



CASCADE
Community Connections

POLICIES

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Revision History

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Approvals

NAME	ROLE	DIGITAL SIGNATURE/DATE
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1 INTRODUCTION

This document describes Cascade Community Connections policies used to manage and control company actions and assets. Policies are divided into three sections:

All policies are reviewed, at a minimum, annually.

2 TERMS

Various terms are used throughout this document and are defined as follows:

Cascade Staff: any individual employed or contracted by Cascade in any capacity.

Client/Customer: term used in any document provided to persons served who is seeking or receiving services from Cascade. In those documents the term “Customer” rather than “person served” is used.

Person Served: an individual utilizing Cascade services. The person served is a stakeholder informing Cascade services and service delivery. All Cascade services center around persons served.

Stakeholders: the family or guardian of a person served. Families and/or guardians are included whenever the term “Client/Customer” is used.

Other Stakeholders: Other Stakeholders may include members of the community at large who pay a supportive role in the life of the person served. These could include employers, agency representatives, advocates, and similar.

3 PERSON SERVED POLICIES

Cascade’s Person Served Policies have been developed and are continuously refined to support its person served philosophy. Unless otherwise stated, the policies detailed below apply to all Cascade programs.

3.1 Person Served and Stakeholder Input

It is the policy of Cascade to obtain input on an initial and ongoing basis from persons served, family or guardians of persons served, and other stakeholders including Cascade staff. Cascade considers the input and involvement of persons served, and of stakeholders representing the interests of the person served, necessary to help define and ultimately determine if the organization is fulfilling its mission and to determine if improvement, revision, or changes to the programs should be initiated. This input may be gathered through, but not be limited to the following mechanisms:

- 1) representation on the Board of Directors by persons served and/or representatives, and representation on various committee and task forces assembled,
- 2) periodic surveys of persons served and other stakeholders,
- 3) person served involvement in the development of individual programs,
- 4) solicitation of stakeholder input for program evaluation and planning,
- 5) suggestions from persons served meetings, staff meetings, and other stakeholder forums, and
- 6) persons served grievances, and/or summaries thereof.

Stakeholder input shall be utilized in ongoing processes for quality improvement, including but not limited to:

- 1) strategic planning,
- 2) development and revision of person centered plans, and
- 3) ongoing evaluation and management of service delivery such as financial planning, resource planning, and performance improvement activities.

3.1.1 Person Served and Stakeholder Input Procedure

To promote the self-determination of persons served, and to monitor and improve programs by gathering input from those served in an ongoing manner, Cascade will utilize the following methods to involve those served and to recognize the importance of their input:

- Periodic persons served questionnaires regarding specific programs or services of the organization shall be conducted and shall be regarded as confidential, including “satisfaction surveys” reported in the Program Evaluation system.
- Formal and informal input from individual persons served, parents and/or guardians will be solicited regarding the program and services received from the organization.
- Results of post-discharge follow-up will be reviewed by designated employees on an annual basis.
- Persons served or their representatives may be recommended for participation on the organization’s standing committees or ad-hoc committees. Persons served who request involvement shall be referred to the appropriate volunteer or employee for consideration, as well as staff employee recommendations for involvement.
- Persons served or their representatives shall be solicited to serve on the Board of Directors. Requests and/or recommendations shall be referred to the Executive or Leadership Development Committee.
- Procedures for responding to person served grievances shall be handled without prejudice.
- Persons served input for individualized planning shall be gathered prior to the planning meeting and during the meeting. Employees shall make efforts to ensure the participation of parents, relatives, and advocates in the planning process. The Support Coordinator or designated plan writer shall ensure input is incorporated into the total plan, including specific outcomes and action plans. The plan will be reviewed with the person served at least four times per year and his/her input shall be recorded.
- The person served’s right to be involved in his/her care, treatment, and habilitation shall be communicated at the time of admission and employee violation of this right shall be sanctioned as described in Personnel Policies.
- Persons served meetings shall be convened at least twice per year. Employees in attendance shall solicit feedback, ideas, grievances and solutions. Records of each meeting shall be recorded and retained on file, and utilized in organizational planning efforts. Pertinent issues shall be communicated to the appropriate Division Director.
- Requests by stakeholders for services shall be encouraged. Stakeholders may submit verbally or in writing their ideas for programs, services, events, and organizational expansion. Suggestions will be reviewed by the appropriate party with verbal or written response given to the person making the suggestion.

3.2 Rights of Persons Served

People with disabilities are afforded the same rights as other citizens. Rights include basic protections and citizen guarantees as outlined in the US Constitution, the US Bill of Rights, the Universal Declaration of Human Rights, and local, state and federal laws. It is Cascade policy to respect, protect, and promote the rights of people we support, and to advance this commitment through the delivery of services and support. In all of our interactions with persons served and stakeholders we will strive to promote their interdependence and self-determination. Minimally, promoting people's rights is comprised of respecting individual preference and choices, and providing assistance to people in exercising their rights. Protecting rights includes responding when individual rights are ignored or infringed upon. Exercising rights is a function of personal choice and individuals may decide not to exercise certain rights. Restricting freedoms or rights should be a last resort and only as a matter of protection of individuals, not as a means of enforcing consequences, punishment, or for the purpose of changing behavior.

All rights detailed by Washington state statute and policy, and by the policies of Cascade, shall be communicated to persons served in meaningful ways at the beginning of services and at least annually. Information about rights, including training and education, shall be made available to persons served and employees on a routine basis. Procedures will address the rights to confidentiality, privacy, freedom from abuse and mistreatment, freedom from retaliation, informed consent, access to outside representation, and investigation of alleged infringements on rights.

All persons served, including his/her guardian, family member or advocate, are entitled to informal and formal methods of complaint or grievance. The procedures shall ensure adherence to an appropriate process with levels of review and defined timelines. Certain rights may be subject to limitation only if exercise of a right is inconsistent with a person served's health, safety or general well-being. Cascade procedures clearly delineate the approval process, length of limitations, appeal process, and the process of gaining informed consent.

3.2.1 Procedure

All Cascade employees and persons served will be educated on and receive information about individual rights. This will occur upon admission or hire and is reviewed with each individual at least annually. Information will be made available in alternative formats as needed. All employees of the organization shall adhere to the following list of rights to ensure that no individuals will be discriminated against when receiving supports and services of the organization.

Each person served shall be entitled to the following rights:

- 4) To be treated with dignity as a human being; courteously and in a manner befitting and respecting his or her age.
- 5) To have the same legal rights and responsibilities as any other person unless otherwise limited by law.
- 6) To have the right to due process review when any limitation to rights is proposed or alleged to have taken place.
- 7) To give informed consent or refusal, and / or an expression of choice regarding types and manner of service delivery, release of information to others, use of additional or concurrent services, and involvement in research projects.
- 8) To receive services regardless of gender, race, creed, marital status, national origin, disability or age.

- 9) To be free from physical, verbal, mental and sexual abuse and neglect; to be free from financial exploitation; to be free from retaliation for reports or grievances.
- 10) To receive appropriate humane and high quality services and supports as determined by the person's support team, which may include, but not be limited to, the person, parents, guardian or authorized representative, and to give informed consent or refusal regarding the composition of the support team.
- 11) To receive these services and supports in the most integrated setting appropriate for the person's particular needs.
- 12) To have access to state rules, policies and procedures pertaining to services and supports; to have access to legal representation; to have access to advocacy support services.
- 13) To have access to personal records, including information needed to make decisions in sufficient time to facilitate decision-making.
- 14) To have personal records maintained confidentially.
- 15) To personal privacy within one's own home and where receiving services.
- 16) To have services, supports and personal records explained so that they are easily understood.
- 17) To a fair and impartial investigation and resolution of alleged infringement of rights.

3.2.2 Employee and Person Served Training

Employees receive training in individual rights at new-hire orientation and through periodic training thereafter. Persons served will receive information about their rights at the time of admission and rights will be reviewed with them at least annually. Identified training needs (when additional instruction is indicated) are included in the individual's person centered plan.

3.2.3 Progression of Intervention

Cascade will support individuals without limitations in their actions as often as possible. At times individual's actions are such that there is the potential of harm to themselves or others and intervention is needed. When this is necessary, the support team will thoroughly assess the situation to determine alternatives and first use non-invasive methods. If those are not effective or the situation is too serious to start there, some limitations or restrictions may need to be put in place.

Any time a limitation or restriction is determined necessary by the team, the least restrictive measure for the situation will be attempted. If less invasive procedures are ineffective, as necessary to protect individuals, more intrusive measures will be used. Restrictions are often a short-term measure until other supports can be put in place for the individual.

3.2.3.1 Risk

Cascade respects persons served by providing them support in opportunities to make choices, take chances, and make mistakes, acknowledging that there is some degree of risk in all activities. While limiting individuals from engaging in situations of perceived risk may keep them safe, it also limits their ability to learn and experience all that life offers. As service providers, there can be a fine line between allowing for risk and inaction, which may be seen as neglect. To assist the support team in making these determinations, a Risk Assessment shall be completed for activities a person served may desire for which there are safety concerns. The risk assessment will address the following:

- What does the person want to do?
- Describe the person's history of decision-making.
- Describe the possible short and long-term consequences if the person engages in the desired activity.
- Describe the possible short and long-term consequences if the person has limitations or restrictions put in place.
- Describe the support and safeguards that could be set in place to protect the person.

From the gathered information, the support team will weigh the benefits and risk, consider possible safeguards and come to a conclusion which may be:

- Accept the person's decision to engage in the activity.
- Add training, support or safeguards and the person continues with activity.
- Activity will be limited in some way.
- Activity will be restricted for the individual.

If the support team decides to limit or restrict the person's activity in any way, the Risk Assessment and team decision will be reviewed by the Advisory Committee.

3.2.3.2 Limitations on Rights

Due to a developmental disability and/or psychiatric conditions, some individuals experience greater personal challenges that may negatively impact their well-being or that of others. They may engage in activities or behaviors that are not preferred lifestyle choices, but are detrimental to themselves or others and are often a result of mental health conditions. In these situations, the safety of everyone involved is the main purpose of limiting the behavior. Limiting a behavior may involve:

- Encouraging (using non-physical and/or physical interaction to transition from one place to another)
- Guiding (using non-physical and/or physical interaction to assist someone to transition from one place to another)
- Assisting (having the person hold on to staff and/or staff physically holding on the person to steady and support him/her while standing or walking to keep him/her from falling or slipping. The person doing the assisting follows the lead of the person being assisted. The person must be released when he/she no longer needs the physical assist).
- Supporting (providing physical assistance to help a person maintain his/her stance and balance, body mechanics, and body positioning).
- Avoiding (eluding, evading or escaping physical contact through the use of body positioning, shifting, stepping, sliding without making physical contact with the person).
- Redirecting or deflecting (while avoiding, using the hand and/or arm to make physical contact without holding on to the person)
- Releasing (removing someone or something from a physical hold; this may involve holding on briefly to the hand and forearm, just above the wrist, of the person).
- Restraining (limiting and redirecting, but not immobilizing, a person who has engaged in a behavior that is harmful to him/herself and/or others).

3.2.3.3 Unplanned Limitations

A short-term limitation of exercise of a right can be established by an employee if they determine that exercise of that right poses an immediate threat to the health and safety of the person served or others. Before any type of restrictive intervention is used, the threat level of the

situation must be assessed. Just because a person is threatening harm to him/herself or others does not mean she/he poses an immediate risk. If an individual is engaging in threatening behavior, three questions must be asked:

- 1) Is there a real (believable) threat to harm to self or others?
- 2) Is the person capable of carrying out the threat of harm?
- 3) Is the threat of harm immediate?

If these questions are all answered “yes,” an employee may need to intervene with a physical interaction, defined as the use of a physical presence, skill, maneuver, or technique to either assist or limit a person’s behavior.

After the threat of harm is over, the employee shall call his or her supervisor to discuss the situation and make a decision of the continuance of the limitation. Such limitation shall be documented in the case record and an event report shall be written. The support team must confer as soon as possible (ideally the next business day) to formulate a plan for the situation should it occur again and an addendum to the person-centered plan will be written.

Longer-term limitations may be required when it is determined by the support team that exercise of the right is inconsistent with the individual’s well-being. Rights and personal freedoms shall not be unduly limited. When necessary to ensure health, safety and welfare, support team recommendations of limitations shall be subjected to careful review by Cascade’s Advisory Committee. If recommended by the Advisors, such extended limitation shall be identified and documented as to onset and rationale in the Person-Centered Plan. If the period of time is not defined, restoration of the right shall be reviewed at least yearly at the annual person-centered plan meeting, and continued limitation must be agreed to by the majority of the team. At least annually, the Advisory Committee must also review the rights restriction to ensure due process is in place.

3.2.3.4 Restoration

Generally, restrictions on the exercise of rights or freedoms as a means of limiting risk or ensuring safety of individuals is for a defined amount of time. Each restrictive plan that is in place will also have an outline of the means by which a person will regain that right. In rare instances, restoration of particular rights might be contra-indicated. On a monthly basis, the rights restriction and the corresponding data collected shall be reviewed by the Cascade Executive Director to monitor progress towards meeting the stated criteria for rights restoration. When an individual meets criterion for rights restoration, the Cascade Executive Director shall submit the documentation to the Advisory Committee so it may be reviewed.

3.2.3.5 Informed Consent

All limitations will be discussed with individuals and guardians and a specific consent form will be developed with signatures from the individual, guardian, and Cascade representative to be presented to Cascade’s Advisory Committee.¹

3.2.4 Advisory Committee

Cascade’s Advisory Committee is an ad-hoc group of community volunteers (not employees of Cascade) who are recognized professionals and who support social and human rights. Cascade

¹ See the Cascade Roster for Advisory Committee member names.

provides each committee member with training only in their duties and responsibilities as they relate to Cascade's services which may include reviewing reports, attending meetings, and participating in discussions and decision making. The Cascade Executive Director, identifies and seeks for advisor participation. The advisors may also provide input and advice in regards to Cascade policies, procedures, programs, or practices that come into question during delivery of Cascade services. The Advisors help to protect the rights and dignity of any person supported by Cascade. The Advisory group has at least three individuals who agree to at least 1 year of participation. Member Requirements: collectively, an Advisor must have experience or training in:

- Abuse and neglect
- Individual rights
- Confidentiality and HIPAA
- Meaningful life, quality outcomes
- Positive behavior support

3.2.4.1 Meeting and Notifications

On an as-needed basis, the Cascade Executive Director schedules meetings with the Advisors. A quorum is established by a minimum of all three members. In addition to standing members, other attendees may be asked to attend the meeting at the request of the guardian or person served. The incident report is provided to attendees at least two business days before the meeting. At the meeting(s) restrictions are reviewed and a determination is made regarding the least restrictive actions to be taken. A follow-up to review outcomes is scheduled and further action is taken if needed.

At least one time per year, the Advisors will examine accumulated data on incidents and identify trends. Any noted concerns or issues are communicated in writing to the Cascade Executive Director within 3 business days of the committee review.

3.3 Person Served Meetings

Meetings should be planned in advance with proper notice given to persons served. Meetings shall be held at times and locations convenient to the majority of persons served involved. Locations should be accessible with consideration given to architectural accessibility and transportation needs of persons served. Whenever possible, additional accommodations or alternative presentation formats will be made available upon request. Notes shall be kept of all persons served meetings and pertinent feedback shall be provided to management.

3.4 Person Served Grievance Policy

Any person served, legal guardian, relative, or advocate of a person served who has a complaint, grievance, or concern regarding treatment, employee interaction, other persons served, and/or perceived violation of rights may pursue a formal resolution of the complaint. Cascade treats all grievances and concerns as formal and we will be tracked. Individuals who wish to appeal a decision made by the organization may request a review of the decision.

Cascade encourages communication regarding grievances and issues and understands that on occasion issues may need to be escalated to be resolved. Before escalating a matter, the individual considering escalation needs to ensure that the necessary analysis and data gathering is done. Escalation should not be undertaken without attending to proper data gathering.

3.4.1.1 Procedure

- 1) An informal discussion about the grievance, concern, or decision will occur with the appropriate members of the support team. If this discussion does not resolve the situation, the following steps will be conducted.
- 2) Request a private meeting or discussion with a member of the respective program management. This request may be given verbally or in writing. Grievance forms may be used, but use of a specific form is not required to initiate the grievance process.
- 3) A meeting or discussion will be scheduled promptly to review and resolve the grievance.
- 4) If resolution or satisfaction is not reached as a result of the initial meeting/discussion, the Cascade Executive Director may request to meet with the person served, employee, and/or others involved. The Cascade Executive Director or designee shall prepare a brief written summary of the grievance (if not yet written) and make a copy available to involved parties within five working days. Within ten days of receipt of the grievance, the Cascade Executive Director shall render a written resolution. The resolution does not have to contain an assignment of blame, but at least should outline instructions to involved parties as to how to avoid similar concerns in the future.
- 5) If the resolution is not to the persons served satisfaction, he/she may request that the grievance be reviewed by the Advisory Committee. The request for The committee will meet with the aggrieved person served within ten working days of receiving the request, and will present a written recommendation within five working days of the meeting. The person served has the right to be accompanied in the meeting by an advocate, including a friend / family member. This right shall be communicated to the person served when the committee is requested, and contact information for outside resources will be provided along with whatever assistance is needed to make the contact. The committee's recommendation is final.

All documentation (emails, written meeting notes, and other written communication) involving grievances and resolutions shall be recorded in the Cascade Incident Tracking System. The document will be reviewed annually, deleting names of specific individuals involved, for analysis of trends.

The act of filing a grievance or appeal shall not result in any form of retaliation or barriers to services.

It is the responsibility of all Cascade employees to be aware of the grievance procedure and to refer any persons served to this procedure when resolution or satisfaction cannot be reached on an informal basis. Employees are expected to assist the person served in utilizing these procedures and/or to refer the persons served to an available advocate if one is needed. Disciplinary action up to and including termination shall be instituted against any employee who discourages or prevents a person served from filing a grievance, who fails to inform a person served of the procedures when a grievance filing may be appropriate, or who engages in any form of retaliation in response to a grievance or appeal.

Information regarding the grievance procedure will be provided in an understandable format to persons served at the time of admission and will be reviewed annually. Employees will receive training regarding the grievance procedure at orientation and periodic training thereafter.

3.5 Advocacy Policy

It is the policy of Cascade that advocacy services will be offered to or accessed for the persons served by the organization. Advocacy in this context is speaking and/or acting on behalf of a person or family to ensure that legal and human rights are met. This includes the rights to education, property, community service, employment, social involvement and other necessities of life. Advocacy services may be delivered in the following manner:

- 1) Individual or case advocacy - ensuring the persons served of their rights to appropriate services including access to information pertinent to informed choice and decision making.
- 2) Systems or class advocacy - seeking to change a policy or practice which affects those persons served by the organization.
- 3) Self advocacy – supporting, advising, and encouraging so as to enable the person to advocate on his/her behalf.
- 4) Legislative advocacy - as permitted by law - seeking legislative enactments which would enhance the rights and opportunities for persons served by the organization.

Individuals may also access or be referred to legal entities for appropriate representation as appropriate to circumstances. Procedures and guidelines will be established as necessary and followed by employees of the organization.

3.5.1 Advocacy Procedure

In accordance with Cascade Policy on Advocacy, employees assist consumers by acting in an informational and guidance capacity, through information sharing, personal guidance, and encouragement to speak for themselves.

Self-advocacy is recommended when appropriate, and persons served shall receive regular and ongoing training in individual rights and decision-making skills. Employees shall support and encourage persons served in expressing their desires and exercising their rights on an ongoing and informal basis as needed. On a regular basis, persons served may benefit from our direct advocacy – as in speaking and/or acting on behalf of a person or family to ensure that legal and human rights are met. This is offered when self-advocacy is not used or is not successful.

In addition, persons served shall have access to external advocacy services where available. When formal external advocacy intervention is needed, the Cascade Executive Director will be informed of the need and will make plans for formal advocacy. The Cascade Executive Director will also confirm that other appropriate resources have been contacted and invited to participate in the discussion. He/she will verify all information provided by the person served, if possible and when meeting with all parties involved, including the person served, provide applicable information regarding options that are available, and verify that legal advice is not being given. He/she will also ensure that the person served has access and/or referral to legal entities for appropriate representation, provide appropriate referral information to the persons served, family, and involved organization(s), document advocacy efforts in the person served record.

Cascade employees know that when exercising advocacy responsibilities, caution is always used and confrontation is avoided. They know to never make threats of any kind. Advocacy work must always be conducted in a professional manner. The actions of each staff member on behalf of persons served may reflect on the organization and on all persons with disabilities.

3.5.2 Informed Consent Policy

Informed consent shall be obtained as required by law and by these procedures. Informed consent shall be based on all relevant facts about a plan and shall be voluntary. Refer to the Cascade Client/Customer Intake Procedure for details, procedures, and form(s).

3.5.3 Privacy and Confidentiality Policy

All persons served have a right to privacy with regard to their personal information. Any private information discussed with a person served must be discussed in as private and respectful manner as is reasonably possible. Refer to Client/Customer Privacy Policy for details, procedures, and form(s).

3.6 Confidentiality Policy

3.6.1 Release of Information:

All information in a client's record/file is considered confidential, and only certain Cascade staff will have access to it unless written permission is granted. During intake procedures, clients are asked to complete a Consent to Exchange Confidential Information Release which outlines with whom Cascade is permitted to share/obtain information about clients.

If information is shared with anyone outside of Cascade, a record is kept which includes:

- The date of exchange or review.
- Who information/records are released to.
- Specifically, what information is released or exchanged.
- Copy of signed Release, unless review is by select State/County staff as mandated by contract.

Clients are welcome and encouraged to request a review of their files at any time. They may contact their Cascade staff representative when a review is desired. If information about a client is disseminated inappropriately, clients are notified immediately as defined below in "Reporting Loss or Theft". When no longer needed, all Confidential Information is returned or if not returned, Cascade certifies that the information is destroyed.

3.6.2 Protection of Confidential Information

Any time client confidential information is obtained, reviewed or filed reasonable steps must be taken by staff to protect confidential information from unauthorized use, loss or theft.

Confidential information includes personal information that identifies a customer such as the customer's name, address, telephone number and Social Security Number. It also includes information such as medical or mental health information, assessments or reports, case narratives and/or financial information.

3.6.3 Client Information Entry Safeguards

Cascade staff members take steps to ensure that a customer's name or other confidential information is not inadvertently seen by another customer. When working on a computer with a client, the customer should be asked to look away or the angle of the computer monitor should be moved so the names of other customers on the staff caseload cannot be seen by the customer.

3.6.4 Calendar Software Use Precautions

When scheduling appointments in electronic calendar software the customer's full name should not be entered. It is preferable to enter the customer's first initial and last name, or abbreviations for the customer's name. Other confidential information such as the customer's Social Security number must not be noted on the calendar.

3.6.5 Case Service Record (Progress Notes)

Customer information must be handled with care.

- During work hours if the Cascade staff member will be leaving the work area for an extended period, progress notes must be put into a drawer or file cabinet out of the view of others.
- After hours or when the office is closed case files must be placed in a locked drawer or locked file cabinet.
- When transporting case records special efforts are taken to make sure case files are put into a locked container and locked in the vehicle (preferably in the trunk) where they are out of view.

The following steps should be taken to protect paper information:

- Limit access to confidential information to employees who need it for business purposes or to persons who have a legal right to see it;
- Work with or use confidential information only in authorized locations and only for official business;
- Store documents in lockable and secure containers or storage areas after normal working hours or when not in use;
- Never leave documents containing confidential information unattended or in public areas;
- When documents containing confidential information need to be moved efforts are made to ensure they are transported securely from one secure area to another secure area;
- Case files that are mailed must be:
 - Packaged inside a sealed envelope marked "confidential;"
 - Addressed to an individual at the receiving office; and
 - Sent by certified mail.

Special care must be taken when case files are taken home to protect customer information from unauthorized use, loss or theft.

- Prior to taking a case file home, the staff person must determine if they have a safe, secure place for working with and storing the case file;
- Case files that are taken home must be logged in and out;
- Case files that are taken home must not be left out where others (including family members, friends or visitors) have access to a customer's confidential information;
- When not in use, during the day and after work hours, the staff responsible for the records assures case files are secured.

3.6.6 Sending a Fax that Contains Confidential Customer Information

When sending a fax that contains confidential customer information:

- Note the word "confidential" prominently on the cover sheet;
- Include a statement on cover sheet that says something such as:

“This fax contains confidential information. If you received this fax in error, please notify us immediately and remove the information from all electronic and hard copy sources. Storing, printing or disseminating this fax to other parties is prohibited unless authorized by the sender”

3.6.7 Sending an email that Contains Confidential Customer Information

When sending an email that contains confidential customer information:

- Customer’s name or Social Security Number are never placed in the subject line. Use non-descriptive identifiers in the subject line and email message because email is a non-secure form of communication;
- Disclose to customers that email communications are considered to be a work product and they may become part of the customer’s case service record;
- Include a statement such as:

“This email, including any attachments, may include confidential and/or proprietary information, and may be used only by the person or entity to which it is addressed. If the reader of this email is not the intended recipient or his or her authorized agent, the reader is hereby notified that any dissemination, distribution or copying of this email is prohibited. If you have received this email in error, please notify the sender by replying to this message and delete this email immediately.”

3.6.8 Encrypting emails

All emails sent to outside agencies containing personal and private information should be sent marked “confidential” and encrypted using the State of Washington secure email portal.

3.6.9 Reporting a Data Breach, Loss, or Theft

Cascade staff members are required to report a data break, loss, or theft of case files, laptops or electronic portable devices to their supervisor as soon as possible, and no later than one day after the confidential information has been lost, stolen or disclosed without legal authorization.

Include the following details in the report:

- Date, location and circumstances of loss;
- Description of lost information;
- Whether and how information was protected; and
- Number of clients impacted.

The supervisor notifies the local law enforcement agency and puts a copy of the report in the customer’s case service record.

To minimize the potential for a data breach, Cascade segregates its data classifying it as either Confidential Data or General Data. Data from one classification is not stored with the other class of data. For example, any data related to a person-served is classified as Confidential data and is stored in secure, encrypted form, labeled as such. The Cascade Strategic Plan is an example of General data. While these data are also stored in encrypted files for the sake of convenience, they are kept in folders separate from person-served data. Access to Confidential Data is granted only on a need to know basis.

Any compromised or potential compromises of Confidential Data are reported to DSHS within 1 (one) business days if fewer than 500 persons’ protected data was compromised. Specific reporting procedures are outlined in each Cascade contract. Data must be reported to the DSHS Contact designated in the Contract, if no DSHS Contact is designated in the Contract, then the notification must be reported to the DSHS Privacy Officer at dshsprivacyofficer@dshs.wa.gov.

3.7 Medication Policy

Under no circumstances does anyone from Cascade administer, prescribe, provide advice, or otherwise become involved with prescribed or over-the-counter medications of any type in relation to a person served or Cascade staff members. Cascade may advise an individual to seek professional assistance if or when questions involving medications of any kind arise.

When there is a discrepancy between what a physician prescribes and what an individual actually takes (or does not take), and the individual self-administers medication while in the presence of a Cascade staff member a medication discrepancy occurs. In all instances, Cascade staff members will contact the caretaker or guardian. If necessary Cascade staff may contact local emergency providers using the local 911 system and will file the Critical Incident Report.

4 STAFF POLICIES

Cascade staff policies apply to the Cascade Executive Director, all Cascade employees, and Cascade contract staff as specified in the relevant contract. All policies are reviewed, at a minimum, annually.

All Employees are required to read and adhere to the Staff Ethics and Code of Conduct. Training on Staff Ethics and Code of Conduct is conducted annually.

4.1 Staff Ethics and Code of Conduct

The Cascade Staff Member Code of Conduct company policy outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication, but we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

4.1.1 Scope

This policy applies to all our employees regardless of employment agreement or rank.

4.1.2 Policy Elements

4.1.2.1 Company employees

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. The Code of Conduct components are:

- Compliance with law: All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.
- Respect in the workplace: All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.
- Protection of Company Property All employees should treat our company's property, whether material or intangible, with respect and care.

4.1.2.2 Fraud, Waste, and Abuse of Company Property

Cascade requires all employees to refrain from fraud, waste, and abuse of company property, whether tangible (physical) or intangible (intellectual). The following definitions apply:

Fraud: An intentional act of deception, misrepresentation or concealment in order to gain something of value. Examples include:

Waste: Over-utilization of services (not caused by criminally negligent actions) and the misuse of resources.

Abuse: Excessive or improper use of services or actions that are inconsistent with acceptable business practices. This refers to incidents that, although not fraudulent, may directly or indirectly cause financial loss. Examples include:

Employees:

- Should not misuse company equipment or use it frivolously.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.
- Employees should protect company facilities and other material property (e.g. company facilities) from damage and vandalism, whenever possible.
- All employees must show integrity and professionalism in the workplace.

4.1.2.3 Job Duties and Authority

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers must not abuse their authority. Cascade expects employees to delegate duties to their team members taking into account their competences and workload. Likewise, team members are expected to follow team leaders' instructions and complete their duties with skill and in a timely manner. Mentoring throughout the company is encouraged.

4.1.2.4 Professional Responsibilities

4.1.2.4.1 Absenteeism and tardiness

Employees should follow their designated work schedules. Exceptions can be made for occasions that prevent employees from following standard working hours or days. Employees are expected to be punctual when coming to and leaving from work. Employees should be accurate and truthful with timesheets and client progress notes.

4.1.2.4.2 Personal appearance

All employees must follow this Cascade dress code and these personal appearance guidelines. These dress code rules always apply:

- All employees must be clean and well-groomed. Grooming styles dictated by religion and ethnicity aren't restricted.
- All clothes must be work-appropriate. Clothes that are typical in workouts and outdoor activities should be worn only when performing these activities.
- All clothes must project professionalism. Clothes that are too revealing or inappropriate aren't allowed.
- All clothes must be clean and in good shape. Discernible rips, tears or holes aren't allowed.

- Employees must avoid clothes with stamps that are offensive or inappropriate.

4.1.2.4.3 Collaboration

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

4.1.2.4.4 Communication

All employees must be open to communication with their colleagues, supervisors or team members and must keep communications professional and collegial.

4.1.2.5 Cyber Security and Digital Devices

The following are guidelines for using computers, phones, the Cascade internet connection and social media to ensure security and protect our assets.

- Internet usage: The corporate internet connection is primarily for business. On occasion, it can be used for personal purposes as long as the use does not interfere with job responsibilities. Personal activities that slow down the internet connection (e.g. uploading photos) are to be halted if you're asked to do so.
- You must not use our internet connection to:
 - Download or upload obscene, offensive or illegal material.
 - Send confidential information to unauthorized recipients.
 - Invade another person's privacy and gain access to sensitive information.
 - Download or upload pirated movies, music, material or software.
 - Visit potentially dangerous websites that can compromise our network and computers' safety.
 - Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.
- Personal cell phone: Personal cellphone use is allowed while at work. However, if the use of a personal cell phone distracts from individual work or disrupts the workplace, the following rules apply:
 - Cell phone use should benefit your work (business calls, productivity apps, calendars.)
 - Personal calls must be kept brief and must be conducted in private (use an empty meeting room or common area so as not to disturb colleagues).
 - Avoid playing games or texting excessively.
 - Do not use a cell phone for any reason while driving a company vehicle.
 - Do not use a cell phone to record confidential information.
 - Do not download or upload inappropriate, illegal or obscene material using the corporate internet connection.
 - Do not use a cell phone in areas where cell phone use is explicitly prohibited.Refer also to the Cascade Employee Handbook, Cell Phone Use.

4.1.2.6 Marketing

Cascade's marketing ethics promotes fairness and honesty in all advertisements and communications. Any kind of false claims to consumers, invading consumer's privacy, stereotyping and targeting vulnerable audiences are considered to be unethical behavior. Actions that harm competitor's image are considered immoral.

Cascade understands that marketing ethics are subjective. Hence, they are openly discussed while making any marketing decisions. Cascade always strives to gain the trust of consumers and create a positive image.

4.1.2.7 Corporate email

Email is essential to Cascade's work. Use company email for work; however some personal use of company email on occasion is allowed.

- Work-related use. You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.
- Personal use. You can use your email for personal reasons as long as you keep it safe and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download eBooks, guides and other safe content for your personal use.
- Our general expectations: no matter how corporate email is used, avoid:
 - Signing up for illegal, unreliable, disreputable or suspect websites and services.
 - Sending unauthorized marketing content or emails.
 - Registering for a competitor's services, unless authorized.
 - Sending insulting or discriminatory messages and content.
 - Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask your supervisor.

4.1.2.8 Social media

Cascade advises against careless use of social media in the workplace. This policy address two types of social media: using personal social media at work and representing our company through social media.

- Using personal social media at work: You are permitted to access personal accounts at work, but responsible actions, according to our policies is vital. Use of social media must not negatively affect productivity. Specifically, we ask you to:
 - Practice discipline. Avoid getting sidetracked by the use of social platforms.
 - Ensure others know personal accounts or statements do not represent the company. For example, use a disclaimer such as "opinions are my own."
 - Avoid sharing intellectual property (e.g. trademarks) or confidential information. Ask a manager or the Cascade Executive Director before company news that is not officially announced is shared.
 - Avoid any defamatory, offensive or derogatory content which violates the company's anti-harassment policy if such content is directed towards colleagues, clients or partners.
- Understanding social media content: Cascade may conduct social media searches as part of its applicant vetting process.

4.1.2.9 Representing the Company Through Social Media

Anyone who handles Cascade's social media accounts or speaks on behalf of the company is expected to protect the company's image and reputation. Specifically, content must:

- Be respectful, polite and patient.
- Be limited to matters within an individuals' field of expertise when possible.
- Follow Cascade's confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.
- Coordinates with supervisors when planning to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.
- Employees are prohibited from posting information, pictures, or anything related to clients of Cascade on their personal social media subscriptions.
- Anything posted on Cascade's social media sites must be approved by the Community Services Supervisor or Executive Director and must be released by the individual(s) involved.

Cascade staff shall not communicate with person's served through their personal social media unless prior approval is obtained.

Cascade employees shall not be "friends" or engage with person's served, person's served family members, or employers through their personal social media sites. **Service Delivery**

This had no text with it. Leftover from something else, or does this need development???

4.1.2.10.1 Corruption Cascade discourages employees from accepting gifts from clients or partners. Briberies for the benefit of any external or internal party are prohibited.

RCW 42.52.150 states: "No state officer or state employee² may accept gifts, other than those specified in subsections (2) and (5) of this section, with an aggregate value in excess of fifty dollars from a single source in a calendar year or a single gift from multiple sources with a value in excess of fifty dollars." Refer to the RCW 42.52.150 for full details.

Any gift received from clients, client's families or partners in excess of \$20 shall be reported to the Cascade Program Director or Executive Director.

4.1.2.10.2 Boundaries

All Cascade employees must respect relationship boundaries.

4.1.2.10.3 Witnessing Legal Documents

Cascade employees must not witness the following legal documents involving persons served or other Cascade employees: Power of Attorney, guardianship, and advance directives.

4.1.2.10.4 Conflict of interest (Review this)

When experiencing a conflict of interest, personal goals are no longer aligned with responsibilities towards the company. Employees are to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. For example, owning stocks of one of our competitors is a conflict of interest. Other examples are:

² Because Cascade contracts with State agencies, RCW applicable to the agency also apply to Cascade.

In other cases, ethical issues may be faced. For example, accepting a bribe may benefit you financially, but it is illegal and against the code of ethics. If Cascade becomes aware of such behavior, termination will be conducted and legal recourse will be pursued.

For this reason, conflicts of interest are a serious issue for anyone associated with Cascade. Vigilance must be used in spotting circumstances that create conflicts of interest, either personal or for team members. Company policies must be followed and actions in the company's best interest must always be the course of action taken. Personal or financial interests must not get in the way of work. If an ethical dilemma is being experienced, a manager or the Cascade Executive Director must be contacted for assistance.

4.1.2.10.5 Solicitation and Distribution

Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company (e.g. religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

Cascade does not allow solicitation and distribution by non-employees in our workplace. An employee may solicit from colleagues only when:

- Colleagues are being asked to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- Support is being sought for a cause, charity or fundraising event sponsored, funded, organized or authorized by the company.
- Colleagues are being invited to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)
- Colleagues are being asked to participate in employment-related activities or groups protected by law (e.g. trade unions.)

In all cases, these activities must not disturb or distract colleagues from their work.

All employees should read and follow our company policies. Any questions should be directed to a manager or the Cascade Executive Director.

4.1.2.11 Disciplinary actions

Cascade may have to take disciplinary action against employees who repeatedly or intentionally fail to follow this code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

Cascade adheres to a non-reprisal policy regarding notices of ethics violations. Alleged violations identified or brought to the attention of Cascade management shall be treated confidentially. The Cascade Grievance Procedure is used as a reporting mechanism.

Cascade focuses on the alleged wrongdoer and not the employee who identified the situation, and if the complaint is valid, the situation that caused it will be addressed immediately. Cascade

ensures that career opportunities will not be affected if a complaint against the company is filed, and that all complaints will be kept confidential.

4.1.2.12 Human Resources

Cascade's human resource activities support professional interactions and activities related to employment. Cascade and its staff members:

4.1.2.13 Organizational Fundraising

As a for-profit company, Cascade does not conduct any fundraising activities. Cascade staff members must not engage in any fundraising activities on behalf of Cascade.

4.2 Workplace Harassment Policy

Cascade's anti-harassment policy expresses our commitment to maintain a workplace that's free of harassment, so our employees can feel safe and happy. We will not tolerate anyone intimidating, humiliating or sabotaging others in our workplace. We also prohibit willful discrimination based on [age, sexual orientation, ethnicity, racial, religion or disability.]

4.2.1 Scope

This workplace harassment policy applies to all employees, contractors, public visitors, customers and anyone else whom employees come into contact with at work.

4.2.2 Policy Elements

Cascade's definition of harassment in the workplace: Workplace harassment includes bullying, intimidation, direct insults, malicious gossip and victimization. Cascade acknowledges that an exhaustive list cannot be created, but presents by example some instances that would be considered harassment:

- Sabotaging someone's work on purpose.
- Engaging in frequent or unwanted advances of any nature.
- Commenting derogatorily on a person's ethnic heritage or religious beliefs.
- Starting or spreading rumors about a person's personal life.
- Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g. bringing coffee) against their will.

Sexual harassment is illegal and Cascade will rigorously investigate relevant reports. If an employee is found guilty of sexual harassment, they will be terminated.

4.2.3 Addressing Harassment

If you're being harassed, whether by a colleague, customer or vendor, you can choose to talk to any of the following:

Offenders. If you suspect that an offender doesn't realize they are guilty of harassment, you could talk to them directly in an effort to resolve the issue. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues.) Avoid using this approach with customers or stakeholders.

Your manager. If customers, stakeholders or team members are involved in your claim, you may reach out to your manager. Your manager will assess your situation and may contact HR if appropriate.

The Cascade Executive Director. All staff members should feel free to reach out to the Cascade Executive Director in any case of harassment no matter how minor it may seem. For your safety, contact the Cascade Executive Director as soon as possible in cases of serious harassment (e.g. sexual advances) or if your manager is involved in your claim. Anything you disclose will remain confidential.

4.2.4 Disciplinary Consequences

Punishment for harassment depends on the severity of the offence and may include counseling, reprimands, suspensions or termination.

4.3 Progressive Discipline Policy

Cascade's progressive discipline policy and procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable employee behavior and performance issues.

Outlined below are the steps of Cascade's progressive discipline policy and procedures. Cascade reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling or training; the employee's work record; and the impact the conduct and performance issues have on the organization.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between Cascade and its employees.

4.3.1 Procedure

4.3.1.1 Step 1: Counseling and Verbal Warning

Step 1 creates an opportunity for the immediate supervisor to bring attention to the existing performance, conduct or attendance issue. The supervisor should discuss with the employee the nature of the problem or the violation of company policies and procedures. The supervisor is expected to clearly describe expectations and steps the employee must take to improve his or her performance or resolve the problem.

Within five business days, the supervisor will prepare written documentation of the verbal counseling. The employee will be asked to sign this document to demonstrate his or her understanding of the issues and the corrective action.

4.3.1.2 Step 2: Written Warning

The Step 2 written warning involves more-formal documentation of the performance, conduct or attendance issues and consequences.

During Step 2, the immediate supervisor and a division manager or director will meet with the employee to review any additional incidents or information about the performance, conduct or attendance issues as well as any prior relevant corrective action plans. Management will outline the consequences for the employee of his or her continued failure to meet performance or conduct expectations.

A formal performance improvement plan (PIP) requiring the employee's immediate and sustained corrective action will be issued within five business days of a Step 2 meeting. The

written warning may also include a statement indicating that the employee may be subject to additional discipline, up to and including termination, if immediate and sustained corrective action is not taken.

4.3.1.3 Step 3: Suspension and Final Written Warning

Some performance, conduct or safety incidents are so problematic and harmful that the most effective action may be the temporary removal of the employee from the workplace. When immediate action is necessary to ensure the safety of the employee or others, the immediate supervisor may suspend the employee pending the results of an investigation.

Suspensions that are recommended as part of the normal sequence of the progressive discipline policy and procedures are subject to approval from a next-level manager and/or the Cascade Executive Director.

Depending on the seriousness of the infraction, the employee may be suspended without pay in full-day increments consistent with federal, state and local wage and hour employment laws. Nonexempt/hourly employees may not substitute or use an accrued paid vacation or sick day in lieu of the unpaid suspension. In compliance with the Fair Labor Standards Act (FLSA), unpaid suspension of salaried/exempt employees is reserved for serious workplace safety or conduct issues. The Cascade Executive Director will provide guidance to ensure that the discipline is administered without jeopardizing the FLSA exemption status.

Pay may be restored to the employee if an investigation of the incident or infraction absolves the employee of wrongdoing.

4.3.1.4 Step 4: Recommendation for Termination of Employment

The last and most serious step in the progressive discipline process is a recommendation to terminate employment. Generally, Cascade will try to exercise the progressive nature of this policy by first providing warnings, issuing a final written warning or suspending the employee from the workplace before proceeding to a recommendation to terminate employment. However, Cascade reserves the right to combine and skip steps depending on the circumstances of each situation and the nature of the offense. Furthermore, employees may be terminated without prior notice or disciplinary action.

Management's recommendation to terminate employment must be approved by the Cascade Executive Director or designate. Final approval may be required from the Cascade Executive Director.

4.3.1.5 Appeals Process

Employees will have the opportunity to present information to dispute information management has used to issue disciplinary action. The purpose of this process is to provide insight into extenuating circumstances that may have contributed to the employee's performance or conduct issues while allowing for an equitable solution.

If the employee does not present this information during any of the step meetings, he or she will have five business days after each of those meetings to present such information.

4.3.1.6 Performance and Conduct Issues Not Subject to Progressive Discipline

Behavior that is illegal is not subject to progressive discipline and may result in immediate termination. Such behavior may be reported to local law enforcement authorities.

Similarly, theft, substance abuse, intoxication, fighting and other acts of violence at work are also not subject to progressive discipline and may be grounds for immediate termination.

4.3.1.7 Documentation

The employee will be provided copies of all progressive discipline documentation, including all PIPs. The employee will be asked to sign copies of this documentation attesting to his or her receipt and understanding of the corrective action outlined in these documents.

Copies of these documents will be placed in the employee's official personnel file.

4.4 Cultural Competency and Diversity Policy

Cascade always strives to meet the needs and expectations of increasingly culturally and ethnically varied populations. It is always the goal to achieve a better understanding of cultural differences and their relationship to the foundations of quality service –respect, inclusiveness, and sensitivity.

Serving diverse populations is not a “one size fits all” process. Diversity includes all differences, not just those that indicate racial or ethnic distinctions.

4.4.1 Purpose

To focus our resources, our mission is: “To create and promote innovative opportunities that reveal the natural potential in each person we serve.”

Our ultimate vision is: to connect people, and enrich lives through our core values which include:

4.4.2 Overall Approach

We use an encompassing approach the help ensure Cascade staff has a greater awareness/knowledge of diverse peoples and cultures that allow them to successfully respond to and support our community. Our plan includes such areas as spiritual beliefs, holidays, dietary regulations or preferences, clothing, attitudes toward impairments, language, how and when to use interpreters, and etcetera.

The enhanced knowledge, skills and behaviors from the implementation of our CCDP will enable our staff to work more effectively cross culturally by:

4.4.3 Commitment

Cascade is committed to:

4.4.4 Jefferson County, Washington Demographics

This information is updated annually, and this policy is adjusted accordingly. As of January 1, 2017, Jefferson County, WA has a population of 30,333 people³. In Jefferson County, 98% are citizens. The ethnic composition of the population of Jefferson County, WA is composed of:

The most common non-English languages in Jefferson County are:

³ <https://datausa.io/profile/geo/jefferson-county-wa/>

Compared to other places, Jefferson County, WA has a relatively high number of Scandinavian (92 speakers), German (135 speakers), and Japanese (56 speakers).

4.4.5 Actions Taken

Each year in July, utilizing current demographic information, Cascade:

- 1) Researches and gathers information and feedback/ideas regarding the enhancement of cultural competency and diversity training, as this information relates specifically to our persons served, stakeholders, staff, and service area.
- 2) Enhances annual Cultural Competency and Diversity staff training and conducts training sessions to provide additional and updated information gathered during the research & feedback process.
- 3) Administers a pre-training and post-training assessment to help determine Cascade staff's level of awareness (See CCDDP Assessment).
- 4) Updates our person served and stakeholder documents (such as the Customer Handbook, or Intake/Exit forms) to reflect appropriate changes. This may include publishing the documents in alternate languages, or similar actions.
- 5) Administers the Cultural and Diversity Competence Assessment
- 6) Conducts additional cultural and diversity competence training to enhance understanding of the major values and beliefs of the people we serve and other stakeholders, especially those who may come from different cultural or spiritual backgrounds.

Cascade focuses on culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status and language. Training will also focus on the cultural and spiritual beliefs of the countries of origin, especially their views of disabilities and its causes, and the influence of culture on the choice of service outcomes and methods. Attendance at cultural competency and diversity training will continue to be documented and included in personnel files and/or training records.

Cascade maintains an awareness of changing needs and expectations of the people we serve and our stakeholders, in conjunction with the changing business needs of our organization. The analysis of these outcomes will also be used by our organization to improve the quality of our programs and services and to facilitate organizational decision making and ongoing strategic planning.

4.5 Corporate Citizenship

Cascade strives to participate in the community at large and to practice Certified B Corporation⁴ requirements as time and resources allow. Cascade staff members regularly engage in social and environmental activities in accordance with B Corporation standards. Active participation with organizations such as Olympic Neighbors is encouraged for all Cascade staff members.

5 GENERAL POLICIES

General Cascade policies apply to both Cascade staff and staff interactions with persons served. All policies are reviewed, at a minimum, annually.

⁴ See www.bcorporation.net.

5.1 Non-Discrimination Policy

Employment and services provided by Cascade shall be extended to all individuals without regard to race, color, national origin, ethnicity, sex, age, religious beliefs, creed, marital status, sexual orientation, disabled or Vietnam Era Veteran status, disability, or use of a trained service animal by a person with a disability. Cascade is committed to applying this policy equally to relationships between the company, its customers, clients and employees. In addition, Cascade does not discriminate in employment practices or delivery of services against persons with HIV infection/AIDS, persons perceived to have HIV infection/AIDS, persons perceived to be related to or residing with someone with HIV infection/AIDS, persons who have tested positive for HIV antibodies, or persons perceived to be at high risk for contracting HIV.

5.2 Minimum Wage Policy

Cascade complies with Washington State minimum wage law and does not place persons served in sub-minimum wage jobs.

5.3 Risk Policy

Cascade has developed a strategy to assess and address risk that can be built upon and adopted consistently throughout the agency. This policy is reviewed at least annually. Updates are made after the formal review and after the annual SWOT Analysis, if necessary.

5.3.1 Scope

Every known hazard and possible risk along with the solution to mitigate the damages cannot possibly be listed, but Cascade's policy serves as a guide or tool to be used to promote awareness, creativity, and responsibility in assessing and addressing risks and in reducing avoidable incidents in community-based employment services.

Knowing that there is dignity in choice, risks must be analyzed and then balanced based on the uniqueness of the individual and their environment. Identifying the risk is the first step in planning.

Most actions carry some degree of risk, but trying to avoid every risk can inhibit living a full life. In many cases it requires negotiation and creativity as well as a common understanding of goals.

Cascade conducts an independent safety audit (refer to the Cascade Safety Audit) at each jobsite at the beginning of employment to identify risks and develop mitigations utilizing Cascade's Hazard/Risk Identification Forms.

Cascade defines risk mitigation as the use and employment of safeguards. Safeguards apply to both the individual receiving services as well as Cascade staff. Safeguards are intentional actions to help reduce the risks a person might face because of their vulnerabilities and/or situation. Everyone is at risk or vulnerable at some time in their life, however people with disabilities may face enhanced risks because of their disability.

Safeguards are meant to be empowering and they can prevent a negative outcome. They can help a person, as well as an agency, be better prepared and create a positive result and potentially offer a sense of security to the individual, their family and staff members.

For Cascade, intentional safeguards can show a level of professionalism and in the event of an incident will document best practices and procedures to investigators and to the public.

Intentional safeguards can help in learning from mistakes thus improving the quality of individual's lives as well as the quality and strength of Cascade's employment services program.

5.3.2 Policy Elements

Cascade uses five elements to safeguard its clients/customers and its staff:

IDENTIFY: Use information included in job descriptions, the referral packet, an ISP (if received), the person's history, and the person-centered planning process to identify hazards.

EVALUATE: Assess the hazards, determine and rate risks using simple formulas (risk referent).

PLAN & ASSIGN: Make plans for safeguards. Assign responsibility to a specific person(s)/position. Record findings, and the proposed actions and safeguards in the Individual Employment Plan (IEP) documents.

IMPLEMENT: Implement the plan and the safeguards. Record the implementation date and have the responsible person(s) sign off. Signed documents become part of the individual's Case Notes.

REVIEW, REVISE: Schedule reviews at regular intervals. Reviews must be signed and dated. This is an on-going process recognizing that persons and situations change. Signed reviews become part of the Individual's Case Notes

These steps are conducted, at a minimum, annually or are conducted when conditions (either the person's or the job situation's) change.

5.3.2.1 Identify

A Hazard is defined as a potential source of harm or damage that may pose a level of risk. Most hazards are possibilities with only a theoretical risk of harm. Many things may constitute a hazard. Hazards can be actions, activities or objects.

A Risk is the likelihood or potential that a specific action or activity (including the choice of in-action) will lead to an undesirable outcome.

Hazards and vulnerabilities can interact together to create risk. Not every hazard is a risk. It's when the hazard coincides with the individual's vulnerabilities that the hazard becomes a risk. Lives change, environments change, and vulnerabilities also change. Some changes may mean that new safeguards are required while others may render current safeguards unnecessary.

5.3.2.2 Evaluate

Risk factors must be documented in the Individualized Job Placement Plan (IJPP) or in job descriptions. All assessments and plans should be accurately recorded in a clear and concise manner so that decisions are transparent. Action plans should be developed, assigned and signed off by staff and all team members and revised as necessary.

Documentation should show that:

5.3.3 Risk Management Plan

Once risks have been identified and evaluated, they are addressed within the IJPP or job descriptions. Consideration is given to the types of safeguards, if any, that are necessary and available to mitigate the risks. Steps of the risk assessment process are documented in a

transparent fashion that will facilitate easy reviews and revisions. Documentation should include the following information:

5.3.3.1 Plan:

The objective of planning is to find a way to reduce the risks directly affecting the person and/or the community at large.

Safeguards will vary based on the uniqueness of the situation and the individuals involved. Cascade management will determine the appropriate safeguards and strategies on an individual basis.

Intentional safeguard planning recognizes that there is no guarantee that all risks are removed. Things change and not everything can be foreseen; constant oversight is required. Responsibility for safeguards is assigned and agreed upon and safeguards are implemented. Documentation is completed and regularly updated.

5.3.3.2 Assign:

The resulting plan identifies who is responsible for all safeguards. All safeguards must be assigned to a responsible party for implementation and review. A chain of command may delegate these responsibilities.

5.4 Safety Practices and Procedures

Cascade uses these procedures to protect the health and safety of Clients and staff. For health and safety reasons, there is no smoking allowed in buildings or vehicles where Cascade is providing services. There are no illicit drugs or weapons allowed in Cascade buildings or vehicles being used to provide Cascade services. Clients requiring special accommodations must be directed appropriately in the event of an emergency.

5.4.1.1 Fires

In the event of a fire, trigger the fire alarm or report it immediately to the closest staff member. An alarm will sound, and you will leave the building and go to a designated area. When you are clear of danger, contact fire emergency services.

5.4.1.2 Bomb Threats

In the event of a bomb threat utilize the Fire Alarm. We will evacuate the building in the same manner as is if there is a fire. Proceed to the designated area and wait for further instructions from management. Do not re-enter a building until you have been cleared to do so.

5.4.1.3 Natural Disasters

Earthquake- In the event of an earthquake: If you are indoors: Remain indoors and seek shelter under strongly constructed tables, desks or door frames. Keep away from windows, fixtures, furniture, and items that may become unstable. Evacuate the premises if it is safe to do so. If you are outdoors: Move quickly away from buildings, electrical structures and flammable products. Proceed to designated assembly area if safe to do so.

Flood- In the event of a flood: Do not enter the flood waters. Stay in a safe location while it continues to offer protection and wait for further instructions from management. Proceed to Cascade's designated assembly area if safe to do so. Management will contact emergency services if required.

Tsunami- If the area is under a Tsunami watch, Cascade management will monitor weather alerts. If a Tsunami Warning is issued for the county, a Tsunami Warning will be announced. Please follow the posted signs to the designated safety area. Cascade management will inform you when conditions are safe to return to or leave the building you are in.

5.4.1.4 Power Failures

In the event of a power failure, Cascade management will direct you with flash lights to the nearest exit. Exit signs are located above each emergency exit. Leave the building and go to a designated area.

5.4.1.5 Health and Medical Emergencies

If an individual is in need of First Aid, notify the nearest Cascade staff person or the employer's management. First Aid kits are located in each building in which Cascade provides services; however, for anything other than a very minor injury or illness, a call to EMT should be made.

5.4.1.6 Exposure to Bloodborne Pathogens

Cascade utilizes the Department of Social and Health Services (DSHS) policy for bloodborne pathogens. DDA Policy 9.03 identifies relevant information about bloodborne pathogens. DDA Policy 9.06 establishes detailed methods for Prevention and Control of Occupational Exposure to Bloodborne Diseases. This information is available at:

<https://www.dshs.wa.gov/sites/default/files/DDA/dda/documents/policy/policy9.03.pdf>.

Use the Critical Incident Reporting and Follow-up Forms to report and analyze any exposure to bloodborne pathogens.

5.4.1.7 Threat of Violence

If there is a threat or act of violence, Law Enforcement authorities may be called immediately. Cascade does not use seclusion or restraint; we may use emergency interventions until law enforcement authorities have arrived.

If any condition is believed to be potentially hazardous, management is to be notified immediately.

5.5 Critical Incident Reporting Policy

At Cascade, a critical incident is any event or situation, either accidental or deliberate that has a stressful impact sufficient to overwhelm the normally effective coping skills of an individual. Critical incidents are abrupt, powerful events that fall outside the range of ordinary human experiences. Risk of serious harm, injury or even death is included as well as abuse or neglect, injuries, communicable diseases, violence or aggression, transportation, weapons, or illicit substances, etc.

5.5.1 Scope

Critical incidents involving services, employees or clients will be reported in accordance with Cascade's procedures to ensure they are efficiently and effectively managed.

This policy recognizes the importance of the health, safety and well-being of clients, staff, volunteers and the public. A standard system of reporting critical incidents enhances quality service provision and minimizes the risk of harm to clients, staff, volunteers and the public.

5.5.2 Policy Elements

Critical incidents may include but are not limited to:

Abuse	Serious Injury	Restraints
Neglect	Missing Person	Medical Errors
Exploitation	Death	Law Enforcement Contact
Rights Violations	Medical Emergency	Suicide Attempt

5.5.2.1 Abuse

Abuse includes, but is not limited to:

- a. Willful use of offensive, abusive, or demeaning language that causes mental anguish of any person with developmental disabilities or a mental illness;
- b. Knowing, reckless, or intentional acts or failures to act which cause injury or death to a developmentally disabled or mentally ill person or which placed that person at risk of injury or death;
- c. Rape or sexual assault of a developmentally disabled or mentally ill person;
- d. Corporal punishment or striking of a developmentally disabled or mentally ill person;
- e. Unauthorized use or the use of excessive force in the placement of bodily restraints on a developmentally disabled or mentally ill person; and
- f. Use of bodily or chemical restraints on a developmentally disabled or mentally ill person which is not in compliance with federal or state laws and administrative regulations.

5.5.2.2 Exploitation

An act committed by any person toward a person with a disability, means:

- a. The taking or misuse of property or resources of a person with developmental disabilities or mental illness by means of undue influence, breach of fiduciary relationship, deception, harassment, criminal coercion, theft, or other unlawful or improper means;
- b. The use of the services of a person with developmental disabilities or mental illness without just compensation; or
- c. The use of a person with developmental disabilities or mental illness for the entertainment or sexual gratification of others under circumstances that cause degradation, humiliation, or mental anguish to the person with developmental disabilities or mental illness.

5.5.2.3 Neglect

- a. Inability of a person with developmental disabilities or mental illness to provide food, shelter, clothing, health care, or services necessary to maintain the mental and physical health of that person;
- b. Failure by a Cascade staff member to meet, either by commission or omission, any statutory obligation, court order, administrative rule or regulation, policy, procedure, or minimally accepted standard for care of persons with developmental disabilities or mental illness;

- c. Negligent act or omission by a Cascade staff member which causes injury or death to a person with developmental disabilities or mental illness or which places that person at risk of injury or death;
- d. Failure by any caretaker, who is required by law or administrative rule, to establish or carry out an appropriate individual program or treatment plan for a person with developmental disabilities or mental illness;
- e. Failure by any caretaker to provide adequate nutrition, clothing, or health care to a person with developmental disabilities or mental illness;
- f. Failure by a Cascade staff member to provide a safe environment for a person with developmental disabilities or mental illness; and
- g. Failure by any caretaker to provide adequate numbers of appropriately trained staff in its provision of care and services for persons with developmental disabilities or mental illnesses.

5.5.2.4 Rights Violations

Through omission or commission, the failure to comply with the rights to which an individual with a disability or mental illness is entitled as established by law, rule, regulation, or policy.

5.5.2.5 Serious Injury

Reported, regardless of the cause or setting in which it occurred, when an individual sustains:

- a. A fracture
- b. A dislocation of any joint
- c. An internal injury
- d. A contusion larger than 2.5 inches in diameter
- e. Any other injury determined to be serious by a physician, physician assistant, registered nurse, licensed vocational nurse/licensed practical nurse.

5.5.2.6 Missing Person

Whenever there is police contact regarding a missing person regardless of the amount of time the person was missing. Reporting should occur during a period of time in which a program provider is responsible for supervision of program participant/consumer.

5.5.2.7 Death

The death of an individual is reported, regardless of the cause or setting in which it occurred during a period of time in which a program provider is responsible for supervision of program participant/consumer.

5.5.2.8 Medical & Psychiatric Emergency

Admission of an individual to a hospital or psychiatric facility or the provision of emergency medical services (treatment by EMS) that results in medical care which is unanticipated and/or unscheduled for the individual and which would not routinely be provided by a primary care provider.

Use Of:

- a. Emergency Medical Services (example⁵: emergency room care)

⁵ Examples of possible scenarios

- b. Emergency Psychiatric Services (example: mental health facility admission)
- c. Life Saving Intervention (example: Heimlich, CPR).

5.5.2.9 Restraints

Every time an individual is restrained, it is:

- a. Personal (the application of pressure, except physical guidance or prompting of brief duration, that restricts the free movement of part or all an individual's body).
- b. Mechanical (the use of a device that restricts the free movement of part or all of an individual's body. Such device includes an anklet, a wristlet, a camisole, a helmet with fasteners, a muff with fasteners, a mitt with fasteners, a posey, a waist strap, a head strap, and restraining sheet. Such a device does not include one used to provide support for functional body position or proper balance, such as a wheelchair belt or one used for medical treatment, such as a helmet used to prevent injury during a seizure.) It also means to cause a device that allows for free movement to be useable. Such as locking a wheelchair or not allowing an individual access to technology.
- c. Chemical (the use of a chemical, including a pharmaceutical, through topical application, oral administration, injection, or other means to control an individual's activity and which is not a standard treatment for the individual's medical or psychiatric condition).
- d. Not Included in a Written and Approved Behavior Plan.
- e. Seclusion: involuntary confinement in a room that the person is physically prevented from leaving.
- f. Isolation: forced separation or failure to include the person in the social surroundings of the setting or community.

5.5.2.10 Law Enforcement Contact

Law Enforcement Contact occurs if:

5.5.2.11 Suicide Attempt

A suicide attempt occurs if there is an intentional attempt to take one's own life. A suicide attempt is limited to the actual occurrence of an act and does not include verbal suicidal threats by a person receiving services.

5.5.3 Addressing Critical Incidents

All critical incidents must be recorded on the Cascade Critical Incident Report Form and must include the following actions:

- 1) At the time of the incident:
 - o Contact emergency services as soon as it is safe to do so. Ensure injured and/or traumatized employees, clients or members of the public are provided with an appropriate emergency response.
 - o Inform the Manager or most relevant staff member, immediately.
 - o Where the critical incident involves suspected criminal activity, the matter must be reported to the Port Townsend Police Department or Jefferson County Sherriff's Office, regardless of any issues of consent or confidentiality.

- Inform government agencies, such as and the Department of Health and Social Services, Child Protective Services, or Adult Protective Services, in accordance with legislative requirements (Chapter 74.34 RCW)
- If the incident involves a DVR Customer or DDA client, inform their DVR counsellor and/or DDA Case Resource Manager, immediately. Fax to DDA from a county library (360-385-940?).
- More detailed reporting may be required in some circumstances, e.g. where the incident involves a child or a vulnerable adult. By law, all Cascade staff are mandated reporters and are required to report suspected or known abuse, neglect, or exploitation of another individual within 24 hours of learning about or observing the abuse. Failure to report can result in disciplinary action and/or prosecution as a gross misdemeanor under Washington State law. (RCW 74.34.053)
- If a Cascade staff member has reasonable cause to suspect any child or vulnerable adult has been abused, neglected or exploited, regardless of the source of information, he/she must:
 - Report the situation as soon as possible, but no later than 24 hours from becoming aware of it, (contact number listed below); and Immediately notify his/her supervisor or manager.
 - Reports must be made within 24 hours of becoming aware of the suspected abuse, neglect or exploitation regardless of employee leave or days off.

Call the number below if you suspect that a child or vulnerable adult is being abused or neglected. The operator will connect you with the right DSHS office to make your report:
 DSHS Toll Free: 1-866-END-HARM (1-866-363-4276)
 Voice/TTY 1-800-737-7931

- Mandated reporters calling a DSHS reporting unit should be prepared to provide, to the extent possible, the following information:
 - Your name and address
 - The name and address of the child or vulnerable adult, and the name of the facility providing care, if applicable
 - The name and address of the client's legal representative or alternate decision maker
 - The nature and extent of the abandonment, abuse, financial exploitation, or neglect
 - Any known history of previous abandonment, abuse, financial exploitation, or neglect
 - The identity of the alleged perpetrator, if known, and
 - Other information that may be helpful in establishing the extent of abandonment, abuse, financial exploitation or neglect
- 2) Contacting law enforcement agencies

If there is reason to suspect sexual or physical assault has occurred immediately contact your local law enforcement agency to report the situation and obtain instructions for:

- Emergency client protection
 - Evidence preservation and collection, where applicable
 - Coordinating with an abuse neglect specialist or a sexual assault center
 - Investigation process and procedures
- 3) Immediately after the incident:
- Assist those involved in the incident to contact family or support persons to advise them of the situation.
 - Provide people who have been exposed to the critical incident with emotional support and practical assistance.
 - Assist in providing transport if required.
 - If the critical incident is of a Police nature or a workplace health and safety issue, ensure the area or site is not disturbed.
- 4) Following the incident:
- Encourage employees or clients to seek further assistance if necessary.
 - Defuse any issues for employees involved in the critical incident.
 - Provide a professional post-trauma counselling service if required.
 - Return the worksite to normal operation as soon as practicable.
 - Follow up with employee's status at a later date as required.

5.6 Equipment and Information Technology(IT) Resources Policy

Cascade has an extensive policy that governs the use of all Cascade equipment and IT resources. Refer to the Cascade Employee Handbook, Section 3.8 for details.

5.7 Financial Controls Policy

5.7.1 Financial Controls

Authorization for signatures necessary on contracts, checks, and orders for payment, receipt or deposit or withdrawal of money, and access to securities shall be provided by resolution of the Executive Director.

- 1) Any individual authorized to purchase goods and/or services for the organization shall follow the procedures set forth in these policies.
- 2) Cascade Management shall be responsible for reviewing and recommending any annual operating and capital budget to the Executive Directors for approval.
- 3) The Executive Director shall be responsible for adopting any annual operating and capital budgets.
- 4) No expense shall be incurred in excess of the authorization limits and, if a budget exists, then the expense should be in accordance with the budget allowing for prior approval exceptions permitted by the Executive Director.

5.7.2 Check-Signing Authority

- 1) Checks require signatures in accordance with Appendix 1 direction.

- 2) Separation of payment duties: Following preparation of the checks for supplier payment, the checks will be placed in sealed envelopes immediately following signature and posted without return to the check preparer.

5.7.3 Cash Disbursements

- 1) An authorized cheque signer will make disbursements only upon review and approval of the transaction. This will include review for the existence of proper supporting documentation, such as a purchase order and evidence of the receipts of the goods and services.
- 2) The procedure for collecting and verifying documentation, etc., follows procedures within the Office.
- 3) Reimbursements

5.7.4 Accounts

The Business shall maintain its bank accounts in major banking institutions as determined by the Executive Director. All funds received shall be deposited regularly. All non-productive funds shall be invested in accordance with the Investment Policy established by the Executive Director.

5.7.5 Authority to Sign

- 1) Authority to sign Checks is held exclusively by the Executive Director.
- 2) Authority to use business owner Credit Cards may be provided by the Executive Director to be used in conjunction with the limits which will be expressed with the authority for use.

In addition, any payments being made to the preparer or processor of payment must be specifically pre-approved by someone other than the payee.

5.7.6 Periodic Review

The Executive Director shall, on a regular basis, review reports and/or lists of payments.

5.7.7 Borrowing of Funds

Funds may be borrowed only as specifically authorized or arranged by the Executive Director.

5.7.8 Loans

Loans will be obtained only as specifically authorized or arranged by the Executive Director.

5.7.9 Credit Cards

Cascade shall not issue corporate credit cards to staff.

A business credit card or owners credit card may be used for business payments in accordance with this authorization and payment policy.

5.7.10 Annual Review

This Policy and all banking authority and procedures are to be reviewed on an annual basis and upon each change of any relevant personnel (Executive Director, Management or Bookkeeper).

6 SIGNATURE PAGE

Cascade Policies contains important information about Cascade, and I understand that I should consult the Executive Director, or my supervisor, regarding any questions I have.

Since the policies described herein are subject to change at any time, I acknowledge that revisions to the policies may occur. All such changes will generally be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the Executive Director of Cascade has the ability to adopt any revisions to these policies.

I further agree that if I remain with Cascade following any modifications to the policies, I hereby accept and agree to such changes.

I have received a copy of Cascade Policies on the date listed below. I understand that I am expected to read the entire policy document. Additionally, I will sign the two copies of this Acknowledgment of Receipt, retain one copy for myself, and return one copy to Cascade's representative listed below on the date specified. I understand that this form will be retained in my personnel file.

Signature of Employee	Date
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Printed Name of Employee

Signature of Cascade Representative	Date
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Printed Name of Representative