



NATIVE AMERICAN COMMUNITY CLINIC

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Native American Community Clinic Employee Handbook

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ABOUT THIS HANDBOOK / DISCLAIMER

We prepared this handbook to assist you in finding the answers to many questions that you may have regarding your employment with Native American Community Clinic. Please take the necessary time to read it.

We do not expect this handbook to answer all of your questions. Your Manager and Human Resources also will be a major source of information.

Neither this handbook nor any other verbal or written communication by a management representative, is, nor should it be considered to be, an agreement, contract of employment, express or implied, or a promise of treatment in any particular manner in any given situation. Native American Community Clinic adheres to the policy of employment at will, which permits the Clinic or the employee to terminate the employment relationship at any time, for any reason, with or without cause or notice.

Many matters covered by this handbook, such as benefit plan descriptions, are also described in separate Clinic documents. These Clinic documents are always controlling over any statement made in this handbook or by any member of management.

This handbook states only general Clinic guidelines. The Clinic may, at any time, in its sole discretion, modify or vary from anything stated in this handbook, with or without notice, except for the rights of the parties to terminate employment at will.

This handbook supersedes all prior handbooks.

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Section 1 - Governing Principles of Employment

1-1. WELCOME TO NACC!

We are happy to welcome you as a new employee to the Native American Community Clinic. ("Native American Community Clinic" or the "Clinic") Our medical Clinic opened in 2003 with only 10 staff people and lots of hope. We have grown substantially over the years, and continue to grow, more than quadrupling in size. We offer a full range of healthcare services that include Medical, Behavioral Health, Dental, and Substance Abuse programs. We've all worked hard to develop a place where patients receive high quality health care in a culturally sensitive and respectful setting. We also strive to maintain a workplace where employees can learn and grow and use their skills to empower patients and each other.

Please feel free to ask questions, offer ideas and find ways to make to make your job more efficient, productive and enjoyable. We look forward to working with you!

Dr. Antony Stately - Chief Executive Officer

NACC'S Mission

Promote health & wellness of mind, body and spirit in Native American Families, decrease health disparities for Native American families in the Twin Cities and to provide quality care regardless of ability to pay

NACC'S Values

- Honor tradition & health
- Be a good relative to all
- Honor diversity and inclusion

1-2. Equal Employment Opportunity

Native American Community Clinic is an is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, sex, marital status, familial status, veteran status, sexual orientation, genetic information, public assistance, local human rights commission activity or any other characteristic protected by applicable federal, state or local laws. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment

The Clinic will endeavor to make a reasonable accommodation to the known physical or mental limitations of qualified employees with disabilities unless the accommodation would impose an undue hardship on the operation of our business. If you need assistance to perform your job duties because of a physical or mental condition, please let your Manager know. The Clinic will attempt to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on the Clinic's operations. If you wish to request such an accommodation, please speak to your Manager.

If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to your supervisor. If you are unable for any reason to contact this person, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be a violation of this policy, please contact Human Resources.

Note: If your supervisor or next level manager is the person toward whom the complaint is directed you should contact Human Resources. The Clinic will not allow any form of retaliation against individuals who raise issues of equal employment opportunity.

If you feel you have been subjected to any such retaliation, report it in the same manner you would report a perceived violation of this policy. To ensure our workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge.

1.3. Working Hours and Schedule

NACC is open for business Monday through Saturday. Schedules are set by Manager according to operational hours. The operational hours are Monday, Wednesday, Thursday and Friday 9:00AM – 6:00PM, Tuesdays 9:30 – 6:00 PM and Saturdays from 10:00AM – 2:00PM.

Section 2 - Operational Policies

2-1. Employee Classifications

For purposes of this handbook, all employees fall within one of the classifications below.

Full-Time Employees - Employees who regularly work at least 30 hours per week who were not hired on a short-term basis.

Part-Time Employees - Employees who regularly work fewer than 30 hours per week who were not hired on a short-term basis.

Short-Term Employees - Employees who were hired for a specific short-term project, or on a short-term freelance, per diem or temporary basis. Short-Term Employees generally are not eligible for Clinic benefits, but are eligible to receive statutory benefits.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as exempt do not receive overtime pay. You will be informed of your classifications upon hire and informed of any subsequent changes to your classifications.

2-2. Access to Personnel Files

NACC maintains a personnel file on each employee. The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, and other employment records.

Personnel files are the property of NACC, and access to the information they contain is restricted. Generally, only management personnel of NACC who have a legitimate reason to review information in a file are allowed to do so.

Under Minnesota law, you have the right to review your personnel record once every six months and, if you leave your employment with us, you may review it once every year as long as we maintain your personnel record.

To review your personnel record, you must make a good faith request in writing and we will provide an opportunity to review your record or make a copy for you. You may also request copies at the time you review your record; these copies will be made without any cost to you. We will provide an opportunity for you to review your personnel record within seven working days of your written request or, within fourteen working days of your written request, if your personnel record is physically located outside of Minnesota.

What is contained in the personnel record is carefully defined under Minnesota law. The law does not require that we allow you to review and copy information that is not contained in your personnel record. If you dispute information contained in your personnel record, you may request that it be removed from your record, or, if we do not agree information should be removed, you may submit up to a five page written response to the information.

We may not take any action against you because you have appropriately asserted your rights to review your personnel record. If you are improperly denied your rights as provided by this law, the law provides you certain remedies. This notice only describes some of your rights under the law. For more information, the Minnesota statutes detailing your rights can be found at Minnesota Statutes. § 181.960 through Minnesota Statutes § 181.965. These laws can be found on the internet at <http://www.leg.state.mn.us/leg/statutes.asp> or in public libraries throughout the state.

2-3. Documentation of Work Hours

It essential for the finance department to have the necessary documentation to reflect all time employees have worked during a pay period, and to account for all regularly scheduled work that the employee did not work, prior to issuing a paycheck. This is a **legal** requirement and it is the employee's responsibility to make sure this documentation is complete and accurate.

You will be assigned a work schedule and you will be expected to begin and end work according to the schedule. To accommodate the needs of our business, at some point we may need to change individual work schedules on either a short-term or long-term basis.

If an employee had any schedule changes, missed punches, offsite work, or unplanned time off, a paper NACC TIME FORM must be completed. The NACC time form must be signed by the employee and all changes must be approved and signed off by the employee's manager at the time of the incident. Only one form per pay period may be used, putting all changes on one form. The NACC time form should be turned in to the employee's direct supervisor/manager by the end of the pay period. Time cards are reviewed and approved by the employee's supervisor/manager. Then the Finance department reviews and the payroll is processed by the finance department.

Exempt and non-exempt are required to document hours worked. Non-exempt employees must also punch out for lunch breaks. If a punch is missed, please contact your manager immediately.

2-4. Overtime

Like most successful companies, we experience periods of extremely high activity. During these busy periods, additional work is required from all of us. Your Manager is responsible for monitoring business activity and requesting overtime work if it is necessary. Effort will be made to provide you with adequate advance notice in such situations.

Any non-exempt employee who works overtime will be compensated at the rate of one and one-half times (1.5) his/her normal hourly wage for all time worked in excess of forty (40) hours each week, unless otherwise required by law.

Employees may work overtime only with prior management authorization. Prior to working overtime hours, a signed form is required. Failure to have a signed authorization for approval for overtime will result in disciplinary action.

2-5. Safe Harbor Policy for Exempt Employees

It is our policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure that you are paid properly and that no improper deductions are made, you must review your pay stubs promptly to identify and report all errors.

If you are classified as an exempt salaried employee, you will receive a salary which is intended to compensate you for all hours you may work for the Clinic. This salary will be established at the time of hire or when you become classified as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work you perform.

Under federal and state law, your salary is subject to certain deductions. For example, unless state law requires otherwise, your salary can be reduced for the following reasons:

- Full-day absences for personal reasons.
- Full-day absences for sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing wage replacement benefits for such absences (deductions also may be made for the exempt employee's full-day absences due to sickness or disability before the employee has qualified for the plan, policy or practice or after the employee has exhausted the leave allowance under the plan);
- Full-day disciplinary suspensions for infractions of our written policies and procedures.
- Family and Medical Leave absences (either full- or partial-day absences).

- To offset amounts received as payment from the court for jury and witness fees or from the military as military pay.
- The first or last week of employment in the event you work less than a full week.

Any full work week in which you do not perform any work in any work week in which you performed any work, your salary will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness or disability.
- Your absence on a day because your employer has decided to close a facility on a scheduled work day.
- Absences for jury duty, attendance as a witness, or military leave in any week in which you have performed any work (subject to any offsets as set forth above).
- Any other deductions prohibited by state or federal law.

However, unless state law provides otherwise, deductions may be made to your accrued leave for full- or partial-day absences for personal reasons, sickness or disability.

Your salary may also be reduced for certain types of deductions such as your portion of health, dental or life insurance premiums; state, federal or local taxes; social security, or 403B

If you believe you have been subject to any improper deductions, you should immediately report the matter to your manager. If the manager is unavailable or if you believe it would be inappropriate to contact that person (or if you have not received a prompt and fully acceptable reply), you should immediately contact the Finance Director or any other manager in the Clinic with whom you feel comfortable.

2-6. Your Paycheck

You will be paid bi-weekly for any time you have worked during the past pay period.

Your payroll stub itemizes deductions made from your gross earnings. By law, the Clinic is required to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions also may include any court-ordered garnishments. Your payroll stub will also differentiate between regular pay received and overtime pay received.

If you believe there is an error in your pay, bring the matter to the attention of Finance Director immediately so the Clinic can resolve the matter quickly and amicably.

If you have a paper paycheck it will be given only to you, unless you request that it be mailed, or authorize in writing for another person to accept your check for you.

2-7. Direct Deposit

Native American Community Clinic requires that employees use direct deposit. Authorization forms are available from Human Resources. If you do not have a bank account or a prepaid card you can request a payroll debit card from Finance Director.

Your first paycheck will be in the form of a live paper check. Any changes made to direct deposit will be for the next payroll cycle.

2-8. Wage Disclosure Protections

Under Minnesota law, an employer may not:

1. Require nondisclosure by an employee of his or her wages as a condition of employment;
2. Require an employee to sign a waiver or other document which purports to deny an employee the right to disclose the employee's wages;
3. Take any adverse employment action against an employee for disclosing the employee's own wages or discussing another employee's wages which have been disclosed voluntarily.

Nonetheless, this policy should not be construed to:

1. Create an obligation on the Clinic or an employee to disclose wages;
2. Permit an employee, without the written consent of the Clinic to disclose proprietary information, trade secret information, or information that is otherwise subject to legal privilege or protected by law;
3. Diminish any existing rights under the National Labor Relations Act;
4. Permit an employee to disclose wage information of other employees to a competitor of the Clinic.

An employer may not retaliate against an employee for asserting rights or remedies set forth in this policy.

An employee may bring a civil action against the Clinic for a violation of this policy. If a court finds that the Clinic has violated this policy, the court may order reinstatement, back pay, restoration of lost service credits, if appropriate, and the expungement of any related adverse records of an employee who was the subject of the violation.

2-9. Salary Advances

Requests for salary payments in advance of any normal pay period may be granted on an emergency basis for hours that have been worked or equivalent in your PTO balance. “Emergency” is defined for this purpose as an unforeseen event involving medical and life or safety situations beyond an employee’s control. **Salary advances will be granted no more than twice in any calendar year, with no exceptions.**

PROCEDURE

1. Employee will inquire about their eligibility status with Finance department.
2. If eligible for a salary advance, an employee should request salary advance form from HR. HR will then submit the document to the CFO for approval.
3. The CFO will forward the form to the CEO for final approval.
4. If approved, the CEO will forward the form to the Finance Director. The employee will be notified when the check is available, usually within one to two days of the request.
5. The full amount of the advance will be deducted from the employee’s next pay check. There will be no installment payment plan as an option.
6. If salary advances becomes a financial burden on NACC, the CEO and CFO, may be discontinue the program at any time.

2-10. Performance Reviews

Depending on your position and classification, Native American Community Clinic endeavors to review your performance both after the first 90 days of employment and annually. However, please understand that a positive performance evaluation does not guarantee an increase in salary, a promotion, or continued employment.

Compensation increases and the terms and conditions of employment, including job assignments, transfers, promotions, and demotions, are determined by and at the discretion of management.

In addition to these formal performance evaluations, the Clinic encourages you and your Manager to discuss your job performance on a frequent and ongoing basis.

2-11. Employee Discipline Procedure

Disciplinary action of NACC employees for violations of rules of conduct, work performance, organizational policies or ethical standards may result in a written warning, a suspension, a demotion or a discharge. Employees should remember that they are employees “at will” and may be discharged at any time for any reason, in accordance with federal, state and local law.

The following items are declared to be grounds for disciplinary action (although charges may be based upon causes or grounds other than those specifically described here). They are: incompetence in the performance of duty and responsibility; neglect of duty; insubordination or willful disobedience of legitimate and appropriate order of manager; dishonesty; purposeful violation of any NACC policy; demonstration of unprofessional and offensive conduct or language toward the public or fellow staff members; absence from work without proper leave.

Disciplinary procedures may or may not include one or more of the following actions:

1. VERBAL WARNING with documentation should be signed and dated.
2. WRITTEN WARNING: The manager should outline the reasons for the written warning, suggest corrective measures to be taken and outline the timeframe for corrective action and re-evaluation. The manager and employee should sign and date the form.
3. PROBATION: The department head and/or manager may deem it necessary to place the employee on a probationary period. The duration of this period is up to the discretion of the department head and/or manager. The issues for discipline are reviewed in more detail during this time. At the end of the probationary period, the manager and/or department head, may decide to lengthen the duration of the probationary period, or decide to discharge or suspend the employee. If the employee’s conduct during the period is satisfactory, the Manager may decide to take no further action.
4. SUSPENSION: When the nature of a violation warrants immediate action, or there has been inadequate improvement as part of the discipline process, the Chief Executive Officer, department head and/or manager may suspend an employee with or without pay. The following procedures must be followed: discussion surrounding reasoning of suspension, outline the timeframe for suspension, and re-evaluation. The manager and employee should sign and date the form.
5. DISCHARGE: If a discharge from employment is necessary; the employee shall be notified of the involuntary discharge in person and/ or in writing. If the employee does not meet in person, phone call attempts to reach employee and the sending of a “certified letter” will be made. Documentation of the discharge will be placed in the employee’s personnel file.

All disciplinary documentation will be placed in the employee file.

2-12. Record Retention

The Clinic acknowledges it's responsibility to preserve information relating to litigation, audits and investigations. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Clinic and its employees and possible disciplinary action against responsible individuals (up to and including termination of employment). Each employee has an obligation to contact the CFO and CEO to inform them of a potential or actual litigation, external audit, investigation or similar proceeding involving the Clinic that may have an impact on record retention protocols.

2-13. Clinic Operational Policies

The purpose of this manual is to provide an overview of employee benefits, workplace rules, and staff expectations. This document doesn't include clinic operating policies and procedures. These materials can be found on our fileserver (Information>NACC Policies). Please see the Operations Director if you have questions or would like to suggest an edit to an existing policy or additional policy added.

Section 3 – On the Job at NACC

3-1. Tardy & Attendance

Regular attendance is essential, and all employees are expected to report to work when scheduled, fully ready and able to perform their assigned duties. Proper notice and approval is expected whenever an employee is tardy or absent.

The tardy and attendance policy will be applied to employees and enforced consistently throughout the organization. Absenteeism is defined as not reporting to work for your scheduled shift. Employees are expected to inform their manager daily during any tardiness or absence, unless they are on a leave of absence. It is the responsibility of the employee to get a confirmed response from their manager. If the manager does not confirm, the employee must try another manager. An employee absent three or more consecutive days due to personal illness must present a doctor's statement before returning to duty.

Tardiness & Absenteeism

Employees are expected to arrive at work on time and be at their assigned workstation at the beginning of their scheduled shift.

On those rare occasions when unavoidable conditions indicate that an employee will be late for a scheduled shift, the employee should notify his/her manager. This will allow the manager to plan the necessary coverage in order to assure that no critical tasks are left undone.

If the employee is in a "time sensitive" job, he/she should check with the manager when arriving at work to ensure that critical tasks have been performed.

Frequent tardiness will not be tolerated by the organization. Employees who establish a pattern of arriving at work late will be subject to discipline up to and including termination.

- An employee is normally expected to notify the Manager at least 2 hours before the shift begins, if the employee cannot come to work.
- If the employee does not give proper notice, he/she will be given a verbal warning and record of the incident will be placed in the personnel file. The employee will be allowed to use PTO (if available for the absence).
- A record of the event will be placed in the personnel file.

If a pattern of absences has been established, it is the responsibility of the manager to counsel the employee and advise him/her that this behavior is unacceptable. Continued unexcused, unplanned absences can result in further corrective action, including up to termination.

No-Call-No Show

Any employee who is absent from work and fails to notify the Manager will be treated as a “no call-no show. Three consecutive days of “no call-no show” is just cause for job abandonment. Any no-call-no-show is potentially cause for disciplinary action up to and including termination.

3-2. Meal and Break Periods

Meal Periods

Managers are responsible for balancing workloads and scheduling meal breaks. Employees who work 6 or more hours are allowed a thirty-minute **unpaid** meal break during the workday, to be scheduled by your manager. Employees may not extend meal breaks beyond the assigned period. All employees should take no less than 20 minutes and no more than a 30 minute lunch break, as required by law. Being tardy from a meal period, may result in disciplinary action.

Eating in an employee work areas is prohibited as it presents an unprofessional work site and risks damage to equipment and documents (there is an exception for Providers as they don't get break periods, and often not even lunch). An employee break-room is available on site for this purpose. Food may be eaten during the allocated breaks and lunch hour, in the break room. Snacks should not be kept in any desk drawer; the break room may be used for this purpose. Beverages (coffee, tea, pop, water) may be consumed at the desk but they must be in spill-proof containers. Requesting to take more than a 30 minute meal period (35 minutes or more) requires authorization from manager. Submit request 1 week in advance so coverage issues can be addressed.

Rest Breaks

It is NACC policy to provide rest breaks during the course of each workday. Employees working a full 8 hour day are formally scheduled for 8.5 hours each day to provide for their 30-minute lunch break. Those scheduled for a full 8-hour workday are entitled to a fifteen-minute break in the morning and afternoon, and these are to be scheduled with the manager. Employees scheduled for less than an 8 hour day are entitled to one 15 minute break. All breaks need to be scheduled with the manager as work- flow permits.

- If there is a busy patient load and/or the provider is likely to need assistance, the employee working with the provider may have to postpone their break until the patient care is completed. There should always be at least two MAs on the floor. MAs, RNs, Records staff, etc. must not take breaks together- the area must always have someone who can help with care issues.

- Breaks are not to be taken at the beginning or the end of a shift as justification for coming late or leaving early.
- Breaks must be taken on site.
- Time spent on rest breaks will be compensated as work time and employees are not required to punch in and out on their time cards. However, employees are expected to return to their workstations promptly at the end of each break and may be subject to disciplinary action for tardiness.
- Employees on rest breaks are not permitted to interfere with fellow employees who are continuing to work.
- Employees are permitted to take their rest breaks in the employee break room provided on site, where food may be consumed.
- Requesting to take a break longer than 15 minutes requires pre-approval by your manager.

****Note: As we are all trying to create an atmosphere of excellent patient care, efficiency and quality, while you are on break, it may be necessary to ask for your assistance, with a patient issue if no one else is available. Your assistance at these unique times will be appreciated and you will have a chance to complete your break as soon as your assistance is no longer needed.**

3-3. Tobacco-Free Workplace

NACC is committed to promoting a healthy, comfortable and productive working environment for its employees and patients and visitors. It is the policy of NACC that use of tobacco products, including the use of e-cigarettes, by staff, patients, visitors or contractors will be prohibited on its property. NACC property shall include, but not be limited to, buildings, grounds, and vehicles owned, leased, or contracted by NACC. Employees who abuse or misuse this policy will be disciplined, up to and including termination.

***Tobacco may be used for traditional/ceremonial purposes if pre-approved by the Chief Executive Officer.**

3-4. Phone Calls/Cell Phones/Texting

All cell phones should be placed on vibrate and only used during break times except for emergencies. Calls must not interfere with patient care or regular job duties. It is not acceptable to walk around the Clinic conducting a personal call on a cell phone. Unless it is an emergency, all personal phone calls should be done away from the work site and only during an employee's break time. If an emergency call requires several minutes, the employee should notify his/her manager and receive permission to punch out and go to a private area to continue the call. All the above guidelines apply to texting, website and social media use on one's personal phone as well. Failure to adhere to this policy may result in further disciplinary action. See section 6.1 for use of communication systems.

Providers and Management may need to use cell phones during working hours for the purposes of completing their job in a timely manner.

*If you are in need of having access to your phone for an emergency situation, it is always best to let your manager know of your need.

3-5. Dress Code - Name Tags

All NACC employees that provide direct patient care are required to wear their ID badges with their name visible. Please note that NACC will provide standard name tags to employees at hire; if badge is lost or broken, it will need to be replaced at employees expense. If NACC changes name tag design, new nametags will be reissued at no cost to employees.

All NACC employees should look neat, clean and appropriate for a professional setting at all times. Employees should use best judgement as to reduce excessive skin from showing.

Scented Products: Employees must limit perfume, scented lotions, and colognes as they may be triggers for allergies.

Shoes -should be comfortable neat and practical. Shoes must provide safe, secure footing, and offer protection against hazards. Shoes that are not acceptable are: flip flops, **open-toed shoes are not allowed for direct patient care staff, heels at or higher than 4 inches are also prohibited.**

Fingernail Care – Natural nails need to be well groomed and maintained. Artificial nails are prohibited for direct patient care staff, unless authorized for a special occasion. Protective gloves must be worn at all times when working with patients.

Shirts - should not be tight, sheer or low cut with cleavage showing. No tank tops unless under a lab coats. No advertising logos unless related to NACC activities.

Pants – Dress pants, khakis, or jeans that are clean and neat in appearance and free of holes, tears and stains. Illusions of holes, tear and stains are also prohibited. Leggings may be worn with tops or dresses that hit mid-thigh. Unacceptable pants will include, but not limited to, athletic attire such as shorts, sweat pants, or yoga pants. There are exceptions to this policy for some roles in which direct patient care is required. Please check with your manager or supervisor if you have questions about suitable attire for your specific position.

Skirts-should be knee length or longer and not tight.

Lab Coats/Uniforms- Providers and lab staff are required to wear lab coats when seeing patients. Clinic staff are required to wear, unwrinkled uniform scrubs.

Inappropriate attire will be addressed by managers.

3-6. Employees Children at Work

NACC has been and wants to continue to be flexible in accommodating moms and their children with various daycare and other emergencies. It is very important that work is not disrupted by children. Please follow the requirements for having kids at work:

1. Before bringing a child, employees **MUST** clear it with their manager.
2. The time should be limited (waiting for a ride from someone, etc.) Employees are expected to punch out while making these arrangements and getting children settled.
3. The child should be in the waiting room or the break room if they are old enough to sit alone (typically over 7 years), **and not sick**. If they are in the break room they should be careful not to disrupt employee's breaks or lunch periods in any way.
4. Ill children should be separated from staff and patients. Please discuss with your manager an appropriate place for your child.
5. If a child cannot be left alone and arrangements cannot be made to have the child picked up and cared for by someone else, the employee may be asked to take the day off. **This is at manager's discretion.**

6. Employee must sign a waiver for releasing liability for the Organization

Section 4 - Benefits

4-1. Benefits Overview

In addition to great working conditions and competitive pay, it is Native American Community Clinic's policy to provide a combination of supplemental benefits to all eligible employees. In keeping with this goal, each benefit program has been carefully devised. These benefits include time-off benefits, such as vacations and holidays, and insurance and other plan benefits. We are constantly studying and evaluating our benefits programs and policies to better meet your present and future requirements. These policies have been developed over the years and continue to be refined to keep up with changing times and needs.

While the Clinic intends to maintain these employee benefits, it reserves the absolute right to modify, amend or terminate these benefits at any time and for any reason.

If you have any questions regarding your benefits, please contact Finance department.

4-2. Holidays

Full-time and Part-time employees will be paid for the following 11 holidays:

New Year's Day
Martin Luther King, Jr. Day
Memorial Day
Independence Day
Juneteenth
Labor Day
Indigenous People's Day
Thanksgiving Day
Day after Thanksgiving
Christmas Eve
Christmas Day

When holidays fall or are celebrated on a regular work day, eligible employees will receive one (1) day's pay at their regular straight-time rate. Eligible employees who are called in to work on a holiday will receive one (1) day's pay at their regular straight-time rate, and an additional payment of straight-time for the actual time they work that day. Unexcused or unscheduled absences directly before or after a paid holiday will result in forfeiture of paid holiday time.

If a holiday falls within an eligible employee's approved vacation period, the eligible employee will be paid for the holiday (at the regular straight-time rate) instead of the vacation day.

If a holiday falls within a jury duty or bereavement leave, the eligible employee will be paid for the holiday (at the regular straight-time rate) instead of the leave day.

If the holiday falls on a day that is not your regularly scheduled day, the employee will not be paid for the holiday.

4-3. Paid Time off

We know how hard you work and recognize the importance of providing you with time for rest and relaxation. We fully encourage you to get this rest by taking your paid time off. Time off under this policy includes extended time off, such as for a vacation, and incidental time due to sickness or to handle personal affairs (NOTE: the calculations below are based on a fulltime 40/hour per week schedule)

Non-exempt, Full and Part-time employees accrue paid time off as follows:

Years of Service	Number of Days Per Year	Accrual Rate per hours worked per pay period
1-3 years	18	.0692
4-7 years	21	.0807
8-11 years	24	.0923
12 plus years	27	.1038

Exempt Employees and Providers accrue paid time off as follows:

Years of Service	Number of Days Per Year	Accrual Rate per hours worked, per pay period
1-3 years	21	.0807
4-7 years	24	.0923
8-11 years	27	.1038
12 plus years	30	.1154

Paid time off is accrued on a pro-rated basis throughout the year and does not begin until completing 30 day of employment. Employees cannot use PTO until after 90 days of employment.

The maximum paid time off entitlement for part-time employees is pro-rated based on hours worked.

Paid time off should be taken during the year received, unless otherwise required by law. Accrued, unused paid time off up to 120 hours can be carried over to the following calendar year. Exceptions to the 120 hour maximum carry over may be made in special circumstances. Special carryover requests of up to 200 hours must be related to upcoming Family or Medical leave and must be made in writing by November 30th, and will so they can be considered by the board before the end of the year.

Employees must begin using PTO in excess of 120 hours in the first quarter of the following year.

If you wish to use 3 or more full days of paid time off consecutively, you must submit a request to your manager at least one month in advance of your requested time off. Similar notice should be provided for planned time off of shorter duration. Every effort will be made to grant your request, consistent with our operating schedule.

Requesting time off in the ADP portal is primarily a financial and payroll management tool. Due to the size and because Native American Community Clinic is a service provider, everyone plays a critical role. It is important to request time off well in advance (Providers ~30 days in advance notice at minimum; preferably 60 days.)

Officer, Managers and Supervisors

All supervisor and managers must provide a coverage plan to their manager for planned time off prior to requesting the time in the ADP system. Once the coverage plan has been approved by your manager, input the time off in the ADP system.

Coverage Plan must include:

- 1. The length of time gone from the Clinic**
- 2. A plan for the essential duties covered while away**
- 3. Verification by the employee's direct supervisor that coverage in the Clinic operations is not at significant risk of being compromised.**
- 4. Approval by CEO**

We encourage employees to manage their PTO time throughout the whole year. It is recommended that employee's bank 16 hours of PTO at all time in case of unpredicted time off that may incur later in the year.

4-4. Increments

Paid time off must be used in ½ day increments for exempt employees.

Up to 40 days of accrued, unused paid time off is paid out upon separation, unless otherwise required by law.

Advanced but unaccrued paid time off will be deducted from your final paycheck, to the extent permitted by law.

4-5. Insurance Programs

Full-time employees may participate in the Clinic's insurance programs. Under these plans, eligible employees will receive comprehensive health and dental insurance coverage for themselves and their families, as well as other benefits.

Upon enrolling, you will receive summary plan descriptions (SPDs) describing the benefits in greater detail. Please refer to the SPDs for detailed plan information. Of course, feel free to speak to Human Resources if you have any further questions.

Insurance will begin on the first of the month following 30 days of employment.

4-6. Employee Assistance Program

Native American Community Clinic provides an employee assistance program for employees. This program is provided through your health benefits. This program offers qualified counselors to help you cope with personal problems you may be facing. Further details can be obtained in your benefits materials.

4-7. Supplemental Benefit

Native American Community Clinic provides the opportunity for Employees to elect supplemental life and AD&D coverage for yourself, your spouse and your dependents through an outside Clinic at the Employee expense. If you are interested in learning more about the supplemental offering, please speak to the Accounting Manager.

4-8. 401K Retirement Plan

Eligible employees are able to participate in the Clinic's retirement plan. Plan participants may make pre-tax contributions to a retirement account via payroll deduction. The clinic will contribute up to a 3% match of the employees' contribution.

Upon becoming eligible to participate in this plan, you will receive a Summary Plan Description describing the plan in greater detail. Please refer to the SPD for detailed plan information. The 401K plan is partnered with a third party vendor. Feel free to speak to Human Resources if you have any further questions.

4-9. Continuing Education Funds & Licensures

Following 90 days of employment, funds are available to all employees for work related training, coursework related to maintaining certification, or may be applied towards specific job required licensure as noted below. Funds are for the actual registration or certification costs. Employees should fill out a CEU/Training request form along with copies of license renewal documents or registration materials to their manager at least 30 days in advance of the course or/workshop registration deadline.

The CEU form will be reviewed by your manager and the Finance team. Once the CEU form is approved, staff should fill out a PO for all costs related to the CEU.

CEU/training request forms can be found on the fileserver (Server 03>Information>Admin Documents)

Unused continuing education funds are not carried over at the end of the calendar year. Funds are available as follows:

Licensure Funds/Continuing Ed Funds and Days

Employee	Licensures Dollars	CEU Dollars	CEU Days
Providers	100%	\$ 1,000	5
Officers/Directors		\$ 500	3
Managers		\$ 250	2
Other Professional	100%	\$ 200	2
Nurses (RN & LPN)	100%	\$ 200	2
LDA	100%	\$ 200	2
CMA/MA/LAB	100%	\$ 150	2
Care Coordinators		\$ 150	2
Advocates		\$ 150	2
Front Desk/MR		\$ 150	2
Admin Support Staff		\$ 150	2

*Prorated by number of hours worked.

*Licensures/Certificates covered by NACC if job required

*Eligible for CEU funds & Days after 90 days of employment

4-10. Lactation Breaks

The Clinic will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's infant child, in accordance with and to the extent required by applicable law. The break time, if possible, must run concurrently with rest and meal periods already provided to the employee.

To provide privacy, the Clinic will make reasonable efforts to provide employees with the use of a room or location in close proximity to the work area, other than a bathroom or a toilet stall, that is shielded from view and free from intrusion by coworkers and the public and that includes access to an electrical outlet. This location may be the employee's private office, if applicable. The Clinic will make reasonable efforts to provide additional break time if necessary to support the health and wellbeing of mother and baby. There may be instances when such accommodations would seriously disrupt the Clinic's operations—in these rare circumstances such accommodation may be impossible. Employees should consult Human Resources if they have questions regarding this policy.

Employees should advise management if they need break time and an area for this purpose. Employees will not be discriminated against or retaliated against for exercising their rights under this policy.

4-11. Workers' Compensation

On-the-job injuries are covered by our Workers' Compensation Insurance Policy, which is provided at no cost to you. If you are injured on the job, no matter how slightly, report the incident immediately to your Manager. Failure to follow Clinic procedures may affect your ability to receive Workers Compensation benefits.

This is solely a monetary benefit and not a leave of absence entitlement. Employees who need to miss work due to a workplace injury must also request a formal leave of absence. See the Leave of Absence sections of this handbook for more information.

4-12. Receiving Health Care at NACC

Employees may choose to receive acute health care at NACC. Relatives or family members of employees will follow same guidelines as employees. In an effort to remain consistent with policies and procedures of confidentiality, maintain equal access to all patients and provide a consistent workflow of services, it is important that employee patients that receive acute care follow these general guidelines below:

1. Do not approach providers about illnesses or prescriptions outside of a scheduled appointment (i.e. no curbside consults). Requests need to be streamlined through the nursing department.
2. Time off for all health care appointments will be treated the same as any other time off request, and needs to be approved at least one day in advance by the manager. Exceptions to advance requests will be made in extenuating circumstances.
3. Request an appointment at the front desk (earlier is better), giving them a note stating whether you need to be seen by a provider, need a lab test or shot (this should already be ordered by a provider), These requests should be handled as they would for any patient.
4. Registration- Fill out the appropriate registration papers as requested.
5. Continue working until notified of appointment.
6. Hourly employees should punch out while being seen by the provider in the exam room, and then punch back in when they are ready to go back to work. Breaks cannot be used for this purpose.
7. Insurance will be billed for all care received at NACC, and insurance co-pays will be collected. If an employee does not have insurance they will be placed on the sliding fee schedule after providing income verification.
8. Employee must make supervisor aware immediately if family members or relatives are receiving healthcare at NACC.

These following services are approved for employees to receive at NACC:

Medical Clinic- acute care only.

Counseling Clinic- No care

Dental Clinic- All care

Chemical Health-No care

Section 5 - Leaves of Absence

5-1. Personal Leave

If you are ineligible for any other Clinic leave of absence, Native American Community Clinic, under certain circumstances, may grant you a personal leave of absence without pay. A written request for a personal leave should be presented to management at least two (2) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and you are not eligible for leave under the federal Family and Medical Leave Act (FMLA) or any state leave law, medical certification also must be submitted. Your request will be considered on the basis of staffing requirements and the reasons for the requested leave, as well as your performance and attendance records. Normally, a leave of absence will be granted for a period of up to four (4) weeks. However, a personal leave may be extended if, prior to the end of your leave, you submit a written request for an extension to management and the request is granted. During your leave, you will not earn vacation, personal days or sick days. We will continue your health insurance coverage during your leave if you submit your share of the monthly premium payments to the Clinic in a timely manner, subject to the terms of the plan documents.

When you anticipate your return to work, please notify management of your expected return date. This notification should be made at least one week before the end of your leave.

Upon completion of your personal leave of absence, the Clinic will attempt to return you to your original job, or to a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of your availability to return to work, failure to return to work when notified, or your continued absence from work beyond the time approved by the Clinic will be considered a voluntary resignation of your employment.

Personal leave, if elected, will run concurrently with short-term disability leave.

5-2. Minnesota Family and Medical Leave

In addition to the leave available under the Clinic's Family and Medical Leave Act ("FMLA") policy, employees in the state of Minnesota also are eligible for parenting leave under the Minnesota Parental Leave Act ("MPLA"). In order to be eligible for leave under the MPLA, an employee must have worked for the Clinic for at least 12 consecutive months immediately preceding the request for leave, **and** worked at least half the full-time equivalent position for his/her job.

Eligible employees may take up to 12 weeks of unpaid leave for the birth or placement for adoption of a child and generally are entitled to be restored to the same or equivalent position upon return from leave. Under Minnesota law, leave for the birth or adoption of a child may begin not more than six weeks after the birth or adoption, except that where the child must remain in the hospital longer than the mother, the leave may not begin more than six weeks after the child leaves the hospital. Where both the federal and MPLA laws apply, any leave taken will be counted under both laws at the same time. In addition, MPLA substantively leave differs from federal FMLA leave as follows:

Eligible employees must provide at least four weeks' notice of leave if at all possible.

If leave is solely pursuant to MPLA, the employee may be required to pay the full health insurance premium during leave.

Eligible employees may utilize any accrued paid time off benefits during leave.

The Leave Policy

Employees may be entitled to a leave of absence under the Family and Medical Leave Act (FMLA). This policy provides employees information concerning FMLA entitlements and obligations employees may have during such leaves. If employees have any questions concerning FMLA leave, they should contact the HR Manager.

I. Eligibility

FMLA leave is available to "eligible employees." To be an "eligible employee," an employee must: 1) have been employed by the Clinic for at least 12 months (which need not be consecutive); 2) have been employed by the Clinic for at least 1,250 hours of service during the 12-month period immediately preceding the commencement of the leave; and 3) be employed at a worksite where 50 or more employees are located within 75 miles of the worksite.

II. Entitlements

The FMLA provides eligible employees with a right to leave, health insurance benefits and, with some limited exceptions, job restoration. The FMLA also entitles employees to certain written notices concerning their potential eligibility for and designation of FMLA leave.

A. Basic FMLA Leave Entitlement:

The FMLA provides eligible employees up to 12 workweeks of unpaid leave for certain family and medical reasons during a 12-month period. The 12-month period is determined based on a 12-month period measured forward from the date the employee first takes a covered leave.

Leave may be taken for any one, or for a combination, of the following reasons:

- To care for the employee's child after birth, or placement for adoption or foster care;
- To care for the employee's spouse, son, daughter or parent (but not in-law) who has a **serious health condition**;
- For the employee's own serious health condition (including any period of incapacity due to pregnancy, prenatal medical care or childbirth) that makes the employee unable to perform one or more of the essential functions of the employee's job; and/or
- Because of any **qualifying exigency** arising out of the fact that an employee's spouse, son, daughter or parent is a covered military member on covered active duty or called to covered active duty status (or has been notified of an impending call or order to covered active duty) in the Reserves component of the Armed Forces in support of contingency operations or Regular Armed Forces for deployment to a foreign country. This leave also is available for family members of active duty service members.

A **serious health condition** is an illness, injury, impairment or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities. Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, incapacity due to pregnancy or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, caring for the parents of the military member on covered active duty and attending post-deployment reintegration briefings.

B. Additional Military Family Leave Entitlement (Injured Servicemember Leave)

In addition to the basic FMLA leave entitlement discussed above, an eligible employee who is the spouse, son, daughter, parent or next of kin of a **covered servicemember** is entitled to take up 26 weeks of leave during a single 12-month period to care for the servicemember with a serious injury or illness. Leave to care for a servicemember shall only be available during a single 12-month period and, when combined with other FMLA-qualifying leave, may not exceed 26 weeks during the single 12-month period. The single 12-month period begins on the first day an eligible employee takes leave to care for the injured servicemember.

A "**covered servicemember**" is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status or is on the temporary retired list, for a serious injury or illness. These individuals are referred to in this policy as "current members of the Armed Forces." **Covered servicemembers** also include a veteran who is discharged or released from military services under condition other than dishonorable at any time during the five years preceding the date the eligible employee takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation or therapy for a serious injury or illness. These individuals are referred to in this policy as "covered veterans."

The FMLA definitions of a "serious injury or illness" for current Armed Forces members and covered veterans are distinct from the FMLA definition of "serious health condition" applicable to FMLA leave to care for a covered family member.

C. Intermittent Leave and Reduced Leave Schedules

FMLA leave usually will be taken for a period of consecutive days, weeks or months. However, employees are also entitled to take FMLA leave intermittently or on a reduced leave schedule when medically necessary due to a serious health condition of the employee or covered family member, or the serious injury or illness of a covered servicemember.

D. No Work While on Leave

The taking of another job while on family/medical leave or any other authorized leave of absence is grounds for immediate termination, to the extent permitted by law.

E. Protection of Group Health Insurance Benefits

During FMLA leave, eligible employees are entitled to receive group health plan coverage (if applicable) on the same terms and conditions as if they had continued to work.

F. Restoration of Employment and Benefits

At the end of FMLA leave, subject to some exceptions including situations where job restoration of "key employees" will cause the Clinic substantial and grievous economic injury, employees generally have a right to return to the same or equivalent positions with equivalent pay, benefits and other employment terms. The Clinic will notify employees if they qualify as "key employees," if it intends to deny reinstatement and of their rights in such instances. Use of FMLA leave will not result in the loss of any employment benefit that accrued prior to the start of an eligible employee's FMLA leave.

G. Notice of Eligibility for, and Designation of, FMLA Leave

Employees requesting FMLA leave are entitled to receive written notice from the Clinic telling them whether they are eligible for FMLA leave and, if not eligible, the reasons why they are not eligible. When eligible for FMLA leave, employees are entitled to receive written notice of: 1) their rights and responsibilities in connection with such leave; 2) the Clinic's designation of leave as FMLA-qualifying or non-qualifying, and if not FMLA-qualifying, the reasons why; and 3) the amount of leave, if known, that will be counted against the employee's leave entitlement.

The Clinic may retroactively designate leave as FMLA leave with appropriate written notice to employees provided the Clinic's failure to designate leave as FMLA-qualifying at an earlier date did not cause harm or injury to the employee. In all cases where leaves qualify for FMLA protection, the Clinic and employee can mutually agree that leave be retroactively designated as FMLA leave.

III. Employee FMLA Leave Obligations

A. Provide Notice of the Need for Leave

Employees who take FMLA leave must timely notify the Clinic of their need for FMLA leave. The following describes the content and timing of such employee notices.

1. Content of Employee Notice

To trigger FMLA leave protections, employees must inform the HR Manager of the need for FMLA-qualifying leave and the anticipated timing and duration of the leave, if known. Employees may do this by either requesting FMLA leave specifically, or explaining the reasons for leave so as to allow the Clinic to determine that the leave is FMLA-qualifying. For example, employees might explain that:

- a medical condition renders them unable to perform the functions of their job;
- they are pregnant or have been hospitalized overnight;
- they or a covered family member are under the continuing care of a health care provider;

- the leave is due to a qualifying exigency cause by a covered military member being on active duty or called to active duty status; or
- if the leave is for a family member, that the condition renders the family member unable to perform daily activities or that the family member is a covered servicemember with a serious injury or illness.

Calling in "sick," without providing the reasons for the needed leave, will not be considered sufficient notice for FMLA leave under this policy. Employees must respond to the Clinic's questions to determine if absences are potentially FMLA-qualifying.

If employees fail to explain the reasons for FMLA leave, the leave may be denied. When employees seek leave due to FMLA-qualifying reasons for which the Clinic has previously provided FMLA-protected leave, they must specifically reference the qualifying reason for the leave or the need for FMLA leave.

2. Timing of Employee Notice

Employees must provide 30 days' advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days' notice is not possible, or the approximate timing of the need for leave is not foreseeable, employees must provide the Clinic notice of the need for leave as soon as practicable under the facts and circumstances of the particular case.

Employees, who fail to give 30 days' notice for foreseeable leave without a reasonable excuse for the delay, or otherwise fail to satisfy FMLA notice obligations, may have FMLA leave delayed or denied.

B. Cooperate in the Scheduling of Planned Medical Treatment (Including Accepting Transfers to Alternative Positions) and Intermittent Leave or Reduced Leave Schedules

When planning medical treatment, employees must consult with the Clinic and make a reasonable effort to schedule treatment so as not to unduly disrupt the Clinic's operations, subject to the approval of an employee's health care provider. Employees must consult with the Clinic prior to the scheduling of treatment to work out a treatment schedule that best suits the needs of both the Clinic and the employees, subject to the approval of an employee's health care provider. If employees providing notice of the need to take FMLA leave on an intermittent basis for planned medical treatment neglect to fulfill this obligation, the Clinic may require employees to attempt to make such arrangements, subject to the approval of the employee's health care provider.

When employees take intermittent or reduced work schedule leave for foreseeable planned medical treatment for the employee or a family member, including during a period of recovery from a serious health condition or to care for a covered servicemember, the Clinic may temporarily transfer employees, during the period that the intermittent or reduced leave schedules are required, to alternative positions with equivalent pay and benefits for which the employees are qualified and which better accommodate recurring periods of leave.

When employees seek intermittent leave or a reduced leave schedule for reasons unrelated to the planning of medical treatment, upon request, employees must advise the Clinic of the reasons why such leave is medically necessary. In such instances, the Clinic and employee shall attempt to work out a leave schedule that meets the employee's needs without unduly disrupting the Clinic's operations, subject to the approval of the employee's health care provider.

C. Submit Medical Certifications Supporting Need for FMLA Leave (Unrelated to Requests for Military Family Leave)

Depending on the nature of the FMLA leave sought, employees may be required to submit medical certifications supporting their need for FMLA-qualifying leave. As described below, there generally are three types of FMLA medical certifications: an **initial certification**, a **recertification** and a **return to work/fitness for duty certification**.

It is the employee's responsibility to provide the Clinic with timely, complete and sufficient medical certifications. Whenever the Clinic requests employees to provide FMLA medical certifications, employees must provide the requested certifications within 15 calendar days after the Clinic's request, unless it is not practicable to do so despite an employee's diligent, good faith efforts. The Clinic shall inform employees if submitted medical certifications are incomplete or insufficient and provide employees at least seven calendar days to cure deficiencies. The Clinic will deny FMLA leave to employees who fail to timely cure deficiencies or otherwise fail to timely submit requested medical certifications.

With the employee's permission, the Clinic (through individuals other than an employee's direct supervisor) may contact the employee's health care provider to authenticate or clarify completed and sufficient medical certifications. If employees choose not to provide the Clinic with authorization allowing it to clarify or authenticate certifications with health care providers, the Clinic may deny FMLA leave if certifications are unclear.

Whenever the Clinic deems it appropriate to do so, it may waive its right to receive timely, complete and/or sufficient FMLA medical certifications.

1. Initial Medical Certifications

Employees requesting leave because of their own, or a covered relation's, serious health condition, or to care for a covered servicemember, must supply medical certification supporting the need for such leave from their health care provider or, if applicable, the health care provider of their covered family or service member. If employees provide at least 30 days' notice of medical leave, they should submit the medical certification before leave begins. A new initial medical certification will be required on an annual basis for serious medical conditions lasting beyond a single leave year.

If the Clinic has reason to doubt initial medical certifications, it may require employees to obtain a second opinion at the Clinic's expense. If the opinions of the initial and second health care providers differ, the Clinic may, at its expense, require employees to obtain a third, final and binding certification from a health care provider designated or approved jointly by the Clinic and the employee.

2. Medical Recertification

Depending on the circumstances and duration of FMLA leave, the Clinic may require employees to provide recertification of medical conditions giving rise to the need for leave. The Clinic will notify employees if recertification is required and will give employees at least 15 calendar days to provide medical recertification.

3. Return to Work/Fitness for Duty Medical Certifications

Unless notified that providing such certifications is not necessary, employees returning to work from FMLA leaves that were taken because of their own serious health conditions that made them unable to perform their jobs must provide the Clinic medical certification confirming they are able to return to work and the employees' ability to perform the essential functions of the employees' position, with or without reasonable accommodation. The Clinic may delay and/or deny job restoration until employees provide return to work/fitness for duty certifications.

D. Submit Certifications Supporting Need for Military Family Leave

Upon request, the first time employees seek leave due to qualifying exigencies arising out of the active duty or call to active duty status of a covered military member, the Clinic may require employees to provide: 1) a copy of the covered military member's active duty orders or other documentation issued by the military indicating the covered military member is on active duty or call to active duty status and the dates of the covered military member's active duty service; and 2) a certification from the employee setting forth information concerning the nature of the qualifying exigency for which leave is requested. Employees shall provide a copy of new active duty orders or other documentation issued by the military for leaves arising out of qualifying exigencies arising out of a different active duty or call to active duty status of the same or a different covered military member.

When leave is taken to care for a covered servicemember with a serious injury or illness, the Clinic may require employees to obtain certifications completed by an authorized health care provider of the covered servicemember. In addition, and in accordance with the FMLA regulations, the Clinic may request that the certification submitted by employees set forth additional information provided by the employee and/or the covered servicemember confirming entitlement to such leave.

E. Substitute Paid Leave for Unpaid FMLA Leave

Employees must use any accrued paid time while taking unpaid FMLA leave (unless the Clinic specifically informs employees that this will not be required).

The substitution of paid time for unpaid FMLA leave time does not extend the length of FMLA leave and the paid time will run concurrently with an employee's FMLA entitlement.

Leaves of absence taken in connection with a disability leave plan or workers' compensation injury/illness shall run concurrently with any FMLA leave entitlement.

Upon written request, the Clinic will allow employees to use accrued paid time to supplement any paid disability benefits.

F. Pay Employee's Share of Health Insurance Premiums

During FMLA leave, employees are entitled to continued group health plan coverage (if applicable) under the same conditions as if they had continued to work. Unless the Clinic notifies employees of other arrangements, whenever employees are receiving pay from the Clinic during FMLA leave, the Clinic will deduct the employee portion of the group health plan premium from the employee's paycheck in the same manner as if the employee was actively working.

If FMLA leave is unpaid, employees must pay their portion of the group health premium through a method determined by the Clinic upon leave.

The Clinic's obligation to maintain health care coverage ceases if an employee's premium payment is more than 30 days late. If an employee's payment is more than 15 days late, the Clinic will send a letter notifying the employee that coverage will be dropped on a specified date unless the co-payment is received before that date. If employees do not return to work within 30 calendar days at the end of the leave period (unless employees cannot return to work because of a serious health condition or other circumstances beyond their control), they will be required to reimburse the Clinic for the cost of the premiums the Clinic paid for maintaining coverage during their unpaid FMLA leave.]

IV. Questions and/or Complaints about FMLA Leave

If you have questions regarding this FMLA policy, please contact the HR Manager. The Clinic is committed to complying with the FMLA and, whenever necessary, shall interpret and apply this policy in a manner consistent with the FMLA.

The FMLA makes it unlawful for employers to: 1) interfere with, restrain or deny the exercise of any right provided under FMLA; or 2) discharge or discriminate against any person for opposing any practice made unlawful by FMLA or involvement in any proceeding under or relating to FMLA. If employees believe their FMLA rights have been violated, they should contact the HR Manager immediately. The Clinic will investigate any FMLA complaints and take prompt and appropriate remedial action to address and/or remedy any FMLA violation. Employees also may file FMLA complaints with the United States Department of Labor or may bring private lawsuits alleging FMLA violations.

V. Coordination of FMLA Leave with Other Leave Policies

The FMLA does not affect any federal, state or local law prohibiting discrimination, or supersede any State or local law which provides greater family or medical leave rights. For additional information concerning leave entitlements and obligations that might arise when FMLA leave is either not available or exhausted, please consult the Clinic's other leave policies in this Handbook or contact the HR Manager.

5-3. Minnesota Parental Leave Act ("MPLA")

Employees in the state of Minnesota may be eligible for parenting leave under the Minnesota Parental Leave Act ("MPLA"). In order to be eligible for leave under the MPLA, an employee must have worked for Clinic for at least 12 months preceding the request for leave, and worked at least half the full-time equivalent position for his/her job; and work for an employer that has 21 or more employees at any single location in Minnesota.

Eligible employees may take up to 12 weeks of **unpaid** leave for the birth or placement for adoption of a child and generally are entitled to be restored to the same or equivalent position upon return from leave. Under Minnesota law, leave for the birth or adoption of a child may begin not more than 12 months after the birth or adoption, except that where the child must remain in the hospital longer than the mother, the leave may not begin more than 6 weeks after the child leaves the hospital. Where both the federal and MPLA laws apply, any leave taken will be counted under both laws at the same time.

The organization will continue full premium employee-only health care coverage and if you elect dependent care coverage at 50%, the organization will cover this during the MPPLA leave.

Eligible employees must provide at least 4 weeks' notice of leave if at all possible.

Eligible employees may utilize any accrued paid time off benefits during leave.

5-4. Jury Duty Leave

Native American Community Clinic realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed time off to perform such civic service as required by law. You are expected, however, to provide the Clinic with proper notice of your request to perform jury duty and with your verification of service. You also are expected to keep management informed of the expected length of your jury duty service and to report to work for the major portion of the day if you are excused by the court. If the required absence presents a serious conflict for management, you may be asked to try to postpone your jury duty. Employees on jury duty leave will be paid for their jury duty service in accordance with state law; however, exempt employees will be paid their full salary for any week in which they perform any work for the Clinic.

In order to be paid full salary, you must forfeit any payment received as part of the jury duty service.

5-5. Bereavement Leave

We know the death of a family member is a time when you wish to be with the rest of your family. If you are a full-time or part-time employee and you lose a relative or loved one, you will be allowed paid time off of up to three (3) days in a calendar year to assist in attending to your obligations and commitments. Paid leave days only may be taken on regularly scheduled, consecutive workdays following the passing of a loved one. You must inform your Manager prior to commencing bereavement leave. In administering this policy, the Clinic may require verification of death.

5-6. Voting Leave

In the event an employee does not have sufficient time outside of working hours to vote in a statewide election, if required by state law, the employee may take off enough working time to vote. Such time will be paid if required by state law. This time should be taken at the beginning or end of the regular work schedule. Your Manager should be notified two – five days prior to the voting day that you need time to vote during working business hours to arrange schedules

5-7. Military Leave

If you are called into active military service or you enlist in the uniformed services, you will be eligible to receive an **unpaid** military leave of absence. To be eligible for military leave, you must provide management with advance notice of your service obligations unless you are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable for you to provide such notice. Provided your absence does not exceed applicable statutory limitations, you will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws. Please ask management for further information about your eligibility for Military Leave.

If you are required to attend yearly Reserves or National Guard duty, you can apply for an **unpaid** temporary military leave of absence not to exceed the number of days allowed by law (including travel). You should give management as much advance notice of your need for military leave as possible so that we can maintain proper coverage while you are away.

5-8. School Conference and Activities Leave

Native American Community Clinic will provide employees with up to sixteen (16) hours of leave during any 12-month period to attend school conferences or school-related activities related to the employee's child (including conferences related to a pre-kindergarten program or child care services), provided the conferences or school-related activities cannot be scheduled during nonworking hours. When leave cannot be scheduled during non-work hours and the need for leave is foreseeable, the employee must provide reasonable prior notice of the leave and make a reasonable effort to schedule the leave so as not to unduly disrupt the Clinic's operations. Leave under this policy is **unpaid**. However, an employee may elect accrued paid time off for leave under this policy.

5-9. Bone Marrow Donation Leave

Employees who work twenty (20) or more hours per week are entitled to up to forty (40) hours of paid leave for the purposes of donating bone marrow. Verification of donation and the length of necessary leave may be required by the Clinic. Reasonable notice of leave must be provided.

5-10. Organ Donation Leave

Employees who work twenty (20) or more hours per week are entitled to up to forty (40) hours of paid leave for the purposes of donating an organ or partial organ to another person. Verification of donation and the length of leave needed may be required by the Clinic. Reasonable notice of leave must be provided.

5-11. Crime Victims Leave

Employees who are victims of a violent crime and are subpoenaed or requested by the prosecutor to attend court for the purpose of giving testimony may be granted reasonable time off from work without pay to attend criminal proceedings related to the victim's case. Employees who are a victim's spouse or immediate family member may be granted reasonable time off from work without pay to attend criminal proceedings related to the victim's case.

This leave will be **unpaid**, unless otherwise required by law.

Employees must give 48 hours advance notice of the request for time off pursuant to this policy, unless impracticable or an emergency prevents the employee from doing so.

Upon request, the employee must provide verification that supports the employee's reason for being absent from the workplace. All information related to the employee's leave pursuant to this section shall be kept confidential by the Clinic.

5-12. Domestic Abuse or Harassment Leave

Employees are entitled to reasonable **unpaid** time off to obtain or attempt to obtain an order of protection and/or other relief from a court related to domestic abuse or harassment.

An employee who is absent from the workplace shall give 48 hours' advance notice to the Clinic except in cases of imminent danger to the health or safety of the employee or the employee's child, or unless impracticable.

Upon request, the employee must provide verification that supports the employee's reason for being absent from the workplace. All information related to the employee's leave pursuant to this section shall be kept confidential by the Clinic.

5-12. Leave without Pay (LWOP)

NACC offers Paid Time Off benefits to all employees. Our PTO policy is rooted in our philosophy that work-life balance is an important aspect of a healthy work environment. We encourage team members to use their time out of the office to improve quality of life, manage stress, and prevent burnout.

Our staffing model is based on employees taking their allotted PTO. Time taking in addition to allotted PTO must be formally requested and approved.

LWOP requests will be reviewed on a case-by-case basis. Decisions will be based on the organizational and staff capacity to manage the absence.

You must submit a written request for LWOP to Human Resources including:

- Reason for leave
- Date expected for beginning leave
- Duration of leave
- Expected date to return to work

There are situations where illness or family emergency forces team members to be out of work beyond their accumulated PTO. In these cases, we ask that you work directly with HR to determine the appropriate course of action, including potential use of FMLA (see section X.X), disability paperwork, doctor's notes or other required documentation.

Section 6 - Communication

6-1. Use of Communication and Computer Systems

Native American Community Clinic's communication and computer systems are intended primarily for business purposes; however limited personal usage is permitted if it does not hinder performance of job duties or violate any other Clinic policy. This includes the voice mail, e-mail and Internet systems. Users have no legitimate expectation of privacy in regard to their use of the Native American Community Clinic communication and computer systems.

Native American Community Clinic may access the voice mail and e-mail systems and obtain the communications within the systems, including past voice mail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Clinic deems it appropriate to do so. The reasons for which the Clinic may obtain such access include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Clinic operations continue appropriately during an employee's absence.

Further, Native American Community Clinic may review Internet usage to ensure that such use with Clinic property, or communications sent via the Internet with Clinic property, are appropriate. The reasons for which the Clinic may review employees' use of the Internet with Clinic property include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Clinic operations continue appropriately during an employee's absence.

The Clinic may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

The Clinic's policies prohibiting harassment, in their entirety, apply to the use of Clinic's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law.

Further, since the Clinic's communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords.

Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited.

No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization.

Violators of this policy may be subject to disciplinary action, up to and including discharge.

6-2. Internet Usage

Native American Community Clinic may review Internet usage to ensure that such use with Clinic property, or communications sent via the Internet with Clinic property, are appropriate. The reasons for which the Clinic may review employees' use of the Internet with Clinic property include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Clinic operations continue appropriately during an employee's absence.

NACC has specific guidelines for the use of the Internet whereby employee must ensure that they:

1. Comply with current laws regarding internet usage.
2. Do not create unnecessary business risk to the Clinic by misuse of the Internet.
3. Limited personal use of the Internet to scheduled break time and scheduled lunch time.
4. Limit use of non-work related emails, to scheduled breaks and scheduled lunch times, during these times, emails of these types are to be used in moderation or at home.
5. All work related documents are to be saved on the "J" (Clinic-wide staff access) and or the employees "H" drive folders.

Unacceptable Internet Use (note: this list is not exhaustive)

1. Use of the Internet for non-work related activities during work hours
2. Visiting Internet sites that contain obscene, hateful or pornographic materials.
3. Using the computer to perpetrate any form of fraud, or software or music piracy.
4. Using the Internet to send offensive or harassing material to other users.
5. Downloading commercial software or any copyrighted materials belonging to third parties, unless advance permission from CEO and this download is covered or permitted under a commercial agreement or other such license.
6. Hacking into unauthorized areas.
7. Creating or transmission of defamatory materials.

8. Undertaking deliberate activities that waste staff effort or network resources. (Downloading photos, music, live streaming, videos, surfing the web, dating sites, non work related graphics, animated cursors etc., and any other use of the Internet for personal use during paid work times). Generating or forwarding chain letters, jokes, or other mass emails is considered an inappropriate use of NACC computers.
9. Introducing any form of computer virus into the corporate network.
 - ▶ Note: any damage to Clinic computers and systems as a result of inappropriate use and/or abuse will be addressed on an individual basis and may result in disciplinary action.

6-3. HIPAA/PHI Policy

The HIPAA policy is in place to provide principles and guidelines for the contents, maintenance, and confidentiality of patients Medical Record that meet the requirements set forth in Federal and State laws and regulations, and to define the portion of an individual's healthcare information, whether in paper or electronic format, that comprises the medical, mental and dental record.

NACC ensures that the medical, mental and dental patient protected health records are maintained in a manner that is consistent with the legal requirements, and is current, standardized, detailed, organized and available to providers at each patient encounter. This allows for facilitating coordination and continuity of care, and permits effective, timely, quality review care and service.

Patients will be afforded the opportunity to consent to or deny the release of identifiable medical or other information except as required by law. All protected health records will be filed, stored and restricted from public access by utilizing standardized and centralized network tracking. All patients will have the ability to review, inspect and/or obtain a copy of their Protected Health Information (PHI) in their medical, mental and dental health record. Medical, mental and dental information may not be disclosed with the consent of the patient.

Medical, mental and dental records are the property of NACC and shall not be removed from the facilities record keeping systems, except when required by law. All employees of NACC are required to sign the confidentiality statement upon hire and annually. This policy applies to all employees of Native American Community Clinic (NACC).

6-4. Use of Social Media

Native American Community Clinic respects the right of any employee to maintain a blog or web page or to participate in a social networking, Twitter or similar site, including but not limited to Facebook and LinkedIn. However, to protect Clinic interests and ensure employees focus on their job duties, employees must adhere to the following rules:

Employees may not post on a blog or web page or participate on a social networking, Twitter or similar site during working time or at any time with Clinic equipment or property.

All rules regarding confidential and proprietary business information apply in full to blogs, web pages, social networking, Twitter and similar sites. Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed in a blog, web page, social networking, Twitter or similar site.

Whether an employee is posting something on his or her own blog, web page, social networking, Twitter or similar site or on someone else's, if the employee mentions the Clinic and also expresses either a political opinion or an opinion regarding the Clinic's actions that could pose an actual or potential conflict of interest with the Clinic, the poster must include a disclaimer. The poster should specifically state that the opinion expressed is his/her personal opinion and not the Clinic's position. This is necessary to preserve the Clinic's good will in the marketplace.

Any conduct that is impermissible under the law if expressed in any other form or forum is impermissible if expressed through a blog, web page, social networking, Twitter or similar site. For example, posted material that is discriminatory, obscene, defamatory, libelous or violent is forbidden. Clinic policies apply equally to employee social media usage.

Client Name encourages all employees to keep in mind the speed and manner in which information posted on a blog, web page, and/or social networking site is received and often misunderstood by readers. Employees must use their best judgment. Employees with any questions should review the guidelines above and/or consult with their manager. Failure to follow these guidelines may result in discipline, up to and including termination.

6-5. Personal and Clinic-Provided Portable Communication Devices

Clinic-provided portable communication devices (PCDs), including cell phones and personal digital assistants, should be used primarily for business purposes. Employees have no reasonable expectation of privacy in regard to the use of such devices, and all use is subject to monitoring, to the maximum extent permitted by applicable law. This includes as permitted the right to monitor personal communications as necessary.

Some employees may be authorized to use their own PCD for business purposes. These employees should work with the IT department to configure their PCD for business use. Communications sent via a personal PCD also may subject to monitoring if sent through the Clinic's networks and the PCD must be provided for inspection and review upon request.

All conversations, text messages and e-mails must be professional. When sending a text message or using a PCD for business purposes, whether it is a Clinic-provided or personal device, employees must comply with applicable Clinic guidelines, including policies on sexual harassment, discrimination, conduct, confidentiality, equipment use and operation of vehicles. Using a Clinic-issued PCD to send or receive personal text messages is prohibited at all times and personal use during working hours should be limited to emergency situations.

If an employee who uses a personal PCD for business resigns or is terminated, the employee will be required to submit the device to the IT department for resetting on or before his or her last day of work. At that time, the IT department will reset and remove all information from the device, including but not limited to, Clinic information and personal data (such as contacts, e-mails and photographs). The IT department will make efforts to provide employees with the personal data in another form (e.g., on a disk) to the extent practicable; however, the employee may lose some or all personal data saved on the device.

Employees may not use their personal PCD for business unless they agree to submit the device to the IT department on or before their last day of work for resetting and removal of Clinic information. This is the only way currently possible to ensure that all Clinic information is removed from the device at the time of termination. The removal of Clinic information is crucial to ensure compliance with the Clinic's confidentiality and proprietary information policies and objectives.

Please note that whether employees use their personal PCD or a Clinic-issued device, the Clinic's electronic communications policies, including but not limited to, proper use of communications and computer systems, remain in effect.

Portable Communication Device Use While Driving

Employees who drive on Clinic business must abide by all state or local laws prohibiting or limiting PCD (cell phone or personal digital assistant) use while driving. Further, even if usage is permitted, employees may choose to refrain from using any PCD while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while the employee is driving, and permitted by law, the employee must use a hands-free option and advise the caller that he/she is unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a cell phone while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

6-6. Publicity/Statements to the Media

All media inquiries regarding the position of the Clinic as to any issues must be referred to the CEO. Only the CEO is authorized to make or approve public statements on behalf of the Clinic. No employees, unless specifically designated by the CEO, are authorized to make those statements on behalf of Clinic. Any employee wishing to write and/or publish an article, paper, or other publication on behalf of the Clinic must first obtain approval from the CEO. Violation of this policy could result in disciplinary action up to and including termination.

6-7. Solicitation and Distribution

To avoid distractions, solicitation by an employee of another employee is prohibited while either employee is on working time and in all immediate patient care areas. Any solicitation must be approved by a manager and is limited to the break room during non-working time and the use of NACC email system to communicate the solicitation is prohibited. "Working time" is the time an employee is engaged, or performing his/her work tasks for Native American Community Clinic.

Solicitation of any kind by non-employees on Clinic premises is prohibited at all times. Communicate to the non-employee that solicitation is not allowed on Clinic premises when the non-employee approaches the Clinic.

Distribution of advertising material, handbills, printed or written literature of any kind in immediate patient care areas and all other working areas of Clinic must be approved through the Clinic manager. Distribution of literature by non-employees on Clinic premises must be approved by the Operations and/or Clinic Manager.

6-8. Employee Bulletin Boards

Important notices and items of general interest are continually posted on our bulletin board. Make it a practice to review it frequently. This will assist you in keeping up with what is current at Native American Community Clinic. To avoid confusion, please do not post or remove any material from the bulletin board in the break room.

6-9. Confidentiality and Data Privacy at NACC

Native American Community Clinic (NACC) is committed to honoring the privacy of all patients and employees and protecting the data and information as required by all applicable rules, regulations, and laws for sharing and handling such data.

1. NACC employees must regard the patient's medical record as confidential information and must at all times be protected from loss or tampering. No one except authorized Clinic personnel is allowed access to the patient's medical record.
2. Staff must avoid conversations regarding patients in hallways or other public areas.
3. When making telephone calls, be cautious in discussing detailed information over phones in high traffic areas.
4. When attempting to reach patients by phone, do not leave messages unless authorized by the patient to do so with specific persons or family members.
5. Do not leave patient-specific information in non-secure areas.
6. All copies of patient records data or databases, including Clinic schedules with patient names, must be shredded or locked at the end of the corresponding work day; **never** tossed in unsecured trash.
7. Do not remove medical records, disks, reports, or printouts containing patient-identifiable information from the Clinic.
8. Keep security codes and passwords private. Do not share with anyone.
9. Computerized patient databases or data are to be saved in password protected files on the Native American Community Clinic shared network drive.
10. Confidential patient paperwork should only be located in designated patient folders (in a locked program specific file cabinet). No confidential paperwork should be located on employee desks for more than that corresponding work day.

11. No patient data (hard copy) or databases (electronic) should be emailed, copied, or taken off premises. All work with patient data must be done on-site at The Native American Community Clinic, with exceptions to providers and managers.
12. All medical records should be stored after-hours in a secured area. These two areas are: the locked Medical Records room and Provider Office.
13. Use of the organization provided laptop onsite or off-site must adhere to all confidentiality and communication policies.

Unauthorized release of confidential information is cause for immediate termination.

Section 7 - General Standards of Conduct

7-1. Workplace Code of Conduct

NACCs mission, community values, and code of conduct are rooted in the seven grandfather teachings. Humility, Courage, Honesty, Wisdom, Truth, Respect, and Love.

Through embodiment of these values, Native American Community Clinic endeavors to maintain a positive work environment. Patients served by NACC are particularly vulnerable, and therefore NACC employees understand that the services we provide require the highest standards of professionalism, integrity, and competence.

You should be prepared to exercise good judgement and common sense in deciding the right actions to take, because the code of conduct and our policies cannot cover every situation that may arise. Please ask questions if you are unclear about any aspect of the code of conduct, or if you are not sure how to respond to an issue not addressed in this handbook.

Our guiding principles are rooted in our shared organizational values. They provide a framework to guide our decision making in all circumstances. Living and working by these values will enable us to create a company culture that we can all be proud of— consistency between our actions and our values promotes harmony and healing.

NACCs values are non-negotiable. Our ability to deliver on our mission and serve our community is dependent on how we show up in our lives and our work on a daily basis—

NACC's Mission: Love

Promote health & wellness of mind, body and spirit in Native American Families.

Honesty and Truth

We strive to be honest and to hold ourselves to the highest possible moral standards. Our reputation in the community and the trust of our patients needs to be protected and nurtured. It is up to all of us to make sure that we continually earn that trust. All of our interactions and encounters with the community we serve should promote confidence, trust, and loyalty.

Humility and Courage

We strive to lift each other up, to provide constructive feedback, and listen to our coworkers concerns without defensiveness. A culture of patient safety and non-judgmental incident reporting is part of our DNA here at NACC. Any time you observe issues that threaten the safety or health of our patients, your coworkers, or the community, say something. Improving our services, facilities, and abilities is a team effort. NACCians are always empowered to step forward and provide feedback-- everyone on this team has a voice, we encourage all team members to use that voice to promote the health and safety of our patients, community and coworkers.

Wisdom

We strive to do the right thing in all situations, even though the right path is rarely the easiest. Ethics are the moral guidelines that guide our actions, words, and deeds. Good ethics are the basis of a cohesive, supportive company culture— these values help us build a strong relationship with each other and our patients.

Respect

We strive to create a diverse and dynamic environment that acknowledges the harms of colonization while respecting the way of life and traditions of every nation, tribe, and culture. We understand that our perspective, values, and way of looking at the world may be different from coworkers, patients, and community members— we have all been shaped by our own unique life experiences. We've found that our culture is stronger when we move toward difficult topics, conversations, and conflicts with mutual respect and empathy.

Unacceptable conduct may subject the offender to disciplinary action, up to and including discharge, in the Organization's sole discretion. The following are examples of some, but not all, conduct which can be considered an unacceptable violation of our code of conduct:

1. Obtaining employment on the basis of false or misleading information.
2. Stealing, removing or defacing Native American Community Clinic property or a co-worker's property, and/or disclosure of confidential information.
3. Completing another employee's time records.
4. Violation of safety rules and policies.
5. The unlawful or unauthorized use, abuse, solicitation, distribution, theft, possession, transfer, purchase, or sale of drugs, drug paraphernalia or alcohol by an individual anywhere on Clinic premises, while on Organization's business (whether or not on Clinic premises), or while representing the Organization, reporting to work or remaining on duty after using drugs or alcohol in any amount that adversely affects the employee's ability to perform the functions of the job. Please refer to your Organization's specific policy (if any) for additional information.
6. Fighting, threatening or disrupting the work of others or other violations of Native American Community Clinic Workplace Violence Policy.
7. Failure to follow lawful instructions of a supervisor.
8. Failure to perform assigned job duties.
9. Violation of the Punctuality and Attendance Policy, including but not limited to irregular attendance, habitual lateness or unexcused absences.

10. Gambling on Organization property.
11. Willful or careless destruction or damage to Organization assets or to the equipment or possessions of another employee.
12. Wasting work materials.
13. Performing work of a personal nature during working time.
14. Violation of the Solicitation and Distribution Policy.
15. Violation of Native American Community Clinic Harassment or Equal Employment Opportunity Policies.
16. Violation of the Communication and Computer Systems Policy.
17. Unsatisfactory job performance.
18. Inappropriate or unethical relationships or interactions that could reasonably be expected to interfere with or impact negatively on our patients.
19. Any other violation of Organization policy.

Use of non-prescribed mind-altering chemicals is not compatible with the health and safety of patients and coworkers. Consumption of alcohol and illegal drugs at NACC is strictly prohibited. If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or patients, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on subjective characteristics such as the employee's appearance, behavior, or speech.

Obviously, not every type of misconduct can be listed. Note that all employees are employed at-will, and Native American Community Clinic reserves the right to impose whatever discipline it chooses, or none at all, in a particular instance. The Organization will deal with each situation individually and nothing in this handbook should be construed as a promise of specific treatment in a given situation. However, Native American Community Clinic will endeavor to utilize progressive discipline but reserves the right in its sole discretion to terminate an employee at any time for any reason.

Following these rules will help to ensure that our workplace remains a safe and desirable place to work.

7-2. Conflict Resolution

The purpose of the employee resolution policy is to provide a means for the employee to resolve work place concerns with management.

NOTE: Personal conflicts between employees are not covered under conflict resolution policy. Ordinary employee conflicts should be dealt with by the involved employees. Managers can be requested to help with mediation of these personal issues, but will not be considered part of this procedure.

Step 1: The employee should present the conflict, verbally or/in writing (employee feedback form) to his/her immediate supervisor. The supervisor/manager will review and respond timely. If the conflict resolution involves an immediate manager, the employee may request a manager from another department to mediate and resolve the conflict.

Step 2: If the Manager fails to respond in a reasonable time period, the employee should put in writing and submit to their Department Head or Human Resources. The Department Head or HR will respond timely.

Step 3: An employee must follow Step 1 and Step 2 first or the appeal will not be discussed any further. If the employee has not had resolution, an employee may submit an appeal to the Director of Operations. The Director of Operations will arrange a meeting from the appealing employee and the immediate manager, either separately or jointly. The Director of Operations may also request statements from other employees.

The Director of Operations may refuse to grant the employee's request for appeal when the issues involved are minor in nature or involve evaluations or judgments by management, may be referred back to Human Resources, unless they appear to be contrary to the policy, malicious or vindictive.

Specific timeline can be discussed with your manager regarding conflict resolution.

7-3. Non-Harassment

It is Native American Community Clinic's policy to prohibit intentional and unintentional harassment of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sexual orientation or age. The purpose of this policy is not to regulate our employees' personal morality, but to ensure that in the workplace, no one harasses another individual.

If an employee feels that he or she has been subjected to conduct which violates this policy, he or she should immediately report via a feedback form the matter to your Manager. If the employee is unable for any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact the CEO. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in his or her reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where

appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Clinic will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy.

If an employee feels he or she has been subjected to any such retaliation, he or she should report it in the same manner in which the employee would report a claim of perceived harassment under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

7-4. Sexual Harassment

It is Native American Community Clinic's policy to prohibit harassment of any employee by any Manager, employee, customer or vendor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within the Clinic. It is to ensure that at the Clinic all employees are free from sexual harassment. While it is not easy to define precisely what types of conduct could constitute sexual harassment and there is a wide range of behavior that may violate this policy even if such behavior does not violate the law, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to your Manager. If you are unable for any reason to contact this person, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be harassment, please contact the CEO. If the person toward whom the complaint is directed is one of the individuals indicated above, you should contact any higher-level manager in your reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Clinic will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If you feel you have been subjected to any such retaliation, report it in the same manner you would report a claim of perceived harassment under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

7-5. Workplace Violence

Native American Community Clinic is strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Clinic and personal property.

We do not expect you to become an expert in psychology or to physically subdue a threatening or violent individual. Indeed, we specifically discourage you from engaging in any physical confrontation with a violent or potentially violent individual. However, we do expect and encourage you to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in Clinic policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or Manager; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; demonstrating a propensity to behave and react irrationally

Prohibited Conduct

Threats, threatening language or any other acts of aggression or violence made toward or by any Clinic employee WILL NOT BE TOLERATED. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, employees and visitors are prohibited from carrying weapons onto Clinic premises.

Procedures for Reporting a Threat

All potentially dangerous situations, including threats by co-workers, should be reported immediately in writing to any member of management with whom you feel comfortable. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede our ability to investigate and respond to the complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Clinic determines, after an appropriate good faith investigation, that someone has violated this policy, the Clinic will take swift and appropriate corrective action.

If you are the recipient of a threat made by an outside party, should be reported immediately to any member of management with whom you feel comfortable. It is important for us to be aware of any potential danger in our offices. Indeed, we want to take effective measures to protect everyone from the threat of a violent act by an employee or by anyone else.

7-6. Inspections

Native American Community Clinic reserves the right to require employees while on Clinic property, or on client property, to agree to the inspection of their persons, personal possessions and property, personal vehicles parked on Clinic or client property, and work areas.

This includes lockers, vehicles, desks, cabinets, work stations, packages, handbags, briefcases and other personal possessions or places of concealment, as well as personal mail sent to the Clinic or to its clients. Employees are expected to cooperate in the conduct of any search or inspection.

7-7. Conflict of Interest and Business Ethics

It is Native American Community Clinic's policy that all employees avoid any conflict between their personal interests and those of the Clinic. The purpose of this policy is to ensure that the Clinic's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the Clinic.

It is not possible to give an exhaustive list of situations that might involve violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

1. Holding an interest in or accepting free or discounted goods from any organization that does, or is seeking to do, business with the Clinic, by any employee who is in a position to directly or indirectly influence either the Clinic's decision to do business, or the terms upon which business would be done with such organization.
2. Holding any interest in an organization that competes with the Clinic.
3. Being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with the Clinic or which competes with the Clinic.
4. Profiting personally, e.g., through commissions, loans, expense reimbursements or other payments, from any organization seeking to do business with the Clinic.

A conflict of interest would also exist when a member of an employee's immediate family is involved in situations such as those above.

This policy is not intended to prohibit the acceptance of modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value.

It is your responsibility to report any actual or potential conflict that may exist between you (and your immediate family) and the Clinic.

7-8. Use of Facilities, Equipment and Property, Including Intellectual Property

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards and guidelines.

Please notify your Manager if any equipment, machines, or tools appear to be damaged, defective, or in need of repair. Prompt reporting of loss, damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. The Manager can answer any questions about an employee's responsibility for maintenance and care of equipment used on the job.

Employees also are prohibited from any unauthorized use of the Clinic's intellectual property, such as audio and video tapes, print materials and software.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in discipline, up to and including discharge.

Further, the Clinic is not responsible for any damage to employees' personal belongings unless the employee's Manager provided advance approval for the employee to bring the personal property to work.

7-9. Employee Health and Safety

Because of their contact with patients or infective material from patients, many healthcare workers (HCWs) (e.g., physicians, nurses, emergency medical personnel, dental professionals and students, medical and nursing students, laboratory technicians, hospital volunteers, and administrative staff) are at risk for exposure to and possible transmission of vaccine-preventable diseases. Maintenance of immunity is therefore an essential part of prevention for HCWs.

NACC requires active immunization for diseases that pose special risks for HCWs i.e. hepatitis B, influenza, measles, mumps rubella and varicella. Of course employees should also have those vaccines that are recommended for all adults (i.e. tetanus, diphtheria and pneumococcal

disease.) and those vaccines that are recommended for them in their particular circumstance, (i.e. hepatitis A, meningococcal disease) and as situations arise (e.g. pertussis or H1N1).

It is the policy of NACC that their employees have documented immunity as demonstrated by serology or by documented vaccinations to hepatitis B, measles, mumps, rubella, and varicella. Healthcare workers who are not immune will need to be vaccinated against these diseases. Healthcare workers are encouraged to receive the influenza vaccine annually.

All NACC employees have the potential for exposure to *M. tuberculosis* through air space shared with persons with infectious TB disease. All paid, volunteer, part time, temporary, contracted, and full-time employees should be included in our TB screening programs. According to guidelines set up by the MDH, NACC is considered medium risk for tuberculosis transmission, and as such employees will receive appropriate TB screenings on hire and annually.

Employees are prohibited from sharing over-the-counter or prescription medication with another employee on Native American Community Clinic premise at any time. Any personal medication needs to be locked in a desk or lockers inaccessible to other employees.

7-10. Hiring Relatives/Employee Relationships

A familial relationship among employees can create an actual or at least a potential conflict of interest in the employment setting, especially where one relative supervises another relative. To avoid this problem, Native American Community Clinic may refuse to hire or place a relative in a position where the potential for favoritism or conflict exists.

In other cases such as personal relationships where a conflict or the potential for conflict arises, even if there is no manager relationship involved, the parties may be separated by reassignment or terminated from employment, at the discretion of the Clinic. Accordingly, all parties to any type of intimate personal relationship must inform management.

If two employees marry, become related, or enter into an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. The Clinic generally will attempt to identify other available positions, but if no alternate position is available, the Clinic retains the right to decide which employee will remain with the Clinic.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

7-11. Gift Policy and Disclosure Form

As a part of its Conflict of Interest Policy, NACC requires that directors, officers and employees decline to accept certain gifts, consideration, or remuneration from individuals or companies that seek to do business with NACC or are a competitor of it. This policy and disclosure form is intended to implement that prohibition on gifts.

Definitions:

“Responsible Person” is any person serving as an officer, employee, or a member of the Board of Directors of NACC.

“Family Member” is a spouse, domestic partner, parent, child or spouse of a child, or a brother, sister or spouse of a brother or sister, of a Responsible Person.

“Contract or Transaction” is any agreement or relationship involving the sale or purchase of goods, services or rights of any kind, receipt of a loan or grant, or the establishment of any other pecuniary relationship. The making of a gift to NACC is not a “contract” or “transaction.”

Prohibited Gifts, Gratuities, or Entertainment

Except as approved by the Board Chair or his/her designee, or for gifts of less than \$50 which may not be refused without discourtesy, no Responsible Person or Family Member shall accept gifts, entertainment or other favors from any person or entity which:

1. Does or seeks to do business with NACC or,
2. Does or seeks to compete with NACC or,
3. Has received, is receiving, or is seeking to receive a contract or transaction with NACC.

Consultant Fees, Honoraria, Gifts

All NACC employees are encouraged to participate in a variety of community and professional activities. In those instances where an employee's activities are part of their regular duties and responsibilities, any payment will be turned over to NACC. All fees derived from NACC reports, activities, events, or speaking engagements while employed by NACC shall also be turned over to the organization.

In some instances, an individual may do work that is based on activities or experiences prior to or separate from their regular duties and responsibilities at the NACC. To avoid actual or appearance of conflict of interest, any employee who engages in any remuneration activity in any field directly related to NACC programs must have prior approval by the Chief Executive Officer. The Board of Directors will review these issues for the Chief Executive Officer.

No employee may formally represent himself/herself as a spokesperson for NACC without prior approval of his/her manager.

7-12. Business Expense

Purchase Orders

Before purchasing or ordering any supplies, NACC employees must complete a Purchase Order (PO) from finance. 2. The employee must include all the necessary information, including name and telephone number of the vendor and the contact name at the Clinic. 3. The purpose, grant or payment method must be indicated on the PO where applicable. 4. Before the items are ordered or purchased the PO must be approved and signed by the manager. The Finance Director and Chief Executive Officer will review and sign approved Purchase Orders only on Tuesdays. 5. The CEO will give signed PO to the Finance department. A copy of the signed Purchase Orders will be given to the employee or manager who originated the Purchase Orders and the order can be placed (purchase made).

Any one item that is in excess of \$1,000 must include at least three quotes from different vendors before approval by the Chief Executive Officer.

It is the responsibility of the employee to keep a copy of the PO until the items ordered are received at the Clinic. **Any purchases made without prior approval may result in disciplinary action.**

Reimbursement

****Note:** In certain situations where timelines are short or unexpected or the Chief Executive Officer is not available, an employee may receive verbal permission from the department head and Finance Director for making a purchase.

If an employee has received verbal approval from the Chief Executive Officer or department head to make a purchase, they may do so and must retain the receipt for the items purchased. The employee must then complete a reimbursement form immediately after the purchase. These forms are available "Info" drive or the Executive Administrative Assistant can provide you with it.

The employee must complete the form, including all relevant and requested information. The receipt/s must then be attached to the form and forwarded to the Finance Department. The reimbursements are made to the employees the Thursday after the reimbursement is approved. The checks must be reviewed and signed by the Chief Executive Officer.

Any purchases made on any NACC accounts, must be pre-approved by the Chief Executive Officer, by completing a PO and indicating which Clinic account the purchase is going to be made on.

7-13. Personnel Travel

Personal and spousal travel expenses. With advance approval from the CEO, individuals traveling on behalf of Organization may incorporate personal travel or business with their Clinic-related trips; however, Personnel shall not arrange organization travel at a time that is less advantageous to the organization or that involves greater expenses to the organization in order to accommodate personal travel plans. Any additional expenses incurred as a result of personal travel, including but not limited to extra hotel nights, additional stopovers, meals or transportation, are the sole responsibility of the individual and is considered off work and will not be reimbursed by the organization. Expenses associated with travel of an individual's spouse, family, or friends will not be reimbursed.

7-14. References

Native American Community Clinic will respond to reference requests through the Human Resources Department. The Clinic will provide general information concerning the employee such as date of hire, date of termination, and positions held. Requests for reference information must be in writing, and responses will be in writing. Please refer all requests for references to the Human Resources Dept.

Only the Human Resources Department may provide references.

7-15. If You Must Leave Us

Should you decide to leave the Clinic, we ask that you provide your Manager notice of your impending departure with a minimum of 2 weeks for non-exempt staff and minimum of 30 days for management/exempt staff. Your thoughtfulness will be appreciated, and will help NACC to continue to provide necessary services until a replacement for you can be identified.

All Clinic property including, but not limited to, keys, security cards, parking passes, laptop computers, fax machines, uniforms, etc. must be returned at separation. Employees also must return all of the Clinic's Confidential Information upon separation. To the extent permitted by law, employees will be required to repay the Clinic (through payroll deduction, if lawful) for any lost or damaged Clinic property.

As noted previously, all employees are employed at-will and nothing in this handbook changes that status.

7-16. Exit Interview

Employees who resign are requested to participate in an exit interview with Human Resources. By engaging in an exit interview, you are helping the NACC leadership and human resources to improve the Clinic for your fellow employees and future staff as well. Your cooperation is greatly appreciated.

7-17. A Few Closing Words

This handbook is intended to give you a broad summary of things you should know about Native American Community Clinic. The information in this handbook is general in nature and, should questions arise, any member of management should be consulted for complete details. While we intend to continue the policies, rules and benefits described in this handbook, Native American Community Clinic, in its sole discretion, may always amend, add to, delete from or modify the provisions of this handbook and/or change its interpretation of any provision set forth in this handbook. Please do not hesitate to speak to management if you have any questions about the Clinic or its personnel policies and practices.

General Handbook Acknowledgment

This Employee Handbook is an important document intended to help you become acquainted with Native American Community Clinic. This document is intended to provide guidelines and general descriptions only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because the Clinic's operations may change, the contents of this Handbook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management.

Please read the following statements and sign below to indicate your receipt and acknowledgment of this Employee Handbook.

I have received and read a copy of Native American Community Clinic's Employee Handbook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of the Clinic at any time.

I further understand that my employment is terminable at will, either by myself or the Clinic, with or without cause or notice, regardless of the length of my employment or the granting of benefits of any kind.

I understand that no contract of employment other than "at will" has been expressed or implied, and that no circumstances arising out of employment will alter "at will" status except IN AN INDIVIDUAL CASE OR GENERALLY in a writing signed by the CEO of Native American Community Clinic.

I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Clinic's Employee Handbook.

Employee's Printed Name: _____ Position: _____

Employee's Signature: _____ Date: _____

The signed original copy of this acknowledgment should be given to management - it will be filed in your personnel file.

Receipt of Sexual Harassment Policy

It is Native American Community Clinic's policy to prohibit harassment of any employee by any Manager, employee, customer or vendor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within the Clinic. It is to ensure that at the Clinic all employees are free from sexual harassment. While it is not easy to define precisely what types of conduct could constitute sexual harassment, and there is a wide range of behavior that may violate this policy even if such behavior does not violate the law, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to your Manager. If you are unable for any reason to contact this person, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be harassment, please contact the CEO. If the person toward whom the complaint is directed is one of the individuals indicated above, you should contact any higher-level manager in your reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. Violation of this policy will result in disciplinary action, up to and including discharge. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Clinic will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If you feel you have been subjected to any such retaliation, report it in the same manner you would report a claim of perceived harassment under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge.

All employees must cooperate with all investigations.

I have read and I understand Native American Community Clinic's Sexual Harassment Policy. Employee's

Printed Name: _____ Position: _____

Employee's Signature: _____ Date: _____

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.

Receipt of Non-Harassment Policy

It is Native American Community Clinic's policy to prohibit intentional and unintentional harassment of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sexual orientation or age. The purpose of this policy is not to regulate our employees' personal morality, but to ensure that in the workplace, no one harasses another individual.

If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to your Manager. If you are unable for any reason to contact this person, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be harassment, please contact the CEO. If the person toward whom the complaint is directed is one of the individuals indicated above, you should contact any higher-level manager in your reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. Violation of this policy will result in disciplinary action, up to and including discharge. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Clinic will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy.

If an employee feels he or she has been subjected to any such retaliation, he or she should report it in the same manner in which the employee would report a claim of perceived harassment under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

Employee's Printed Name: _____ Position: _____

Employee's Signature: _____ Date: _____

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.

Confidentiality Agreement

All staff of the Native American Community Clinic (NACC) is required to sign a Confidentiality Agreement. At orientation, the employee will be presented with a document containing the following statement to be signed.

During the course of my employment at NACC, I will:

1. Only access information and data necessary to do my legitimate work activities.
2. Not discuss or share patient or employee information with another individual unless it is necessary for that individual to perform his/her work activities and s/he is authorized to have access to the information.
3. Exercise discretion in conducting conversations, or acting in a manner which would reveal confidential information while in a public or semi-public area, such as the break room.
4. Prevent unauthorized persons from accessing and viewing patient or employee data by not leaving patient information on computer screens, printers, fax machines, or in insecure areas.
5. Inform my manager if I have reason to believe that anyone may have learned or has used my security code for accessing computer systems at NACC.
6. Inform my manager if I observe untrained and unauthorized persons harming or accessing computer systems through inappropriate use.
7. Use all property, data and products in accordance with the applicable licensing agreement, lease agreements, and contracts for NACC.
8. Access medical records only if related directly to my providing patient care or quality reviews if that is part of my job.

Employee's Printed Name: _____ Position: _____

Employee's Signature: _____ Date: _____

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.

Conflict of Interest

All staff of the Native American Community Clinic (NACC) is required to sign a Conflict of Interest. At orientation, the employee will be presented with a document containing the following statement to be signed.

STATEMENT CONCERNING CONFLICTS OF INTEREST

I am a staff member or member of the Board of Directors, or a member of a committee with Board-delegated duties, of NACC.

I have received a copy of the current Conflict of Interest Policy adopted by the Board.

I have read and I do understand the Policy.

I agree to comply with the Policy.

I understand that NACC is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes. I agree to refrain from any conflicts of interest or appearance of conflicts of interest between the organization and myself, and to disclose any such conflicts of interest or appearance of conflicts of interests prior to any decision by the NACC CEO or Board of Directors or any committee of the Board.

Signature: _____ Date: _____

Printed Name: _____

In the interest of full disclosure, I declare the current conflict(s) of interest:

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.