergencies. The leave of absence must be authorized by the CEO. The written authorization will be made a part of the employee’s personnel file for future reference. In the event a leave is granted, it will be only for the length of time needed and, unless the leave is part of an ADA accommodation, will be no more than three (3) months, including extension(s). During the time of absence, there will be no accrual of paid-time-off or paid holidays.

An employee who does not return to work on the first regular working day following the end of the period provided in the leave of absence will be terminated, unless an extension is requested in writing by the employee and granted by the CEO.

In order to remain covered under CASA’s medical and hospitalization insurance plan, an employee on leave of absence in excess of thirty (30) days is required to pay the necessary insurance premiums through the company. An employee, who becomes temporarily disabled (to include pregnancy), must furnish with a statement from his or her physician advising of his/her surgery or other corrective medical procedures in the case of other temporary disability, including the approximate date the employee will be able to return to work. Every effort will be made to place an employee returning from a leave of absence in the same or a comparable job as that which the employee held before leaving. If such a position is offered to the employee returning from a leave of absence and the employee refuses such offer, he/she will be considered as having “voluntarily terminated” from employment with CASA. Paid-time-off will not accrue when an employee is in a leave without pay status.

<table>
<thead>
<tr>
<th>Policy No.</th>
<th>5-5</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Maternity Leave</td>
<td>✓ Exempt</td>
</tr>
</tbody>
</table>
CASA treats pregnancy and childbirth the same as any other temporary medical condition, providing access to medical benefits, paid time off and disability leaves on the same basis as such benefits are provided to other employees or for other conditions.

Paid benefits for maternity are provided to employees under the PTO Policy. First, the employee may use any time accumulated. A pregnant employee should notify her supervisor as soon as possible to plan for required time off due to maternity. She should also arrange to meet with the Human Resources Coordinator to review details and requirements for the leave. If disability begins before delivery, the employee must submit documentation from her physician regarding the nature and expected duration of the disability. Once delivery has occurred, the employee will be automatically considered unable to work for six weeks (6) post-delivery, unless the employee notifies the Human Resources Coordinator that she is no longer disabled and is ready to return to work. If the employee is still unable to work beyond six (6) weeks post-delivery, the employee’s physician must document this.

If an employee’s pregnancy causes a hazard to person or property prior to taking maternity leave, and the employee refuses to take time off, the CEO may place her on paid time off or absence without pay status until her physician certifies her that she is able to return to work.

An employee on maternity leave must contact the Human Resources Coordinator within ten (10) days after the birth of the child or termination of the pregnancy to determine the date that she will return to work. An employee on maternity leave who uses all accrued paid time off may request a leave of absence. The employee must make requests to the CEO at least fourteen (14) days prior to expiration of the leave period or extension thereof. The CEO will approve or disapprove the request. If paid time off is exhausted, the employee will be placed on leave without pay for thirty (30) days or less if required by physician. In this case, CASA’s contribution to the employee’s benefits package will discontinue unless the employee continues to contribute the employee share of the premium owed.
A Full-time employee who enters into active service of the Armed Forces of the United States will be granted a leave of absence from the initial period of active service for which ordered or volunteered. The leave of absence may be continued for ninety (90) days following discharge or for hospitalization continuing after discharge and related to the military service for a period of not more than one (1) year.

A regular full-time employee who is a reservist of the Armed Forces or a member of the National Guard engaged in active duty or training will be allowed up to fifteen (15) working days leave each calendar year without loss of pay or annual leave if ordered to duty or while engaged in training.

- Leave must be arranged in advance with proper documentation to the Human Resources Coordinator. The employee must submit a copy of the military orders.

- Leave is granted to attend required military training and does not accumulate.

- Voluntary duty for training will be charged to paid-time-off or authorized leave without pay if the employee has no accrued paid-time-off.

- Employees may retain any compensation they receive for their military service in addition to the salary they receive from CASA.

The employee will be entitled to be reinstated to his/her former position of like status and pay provided:

- The employee is willing to report to work within ninety (90) days after discharge or after hospitalization continuing after discharge for a period of not more than one (1) year and

- he/she is physically and mentally fit for employment. If, by reason of disability, the employee is not fit for a position of like status and pay, even with reasonable accommodation, but is qualified to perform duties of a lower grade position, such other position will be offered if a vacancy exists; and the employee is willing to accept a lesser position if there has been a reduction in force during his/her absence.

If the employee received, a discharge other than Honorable, re-employment will be at the discretion of the CEO.
Full-time employees are eligible to begin accruing Paid Time Off (PTO) at the time of hire. PTO hours are to be used when an employee needs and/or requests time off due to illness, bereavement, vacation, or personal emergencies. PTO hours will not accrue for any pay period during which an employee is in a non-pay status.

**Annual Accrual**

For the purposes of calculating PTO, the “anniversary date” is determined as the first day of the month of the employee’s hire date. PTO hours are accrued on a monthly basis.

<table>
<thead>
<tr>
<th>Years of Employment</th>
<th>Yearly Accrual-Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 2</td>
<td>20 days</td>
</tr>
<tr>
<td>3 to 5</td>
<td>25 days</td>
</tr>
<tr>
<td>6 and above</td>
<td>30 days</td>
</tr>
</tbody>
</table>

These days are in addition to all Bexar County holidays.

**Administration of Paid Time Off**

- Exempt employees are required to submit PTO forms monthly in accordance with the monthly calendar.
- Non Exempt employees are required to submit bi-monthly time-sheets indicating PTO usage.
- It is mandatory that five (5) days of PTO be used annually. An employee can carry over or “bank” up to six (6) weeks of eligible PTO.
- Employees are encouraged not to miss work in their first 90 days of employment. Should an emergency occur within the first 90 days, the supervisor might approve the use of PTO.
- Following separation or termination of employment, employees will receive payment for accrued PTO hours, up to maximum of eighty (80) hours. However, any employee who voluntarily resigns and gives less than two (2) weeks’ advance notice of resignation will be paid accrued PTO hours, up to a maximum of forty (40) hours. Any employee who voluntarily resigns and fails to give any advance notice will not receive payment for accrued PTO hours.
- Employees hired on or before the fifteenth (15th) day of the month or separated on or after the sixteenth (16th) day of the month will receive full PTO credit for the month. Those employees hired after the fifteenth (15th) day of the month receive no PTO credit for the month. The CEO may adjust these rules on an as needed basis.
<table>
<thead>
<tr>
<th>Policy Name:</th>
<th>Unemployment</th>
<th>✓</th>
<th>Exempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revised Date:</td>
<td></td>
<td>✓</td>
<td>Non-Exempt</td>
</tr>
</tbody>
</table>

CASA pays taxes for unemployment compensation benefits for all eligible personnel to provide income during periods of unemployment. The Texas Workforce Commission determines eligibility for and the amount of compensation.
Punctuality in reporting for work and regular attendance are absolutely essential to the efficient operation of CASA. Employees are expected to be punctual and regular in attendance. Any tardiness or absence causes problems for fellow employees and supervisors. When one employee is absent, others must perform the work, just as you must assume the workload of others who are absent.

Employees are expected to report to work as scheduled, on time and prepared to perform their duties. Employees also are expected to remain at work for their entire work schedule or when required to leave on authorized business. Late arrival, early departure or other absences from scheduled hours are acceptable, but it is the employees’ responsibility to gain approval from his/her supervisor of the deviation from normal office hours.

**Unauthorized Absence**

Unauthorized absence is defined as the absence of an employee from scheduled work without approved leave. Any failure to report to work on time is considered unauthorized absence. Employees should notify their supervisor at least 45 minutes prior to work start time, if they are unable to work. Paid-time-off (PTO) not reported to the immediate supervisor within thirty (30) minutes after scheduled starting time is an unauthorized absence unless sufficient evidence is presented to show that the emergency was of such a nature as to make a personal reporting impossible or difficult.

Excessive absences, regardless of the reason, will be grounds for dismissal. Excessive absences are defined as:

- More than three (3) unexcused absences per year.
- Absences in excess of the number of PTO the employee is eligible to use for the year unless a “Leave of Absence” has been granted.

In the event of an emergency, the employee is expected to contact their supervisor as soon as possible after the emergency. Emergencies are defined as:

- An unforeseen event(s) of sufficient stature to prevent the employee from calling the supervisor. It will be the supervisor’s responsibility to assess the nature of the emergency and to determine if the absence was justified.
- Illnesses or injuries, which require immediate care and prevent the employee from contacting their supervisor.

A telephone call from a spouse, parent, or child is unacceptable unless the employee is physically unable to make the call. The employee’s failure to report to work without notice is a serious matter and will not be tolerated. If the employee fails to report to work without notification, he/she will be considered to have abandoned his/her position and the employee’s employment will be terminated. If the immediate supervisor cannot be reached after attempting to call and leaving a message on the provided supervisor’s cell phone number, the employee must call the Human Resources Coordinator by 9:00 a.m. In the event of failure to comply with the call in procedures, the employee will be charged on the payroll as leave without pay.

**Tardiness**

All employees are expected to arrive at work on time. If an employee is late to work, he/she must promptly notify his/her immediate supervisor. Repeated tardiness may subject an employee to termination. Excessive tardiness will not be tolerated.
**Policy No.** 6-2  
**This policy applies to:** Exempt  

**Policy Name:** Change of Address  
**Revised Date:** 5/19/11  

All employees of CASA are required to furnish the Human Resources Coordinator with all their addresses and telephone numbers, for emergency purposes. This information will be used strictly for CASA business. If the employees change his/her mailing address and/or telephone number(s), they must notify the Human Resources Coordinator within thirty (30) days of the change. This is important in the event there is a need to mail the employee any information or contact him/her on short notice. An emergency telephone number is also required.

**Policy No.** 6-4  
**This policy applies to:** Exempt  

**Policy Name:** Professional Appearance  
**Revised Date:** 5-19-11  

CASA is a non-profit organization dedicated to providing a “child’s voice in court.” As such, it is extremely important that our employees be concerned with their professional appearance. Employees are expected to dress in a professional manner while on CASA business, using good judgment and the examples below as their guideline.

All employees are responsible for understanding and following the guidelines to ensure that inappropriate clothing is not worn to work. CASA reserves the right to discuss with any employee his/her dress and to require changes, if deemed necessary. If you are in doubt as to what is appropriate, please consult with your supervisor. Any employee whose personal appearance is unacceptable will be sent home to change clothing and this non-work time will be unpaid. If in doubt, do not wear the item until consulting with your supervisor.

Supervisors are responsible for assuring that employees follow acceptable dress and grooming standards, as is appropriate for the “customers” with which the employees interact. Based on the primary “customer,” dress standards may differ by department or nature of work duties, and therefore, it is critical that employees rely on guidance from their supervisor, not the clothing of fellow employees. Violations of this policy may result in disciplinary action.

The following are examples of dress that is considered unacceptable attire for the workplace. This list is not all-inclusive and is meant to be used as a guideline to gain an understanding of what reflects the professional image of CASA. Exceptions can be made with prior approval from the employee’s Supervisor.

**Examples of Unacceptable Workplace Attire:**
- T-Shirts
- Shorts
- Casual sandals or shoes (for example, flip-flop style sandals, tennis shoes, Crocs, slippers)
- Frayed or torn items
- Casual cropped pants (dressier Capri’s and mid-calf length and longer are OK)
- Athletic wear
- Spandex or Lycra, such as biker shorts
• Tank tops, tube tops, halter tops, off-the-shoulder, or tops/dresses with spaghetti straps (straps must be at least 2 inches wide)
• Underwear as outerwear
• Beach wear
• Midriff length tops
• Short Skirts (about 3-4 inches above knee or fingertips is usually ok)
• Faded, torn, frayed Jeans. Staff member may get pre-approval from their supervisor to wear Jeans on a day other than Friday, when it is appropriate for work tasks.
• If you have to tug at your clothing all day to get into compliance, that item is most likely unacceptable.
It is the policy of CASA to comply with all applicable federal, state and local regulations regarding smoking in the workplace and to provide a work environment that promotes productivity and the well being of its employees. Smoking is prohibited inside all CASA facilities and vehicles except for areas where it is specifically authorized.

Employees are expected to exercise common courtesy and to respect the needs and sensibilities for co-workers with regard to the smoking policy. CASA will not accept responsibility for non-smoking employees who allow them to be subjected to second-hand smoke. Employees who violate this smoking policy will be subject to discipline, up to and including termination.

Note: CASA does not enforce a policy of discharging employees or refusing to hire applicants because they are smokers. Smokers have a special obligation to keep smoking areas litter-free, (i.e. vehicles, designated smoke areas).
Child Advocates San Antonio (CASA) values the contributions of its employees. In addition to offering employees competitive pay and benefits, CASA has several programs of employee recognition and appreciation throughout the year. An outstanding and committed staff is the hallmark of a strong organization and CASA is no exception. Our staff should be recognized for their outstanding quality, dedication, and leadership. Creating our formal recognition programs provides us with more ways to celebrate imagination and creativity and a commitment to excellence in all of our activities.

**Underlying Principles of Staff Recognition Awards**

- Publicly recognize individuals and/or teams for their exceptional contributions to their department, CASA as a whole, or to the surrounding community.
- Celebrate that each individual can and does make a difference.
- Highlight behaviors that support CASA goals and highlight employees as role models.
- Foster an environment of shared success and commitment.
- Provide a fair and flexible staff recognition system that is woven into the fabric of CASA.

**The Staff Recognition Pyramid**

The CASA staff recognition programs should be viewed in the continuum of four programs. First is our base compensation program of salary and benefits. All salary increases are based on merit and therefore provide a significant foundation to recognize meritorious service. As supplemental features, we now have three special programs above base compensation.

**Excellence Award for Employee of the Quarter**

This award is designed to recognize an individual who demonstrates outstanding behaviors or produces exceptional results, which create a better workplace for all, volunteers, and the community. We know many of you are working hard to create this type of atmosphere each day, and we want to highlight those who are going the extra mile. In an effort to encourage greater participation in the recognition program, CASA designated a program to highlight recognition on a quarterly basis.

**Criteria for Employee of the Quarter**

- Exempt and nonexempt employees are eligible, with the exception of the CEO and Vice Presidents.
- The nominee must demonstrate accomplishments that can be linked to creating a better environment (workplace, community, clients well being).
- The nominee must promote positive interaction between clients and staff.
• The nominee makes a vital contribution toward achieving CASA’s goals.

• The nominee must demonstrate professionalism and enthusiasm in the performance of responsibilities.

• The nominee must strive to enhance the quality of services provided by CASA.

Nomination Instructions

A co-worker or supervisor may nominate a candidate as “Employee of the Quarter” by submitting a nomination form to the nominee’s supervisor. The Supervisor completes the form and gives them to the Human Resources Coordinator. Vice Presidents will make the final selection. Once the final selection has been made, the Human Resources Coordinator will be notified.

Recognition

• The Employee of the Quarter will receive a framed certificate and a letter signed by the Board of Directors indicating their accomplishments and selection.

• The CEO will provide the selected employee with a framed certificate and $100.

• The Human Resources Coordinator will include the recognition in his/her personnel file.

• The Employee of the Quarter’s picture will be featured in the Main Office on the “Success Wall”.

• Those nominees who are not selected will receive a letter from the Board of Directors in appreciation of their nomination.

Spot Bonus

This award is aimed at providing a timely cash bonus ranging from $25 to $50 to an individual who has accomplished an extraordinary achievement that is beyond what would normally be expected within the workplace. Spot bonus recipients’ contributions must be tied to one of CASA’s goals.

Criteria for Spot Bonus

• Exempt and nonexempt employees are eligible, with the exception of the CEO and Vice Presidents.

• Contributions that have a significant impact on department or CASA objectives.

• Extraordinary efforts beyond the normal responsibilities of the position.

• Accomplishments may often be quantified as to the results they produced.

Nomination Instructions

Any employee may start the nomination process for an award. A nomination form will be provided. Each nominee’s supervisor will be informed by the nominator. Final determination of award and award amount will rest with the Vice Presidents. Nominations should be timely.
Recognition

- The size of the bonuses will vary based on the achievement, and will range of $25 to $50.

The CASA Employee of the Year Award

The award is given at the end of the year at the staff recognition luncheon. Each year, CASA hosts an Excellence Award Luncheon at which employees are recognized for outstanding achievement, years of service and involvement in CASA activities.

Criteria for Employee of the Year

- Exempt and nonexempt employees are eligible, with the exception of the CEO and Vice Presidents.
- Contributes to outstanding and sustained improvements in service to staff, volunteers, and clients.
- Significantly improves or enhances the quality of work in ways that make a substantial difference for staff, volunteers, and clients.
- Develops creative solutions to problems that result in significantly more effective, efficient CASA operations, which may also result in cost savings to the CASA.
- Facilitates CASA’s changing culture in ways that promote inter-departmental teamwork, enhance communications, and inspire commitment and productivity.
- Contributes meaningfully to the betterment of the community at large.
- Any member of CASA may submit nominations for Employee of the Year.

Nomination instruction

A co-worker or supervisor may nominate a candidate as “Employee of the Year” by submitting a nomination form to the nominee’s supervisor. The supervisor completes the form and gives them to the Human Resources Coordinator. Executive Committee will make final decision.

Recognition

- The “Employee of the Year” will receive a RESERVED parking space, in front of the building for one year.
- The CEO will present the winner with a certificate and engraved plaque.
- The winner’s name will be displayed on a perpetual plaque to serve as a daily reminder of CASA’s appreciation.
- The winner will receive $1000.

Other employee appreciation activities include the annual Holiday Party.
CASA wishes to recognize those employees who have devoted substantial years of service to the CASA. All employees are eligible to be recognized. Employees who have completed 1, 5, 10, 15, 20, and 25 years of service will receive a service award.

Service awards will be presented once per year at the annual luncheon. Employees who have had breaks in service or who have worked part-time will not have that time counted toward a service award. An employee must have completed the appropriate number of years of continuous full-time employment in order to receive that award.
The job description provides a basis for job-related selection procedures and performance standards. The job description specifies:

- Scope of responsibility and accountability,
- Specific job functions and tasks,
- Functions and tasks which are essential,
- Educational prerequisites,
- Skills, knowledge and abilities required to perform the job successfully,
- Certifications or licenses required,
- Physical requirements of the position including essential functions for Americans with Disabilities Act (ADA),
- Special conditions of employment,
- Closeness of supervision required, and
- Judgment and discretion required.

When a job is established or changed, a job description is written. The job description documents the job duties and standards. This provides information upon which salary grade is assigned and serves as a basis for employee assessment in the Performance Evaluation process.

Every employee will be given a job description upon hire. Job descriptions will be reviewed for necessary updating once a year, most commonly at the annual performance review. Updated copies of all job descriptions will be maintained in the Human Resources office for inclusion in the master job description record.

Full-time staff supervising volunteers on Temporary Managing Conservatorship (TMC) child protective services cases has a maximum load of 30 volunteers or 45 cases. In the event the employee is required to perform duties other than supervision of volunteers, the number of volunteers the employee can supervise is reduced.

Staff supervising volunteers who serve Permanent Managing Conservatorship (PMC) custody, or courtesy cases can be assigned more than thirty (30) volunteers or forty-five (45) cases at the discretion of the Vice President of Programs.
The Performance Evaluation is a means by which the supervisor summarizes, assesses the work performance of an employee, and gives suggestion for future development. Supervisors are strongly encouraged to discuss job performance and goals with employees on an informal, day-to-day basis. Formal performance evaluations are conducted to provide both supervisors and employees the opportunity to look back over the previous year’s accomplishments, discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting individual and organizational goals. All employees are given the opportunity to sign the evaluation, to obtain a copy and to include written comments before the report is entered into the personnel record.

The Performance Evaluation lays the foundation for the merit-based pay adjustments that may be awarded by CASA. In order to ensure that each employee receives at least annual performance feedback, merit increases will not be processed through payroll unless a written annual performance evaluation has been received in the Human Resources office.

Procedure

The performance of all employees is evaluated according to an ongoing 12-month cycle, based on the fiscal year. The evaluation period is July 1st through June 30th. New employees receive check-ins to determine progress in learning jobs and meeting performance expectations after 90 days.

The Human Resources Coordinator is responsible for the management of the Performance Evaluation Program. The Human Resources Coordinator will provide all supervisors with the proper evaluation forms and a deadline for the evaluation to be returned to the Human Resource office.
The performance management process provides an opportunity for the employee and the manager to agree upon performance expectations and goals. Performance plans should contribute to departmental, CASA’s mission, and the professional growth of the employee.

**Ongoing performance feedback** should be a routine part of the performance management process. Feedback should be based on observed and/or verifiable work-related behaviors, actions, statements, and results. Effective feedback helps the employee to sustain good performance, to develop new skills and to improve performance when necessary.

**Performance evaluation** is an annual process of assessing, summarizing, and planning for development of employee performance.

**Developing employee performance** furthers the mission of the organization and enhances the overall quality of the workforce within by promoting a climate of continuous learning and professional growth; helping to sustain employee performance at a level which meets or exceeds expectations; enhancing job or career-related skills, knowledge and experience; enabling employees to keep abreast of changes in their fields; making employees competitive for employment opportunities within; promoting affirmative action objectives; and motivating employees.

**Rewards and recognition** should reflect the employee’s level of performance and contribution, differentiating and highlighting those employees with outstanding performance levels.

---

**PERFORMANCE MANAGEMENT MODEL**

```
Mission Statement

Department Strategic Goals

<table>
<thead>
<tr>
<th>Rewards and Recognition</th>
<th>Clear Expectations and Standards</th>
<th>Ongoing Coaching and Feedback</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Formal Performance Evaluation &amp; Development Plan</td>
</tr>
</tbody>
</table>
```
The performance standard provides a benchmark against which to evaluate work performance. While the job description describes the essential functions and the tasks to be done, the performance standard defines how well or at what level each function or task must be performed in order to meet or exceed expectations. The employee should understand what counts as a “job well done” in the mind of the manager.

Standards of performance are usually:

1. Explained to new employees within the first month on the job.
2. Clarified and reinforced continually as performance is discussed.

**Performance Goals**

Performance goals are future oriented targets for change. They can be projects to be completed or a change in current functioning or performance that is expected.

**Ratings**

CASA specifies general criteria for the five appraisal ratings. These ratings describe the level of performance of the individual employee compared to the job requirements; the supervisors’ standard of performance, and any goals established.

<table>
<thead>
<tr>
<th>Rating</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Outstanding, far exceeds all established goals/expectations for the position.</td>
</tr>
<tr>
<td>4</td>
<td>Very good, usually exceeds all established goals/expectations for the position.</td>
</tr>
<tr>
<td>3</td>
<td>Good, meets and sometimes exceeds established goals/expectations for the position.</td>
</tr>
<tr>
<td>2</td>
<td>Fair, meets some but not all expectations for the position; performance requires improvement.</td>
</tr>
<tr>
<td>1</td>
<td>Poor, Does not meet expectations for the position; action required and deficiencies must be addressed.</td>
</tr>
</tbody>
</table>
Policy No. | 7-7 | This policy applies to:  
---|---|---
Policy Name: | Training and Development | ✓ Exempt
Revised Date: | ✓ Non-Exempt

CASA provides training and development for employees to improve their knowledge, skills, and abilities and provides information about backgrounds and needs of the children served by the program.

The training and development program consist of the following:

- Reviewed annually and revised based on the CASA program’s assessment of its training needs.
- The opportunity for employees to pursue continuing education to upgrade knowledge and skills to fulfill the requirements of their respective positions.
- Information related to children who are abused and neglected and in the court system, including cultural competency, inclusion, and diversity issues.
It is the policy of CASA to establish and maintain salary levels, which reflect position responsibilities, are competitive with the external market, and are capable of attracting, retaining, and motivating competent employees who are qualified to contribute to attaining CASA's mission. All salary administration decisions are subject to budgetary considerations.

CASA’s Salary Administration Program establishes and maintains sound, practical guidelines and procedures for effective salary administration. These guidelines and procedures are designed to create a better understanding of the principles of salary administration and to permit delegation of authority and responsibility for the administration of salaries within the framework of the salary policy.

The Salary Administration Program strives to provide:

1. A job classification system based on a market-pricing model, which systematically results in fair and consistent assignment of job grades.
2. A program that is understood and supported by the CEO and the Board of Directors.
3. A program that is easily explained and justified to employees and supervisors within a system of checks and balances.
4. A system that considers employment practices and trends in the competitive labor market.
5. A system that is easy to administer.

**Elements of Salary Administration Program**

The basic elements of Salary Administration Program consist of:

- **Position Definition:** Establishes written job descriptions, which define the duties and responsibilities of each position.

- **Salary Ranges:** Establishes the minimum and maximum dollar limits to be paid for each position classified within a given pay grade based on competitive salary information and the relative value of each position to CASA.

- **Salary Reviews and Adjustments:** Establishes the criteria and procedures for employee salary reviews and salary adjustments.
Procedure

To ensure the successful implementation and administration of the Salary Administration Program, the following have been assigned specific areas of responsibility:

**Board of Directors**

- Annually approves the personnel budget.
- Annually reviews and approves CEO compensation.
- Annually documents that CEO Compensation was approved by independent persons, used comparability data for determination and documents contemporaneous substantiation of the deliberation and decision for compensation.

**CEO**

- Coordinates development, implementation, and administration of the program.
- Works with departments to ensure that compensation policies are communicated, understood, and applied.
- Reviews and approves (or disapproves) all recommended changes in the grades of current jobs and assignment of new jobs into grades.
- Ensures that individual employee annual and promotion increases are within authorized guidelines.
- Reviews and evaluates out-of-policy salary activity in coordination with the Board of Directors and makes recommendations to the Board of Directors.
- Reviews and approves annual salary structure adjustments and salary increase budgets.
- Annually approves salary structure and salary increase budgets.
- Reviews and approves adjustments to the salary grade structure.
- Reviews and approves all exceptions to salary policies, as appropriate, for all positions.
- Reviews and rules on disputed new position or re-classification requests.

**Managers and Supervisors**

- Maintains a thorough knowledge of salary administration policies and procedures and applies them in recommending adjustments.
- Keeps employees informed on a timely basis of all aspects of the Salary Administration Program and related procedures.
- Considers the performance of each subordinate as part of the compensation review process. Advises CEO of significant changes in the scope of responsibility of subordinate positions.
- Conducts an annual formal performance evaluation for employees under their supervision.
- Discuss all salary increases individually with each employee under their supervision, connecting performance to salary increase.
In order to pay wages reflecting assigned job responsibilities, CASA uses a market pricing method of job classification as the principal determinant in the positioning of jobs in pay grades. Job Classification is based upon a job's value as determined by a survey of the marketplace deemed appropriate to that job. When no market value is ascertainable, positions are classified based upon their comparability within CASA to positions with like values in the marketplace.

**Objectives of Job Classification**

There are two considerations in the determination of how a job is classified:

- The definition of the position in terms of duties, scope of authority and responsibility, and knowledge, skills and abilities necessary to perform the job.

- The value of the position as determined by market place comparisons to similar positions.

**The Objectives of the Job Classification Plan are:**

- To provide a systematic, equitable, and fair basis for sound job ranking to ensure that all positions are compensated in relation to both the marketplace and all other positions at CASA.

- To provide a basis for determining the differences in salaries, which reflect the proper relationship to salaries, paid for jobs with similar requirements and responsibilities as determined by the marketplace and evidenced in reputable published surveys.

**Procedure**

To establish and maintain equitable relationships, benchmark positions will be analyzed based on job responsibilities. Comparisons will be made with jobs in having like responsibilities deemed to be comparable to CASA. The market data gathered for these positions will be the basis for developing the salary structure.
A new function or a new way of performing current functions will require a new position to be developed. In order to avoid unnecessary expansion of headcount and associated costs, the CEO must carefully analyze current structure and workloads to develop the most efficient and cost effective arrangement of duties and functions before establishing a new position. New positions resulting in an increase to headcount will require the approval of the CEO and the Board of Directors.

Titling

The CEO will manage and control the assignment of titles. Titles should denote both function and organizational level in a consistent manner.

Job Description

The job description should be prepared in narrative form and describe the functions, duties, and responsibilities of the job as concisely as possible, providing a clear, complete picture of the job. The job description should contain simple direct statements and avoid ambiguous terms. The description should be as specific as possible and state the assigned duties and responsibilities precisely, including qualifications and essential duties consistent with ADA requirements, although it should not be assumed to preclude for each position alternative duties as assigned. Each position description should spell out a supervisory chain of command and specific delegation of authority.

Where several positions have substantially the same duties and responsibilities, one job description and one job title may suffice. The description should be general enough to encompass all duties and responsibilities of the various incumbents.

Evaluation Process

Since most positions vary in duties and degrees of responsibility, reliable and appropriate survey matches must be made based on the duties and responsibilities of each position. Consideration of personalities, performance levels, or qualifications of specific persons performing or who have performed the work is to be avoided since position classification is concerned only with the position itself.

Market competitive data will be gathered for each new job to be classified where there is a good match with survey positions. If there is no good survey data available, research will be performed to locate comparable positions and pay levels. The data gathered is reflective of competitive pay for qualified employees who fulfill the responsibilities of the position in a satisfactory and fully qualified manner. Once all competitive data is gathered for the new position, it will be averaged. The new position will then be placed in the job grade whose midpoint is closest to that competitive average. A non-benchmark position will be slotted into a grade based upon its comparative duties and responsibilities with those benchmark jobs already in the grade structure. Once a position classification has been approved, the position classification and salary range will remain in effect until the duties and responsibilities undergo a sufficient change to warrant reclassification.
Department managers notify the CEO of all situations in which:

- Job grade assignments based on job classification appear to be out of line with other subordinate jobs.

- Jobs in their area of responsibility have undergone significant changes in accountability or responsibility.

- Unacceptable or unusual job turnover has occurred which may be due to salary range guidelines, or existing salary guidelines would, in the manager’s judgment, result in over/underpaying an individual employee.

**Procedure**

Vice Presidents will notify the CEO by submitting a Position Re-Classification Form to request that the position be reviewed for appropriate grading. Approval of the Board of Directors is required for any change increasing a grade assignment higher than two grades or any change involving a significant number of employees.

**Classification Review Cycle**

The CEO or designee will annually inquire about changes in job responsibilities in addition to conducting annual surveys.
CASA establishes and maintains salary ranges that reflect the market value and market movement of salaries as evidenced by relevant comparisons with salary survey data. The CEO prepares and presents salary ranges, which reflect the current competitive labor market to the Board of Directors for approval.

**Salary Ranges**

Jobs of similar or equal value are grouped into pay grades through the classification process. Each grade has an associated salary range with a minimum and maximum level. Salary ranges are further broken down into pay for experience and performance levels, as follows:

**Minimum of Range:** The minimum will be sufficiently high to attract competent applicants to fill the jobs within the range. Employees who possess the minimum qualifications for the job will generally be paid at least the minimum salary for the range.

**Midpoint:** The midpoint of a salary range indicates the average market value of jobs in that grade as determined by market comparisons and salary surveys. An individual paid at or near midpoint should be fully experienced and qualified to perform the job.

**Salary or Range Maximum:** The maximum of the range represents the maximum dollar value CASA is willing to pay for the services represented by that job.

Paying an employee’s salary above the maximum for the grade, as this indicates CASA is paying a substantial premium above market for that position. Employees who are paid at or above the pay grade maximum will not receive salary adjustments as long as their salary remains above the grade maximum. Careful consideration should be given to increases above the maximum irrespective of hire date.

**Updating Salary Grades**

In order to maintain a competitive salary structure, trends in salary levels will be researched each year. The CEO will review as many jobs as possible. The Board of Directors will review the CEO’s compensation annually. Competitive salaries for jobs will be measured among a combination of national, regional, local, and industry competitors.

**Salary Range Revisions**

The procedure for revision of the salary ranges is based upon: competitive data gathered by the CEO and recommended adjustments to the salary structure prepared by the CEO. If the data indicates the general salary line has shifted, the salary structure as a whole may be revised. Adjustments to the salary structure are not passed on to employees in the form of a general increase or decrease or an across-the-board salary adjustment. Individual salary increases are to be awarded based on the employee’s individual performance as defined during the evaluation process.
Pay increases are based upon CASA’s financial state and the employee’s performance. Pay increases become effective August 1st. Formal performance reviews will be given no later than the last business day of July 30th, unless extended with authorization by the CEO.

All salary adjustments will be related to job performance and position in job grade. Salaries will be reviewed on an annual basis, generally at the end of the fiscal year, and adjusted as appropriate to ensure that each employee’s salary reflects his/her contribution. An annual increase is not guaranteed. Length of service or time spent in a job does not justify an increase. Employees who fail to meet expectations, or whose performance is unacceptable, are not eligible for salary increases. All salary administration decisions are subject to budgetary considerations.

**Merit Increase Administration**

Merit salary increase recommendations will be accompanied by a Performance Evaluation Form and will be forwarded to the CEO. Merit salary increases should reflect the performance rating. Levels of performance and increases should be differentiated among employees with the outstanding performers receiving a higher rating than those who are performing competently. Those who are not performing satisfactorily in the job should not be recommended for a merit increase.

The CEO will review the ratings, consider the distribution of ratings, merit increases by job level, and function category, and will discuss any questionable ratings or increases with the manager involved. This is to ensure consistency and fairness of ratings and increases within and among departments.

Salary increases **must not** be communicated to employees until after the CEO has given final written approval.

**Increase above Grade Maximum**

Employees who are paid at or above the salary grade maximum are not eligible for salary adjustments. Increases above the maximum are discouraged for any employee and should be carefully considered by the manager since the employee is already being paid well above market value for the position being performed and significantly more than others in the same grade.

**New Employees**

New employees who have been employed less than six months will not receive a merit increase. New employees, who have been employed more than six months but less than one year, will be eligible for a pro-rated merit increase.

**No Merit Increase**

Employees who fail to meet performance standards will not receive a merit increase, and will be scheduled for a follow-up performance evaluation, but not merit increase, in ninety (90) days.
Promotion Increases

The amount of promotion increase will be determined by the CEO. Any promotion increase above 8% (unless required to bring employee to new grade minimum) will require disclosure to the Board of Directors. Promotion increases will normally be effective at the beginning of the pay period in which the promotion occurs.

Market Adjustments

If an employee’s salary is significantly (more than 15%) below the market wage, i.e. midpoint for the grade, and the employee’s performance is exemplary, consideration can be given (if budget allows) to an out-of-cycle market adjustment to assure employee retention.

Lateral transfers

Employees transferring from one job to another within the same pay grade will not receive an increase. Any merit increase for the performance year will be based on performance in the new job.

Demotions

Demotions are discouraged in most situations. Consideration for pay as it relates to transfers to a lower pay grade will be handled on an exception basis by the CEO. However, if the transfer results in that job falling into a lower pay grade, the employee will receive a pay reduction if his/her salary is above the maximum of the lower pay grade.
Should a workplace accident occur and you are injured, which may or may not require medical attention, you must report the accident to your supervisor as soon as practical. You will be required to complete an accident report regardless of the severity of any injury.

**Reporting**

The person involved in an accident should generally not be required or allowed to fill out the reports. This should be done by the person’s supervisor or a member of the administrative staff. Having the report filled out by a third party ensures more objective reporting, and it provides another control or safeguard in the integrity of the process.

**Accident Investigation**

An accident is the result of an unsafe act on the part of either the injured employee or an unsafe condition or a combination of both. The purpose of an accident investigation is to isolate and identify accident causes in order to permit direct positive action to prevent recurrences. Accident prevention must be based on facts, which clearly identify the problem. Every incident occurring within the scope of activities should be investigated by the appropriate person/department.

**Key facts that need to be identified in any accident**

- Nature of Injury - the type of physical injury incurred, (laceration, break, etc)
- Body Part - the part of the body directly affected by the injury.
- Source of Injury - the object, substance, exposure or motion which directly produced or inflicted the injury
- Hazardous Condition – the physical condition or circumstance which permitted or caused the occurrence of the accident
- Unsafe Act - the violation of a commonly accepted safe procedure which directly permitted or caused the occurrence of the accident or event, i.e., failure to use personal protective equipment, unsafe loading, unsafe placing and mixing, unsafe lifting and carrying, etc.
- Unsafe condition - Normally a breakdown in management responsibility will result in an unsafe condition such as blocked exits, broken furniture, wet floor, loose handrails, etc. If proper lines of communications, as well as supervisory training are in place, the chances of unsafe conditions developing are considerably reduced.
- Location - the exact place where the accident occurred.
**Accident Investigation Results**

Analysis of the circumstances of accidents can produce these results:

- Identifies and locates the principle sources of accidents by determining, from actual experience, the materials, equipment, and actions most frequently involved in accidents and the jobs most likely to produce injuries.

- Indicates the need for changes by identifying the unsafe conditions of equipment and materials.

- Discloses unsafe practices, which necessitate training of employees.

- Discloses improper placement of personnel by identifying instances in which inabilities contribute to accidents.

- Permits an objective evaluation on the progress of the Safety Program by determining the effect of preventive measures, educational techniques and other methods adopted to prevent injuries.

**Disposition/Routing**

The Human Resources Coordinator, in coordination with the Operations Manager, is responsible for conducting investigations.
Equipment essential in accomplishing job duties is expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

Notify your supervisor if any equipment, machines, or tools appear to be damaged, defective, or need repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Your supervisor can answer any questions about an employee’s responsibility for maintenance and care of equipment used on the job. The improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in disciplinary action.
<table>
<thead>
<tr>
<th>Policy No.</th>
<th>9-3</th>
<th>This policy applies to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Name:</td>
<td>Family &amp; Visitors in the Workplace</td>
<td>Board of Directors</td>
</tr>
<tr>
<td>Revised Date:</td>
<td></td>
<td>Exempt</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-exempt</td>
</tr>
</tbody>
</table>

To provide for the safety and security of employees and the facilities at CASA, only authorized visitors are allowed in the workplace. All visitors must sign in and out of the building.

In an effort to maintain a safe, harmonious, and professional working environment for its employees, CASA expects that employees will not bring family members or visitors into the work area frequently or for extended periods.
Every employee has the responsibility of preventing accidents and is expected to cooperate fully in the measures taken for safety. All of us must be responsible for our own safety, but we also have a responsibility to our family, our co-workers, our community, and CASA.

The commitment to safety is a condition of employment for all employees. CASA employees are expected to observe safety practices, rules and operating procedures, as well as instructions relating to the efficient performance of their work.

Statement of Safety Policy

The purpose of a Statement of Safety Policy is to inform all employees that CASA is interested in their safety, health, and well-being as well as the safety and well-being of the community at large. CASA has instituted a comprehensive Safety Program and all employees are expected to follow all safe work procedure outlined in the policy. Leave no doubt about personal concern for the safety and health of the public as well as our employees, and the priority placed on them in the organization. The statement of safety policy must be clearly understood by all.

Work Conditions

- All work areas are arranged in a manner designed to promote safety and prevent accidents.
- First-aid kits are maintained in appropriate readily accessible locations for use in treating minor injuries or illnesses.
- CASA’s office is designated a non-smoking workplace.

Designation of Responsibilities

Management

- Assigns safety responsibilities. Management cannot delegate to others its responsibility for employee safety and health.
- Issues a written Policy Statement to establish and reiterate the commitment to safety and health. The Policy Statement will be given to every employee.
- Establishes a “Code of Safe Practices and Operating Procedures” detailing specific instructions and rules to help keep CASA a safe and healthy place for employees.
- Documents safety policies, assignment of responsibilities, directives, evaluations, and other actions related to the Safety Program.

Safety Officer/Operations Manager

- Provides information and assists management in its efforts to ensure a safe and well-maintained work environment.
- Keeps management informed as to the effectiveness of the various safety activities within the organization.

- Provides technical information. Reviews records to discover trends, repeaters, number of losses, and lost time days. Assesses training needs and ensures quality training is provided.

- Reviews Supervisor Accident Investigation Reports as well as incident reports to determine if the “cause” of loss has been identified, corrective action implemented, and the assignment of responsibility made that will reduce or eliminate the likelihood of a recurrence.

- Ensures all employees attend mandatory training to include follow up and rescheduling training.

- Ensures inspections of each facility and its equipment in accordance with safety policies, procedures, and standards.

**Team Leaders**

- Implements the Safety Program.

- Keeps their director informed as to the effectiveness of the Safety Program within their areas of operation.

- Investigates all reported claims occurring in their areas of operation. No report will be considered complete until the accident cause is identified, responsibility is determined, and corrective action taken to eliminate the likelihood of a recurrence.

- Trains volunteers under their leadership to safely perform their duties, identifies hazards that are unique to their work assignments.

- Ensures that each employee understands that compliance with all safety policies and procedures is mandatory and violation will not be tolerated.

- Considers employee safety performance as part of their regular employee performance evaluations.

- Enforces safe work procedures and work methods with the disciplinary action necessary to assure compliance.

**All Employees**

- Follows safety procedures and takes an active part in the work of protecting themselves, their fellow workers, equipment, and facilities.

- Reports all accidents, regardless of how slight, immediately to their supervisor.

- Attends safety-training meetings when requested to do so.

- Reports to work free from the effects of drugs or alcohol.

- Performs his/her duties in a safe manner.

- Immediately report unsafe conditions to the supervisor.
Recognizes that proper observance of safety procedures is a condition of employment

Safety Meetings

The Safety Officer will hold group meetings at least quarterly. The following is a guideline to carry out a meeting in order to derive the maximum benefits.

- Hold a structured meeting.
- Make the meetings informal, but orderly. Stick to the subject of safety.
- Limit structured meetings to 30 minutes. If discussion gets hot and heavy, which is good if controlled, continue it at the next meeting. Discuss only a single point or subject at the meeting.
- Meeting may be opened by stating the subject or problem. The group’s activities on the job should furnish the source of all safety topics. The group leader should develop the discussion with the group.
- During meetings, hazards found during inspections should be discussed. Program changes and updates, if any, should be presented.
- Attendees should sign a roster or form to document that the training was held and who participated. The Safety Officer should document each safety meeting.
Child Advocates has a zero tolerance for violence. If an employee engages in any violence in the workplace, or threatens violence in the workplace, employment will be terminated immediately. No talk of violence or joking about violence will be tolerated.

“Violence” includes physically harming another, shoving, pushing, harassing, intimidating, coercing, brandishing weapons, and threatening or talking of engaging in those activities. It is the intent of CASA to ensure that everyone associated with CASA, including employees, volunteers, clients, and visitors, never feels threatened by any employee’s actions or conduct.

**Reporting Violence**

It is every employee’s responsibility to prevent violence in the workplace. Reporting what is seen or heard in the workplace could indicate that a co-worker is in trouble. Employees may be in a better position than management to know what is happening with other co-workers.

CASA requires employees to report any incident that may involve a violation of this policy. Concerns may be presented to the employee’s immediate supervisor. Failure to report violence in the workplace could result in disciplinary action. All reports will be investigated and information will be kept confidential to the extent allowable by law.
No guns or weapons of any kind will be carried or transported by CASA employees, volunteers or directors, including those persons licensed to carry a concealed handgun under Section 411.171 of the Texas Government Code, while involved in any CASA related activity. The prohibition does not apply to law enforcement personnel.

For purposes of this section, the term “law enforcement personnel” includes:

- Sheriffs and their deputies;
- Constables and deputy constables;
- Marshals or police officers of an incorporated city, town, or village;
- Rangers and officers commissioned by the Police Safety Commission and the Director of the Department of Public Safety; and
- Investigators of the district attorneys’, criminal district attorneys’, and county attorneys’ office.

Violations of this policy may result in disciplinary action, up to and including dismissal.
Policy No. 9-7

<table>
<thead>
<tr>
<th>Policy Name:</th>
<th>Workplace Security</th>
<th>This policy applies to: Exempt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revised Date:</td>
<td></td>
<td>Non-exempt</td>
</tr>
</tbody>
</table>

In an effort to fulfill this commitment to a safe work environment for employees, clients, and visitors, access to CASA’s property is limited to those with a legitimate business interest. CASA’s doors are locked at all times. All employees are given a key to the front door and an alarm security code. Security and safety in the workplace is every employee’s responsibility.

The team concept of safety requires everyone to share both rights and responsibilities. All employees should use good judgment and common sense in choosing the places they go, how they get there, and the times they visit those places. They should also take precautions to protect their valuables in their offices and cars. Cars should be locked and valuables should be placed out of view.

Employees have the primary responsibility for protecting their personal property. CASA’s insurance does not cover personal property, and there is no liability should the items be stolen or misplaced.