



# Personnel Manual

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## 2.1 Introduction

At Stepworks Recovery Centers, we believe in people. Since 2003, Stepworks Recovery Centers has helped thousands of patients recover from addiction to drugs and alcohol, with our success rate being more than double the national average. We believe that our success was built on the quality of our team and our dedication to a simple mission: helping others recover from addiction. We understand that no one asks to be an addict, or to have a personality disorder, or to suffer from chronic pain. Our team members are some of the best in the business when it comes to providing life-changing care to our patients.

This is our personnel manual. This manual outlines the conditions of employment and personnel policies that you will need to know as you join our team. But we also wanted to use this manual to tell our story and our mission to our new team members. The *Stepworks Personnel Manual* is the organization's vehicle for communicating the goals of the company, the culture behind the organization, and what we value in our team members.

As a new team member of Stepworks, you will be joining this team—and we're excited to have you! We hope that the *Stepworks Personnel Manual* articulates our vision in a way that has an impact on you and your time with the company.

We recognize that our business needs may change from time to time and that new government regulations may affect our operations. Therefore, we reserve the right to amend, rescind, or modify any of Stepworks' policies, practices, and benefits at any time with or without notice. If any changes are made, you will be notified and receive access to the changes. Also, though we will require that you sign an acknowledgement that you have received and read this manual, it is not a contract between you and Stepworks and is not a guarantee of employment. Please read this personnel manual thoroughly and retain it for future reference.

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## 2.1.a Team Member Training

As you join the Stepworks team, you will need to be introduced to our policies and procedures, your role in the company, and what is expected from you from day to day.

Upon hire, a new team member will go through the following process. There may be deviations in the process depending on your position with the company.

1. Complete onboarding through Zenefits. On this platform, you will complete your tax withholdings, your I-9 form, direct deposit information, and benefit enrollment forms, and you will provide the company with your demographic and emergency contact information.
2. You will receive this personnel manual. An acknowledgement form must be signed. Read it carefully and present any questions to your supervisor.
3. You will receive and sign your job description.
4. You will receive and sign Stepworks' code of conduct and department-specific manuals.
5. You will complete competency training through Stepworks University. This will include training for all Stepworks team members and training for your specific position with the company.
6. You will complete competency-based HIPAA training, compliance training, and OSHA training.
7. A background check, a drug screen, and credentials verification (if applicable) are required of all new team members. Employment is provisional until these results have been received.
8. Stepworks requires all team members that are at risk of exposure to hepatitis B to either receive the hepatitis B vaccinations, provide proof of immunization status, or sign a declination of vaccine form within 10 days of hire. If electing to receive the vaccinations, these will be provided free of charge. If you're unsure of your vaccination status, Stepworks may draw a titer lab to assess immunity.
9. All team members are required to have a PPD skin test within 10 days of hire. This will be repeated as required by OSHA or after exposure to patients or staff members with tuberculosis. If a team member has a past medical history of tuberculosis infection or a positive PPD test, the team member will be required to complete a chest x-ray. This will all be provided free of charge.
10. You will receive the Stepworks Culture Book and on-the-job training with your supervisor and other senior team members.

If at any point you have questions or are unsure about your training, a process, or a procedure, always ask your trainer or your supervisor. If you feel as though you require more training in a certain area, make your supervisor aware, and it will be provided. It is always better to ask than to guess and make an error. In addition, please feel free to provide feedback to your supervisor at any time. Formally, Stepworks will also conduct surveys to collect any feedback you may have. This helps us improve Stepworks and develop our risk assessment and strategic plan.

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## 2.2 Mission

### Who we are and what we do

As we developed our mission statement, we wanted it to mean something to our team members as much as our leadership. It would be the yardstick against which we would frequently measure our efforts as individuals and as a company. We needed a mission statement that would organize the goals and services of all our entities under a single encompassing idea. This idea needed to say what we wanted to accomplish as an organization and how we were going to do it. We arrived at a mission that we constantly seek to fulfill through our facilities, materials, and team members.

#### The Stepworks Mission:

We help people hurt by addiction reclaim their dignity and build a better life.

In the next few pages, we will dig deeper into the meaning of and philosophy behind this mission statement.

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## 2.3. Philosophy

### Understanding the Mission

**What we do:**

We help people hurt by addiction reclaim their dignity and build a better life.

What does it mean to help people hurt by addiction reclaim their dignity and build a better life? Better yet, how do you measure it? At Stepworks, we believe that we can measure this with three factors: *patient relations*, *facility presentation*, and most importantly, *health outcomes*.

**Patient Relations**

Patients in the healthcare industry are often treated like factory-farm cattle—moved as quickly as possible through impersonal and convoluted systems during their treatment. Medical care is often fragmented, antiquated, and dehumanizing. At Stepworks, we seek to offer high-quality personal treatment. That process must begin with positive patient relations.

*Patient relations* refers to the series of interactions between the Stepworks team and patients. This begins with the first contact with the future patient, usually through a website or advertisement, and it continues through the intake process, treatment, discharge, and follow-up interactions.

We believe that everyone employed by the Stepworks company has some impact on patient relations, whether they are clinical staff, medical providers, receptionists, intake personnel, web programmers, or graphic designers. We are all working towards fulfilling our mission in some way through the specific jobs we perform. We are all part of the treatment team.

All Stepworks team members are responsible for considering how their work impacts patient relations and how they can make these interactions positive for all patients.

**Facility Presentation**

When people are seeking care, they are often in physical discomfort and may be experiencing anxiety related to their illness or their experience with a health provider. Patient relations present our first opportunity to



mitigate their discomfort as we invite them into our services through kindness, empathy, and attention. When they arrive at our facilities, they are greeted with the next level of the patient experience: *facility presentation*.

At Stepworks, we strive as an organization to take pride in and responsibility for everything we do. We believe that our operations and facilities are a direct reflection of who we are as a company. For this reason, we place facility presentation as one of the core values of the patient experience.

We want patients to feel comfortable when they arrive and throughout their stay at each Stepworks facility. To that end, Stepworks' facilities place emphasis on modern design, comfortable features, and cleanliness of settings. We don't want our facilities to feel like standard medical facilities. Instead, we seek to create calming environments that reflect the comfort one might find in one's own home.

### **Health Outcomes**

Patient relations and facility presentation are essential to the patient experience, but they are, for the most part, external factors—icing on the cake. So what's the cake? At the core of the Stepworks patient experience—and what we, as an organization, place above everything else—is *health outcomes*. We can express this idea with a simple question: "What is best for the patient?"

We are in the business of improving lives. This means offering health solutions that are proven by research, ethically sound, and have the highest probability of success. The goal of the Stepworks organization and each subsidiary always comes back to *improved health outcomes*. The question that each Stepworks clinician should ask is not, "What is best for myself or the business?" but, "What is best for the patient?"

This philosophy of care might seem obvious at the outset. However, we believe that the healthcare industry suffers from a systematic reversal of this tenet. Stepworks strives to correct for this tendency to lose sight of the individual patient's best interests. Our mission is to dramatically improve patient experience, and we do that through a focus on patient relations, facility presentation, and health outcomes. But the latter area is really the key. The most important thing we can do is to keep asking ourselves the simple question, "What is best for the patient?"

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## 2.4. Philosophy on Addiction

### Addiction is Brain Disease

Stepworks starts from the medically backed understanding that addiction is a brain disease. Addiction is a medical condition with complex causes and research-proven methods of treatment. It is a chronic and relapsing disease that will progress unless treated. Without treatment, addiction can be fatal. As with other chronic conditions such as diabetes, disease management principles can be applied to living with addiction to allow for long-term recovery and wellness.

### Addiction Reaches Beyond the Individual

Stepworks acknowledges that addiction has consequences that extend beyond the individual. Addiction also causes lasting damage to one's personal and productive relationships. Family members, friends, and others who are close to someone addicted may also suffer from the negative consequences of addiction, experiencing personal conflicts and even financial or legal difficulties. Loved ones can also contribute to the progression of the disease if they are not educated about how to be a positive force in the life of someone with an addiction. Recovery is about repairing not only the condition of the brain but also the relationships and circumstances that have been damaged by addiction.

### Stigma and Recovery Don't Mix

Stepworks will not perpetuate the stigma that so many people still face when struggling to understand or seek help for addiction. Stigma and recovery don't mix. We believe treatment is more effective when a culture of hope and goal-driven motivation is fostered in any recovery program or community. We encourage all who are struggling with substance use problems not to feel shame or guilt but to take responsibility for their condition and make the choice to look forward to sobriety and the life choices that promote continued recovery.

### Many Tools in the Recovery Toolbox

Stepworks believes that many tools and approaches can be effective in treating addiction and promoting recovery. There are different stages of addiction, and the appropriate course of treatment can vary among individuals. While some people may be able to remain sober after a course of outpatient treatment, others may require the structure provided by a residential treatment setting in order to regain their health. Support groups, recovery groups, community engagement, and online recovery tools are vital to sustaining recovery after treatment in a more structured setting. There are many tools that help people stay clean, and addiction management doesn't end after finishing an addiction treatment program. That's just the beginning of lifelong recovery.

### We Ask Our Patients to Be “All In” for Recovery

Stepworks offers outstanding addiction treatment and recovery services, but successful recovery also requires that our patients commit to an attitude of “all-in” engagement with their treatment plans. This requires starting from an understanding that one has an addiction that is unsustainable for a healthy life with good relationships and positive experiences. It means committing to learning about the disease and developing a personalized treatment plan to overcome addiction and redress the problems caused by the choices one made while actively addicted. It means educating friends and loved ones about how to help one stay the course of recovery as well as enlisting them for support in times of need. The programs offered by Stepworks will be most helpful when our patients engage in a total commitment to recovery.

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## 2.5 Culture

### What Our Company Values

The culture of an organization informs how the leadership and team members interact with one another, how team members approach their work, and what work habits are valued and rewarded within the organization. Most importantly for Stepworks, company culture describes how the company approaches its mission and serves its customers.

A company's culture defines who they are. At Stepworks, our culture is defined by three words: **integrity**, **honesty**, and **respect**. These are the core values that our company believes to be more important than anything else.

These action words may sound superficial at the outset. After all, it's very easy to say that a company values integrity, right? However, we're interested in looking beyond the superficial meaning. Learning how Stepworks defines these action words in theory and practice will help you to understand what the company values from its team members and from a broad organizational perspective. Stepworks aims to reward those in whom we find these values carefully exhibited.

#### **Integrity**

As an organization, we strongly believe that a person's integrity is far more important than experience, education level, or certification. At Stepworks, we frequently hire team members who are less qualified, less experienced, and less educated over applicants with much larger resumes, simply because the applicant exhibits more integrity during the employment interview. This strategy of placing integrity over experience is one that we encourage throughout the leadership of Stepworks.

How do we measure integrity? There is no chart or graph to measure integrity. Instead, integrity is represented in how we act within the organization. For the sake of clarity, we have listed a few simple directives that will help all team members better embody the value of integrity.

#### **Take Responsibility**

In your time with the company, you will likely do some things very well and also make some mistakes along the way. At Stepworks, respect is given when team members own their achievements and their mistakes in an equal fashion. It's quite easy to take responsibility for an achievement, but it's never easy to take responsibility for a mistake. But by taking responsibility for a mistake, you will communicate to your supervisors and leadership that you are capable of shouldering the responsibility of a decision. Leadership

roles are not filled with perfect people, but with people who have made mistakes, owned their mistakes, and corrected them for the benefit of the company.

### **Always Be Transparent**

What does transparent mean? Simply put: honest questions should always be answered honestly. When speaking with a supervisor or a patient, you'll eventually be asked a question that could be uncomfortable to answer honestly. Maybe you are afraid of insulting someone or hurting their feelings, maybe you don't want to get another staff member in trouble, or maybe you want to shield a patient from the guilt they might feel if you were to answer a question honestly about their behavior.

Being transparent means being dedicated to openness. Whenever you speak to anyone, don't embellish, don't lie through omission, and don't talk around an issue instead of speaking about it directly. Don't talk "around something," that might be difficult; instead choose to cut straight to the issue and be as transparent as possible.

Stepworks operates in the fields of substance abuse and behavioral health disorders. In other words, we operate in health sectors populated with patients who confuse reality and fiction, manipulate the people around them, and are frequently dishonest as a result of the behavioral effects of their disease. This makes it a priority for our team members to be transparent with each other and their patients at all times.

### **Honesty**

Honesty is a continual decision to always tell the truth. It is an aspect of integrity, our first core value, but honesty is such an important topic that we have established it as our second core value. The reason that honesty is so important is that honesty is so often abused.

In dealing with substance use disorder specifically, not telling the truth is a symptom of the disease. To put it frankly, people with addictions often lie. They lie about their drug use, the consequences of their disease, and many more things. Because our patients are so prone to telling lies, again because of their disease, it is incumbent upon us to demonstrate honesty both in our interactions with patients, with each other, and with ourselves.

Asking Stepworks team members to be honest may seem like a rather obvious statement, but honesty is so important! Stepworks maintains a zero-tolerance policy for dishonesty within the organization, whether it is directed toward a client or fellow staff member. So, be honest to a fault with your team, supervisors, and patients.

### **Respect**

Addiction steals the dignity of our patients. They are often embarrassed by their circumstances, feeling guilty about past decisions, and suffer from low self-esteem. A very important part of recovery is restoring the respect that our patients have for themselves. The way we help restore respect is to show respect.

How do we show respect?

The simplest way to show respect is to honor the golden rule: treat others as you would like to be treated. We all want to be respected as individuals. If we have an opinion, we want that opinion heard. If we are talking to someone, we want them to be honest with us rather than tell us lies or hide the truth. If we tell someone something, we want them to believe us if trust has been established.

If we are respected in these ways, we start to respect ourselves. When we start to respect ourselves, we start to feel better about ourselves. When we start to feel better about ourselves, our dignity can begin to be restored. That is one of the best ways you can help our patients: treat them with respect so that they can begin to respect themselves again.

You are going to receive a booklet called “The Stepworks Culture Book.” This booklet is going to further elaborate on how we view the disease of addiction, how we serve people hurt by addiction, and what we expect from our team members.

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## 2.6 Compliance Policies

*Each team member is held accountable for compliance.*

Stepworks team members should never rely on other team members or supervisors to maintain personal compliance. It is the responsibility of each team member to know what the state and federal regulations are and to strive to ensure compliance on a personal and company-wide level.

Stepworks is committed to establishing and maintaining an effective compliance program in accordance with the guidance published by the Office of the Inspector General and the US Department of Health and Human Services. Stepworks is committed to the seven elements of an effective compliance program as laid out by the Federal Sentencing Guidelines and compliance with all applicable laws, regulations, and requirements.

### Written Standards and Procedures

Stepworks has created policies and procedures to comply with federal and state regulations. It is the responsibility of each team member to become familiar with the policies and procedures that apply to their day-to-day activities and to comply with those policies at all times. Training on Stepworks' policies and procedures is required annually. In addition, the team member must comply with Stepworks' code of conduct and reaffirm this annually. The code of conduct can be found on Zenefits and [Stepworks University](#).

### Oversight

To oversee and implement Stepworks' compliance program, Stepworks has designated a compliance department and a compliance committee made up of key leaders in the organization. Compliance is overseen by the chief operating officer. The compliance committee:

- oversees and monitors the compliance program;
- reports regularly to the board and executive leadership;
- assists in setting a tone and creating a culture of open communication;
- establishes auditing and monitoring plans;
- assists the organization in developing appropriate standards for discipline and enforcement; and
- establishes and implements a communication strategy to assure that enforcement and discipline standards are understood throughout the organization.

### Training and Education

The amount of training provided to team members will be directly related to their job requirements. All team members will receive mandatory compliance training as part of their orientation. In addition, mandatory subject-specific training will be provided based on the team member's position and responsibilities within the organization. Attendance and



participation in mandatory training is a condition of continued employment, and failure to comply with training requirements will result in disciplinary action.

**Internal Monitoring and Auditing**

Internal monitoring and auditing activities will be conducted on an ongoing basis under the direction of the chief operating officer. These activities will be designed to address compliance with federal and state regulations and laws governing billing and coding. As part of the monitoring process, the chief operating officer will:

- conduct on-site visits to facilities;
- conduct interviews with personnel;
- obtain surveys to solicit information from all team members;
- conduct risk assessments to determine key areas of concern; and
- conduct trend analyses to identify deviations over a given time period.

**Lines of Communication**

The compliance program needs to proactively identify issues and prevent problems from developing. All team members are responsible for promptly reporting any possible misconduct. This includes the potential misconduct of fellow team members, vendors, and contract or temporary workers.

Team members should first discuss a concern with their immediate supervisor, who is closest to the situation and best able to help. If a team member is uncomfortable discussing something with their immediate supervisor, the team member should report the concern to the compliance department.

Team members should never undertake to investigate an issue themselves.

All team members are also encouraged to contact the compliance department to ask questions or seek guidance regarding specific activities or policies and procedures. Stepworks will treat calls about compliance concerns in a manner that is confidential but also consistent with the need to investigate, cooperate with the government, and comply with legal obligations.

Stepworks maintains a hotline where team members may report concerns anonymously. The number of the hotline is 800-545-9031, ext. 3200. The compliance department will respond promptly to all concerns received on the hotline, evaluating each potential issue before referring for investigation or another appropriate follow-up. The compliance department will maintain a log of all calls to the hotline, including the nature of the call and the resolution.

If the complaint is not anonymous, the compliance department will follow up in writing within five days and attempt to resolve the identified problem with the involved parties and executive board, if applicable.

Stepworks' compliance policy is to protect team members from retaliation and maintain confidentiality with respect to all concerns raised. Stepworks' managers, supervisors, and team members must not engage in retaliation, retribution, or any form of harassment directed against a team member who has reported, or is considering reporting, a compliance concern. Any manager, supervisor, or team member who engages in such retribution, retaliation, or harassment is subject to discipline, up to and including termination. For contractors, such actions may lead to the termination of their contract.

### **Disciplinary Guidelines**

Stepworks' code of conduct applies to team members at all levels at all locations within the organization and will be enforced regardless of a team member's position, rank, or tenure. Failure by any team member to comply with applicable regulations or Stepworks' policies and procedures will subject the team member to disciplinary action up to and including termination. This includes not reporting potential non-compliance issues committed by others. Supervisors who ignore or fail to detect misconduct, or who have knowledge of the conduct and fail to correct it, are subject to disciplinary action up to and including termination. Stepworks' personnel manual sets forth the degrees of disciplinary action that may be imposed on team members for failing to comply with Stepworks' policies. Intentional or reckless noncompliance will subject the transgressor to more significant sanctions than unintentional noncompliance or honest mistakes. Disciplinary action will be taken on a fair and equitable basis and will be applied in an appropriate and consistent manner; all levels of team members are subject to the same disciplinary action for the commission of similar offenses.

### **Response and Prevention**

Violations of Stepworks' compliance program threaten our status as a reliable, honest, and trustworthy provider and could result in consequences from outside authorities. For this reason, the compliance department will promptly respond to any and all reports of non-compliance. Records of such investigations will contain documentation of the alleged violation, a description of the investigative process, copies of interview notes and key documents, and the results of the investigation. If the compliance department recommends disciplinary action, it will be handled promptly by the appropriate supervisor and HR. Discipline will be imposed in accordance with Stepworks' policies and procedures. If the compliance department discovers credible evidence of misconduct and, after a reasonable inquiry, has reason to believe that the misconduct may violate criminal, civil, or administrative law, then Stepworks shall promptly report the existence of such misconduct to the appropriate governmental authority, demonstrating good faith and willingness to work with government authorities to correct and remedy the problem.

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## 2.6.a Conflicts of Interest

Conflicts of interest are situations in which personal considerations may affect, or have the appearance of affecting, an individual's loyalty and ability to fulfill their responsibilities to Stepworks. A conflict of interest policy protects Stepworks in situations where team members, or others acting on behalf of Stepworks, personally benefit from actions that go against Stepworks' best interests. However, there may be some situations in which a conflict of interest may be managed. All potential conflicts of interest should be disclosed to the board in order to determine how to best manage these issues.

### Corporate

- Members of the company's board must disclose all activities that might present conflicts of interest to the board for review. This includes using the power of their position for personal benefit at Stepworks' expense.
- If a corporate transaction would cause a financial benefit to a member, the member must fully disclose the interest and abstain from voting.
- Loans to members are prohibited.
- A board member must not serve on the board of a competing organization.

### Human Resources

- Stepworks will not accept a new staff member who has a private relationship that will conflict with Stepworks' interests and/or the interests of a patient of Stepworks.
- Stepworks may not employ persons who are currently employed as a law enforcement officer, corrections officer, probation officer, attorney, a team member of the Administrative Office of the Courts, a team member of The Division of Substance Abuse, or a judge.
- Stepworks will not accept a new staff member currently employed by a competing organization unless approved by the board.
- Stepworks team members or team member family members may not own or operate sober living facilities, halfway houses, or recovery homes without board approval.

### Service Delivery

- A team member may not act on behalf of Stepworks in any transaction that involves persons or organizations with which that team member, or a member of the team member's immediate family, has a significant connection or financial interest.
- Preferential treatment should not be given to individuals or entities due to a personal relationship with someone at Stepworks.
- Team members are prohibited from accepting personal fees or commissions from any transactions on behalf of or related to Stepworks or its property.

- Team members will not accept gratuities or inappropriate gifts from patients.
- Team members are prohibited from accepting compensation, services, benefits, payment, gratuities, or any other type of consideration from any organization doing business or seeking to do business with Stepworks. Traditional holiday gifts from referral sources or business vendors to the facility are acceptable.
- Stepworks' team members are prohibited from offering or accepting bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. Favors might include but are not limited to, promising to make referrals to a specific facility or promising to use a specific vendor's product.
- Team members must not knowingly violate any state or federal statute or any procedures adopted by the business relating to contracts, bidding, accounting, financial reporting, and disclosure procedures.

Any team member who believes that anyone within the organization has violated or intends to violate this policy is required to report their concerns to a supervisor or the compliance department as soon as possible. Failure to disclose a violation or possible violation of this policy constitutes a violation of this policy. Any violation of this policy may be grounds for discipline, up to and including immediate termination of employment.

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## 2.6.b Fraud, Waste, and Abuse

Stepworks wants to find and stop healthcare fraud, waste, and abuse. Stepworks takes seriously our responsibility to protect the integrity of the care our patients receive. Stepworks team members receive annual training in fraud, waste, and abuse in combination with their annual HIPAA and OSHA training.

Fraud is any deliberate and dishonest act intended to result in financial or personal gain. Some examples of healthcare fraud are:

- Knowingly billing for services that have not been rendered
- Knowingly altering claim forms to receive a higher payment amount
- Falsifying documentation

Waste is the overutilization of services. Some examples of waste in healthcare are:

- Ordering unnecessary tests to guard against liability
- Spending on more expensive services that do not produce better outcomes

Abuse is defined as practices inconsistent with sound fiscal, business, or medical practices, and practices that result in an unnecessary cost or in reimbursement for services not medically necessary. Some examples are:

- Charging excessively for services
- Billing for services that are not medically necessary

### How Can I Help Prevent Fraud, Waste, and Abuse?

- Validate member ID cards prior to rendering services.
- Ensure accuracy when submitting claims for services billed.
- Avoid unnecessary drug prescriptions and/or medical treatment.
- Report all suspicions of fraud, waste, and abuse by contacting the compliance department.

### Federal False Claims Act (FCA) and Kentucky Medicaid Anti-Fraud Statute (KMAFS)

Defrauding the federal or state government and its programs is illegal. Committing Medicare or Medicaid fraud may lead to imprisonment, fines, and penalties for both entities and individuals.

The KMAFS makes it unlawful for a person to submit false and fraudulent claims to the Kentucky Medicaid program or present false information so that an individual or facility may be licensed or recertified as a Medicaid provider. Violations of this statute are criminal and civil offenses and punishable by imprisonment and significant monetary penalties. It will also result in exclusion from all Kentucky Medicaid programs.

The FCA applies to both Medicare and Medicaid claims. Any person who knowingly submits or causes the submission of a false or fraudulent claim is subject to both civil and criminal penalties and exclusion from all federal healthcare programs. The term “knowingly” does not refer to intent to defraud, but it means that the person has actual knowledge of the information or acts in deliberate ignorance or reckless disregard of the truth or falsity of the information related to the claim.<sup>1</sup>

## Whistleblowers

Stepworks wants to protect team members’ right to report actual or suspected fraud, waste, and abuse. No team member may threaten, coerce, harass, retaliate, or discriminate against any individual who reports a compliance concern. Team members may report these concerns anonymously to the compliance department using the hotline.

Both the KMAFS and the FCA also contain provisions that forbid employers from retaliating or discriminating against any person who makes a good faith report of fraud to the appropriate authorities or testifies in any proceeding with regard to any report or investigation.

## Prevention and Detection of Fraud, Waste, and Abuse

In an effort to deter instances of fraud, waste, and abuse, Stepworks routinely performs audits of billing and medical record documentation. In addition, Stepworks will investigate all detected outliers and deviations from standard practice as well as any allegations of fraud, waste, and abuse it receives. Stepworks will report all substantiated allegations to the appropriate regulatory authorities who may perform their own investigation and take action against those who are found to have committed health care fraud and/or abuse.

Date Issued:	May 2020	CARF Standard:	1.A.7.d 1.I.6.d.
Date Revised:	April 2023	Kentucky Standard:	Ky. Rev. Stat. § 205.8451, .8463, .8467
Date Last Reviewed:	April 2023		Deficit Reduction Act of 2005, Section 6032, 31 U.S.C. §§ 3801-3812, 3729-3733

<sup>1</sup>

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/Fraud-Abuse-MLN4649244.pdf>

## 2.6.c Excluded Individual and Entity Screening Policy

Stepworks will not employ, contract, or credential any team member or contracted staff member or entity ineligible to participate in federally and/or state-funded healthcare programs. To ensure compliance with this standard, Stepworks will conduct monthly monitoring of the Office of Inspector General (OIG) List of Excluded Individuals/Entities (LEIE), System Awards Management (SAM) list, and Kentucky Medicaid Provider Termination and Exclusion List. The performance of monthly monitoring is documented.

It is Stepworks' expectation that all contractors, subcontractors, and vendors perform federal and state exclusion checks on its team members.

Should Stepworks become aware of a team member or contracted staff member on one of the excluded lists:

1. Supervisors and the board will be notified as appropriate.
2. The ineligible person will be placed on unpaid leave immediately.
3. The ineligible person will be given 14 days to respond in writing to Stepworks and 60 days to provide documented proof of the completion or verification of any and all procedures required to clear them from the exclusion list.
4. If the ineligible person follows the procedure in step 3, the ineligible person may be eligible for employment reinstatement upon receipt of satisfactory reinstatement documentation from the government departments that manage the exclusion lists.
5. If Stepworks has not received satisfactory reinstatement documentation from the government departments that manage the exclusion lists within 60 days, the team member will be terminated.
6. When applicable, Stepworks will calculate and prepare repayment for amounts received from federal or state healthcare programs for services furnished by an ineligible person.

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Date Issued:	May 2020	CARF Standard:	1.A.7.b
Date Revised:		Kentucky Standard:	
Date Last Reviewed:	April 2023		



## 2.6.d Workplace Harassment

All team members have a right to work in an environment free of discrimination, which includes freedom from harassment—whether that harassment is based on gender, age, race, national origin, religion, sexual orientation, marital status, or membership in other protected groups. Stepworks prohibits harassment of its team members in any form by supervisors, coworkers, customers, or suppliers.

Such conduct may result in disciplinary action up to and including termination of the team member who harasses others. Offending non-team members, including customers and suppliers, will be asked to leave and not return.

Specifically, no supervisory personnel shall threaten or insinuate either explicitly or implicitly that any team member's submission to or rejection of sexual advances will in any way influence any personnel decision regarding that team member's employment, valuation, wages, advancement, assigned duties, shifts, or any other condition of employment or career development.

Other harassing conduct in the workplace, whether physical or verbal, committed by supervisory personnel or others is also prohibited. This includes slurs, jokes, or degrading comments concerning sex, age, race, national origin, sexual orientation, religion, marital status, or membership in other protected groups; repeated offensive sexual flirtations, advances, or propositions; continual or repeated abuse of a sexual nature; graphic verbal comments about an individual's body; and the display in the workplace of sexually suggestive objects or pictures.

Team members who have complaints of harassment should report such conduct to their supervisor. The supervisor should immediately report the complaint to their supervisor and the chief operating officer. Team members who observe harassment should report in the same manner. Stepworks will investigate the matter. Where investigations confirm allegations, appropriate measures will be taken. All team members are expected to cooperate with the investigation. Failure to do so may result in discipline, up to and including termination. Information provided by individual team members in the course of an investigation will be treated as confidential and only provided to those who have a need for the information or when it is required in the course of investigating the complaint. Providing false information in the course of an investigation is grounds for discipline, up to and including termination.

Stepworks' compliance policy is to protect team members from retaliation and maintain confidentiality with respect to all concerns raised. Stepworks' managers, supervisors, and team members must not engage in retaliation, retribution, or any form of harassment directed against a team member who has reported, or is considering reporting, a harassment concern. Any manager, supervisor, or team member who engages in such retribution, retaliation, or harassment is subject to discipline, up to and including termination. For contractors, such actions may lead to the termination of their contract.

Date Issued:		CARF Standard:	
Date Revised:	April 2023	Kentucky Standard:	
Date Last Reviewed:	April 2023		

## 2.7 Confidentiality Introduction

Confidentiality is an issue of grave importance in chemical dependency. These illnesses are generally misunderstood and are often surrounded by myths and distortions of fact. For these and other reasons, information about people with these illnesses has great potential for harm and embarrassment. Stepworks is obligated to safeguard all information about its patients and is committed to following federal HIPAA and CFR 42 Part 2 Substance Abuse regulations that protect patient confidentiality and privacy.

It is imperative that all team members take confidentiality very seriously and carefully abide by all regulations listed not only in this policy but within their Stepworks University and on-site training. Failure to comply with any confidentiality policies and procedures will result in disciplinary action, up to and including termination.

At the time of admission, or as soon as the patient is capable of rational communication, Stepworks will communicate and provide each patient with a copy of its privacy policy, which outlines the federal regulations that protect the confidentiality of alcohol and drug abuse records.

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Date Issued:		CARF Standard:	1.E.1.c
Date Revised:	May 2020	Kentucky Standard:	
Date Last Reviewed:	April 2023		

## 2.7.a Patient Confidentiality—Team Member Responsibilities

- All information related to a patient's care, treatment, or condition constitutes confidential information. This includes information in the patient's chart AND information obtained via conversation with the patient or with other personnel.
- Under Part 2 regulations, any identifying information about the patient is considered confidential information. This includes the patient's name, date of birth, address, phone number, photograph etc.
  - Referencing publicly available information about a patient is a confidentiality breach. For example, a team member tells their spouse that they know the patient whose name is in the paper from work. This is a confidentiality breach, even if the team member doesn't release any other information.
- Patient information, even the patient's past, present, or future presence in the facility, should not be released to anyone without a specific signed release by the patient.
  - If someone calls asking if a patient is at our facility, we are only allowed to release that information if we have a signed consent from the patient for that particular person.
  - If not, the team member must respond, "I can neither confirm nor deny that the person is a patient here." This response must also be given if the person is not a patient.
- Confidential information should not be discussed with anyone except Stepworks staff members directly involved in the care of the patient.
  - Discussing a patient with another staff member, if not medically necessary, is not only gossip, but it also constitutes a confidentiality breach.
- Under Part 2 regulations, there must be a signed release on file to release information to other treating providers of the patient, attorneys, and courts.
- Taking confidential information from the premises in paper or electronic format is prohibited unless given explicit permission by the company.
- Paper PHI should be treated with extreme care. It should be shredded immediately after use and placed face-down when not in-use. The use of makeshift "shred-boxes" outside of the designated containers provided and serviced by the shredding contractor are prohibited.
- Accessing a patient's chart without medical necessity, for example, out of curiosity, constitutes a confidentiality breach.
- Further confidentiality training will be required annually of all team members.

### Penalties for Violations

All team members and persons having access to patient records, including former team members, are required to abide by Stepworks confidentiality policies along with all applicable state and federal laws, rules, and regulations. Violation of these policies and/or applicable state and federal laws, rules, and regulations will result in disciplinary

measures up to and including termination. In addition, there are criminal penalties for violating federal privacy regulations, including fines and imprisonment.

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Date Issued:		CARF Standard:	1.E.1.c 1.E.1.j
Date Revised:	August 2023	Kentucky Standard:	902 KAR 20:430 §4:7(d)
Date Last Reviewed:	August 2023		

## 2.7.b Disclosure with Patient Consent

In most circumstances, the patient must sign a **written consent** for Stepworks to disclose the patient's information. All consents must contain the following:

1. Stepworks' name as the organization permitted to make the disclosure;
2. The name or title of the individual or organization to which the disclosure is being made;\*
3. The name of the patient;
4. The purpose of the disclosure;
5. What kind of information to be disclosed (The disclosure must be limited to information needed to carry out the stated purpose.);
6. The signature of the patient and, when required, the signature of the person authorized to sign in lieu of the patient;
7. The date, event, or condition upon which the consent will expire (This date, event, or condition must ensure that the consent will last no longer than reasonably necessary. A patient may revoke a consent at any time by notifying a Stepworks staff member.);
8. The date the consent was signed;
9. Prohibition on re-disclosure: "42 CFR Part 2 prohibits unauthorized disclosure of these records."

\*A general designation of "all treating providers" may be used to release information to all past, present, and future treating providers of the patient. If using a general designation, there must be a statement on the consent form that, upon request from the patient, Stepworks must provide a list of entities to which their information has been disclosed pursuant to the general designation.

If the consent is expired, revoked, or is known to be fraudulent, patient information may not be disclosed.

Each disclosure of patient information must include the date the information was disclosed and the signature of the staff member who released the information. The consent form will be a part of the patient's record.

### Patient Access to Records

A patient may have access to their own records, pursuant to federal and state confidentiality laws, including the right to inspect and copy the records Stepworks maintains about the patient. The patient may be asked to sign a release of medical records to provide documentation of this disclosure. The patient is entitled to one free copy of their medical records. Beyond that first copy, an administrative charge of \$1 a page will be charged for additional copies.

### Incompetent Patients

If a patient has been adjudicated as lacking the capacity, for any reason other than for insufficient age, to manage their own affairs, the patient may be given a guardian authorized by state law to act on that patient's behalf. If a patient has a guardian, the guardian must sign all applicable intake paperwork and consents and be involved in the medical decision-making of the patient. Disclosure cannot be made without the guardian's consent. Please note that Stepworks does not treat minor patients, i.e. patients under the age of 18.

### Deceased Patients

In the case of a deceased patient, disclosures required under federal or state law involving the collection of death and other vital statistics may be released without consent. Outside of this, any other disclosure is subject to CFR 42 Part 2 regulations. Consent may be given by an executor, administrator, or other personal representative appointed under applicable state law. If there is no such applicable state appointment, consent may be given by the patient's spouse or, if none, by any responsible member of the patient's family.

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Date Issued:		CARF Standard:	1.E.1.c 1.E.3 2.G.1.
Date Revised:	May 2020	Kentucky Standard:	902 KAR 20:430 §4:7(d) 907 KAR 15:022 §6:12(b)
Date Last Reviewed:	April 2023		

## 2.7.c Disclosure Without Consent

There are some circumstances in which Stepworks may disclose patient information without written consent from the patient. If there is any question as to whether written consent is required, team members should consult their supervisor or the compliance department. Written consent from the patient is *not* required in the situations below:

1. **Communication among Stepworks team members** and contractors who have the need for information due to their responsibilities at Stepworks for diagnosis, treatment, or referral of patients
2. **Communications between Stepworks and qualified service organizations** of information needed by that organization to provide services to the program
3. **Initial reports of suspected child/adult abuse** as required by law
4. **Communications from Stepworks team members to law enforcement officials** which are directly related to a crime, on the premises against Stepworks personnel, or a threat to commit such a crime
  - a. Disclosure is limited to the circumstances of the crime, including patient status of the individual committing or threatening to commit the crime, the individual's name, address, and last known whereabouts.
5. **Medical Emergencies**
  - a. Patient-identifying information may be disclosed to medical personnel treating a condition which poses an immediate threat to the health of the patient and requires immediate intervention.
  - b. Immediately following the disclosure, a Stepworks staff member should document the following in the patient's record:
    - i. The name of the medical personnel and affiliated health care facility
    - ii. The name of the staff member making the disclosure
    - iii. The date of the disclosure
    - iv. The nature of the emergency
6. **Audit and Evaluation Activities**
  - a. Federal, state, or local governmental agencies that provide financial assistance to Stepworks, or are authorized by law to regulate Stepworks' activities; third-party payers covering patients at Stepworks; other lawful quality improvement organizations on behalf of a third-party payer; and Medicare and Medicaid may be given access to patient records without the patient's written consent.
    - i. These agencies may review and copy or download patient records for removal provided they agree in writing to:



1. Maintain and destroy the patient-identifying information in a manner consistent with policies and procedures established in 42 CFR Part 2:16;
2. Retain records in compliance with applicable federal, state, and local record retention laws; and
3. Comply with the limitations on disclosure and use in 42 CFR Part 2:53, section d.

## 7. Court Orders

- a. A subpoena is not sufficient to obtain patient records without consent.
- b. **All court orders should be obtained with the assistance of, or reviewed by, legal counsel.**

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Date Issued:		CARF Standard:	1.E.1.c 1.E.3 2.G.1.
Date Revised:	April 2023	Kentucky Standard:	902 KAR 20:430 §4:7(d)
Date last Reviewed:	April 2023		

## 2.7.d Operational Confidentiality

Any financial or proprietary information related to Stepworks should be considered confidential and not released without prior authorization of the board. Stepworks' activities, operations, and business affairs may not be disclosed to anyone outside the organization except when required in the normal course of business. Any violation of this policy may be grounds for discipline up to and including immediate termination of employment.

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Date Issued:		CARF Standard:	1.E.1.c
Date Revised:	May 2020	Kentucky Standard:	
Date last Reviewed:	April 2023		

## 2.8 Cultural Competency and Diversity Plan

Stepworks understands that a rich diversity of racial and socioeconomic backgrounds, ages, ethnicities, genders, sexual orientations, and points of view contributes to the creativity of the organization's thinking and to its effectiveness with communities, patients, and leaders. We seek to create and maintain a diverse staff at all levels and to show sensitivity to and respect for differences in all of our personal, professional, and business relationships on behalf of Stepworks Recovery Centers. We seek to use our core values and resources in an equitable manner for all staff and patients, further reflecting our commitment to all forms of diversity. Stepworks Recovery Centers is dedicated to providing culturally competent services to a diverse population.

- Stepworks will not prohibit services based on gender, age, culture, religious or spiritual beliefs, socioeconomic status, disability, sexual orientation, or language within its scope/ability to provide treatment.
- Stepworks will not hire staff based on gender, age, culture, religious or spiritual beliefs, socioeconomic status, disability, sexual orientation, or language within staff's ability to perform within their job description.
- Stepworks staff will complete a cultural competency training on the Stepworks University platform upon hire.
- Stepworks will measure the organization's cultural competence through the use of their satisfaction surveys and address patients' individual cultural needs as they arise. (See Accessibility Plan.)
- Stepworks will collaborate among providers and community organizations on outreach and enhance public relations while sharing the vision of cultural competency.
- Stepworks will compare community needs with the capability of the organization and develop a plan to address the organization's deficiencies.

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Date Revised:	January 2023	Kentucky Standard:	
Date last Reviewed:	April 2023		NARR D.11.b

## 2.9 Equal Opportunity Employment

It is Stepworks' policy to use all qualified available human resources to the fullest. We have always given appropriate attention to such factors as educational background, previous experience, proven skills, desirable character traits, and growth potential. The personnel hired and promoted are selected from all applicants on the basis of qualifications felt essential for a team member to perform well. These factors include ability, availability, capability, aptitude, experience, education, and a willingness to work and serve.

It is also the policy of Stepworks to establish and follow fair, consistent, and non-discriminatory employment practices in compliance with all applicable federal and state regulations, including the *Equal Employment Opportunity Act* and the *Americans with Disabilities Act (ADA)*. Stepworks will not discriminate against any person, team member, or job applicant because of race, creed, color, religion, gender, age (40 and over), national origin, or qualified disability.

This policy shall apply to all activity with regard to communications, recruitment, job placement and promotions, training and educational programs, layoffs and terminations, compensation, team member benefits, and working conditions of employment.

The ADA requires employers to provide reasonable accommodations that allow disabled individuals to do their jobs. If a team member is a qualified individual under the ADA and requires accommodation for their disability, a request for reasonable accommodation should be made to the team member's supervisor.

All formal employment offers are contingent on the results of background checks and reference checks, which may be performed after the initial offer.

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Date Issued:		CARF Standard:	1.A.6.a.8 1.I.3.e
Date Revised:	May 2020	Kentucky Standard:	
Date last Reviewed:	April 2023		

## 2.10 Workforce Composition

To support the mission of Stepworks, and to meet the needs of each branch of its organization, the company employs both full-time and part-time team members. These include managerial and corporate staff, a clinical staff of physicians, RNs, LPNs, and CMAs, recovery coaches, peer support specialists, and clinicians. The following definitions have been established in order to standardize terminology and provide common understanding:

1. **Team member** - a person who receives wages or salaries from Stepworks.
2. **Regular full-time team member** - those team members who work a minimum of 30 hours weekly and who maintain continuous regular employment status. Regular full-time team members are eligible for all company benefits.
3. **Regular part-time team members** - those team members who work less than 30 hours weekly and who maintain continuous regular part-time employment status. Regular part-time team members are not eligible for company benefits.
4. **PRN (as needed)** - those team members who are not scheduled to work on a routine basis. These team members typically fill in when staffing is needed due to vacations, holidays, or other short durations. PRN team members are not eligible for company benefits.
5. **Temporary team members** - those team members whose services are intended to be of a limited duration. These positions can be full-time or part-time. Temporary team members are not eligible for company benefits.
6. **Independent contractors** - These individuals or entities are not team members and therefore not eligible for company benefits.

### Exempt and Nonexempt Team Members

For payroll purposes, team members are classified as either *exempt* or *nonexempt*. This classification is based on the type of work performed by the team member and federal requirements. *Exempt* team members are exempt from overtime compensation per federal and state wage and hour regulations. Determination of exempt or nonexempt status will be made at the time of hire based on the requirements in the *Fair Labor Standards Act*. A team member's status could change if their job duties change over the course of their employment.

### Organizational Chart

An organizational chart for Stepworks that defines its leadership structure and responsibility for each level of leadership is available for all team members on Zenefits. This also defines the lines of administrative and clinical authority.

### Job Descriptions and Continuing Education

Job descriptions will be maintained in Zenefits. All new team members will receive and sign their job description at the time of hire. Job descriptions will state the qualifications, duties, and reporting supervisor for each position. Job descriptions are dynamic documents and are subject to change as responsibilities and regulations change. If there are changes to a job description, team members will be required to review and sign a new copy.

All positions are subject to any state or federal training requirements related to the position held, continuing education specific to enhanced roles or licensing requirements, and areas that are identified by the team member or supervisors where knowledge or skill improvement is necessary.

### Volunteers

Stepworks may utilize volunteers in nonclinical positions to provide nonclinical service to patients.

- Volunteers will be under the supervision of Stepworks staff at all times.
- Volunteers will receive handbook guidelines for volunteers.
- Volunteers will sign into the facility as guests each time they enter the facility.
- All volunteers will sign a confidentiality agreement prior to engaging in volunteer work with patients. This form is available on [Stepworks University](#).
- All volunteers will be notified of steps for disciplinary action and discharge from service requirements under the same guidelines as paid staff.

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Date Issued:		CARF Standard:	1.a.1 1.l.1. 1.l.3.b.
Date Revised:	March 2021	Kentucky Standard:	902 KAR 20:430 §4:7(a)(e), 908 KAR 1:370 §9:6(a-b)
Date last Reviewed:	April 2023		

## 2.11 General Workforce Requirements

Stepworks desires to make every effort to provide its patients with quality care delivered by quality staff with appropriate credentialing and certifications. All Stepworks staff appointments will be based on training, experience as demonstrated by competency, and a strong commitment to professional ethics.

- Prior to initial hire, all staff will be subject to criminal background checks through the Kentucky State Police and the Federal Bureau of Investigation (FBI).
- Prior to initial hire, all staff will be subject to checks against the Kentucky Nurse Aide and Home Health Abuse Registry, the Kentucky Caregiver Misconduct Registry, the Kentucky Child Abuse and Neglect Registry/Kentucky Central Registry, the LEIE, the SAM list, and the Kentucky Medicaid Provider Termination and Exclusion List.
- After initial hire, Stepworks will conduct ongoing monitoring of their current team members against the above lists, registries, and arrest records.
- Stepworks will verify driving records of all transportation team members.
- Stepworks reserves the right to verify driving records of all team members.
- Prior to initial hire, Stepworks will ensure that all personnel are qualified for their position through documentation of education and work experience and professional licensure, certification, or registration. Stepworks will ensure the accuracy of these documents by verifying primary sources prior to the initial hire date.

### Clinical Staff

- All Stepworks facility administrators and clinicians will be credentialed and/or certified per state regulations and their licensing boards.
- Clinicians requiring supervision will be supervised by a clinical services director per state regulations.
- Stepworks will verify the renewal of clinical staff licensing with primary sources as required by the state, their speciality, and governing licensing boards.
- Stepworks will maintain malpractice insurance on eligible clinicians as required by law.

### Response

- Stepworks will not employ any person who does not meet minimum standards. Should professional licensure, certification, or registration not prove valid, Stepworks will rescind any offers of employment.
- An individual who has had a conviction or guilty plea for the neglect, physical abuse, sexual abuse, or sexual exploitation of a child will not be employed by Stepworks.

- An individual who has had a conviction or guilty plea to a sex crime or criminal offense against a minor (both as specified in KRS 17.500) will not be employed by Stepworks.
- Stepworks will not employ an individual who has had a criminal conviction or guilty plea to a violent crime as specified in KRS 439.3401 or a class A felony.
- Stepworks will not employ an individual who is listed on the nurse aide and home health abuse registry or caregiver misconduct registry.
- All hires are provisional until the background checks have been processed and returned to Stepworks. This should take no longer than 60 days.
- Should ongoing monitoring produce a hit on one of the above lists or registries, the team member will be placed on unpaid leave while the issue is resolved. Should the appeal remain unresolved or the licensure, certification, or registration not renew within 60 days, the team member will be terminated.

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Date Issued:		CARF Standard:	1.1.4, 2.A.25
Date Revised:	May 2020	Kentucky Standard:	908 KAR 1:370 §14:2-3; §15:1,3 902 KAR 20:430 §4:6
Date last Reviewed:	April 2023		NARR A.2.f., D.10.b



## 2.12 Probationary Period

To acclimate new team members to Stepworks, the first 10 weeks of employment are considered a probationary period. This period is set up to accommodate the team member and their supervisor. It is a period of adjustment and adaptation on both the personal level and the job requirement level. The staff member is expected to meet or exceed the initial demands of the position during this time period. Also, it is a time period of adjustment to Stepworks' overall policies and work rules. If, during this time period, the staff member fails to adapt successfully to the requirements of the position, employment will be terminated. This determination will be made by the team member's supervisor.

In some cases, if the team member has not met all expectations during the probationary period, this trial period may be extended per the discretion of the team member's supervisor.

Stepworks also reserves the right to place a team member on probation should performance deficiencies arise, but they are within the team member's ability and desire to correct. This course of action delays or avoids discharge of the staff member. It should be used sparingly and only where the supervisor sees evidence of a sincere desire from the team member to try to work things out. A written document placing the staff member on probation should be completed by the supervisor and signed by the team member. It should be placed in the team member's personnel file and HR should be notified. Specific areas of improvement should be delineated in the document and a performance review prepared at the end of the period if the staff member is to be retained.

- Holiday pay is not granted during the probationary period.
- While PTO may accrue, PTO may not be used during the probationary period, therefore all absences will be unpaid.
  - All effort should be made to avoid absenteeism during the probationary period as these will be unpaid absences. The policy on unpaid absences will apply.
- Salary increases will not be granted during the probationary period.
- Completion of the probationary period is not a guarantee of continued employment. See "At-Will Employment."

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Date Issued:		CARF Standard:	1.1.4
Date Revised:	May 2020	Kentucky Standard:	
Date last Reviewed:	April 2023		

## 2.13 Wage and Salary Administration

Stepworks recognizes that payroll is a major portion of fixed expenses and will be controlled like all expenses. But payroll is also an investment, the same as an expenditure for facilities or inventory, and should be planned for maximum return to the company.

### Provisions

- Wage and salary administration will be externally competitive, internally equitable, and performance-related.
- Wage and salary scales are based on the technical training, experience, and responsibilities required by the position held.
- Wage and salary information regarding an individual team member is personal information and will be confidentially maintained by Stepworks.
- Wage and salary changes will be based upon objective appraisal of team member performance. The following performance factors will be considered when establishing a fair and equitable salary:
  - Attitude, cooperativeness, loyalty, initiative, and dedication
  - Attendance
  - Quality and quantity of work
  - Ability to receive and carry out instructions
- Merit increases will require substantiation by an annual performance review. A positive performance review does not necessarily substantiate a merit increase.

### Procedures

- Individuals should not be hired below the minimum salary range.
- Individuals will not be hired above the maximum salary range without approval of the board.
- Merit increases are granted only to those team members whose performance exceeds acceptable standards and whose salaries are not appropriate for their level of performance.
- Merit increases will not be granted routinely for passage of time or to placate, appease, or build the morale of the team members whose salaries are already equitable and reasonably reflect their level of performance.
- Management will authorize guidelines specific to each merit review.
- Promotions involve a change of job duties and a distinct increase in job responsibilities. Promotions will normally be accompanied by a promotional increase to provide tangible recognition of the acceptance of greater responsibility. The amount of promotional increase should take the team member to at least the minimum rate of the new job classification.
- Lateral reclassifications (change in job title, but no change in job grade) and lateral transfers (change in location, but no change in job title or job grade) will not warrant a pay increase. Any exception will require prior approval of the board.

- Demotions will be individually evaluated by the board for appropriate salary treatment.
  - No advance salary payments will be made.
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Date Issued:		CARF Standard:	1.1.6.c
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Date last Reviewed:	April 2023		

## 2.14 Payroll Procedure

All questions regarding payroll should be directed to the team member's immediate supervisor.

### Schedule

- A schedule will be determined by the supervisor.
- The regular work week is 40 hours.
- A work week is defined as seven consecutive 24-hour periods starting with shifts that begin at 12:00 A.M. Sunday morning and end the following Saturday at 11:59 P.M.
- The payroll period is a 14-day period that encompasses two consecutive work weeks, beginning on Sunday at 12:00 A.M. and ending 14 days later on Saturday at 11:59 P.M.
- Payday is every two weeks on Friday. If the payday falls on a holiday, pay will be authorized on the last working day before the holiday.

### Breaks and Time Sheets

- Team members are allotted a 10-minute break within the first four hours of work and a 10-minute break during the last four hours of work.
- Team members must take a meal-time of at least 30 minutes if working over 6 hours in a shift. The first 30 minutes of a meal-time is paid time. Anything over 30 minutes is unpaid time.
- Proper time-keeping is the responsibility of each team member.
- Nonexempt team members are required to indicate arrival and departure times through the timeclock located at each facility.
  - Team members should not clock other team members in or out.
  - If a team member forgets to clock in or out, they must contact their supervisor to discuss correcting the time entries.
  - Team members are required to clock out anytime they leave the facility during the day.
  - Team members may remain clocked in if leaving the facility on approved company business.

### Overtime

Overtime compensation, as defined by the *Fair Labor Standards Act*, will be calculated at one-and-one-half times an eligible team member's hourly rate for all hours worked in excess of 40 hours in a work week. Situations such as unexpected team member absences, unusual workloads, or emergency situations may require a team member to work overtime.

- All nonexempt team members are eligible for overtime compensation.
- Overtime must be approved by the team member's supervisor. Overtime worked without prior approval will

be paid, but the team member may be subject to disciplinary action.

- Overtime will be paid for hours actually worked.
  - Holidays in which the team member did not work but was paid holiday pay are excluded when calculating overtime hours.
  - Paid time off and other non-working hours are also excluded.
  - Required meetings and seminars are considered hours worked.

### **Payroll Deductions**

All deductions from a team member's wages shall be in accordance with applicable law, and when required, the team member's consent. Deductions will be made from team member's wages in this order:

- FICA taxes
- Federal and state withholding
- City taxes
- Amounts owed to the company for approved payroll deductible expenses
- Child support and garnishments

The following procedures for payroll deductions apply:

- Team members shall be required to complete all applicable forms necessary for deductions as may be required by law; such forms include the federal W-4 and state withholding form.
- Team members must consent in writing to payment of group health insurance and contributions to a retirement plan.
- No deduction from a team member's wages for any period shall cause the team member's wages for any such period to be less than the wage required to be paid by the company pursuant to applicable law.
- Deductions not taken for any pay period may be carried over to succeeding pay periods and deducted from wages due in the succeeding pay periods to the extent allowed by law.
- Team members are to be notified of all deductions.
- If the team member objects to a deduction, such as a garnishment or child support order, the team member should contact the applicable governing authority for resolution. Garnishments will continue until the company receives documentation from the applicable authority of the cancellation of the garnishment.

### **Holidays**

The following holidays will be observed annually as an 8-hour day off for most team members:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day

- Christmas Day

Holiday pay, at a rate of 8 hours' pay at the team member's regular rate of pay, will be paid to eligible team members for the above designated holidays. To be eligible to receive holiday pay for hours not worked on the above designated holidays, the team member must:

- be a full-time team member;
- have completed their probationary period;
- be at work or on scheduled absence on the work days immediately preceding and following the day on which the holiday is observed; and
- be on active payroll: a team member otherwise qualified to receive holiday pay who has taken a leave of absence (i.e. will be absent from work for more than 5 consecutive days) during the week in which a paid holiday occurs or is celebrated is not on active payroll and is therefore ineligible for holiday pay for that given holiday.

If a team member is scheduled to work a holiday and has completed their probationary period, that team member will receive time-and-a-half for hours worked on the holiday regardless of employment status, i.e. including part-time and PRN team members. Full-time team members who are otherwise eligible for paid holidays will be paid time-and-a-half in lieu of the holiday pay described above.

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## 2.15 Attendance Standards and Unpaid Time Off

Stepworks offers services 24 hours a day, 7 days a week. In order to do this with high service quality, our facilities and administrative offices must be fully staffed. Absenteeism detracts from this service and causes an undue burden on those team members who must fill in for absent team members. In regard to attendance, team members are expected to:

1. Maintain good personal health standards which will allow them to perform their work in a competent manner on a regular basis.
2. Avoid letting minor indispositions keep them from performing their jobs. At the same time, good judgment should be used with respect to contagious ailments which might have adverse effects on other team members.
3. Communicate any unplanned absences to your supervisor via personal contact as soon as possible.
4. **Attend to personal affairs during non working hours.**

In order to translate attendance standards into an effective working policy, Stepworks has adopted guidelines on paid absences as well as a practical set of standards on the number of unpaid absences within a specified time period. Time without pay is strongly discouraged because it leads to undue overtime and distress on behalf of the company, supervisor, and fellow team members.

Team members who are absent from their work during a scheduled shift will use, in the following order:

1. PTO hours
2. Vacation hours
3. Unpaid time off: If the team member has no PTO or vacation hours available, then the team member must complete an unpaid time off request. This must be approved by the team member's supervisor before scheduling the time off.

### Unpaid Time Off

Excused absences are those that are unpaid due to the lack of available paid time off but are accompanied by a doctor's note. These may be full or partial days of work. The standards concerning excused absences are as follows:

1. After three occasions\* of unpaid, excused absence in a six-month period, the team member should be counseled concerning attendance standards.

2. After six occasions\* of unpaid, excused absence in a 12-month period, the team member should be placed on probation for 90 days.
3. Unpaid, excused absences exceeding nine occasions\* in a 12-month period is grounds for termination of employment.

\*Occasion is defined as an absence of a partial day or more days, due to a non-work-related illness, separated by one or more days of work.

Unexcused absences are those that are unpaid due to the lack of available paid time off and not accompanied by an applicable doctor's note. Except in extreme circumstances, unexcused, unpaid time off should not exceed three shifts (24 hours) in a 12-month period. If a team member has taken more than 24 hours of unexcused, unpaid time off in a 12-month period, then they will be given a written warning of excessive absenteeism. Further unexcused absences may result in immediate termination at the sole discretion of the company.

If an unpaid time-off request is denied, and the team member fails to show up for work on the day requested, the absence will be considered the team member's resignation.

Team members who are able to switch shifts with another team member to avoid an absence may do so with approval from the team member's supervisor. This trade of shifts:

- must be initiated by the team member who will be absent;
- must be with another team member of equal responsibilities and job grade (i.e. a recovery coach cannot trade shifts with a nurse);
- must occur in the same work week (Sunday–Saturday);
- must be done with enough prior notice so that both shifts are entirely covered;
- must not cause overtime to occur for either team member; i.e. the other team member may not already be in overtime for that particular work week; and
- must be approved by the team member's supervisor.

*Note: Absenteeism for the purpose of termination in the hopes of receiving unemployment has been viewed unfavorably by the Unemployment Office and may result in the denial of unemployment benefits. You should contact the Unemployment Office before pursuing such a course.*

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## 2.15.a Vacation and Paid Time Off

The privilege of vacation and paid time off (PTO) is extended to regular full-time team members only. Vacation and PTO is only available to be used after team members have completed their probationary period. Team members may not borrow from future, unearned time.

Team members receive a set amount of vacation time on the anniversary of their hire. The amount is based on length of service. Vacation time may be used up to the next anniversary of the team member's hire, at which point unused vacation time is forfeited. Team members do not accumulate any more vacation time during the year.

PTO is for hourly team members only, and it is accumulated every paycheck. Team members may roll unused PTO from year-to-year. The team member is allowed to accumulate a total of 48 hours of PTO time. At the point in which 48 hours is reached, the team member will stop accumulating PTO time until some of the PTO time is used. Once the team member uses some of that time, they may begin accumulating PTO again.

Time will be earned as follows<sup>2</sup>:

Hourly Team Members		
Anniversary Year	Total Vacation Hours	Total PTO Hours
End of probation to 1 Year	24	24 (0.92 hours every paycheck)
1–2 Years	40	24 (0.92 hours every paycheck)
3–9 Years	80	24 (0.92 hours every paycheck)
10+ Years	120	32 (1.23 hours every paycheck)

Salaried (Exempt) Team Members		
Anniversary Year	Total Vacation Hours	Total PTO Hours
End of probation to 1 Year	80	0
1–2 Years	96	0
3–9 Years	104	0

<sup>2</sup> Stepworks management reserves the right to negotiate individual time-off allocations on a per team member basis.

10+ Years	120	0
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### Holidays During Time-Off Requests

When a holiday falls during a week in which the team member has requested time off, the team member may not use paid time and holiday pay for the same day. The team member will only receive holiday pay for the holiday.

### Scheduling of Time Off

1. Requests are granted on a first-come, first-serve basis and should be submitted through Zenefits.
2. All efforts should be made to make requests six weeks in advance to give adequate time to plan for absences. Team members should wait for approval before making deposits toward vacations.
3. Approval for time off is at the supervisor's discretion. Should the time-off request not allow the work to be adequately covered, the supervisor may deny the request.
  - a. Team members who fail to report to work on a day for which a paid time-off request was denied will be subject to disciplinary action, up to and including termination.
4. Two consecutive holiday periods should not be requested. Team members should not request the same holiday period in two consecutive years unless no other team members have requested the time.
5. Approved time off may be canceled or shortened if the team member uses additional time off in the interim, resulting in a deficiency of time off. The company will not be responsible for any deposit lost due to these circumstances.
6. Time off should be taken in increments of four or eight hours.
7. Exempt (salaried) team members are not required to use vacation time for partial days per the Department of Labor. However, should this privilege be abused, the team member may be counseled on attendance requirements including potential disciplinary measures.
8. Unpaid time-off requests should only be submitted and approved in rare and unusual circumstances.

### Other Uses of Vacation and PTO

1. PTO must be used before unpaid time off for leaves of absence, including family, maternity, medical, and FMLA leave.
2. Time off for jury duty shall not constitute PTO time and shall be compensated by the company based on the team member's regular scheduled hours, minus compensation provided by the court system for up to 24 hours. Documentation must be provided.
3. PTO may be used for witness duty, military duty, and other absences required by law.

**Vacation and PTO upon the Separation of Employment**

1. PTO is never paid out upon separation of employment, whether it be termination, layoff, or resignation.
2. If a team member is terminated for any other reason besides layoff, the team member will not receive any vacation or PTO pay. If a team member is laid off, the team member will receive any vacation time available at the time of layoff.
3. Neither vacation nor PTO may be requested after the team member has submitted their resignation.
4. Vacation will not accrue if the team member's anniversary date falls within their resignation notice period.
5. If an unlicensed or nonadministrative team member leaves the company and provides two weeks' notice, any unused vacation time will be paid to them on their final paycheck.
6. Due to the unique nature of their position and customary length of notice required for a potential replacement, licensed staff and department supervisors are required to give four weeks' notice in order to qualify for payment of vacation time on their final paycheck.

**Vacation and PTO upon Retirement**

Pay in lieu of vacation time will be allowed in those instances where the retiring team member has either not chosen to take or has not had the opportunity to take all earned vacation prior to the date of their retirement. Remaining PTO is not paid out.

**PTO Allowances Upon Death**

In the event of death, the next of kin will be paid an amount equivalent to pay in lieu of vacation time for all accrued vacation time not taken by the date of death. PTO will not be paid out.

**Team Member Change of Status**

If a team member has a change from part-time to full-time status, the team member will begin accruing vacation and PTO upon their full-time start date. Their full-time start date will become their new anniversary date for time-off accrual purposes. They do not, however, have to serve a probationary period to begin using accrued PTO unless they are currently in their initial probationary period.

If a team member has a change from full-time to part-time or PRN status, they will lose any accumulated PTO. Any remaining vacation time may be used by the team member's next anniversary date. If unused, the team member will

lose the vacation time. The team member will no longer accrue vacation or PTO at the time they switch to part-time status.

If a team member has a change from an hourly team member to a salaried team member, they will stop accruing PTO at the time of the change. Their accumulated PTO will be added to their accumulated vacation time to be used until their next anniversary date. Upon their next anniversary date, they will convert to the salaried time-earned rubric. Their original start date will continue to be their anniversary date for time-off accrual purposes.

If a team member has a change from a salaried team member to an hourly team member, they will begin accruing PTO at the time of the change. They do not have to serve a probationary period to use PTO.

### Voting Time

The company encourages team members to vote in national, state, and local elections. Voting time off will be granted if requested at least one day in advance in accordance with state laws.

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## 2.15.b Bereavement Leave

Stepworks recognizes that a time of bereavement is a very difficult one for a team member. In this event, every effort will be made to ensure that the team member is able to attend to family matters. However, Stepworks must have a guideline for the amount of time away from the job.

Absence due to a death in the team member's immediate family (spouse, child, mother, father, sister, brother, or equivalent in-law, grandparent, or individual who took the place of parents in the team member's childhood) will be an excused absence. Team members may be granted this excused absence for up to three assigned days. Team members may choose to use vacation/PTO or take the time unpaid for the bereavement of an immediate family member. Time taken unpaid will not count against the team member in terms of penalties for unpaid absences. For extenuating circumstances, management may grant leave beyond three days. If the time off exceeds three days, vacation/PTO must be used. If the team member does not have any available vacation or PTO, the policy on excused absences will apply.

Time off for other funerals will be considered on an individual basis. For funerals besides those of immediate family, vacation/PTO must be used. If the team member has no available vacation or PTO, the policy on unexcused absences will apply.

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## 2.15.c FMLA Leaves of Absence

Stepworks is considered a covered employer under the Family and Medical Leave Act. Therefore eligible team members can take up to 12 weeks of unpaid, job-protected leave in a 12-month period for the following reasons:

- The birth of a child or placement of a child for adoption or foster care;
- To bond with a child (leave must be taken within one year of the child's birth or placement);
- To care for the team member's spouse, child, or parent who has a qualifying serious health condition;
- For the team member's own qualifying serious health condition that makes the team member unable to perform the team member's job;
- For qualifying exigencies related to the foreign deployment of a military member who is the team member's spouse, child, or parent.

An eligible team member who is a covered service member's spouse, child, parent, or next of kin may also take up to 26 weeks of FMLA leave in a single 12-month period to care for the servicemember with a serious injury or illness.

A team member must meet three criteria in order to be eligible for FMLA leave. The team member must:

- Have worked for Stepworks for at least 12 months;
- Have at least 1,250 hours of service in the 12 months before taking leave;
- Work at a location where Stepworks has at least 50 team members within 75 miles of the team member's worksite. (Note: only Stepworks' Elizabethtown facilities are within 75 miles of each other, therefore team members working at other facilities would not be considered eligible team members under FMLA. Please refer to the policy "Non-FMLA Leaves of Absence.")

A team member does not need to use leave in one block. When it is medically necessary or otherwise permitted, team members may take leave intermittently or on a reduced schedule. Stepworks requires the use of accrued paid leave while taking FMLA leave. If a team member substitutes accrued paid leave for FMLA leave, the team member must comply with Stepworks' normal paid leave policies.

While team members are on FMLA leave, Stepworks will continue health insurance coverage as if the team members were not on leave. During the FMLA leave period, a team member must continue to pay whatever share of group health plan premiums that the team member paid prior to FMLA leave. Stepworks will provide the team member with advance written notice of the terms and conditions under which these payments must be made. If premiums are raised or lowered, the team member would be required to pay the new premium rates. Upon return from FMLA leave, most team members will be restored to the same job or one nearly identical to it with equivalent pay, benefits, and other employment terms and conditions.

Stepworks may not interfere with an individual's FMLA rights or retaliate against someone for using or trying to use FMLA leave, opposing any practice made unlawful by the FMLA, or being involved in any proceeding under or related to the FMLA.

Generally, team members must give 30 days' advance notice of the need for FMLA leave. If it is not possible to give 30 days' notice, a team member must notify Stepworks as soon as possible and, generally, follow Stepworks' usual procedures. Team members do not have to share a medical diagnosis but must provide enough information to Stepworks so that it can determine if the leave qualifies for FMLA protection. Sufficient information could include informing Stepworks that the team member is or will be unable to perform his or her job functions, that a family member cannot perform daily activities, or that hospitalization or continuing medical treatment is necessary. Team members must inform Stepworks if the need for leave is a reason for which FMLA leave was previously taken or certified.

Stepworks can require a certification or periodic recertification supporting the need for leave. If Stepworks determines that the certification is incomplete, it must provide a written notice indicating what additional information is required.

Once Stepworks becomes aware that a team member's need for leave is for a reason that may qualify under the FMLA, Stepworks must notify the team member if he or she is eligible for FMLA leave and, if eligible, must also provide a notice of rights and responsibilities under the FMLA. If the team member is not eligible, Stepworks must provide a reason for ineligibility. Stepworks must notify its team members if leave will be designated as FMLA leave, and if so, how much leave will be designated as FMLA leave. Team members may file a complaint with the U.S. Department of Labor, Wage and Hour Division, or may bring a private lawsuit against an employer. The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement that provides greater family or medical leave rights.

Notice of Eligibility and Rights and Responsibilities (FMLA) to be given to team members after determining FMLA eligibility.

Certification of Health Care Provider for Team Member's Serious Health Condition (FMLA)

Certification of Health Care Provider for Family Member's Serious Health Condition (FMLA)

Certification of Qualifying Exigency for Military Family Leave (FMLA)

Certification for Serious Injury or Illness of a Current Service Member for Military Family Leave (FMLA)Certification for Serious Injury or Illness of a Veteran for Military Caregiver Leave (FMLA)

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## 2.15.d Non-FMLA Leaves of Absence

This policy covers team members who are not eligible under FMLA. Generally, Stepworks does not guarantee that a person's job will be held while they are on a leave of absence. Usually, if available, a team member returning to work on the date the leave/disability ends will be reinstated to their previous job status or one of similar salary and responsibilities. Normally, if a position is not available, a team member will be placed on preferential hiring status for positions for which they are qualified. As always, the most qualified candidate will be selected for open positions. This policy may be varied to accommodate applicable law.

- During a leave of absence, the team member must exhaust all paid time first. The remainder will then be unpaid.
- There are no automatic rights to obtain a leave; it must be requested in writing and approved by management. Forms are available on [Stepworks University](#).
- A team member anticipating an absence of more than five days must apply for a leave of absence. Failure to obtain a leave of absence will be considered a resignation.
- All leaves of absence require the approval of management.
- All leaves must have a specific duration and return-to-work date determined at the time the leave is granted. Failure to return to work on the determined return-to-work day will be considered a resignation by the team member.
- A team member must assume the initiative in arranging to pay the full premiums for health and other benefits during the leave; otherwise the benefits may be discontinued during the leave. Continuation under COBRA may also apply. This may also affect benefit eligibility when the team member returns from leave.
- PTO and vacation benefits do not accrue during a leave of absence.
- Stepworks has the right to initiate a leave of absence for any team member when, in its sole judgment, such a leave is appropriate.

Management will consider the following criteria when approving a leave of absence without pay:

- Regular status of team member
- Request submitted in writing stating the reason, date of leave, and date of return
- Attendance and performance record of team member
- Length of service of the team member

### Maternity Leave

Maternity leave is granted in case of birth or adoption. Six weeks of leave will be granted unless additional time is required per an order from the team member's obstetrician.

### Medical Leave

- The intent of a medical leave of absence is to provide a team member the necessary time to recover from an injury or illness disabling them for a period of time exceeding five days.
- A team member is eligible to apply for a medical leave of absence upon completion of three months of continuous full-time employment.
- Medical leave without pay may be granted to regular full-time team members for up to six months. In no instance will a medical leave be extended beyond six months. For disabilities expected to last beyond six months, the team member should immediately apply for Social Security, Medicare, or other disability coverage.
- Requests for medical leave must be accompanied by a doctor's statement and approved by management.
- Stepworks reserves the right to require an examination by a physician of its choice if there is a question regarding the team member's physical ability to start or remain on a medical leave status.
- A team member returning to work after a medical leave must provide his or her designated supervisor with a written release from a medical provider to resume expected job duties prior to returning to work.

### Personal Leave

- A team member requesting personal leave must have worked full-time a minimum of six continuous months prior to the request.
- Personal leave may be granted up to 90 days. It may be extended at the discretion of the company another 90 days under special circumstances.

### Leaves of Absence With Pay

Leaves of absence with pay may be granted for professional meetings, institutes, workshops, etc., provided such attendance promises to be of substantial benefit to Stepworks and to the team member and his or her job, and provided such arrangements can be scheduled without interference with the department work schedule. Leave must be accompanied by a proper request, budget authorization, and approval from management; leave with pay may not exceed five days per year. Extended educational leave may be granted in special cases.

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## 2.15.e Military Leaves of Absence

Stepworks shall comply with the provisions of the Vietnam Era Veterans' Readjustment Assistance Act, which provides reinstatement for veterans and returning reservists to positions held prior to their entry into military service.

To qualify for reinstatement under federal law, the team member must meet the following requirements:

1. Must have been employed in a regular position before induction
2. Must have left position with Stepworks to enter the armed forces
3. Must have been honorably discharged
4. Must apply for reinstatement within 90 days of release from service or from hospitalization that continued after discharge for a period of up to 1 year
5. Must still be qualified to perform the duties of former position upon completion of service

Stepworks may refuse to reinstate a reservist (or other veteran) only where circumstances have changed which make it impossible or unreasonable to do so.

### Veterans' Rights After Reinstatement

The legal reinstatement rights of team members who enlist or are inducted into military service are as follows:

1. Team members shall be considered as having been on an authorized leave of absence and shall be entitled to reinstatement to former position or a position of comparable seniority, status, and pay, and to accumulate seniority for the period of military service.
2. Reinstated veterans are entitled to all benefits offered to team members on leave of absence at the time they entered military service, including group and other insurance programs.
3. The reinstatement rate of pay should include any general increases and adjustments given during the leave of absence.
4. A veteran may not be discharged without cause for one year following reinstatement. Although protection against termination is limited to one year, there is no statutory limitation or protection of seniority rights.
5. Other eligible persons:
  - a. Inductees and enlistees who entered active duty in the U.S. Public Health Service for no more than a period of four years after August 1961, are also covered by the reemployment provisions of the act.

b. Members of the National Guard and Reserve

The Uniformed Services Employment and Reemployment Rights Act of 1994 guarantees that team members who enlist or are called to active duty from a reserve or National Guard unit or from the Ready Reserve will be rehired when they return from active service. Reservists who return from active or reserve duty must be given the same position or, if that is not feasible, a position of similar seniority, status, and pay. Reservists returning with disabilities that prevent them from performing their original duties must be offered as similar a position as is practical. Reservists who are so disabled that they cannot perform the essential functions for any position in the organization are not required to be rehired.

Returning reservists must be treated as though they were on leave of absence, and must be reinstated with no loss of seniority. In addition, they are entitled to participate in insurance or other benefits under Stepworks' policy regarding leaves of absence in effect at the time of the call-up.

To be rehired, returning reservists must satisfy the following requirements:

1. Must have left a regular position (temporary jobs not protected)
2. Must not have been dishonorably discharged
3. Generally cannot have remained on active duty for more than four years or been hospitalized for more than one year after active duty
4. Must request in writing the previous position within 90 days of release from active duty or discharge from hospital

The employer cannot terminate rehired reservists for one year after they return from duty, except for cause. If the military call-up lasted fewer than 90 days, reemployment rights are protected for shorter periods. In such cases, team members have 31 days to request in writing the previous position and are protected from termination for six months, except for cause.

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## 2.15.f Inclement Weather Conditions

There is the occasional potential for flooding, tornadoes, ice, and snowstorms. In general, all team members are expected to report to work unless major thoroughfares have been closed due to extreme weather.

1. Often bad weather conditions are localized and, simply by waiting, a team member may be able to safely arrive at work later in the day. Under such circumstances, a team member should call a supervisor to advise them of the poor weather conditions in the area and the team member's expected time of arrival. Depending on the circumstances, the supervisor may tell the team member to simply remain at home for the day.
2. On occasion, bad weather may occur during the day after having arrived at work. Depending on the circumstances, team members may be directed to a place of safety within the building or may be told to leave and return home.
3. Team members who do not report to work will not be paid for the day. With management approval, the individual may use vacation or PTO.
4. Because team members are given the option to remain home during inclement weather, Stepworks will not be responsible for any personal injuries or property damage incurred during attempts to commute to work.
5. All staff are encouraged to be prepared for sudden storms.

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## 2.16 Team Member Benefits

Full-time team members are eligible for benefits offered by the company. Most benefits are deducted pre-tax from team member pay. Some benefits, such as short-term disability, are deducted after-tax. Team members are eligible for health, dental, vision, short-term disability, and ancillary benefits on the first day of the month after 30 days of employment.

### Health Benefits

If a full-time team member elects health benefits, the company will contribute \$300 monthly toward premium cost. Any additional cost, including the cost of adding family members, will be the responsibility of the team member.

### Dental, Vision, Short-term Disability, and Ancillary Benefits

Full-time team members are also eligible for dental, vision, short-term disability, and other ancillary benefits as determined by the company for both themselves and their family members. If the team member elects health insurance, all other benefits will be paid by the team member.

If the team member does not elect health benefits, Stepworks will contribute \$200 monthly to other benefits. This \$200 must be applied toward benefits or it will be forfeited. Team members may elect benefits in excess of the \$200, but any additional cost will be the responsibility of the team member.

### Life Insurance

Stepworks pays for a \$25,000 life insurance policy on behalf of each team member.

### COBRA

Should a qualifying event occur that causes loss of coverage, the team member may choose to continue their health coverage through COBRA. Any costs of continuing coverage through COBRA are the responsibility of the team member. More information will be given at the time of benefit enrollment.

### Retirement Plan

Stepworks provides a 401k plan in its team member benefits package. Full-time team members are eligible to participate in the plan, but participation is optional. There is a corresponding employer match. Team members are eligible to participate when they are at least 21 years old and have been employed for one year. Stepworks reserves the right to terminate the plan. Further information about the current retirement plan is provided during open enrollment periods.

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## 2.16.a Professional Medical Services Provided to Team Members

Stepworks will provide outpatient office services in its Intensive Health location to any Stepworks team members who choose to accept this benefit.

- All services provided will be in accordance with Intensive Health standard operating procedures including documentation of ALL services provided.
- To receive services at Intensive Health, team members must call to make an appointment: 270-765-5900. The team member should notify the appointment scheduler that they are a team member of Stepworks.
- Charges for services received will be limited to the actual cost of supplies, medications, lab testing, or injectables. Team members will not be charged the cost of the office visit code.
- If you do not have health insurance, payment for charges is expected at the time of service or within 24 hours.
- Stepworks will file the team member's health insurance if applicable, however, if the team member's insurance leaves the cost of supplies, medications, lab testing, or injectables to the team member's deductible, the team member will be expected to pay for the cost of those services. The cost for the actual office visit code will be forgiven.
- If the team member has health insurance, a bill will be sent to the team member for any outstanding costs. Payment is expected within 30 days of the date of the bill.
- If the team member receives a bill that they feel is inaccurate, they should contact Stepworks' billing department as soon as possible.
- Failure to pay for services rendered may result in recoupment through payroll deductions at the discretion of the chief financial officer.

While Intensive Health holds to the highest HIPAA standards, Intensive Health cannot guarantee that a fellow team member will not see your medical records. Deliberate access of medical records for reasons unrelated to treatment, payment, or healthcare operations is prohibited, and such unauthorized access will be subject to disciplinary action. But, as a patient of Intensive Health, there may be a need for certain team members to access your record for the above stated reasons. If the nature of your condition requires absolute confidentiality, we highly recommend that you seek care elsewhere.

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Date last Reviewed:	April 2023		



## 2.17 Mileage and Expenditure Reimbursement

Business mileage is the travel a team member incurs beyond normal commute mileage. The mileage rate is determined by the IRS every year. Other business expenses made on behalf of the company by an individual may be reimbursed *only* if pre-approved by the team member's supervisor.

Mileage or expense reimbursement must be approved by your supervisor through the Expense Reimbursement Form. The Expense Reimbursement Form should be completed within 48 hours of a team member's incurred expense. Supervisors have the right to dispute or modify reimbursable miles based on substantiation of the trip.

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## 2.18 Workplace Posters

The following informational posters will be displayed in primary staff areas or online:

- KY Workers Compensation Certificate
- KY Safety and Health on the Job
- KY Equal Employment Opportunity Poster
- KY Public Accommodation
- KY Unemployment Insurance
- KY Wage and Hour Laws
- KY Child Labor Law
- KY Wage Discrimination Because of Sex
- Federal Equal Opportunity (EEOC)
- Federal OSHA "It's the Law"
- Federal Fair Labor Standards Act
- Federal Team member Polygraph Protection Act
- Federal Family Leave Medical Act
- Uniformed Services Employment & Reemployment Rights Act (USERRA)

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## 2.19 Team Member Social Media Policy

All Stepworks team members are required to observe professional behavior and boundaries in the use of internet services and social media websites. Team members who fail to observe the following guidelines may be subject to disciplinary measures up to and including termination.

### **Company-Owned Equipment and Technology**

All tech equipment owned by the company that is used by team members is intended for work use only. Team members should not use company property for personal matters unrelated to their job duties.

### **Social Media During Work**

Stepworks team members are expected to refrain from interacting on social media websites or accessing the internet for personal reasons during work hours, whether on company-owned or personal devices.

### **Negative Communication on Social Media**

Team members of Stepworks should be careful that their social media communications do not negatively impact the reputation or standing of the company. Any damaging, demeaning, or libelous comments directed toward the company or its team members, associates, or patients, or inappropriate postings that may include discriminatory remarks, harassment, and threats of violence, or similar inappropriate or unlawful conduct on social media websites, discussion forums, or comment sections of web pages would constitute a violation of this policy.

### **Private and Confidential Information**

Social media or other internet posts by Stepworks' team members must not include any sensitive or confidential information. Stepworks or its team members will never share information about or photos of its persons served unless explicitly authorized through a specific written release by the individual person served.

### **Compliance with Other Policies**

Social media use by individuals acting in their capacity as team members of Stepworks must comply with all policies and procedures of the company, notably all those that relate to discrimination and harassment in the workplace.

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## 2.20 Phone, Internet, and Mail

Stepworks team members are expected to give their full attention to the patients served and their own job responsibilities. Failure to abide by the following admonitions may result in disciplinary action, up to and including termination.

- Use of the company telephone for personal matters should be limited to emergencies only.
- Personal outgoing long-distance calls or faxes on the company lines are not allowed.
- Company phones may only be used for business purposes and may be used by patients with approval and appropriate monitoring by staff.
- Personal cell phones should be kept on vibrate. They should be answered in emergencies only and never in the presence of patients.
- Texting should be limited to emergencies only and never in the presence of patients.
- Patients are prohibited from using staff cell phones under any circumstances.
- The mail and email system is for company business only. Personal mail and email should not be sent to the company address or company-owned email addresses.
- Internet access is for company use only: personal use is prohibited on company-owned and personal devices.
- Accessing company files or the electronic medical records under another individual's login is prohibited.
- Login and password information should be safeguarded and never shared with other team members or patients.
- Team members must log out of all computers and smart tablets as soon as they have completed their work. Never leave an electronic device unattended and accessible.

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## 2.21 Company Property

Team members are not permitted to use office or medical supplies for their personal use without first obtaining permission. Team members may not use the medical or office equipment for themselves or their families unless otherwise authorized to do so. This includes but is not limited to printers, scanners, and fax machines.

No equipment, documents, records, or other property of any kind belonging to the company shall be removed from the premises by a team member without first obtaining permission. Stationary or forms which have the company logo may not be used for personal purposes at any time.

Personal use of any medication (including sample drugs) provided in the office is forbidden without the permission of the medical director.

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## 2.22 Safe Environment and Incident Reports

Stepworks will provide a safe working environment for all staff members and patients. Stepworks is committed to complying with all applicable OSHA standards. Stepworks strives to prevent critical incidents and team member injuries through monitoring, remediation, and annual review of all critical incidents and team member injuries.

- Supervisors will conduct monthly health and safety checks at all facilities and remediate any hazards or issues. A log of this will be kept.
- The fire marshal and county health inspectors will conduct inspections at least annually per regulation and produce reports for Stepworks' review and remediation. The Office of the Inspector General also conducts facility surveys as required by licensure.
- All team members are expected to resolve safety issues and hazards as they become aware of them. If the safety issue has occurred more than once or is beyond the team member's scope of control, the team member should notify their immediate supervisor so that further action can be taken.
  - Any damage to buildings, property, or equipment should be reported to a supervisor immediately, and an incident report should be completed.
- All staff will be trained in safe working procedures and conditions.
  - All staff will receive annual OSHA compliance competency training. Those team members working in a residential or outpatient facility will receive training on the handling and disposal of bloodborne pathogens and/or biohazardous materials.
  - All staff working directly with patients will receive crisis intervention training.
  - All staff will be trained and evaluated annually on safety and emergency procedures.
  - All staff will complete emergency drills on a regular basis to ensure competency.
- All medications and hazardous materials will be maintained in the manner required by law and licensure.
- Team members are expected to wear appropriate personal protective equipment (PPE) when performing tasks that are potentially hazardous; failure to do so may lead to disciplinary action.
- Team members should complete incident reports as appropriate. Team members will receive further training on incident reports, including critical incidents, in their annual training. Incident forms may be found on [Stepworks University](#).
  - Incident reports should be completed within 24 hours.
  - Critical incidents should be reported to the team member's supervisor immediately. The supervisor should also report to their supervisor.
  - Debriefing and remediation should take place as soon as feasibly possible, if applicable.

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Date Revised:	March 2021	Kentucky Standard:	
Date last Reviewed:	April 2023		

## 2.23 Work-Related Injuries

Stepworks is insured under the Kentucky Workers' Compensation Act. Workers' compensation benefits provide medical benefits for work-related injuries or illness. Insurance premiums for workers' compensation coverage are paid by the company.

All questions relating to eligibility for workers' compensation benefits, the computation of benefits, or the amount of benefits are determined by the insurance carrier. Team members may contest any determination of the insurance carrier by filing an application for adjustment of claim under the Kentucky Workers' Compensation Act.

To protect team members' and the company's interest in case of injury or illness that is considered work related, **team members must report an injury or job-related illness immediately to their supervisor.** An incident report must also be completed. Team members and supervisors should follow the procedures as detailed in the corresponding training and instructions in each facility's OSHA binder. For exposure to bloodborne pathogens, staff should follow instructions on the "Bloodborne Pathogen One-Sheet" found on [Stepworks University](#) and posted in the facilities.

The corresponding incident report and any other records pertaining to a team member's work-related injury or illness will be kept separately in the medical record portion of the team member's personnel file.

No team member will be harassed, coerced, intimidated, retaliated against, discharged, or otherwise subjected to any adverse employment action by the company for reporting an on-the-job accident or injury or a work-related illness, or for filing and pursuing a lawful claim under the Kentucky Workers' Compensation Act.

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Date last Reviewed:	April 2023		



## 2.24 Lactation/Breastfeeding Accommodation

Stepworks supports its staff members who choose to breastfeed their infants and will make reasonable accommodations for those team members who need to express breast milk during working hours.

### Privacy and Cleanliness

- Stepworks will provide a private space (not a restroom) for women to express breast milk. This space may be used for other purposes during the course of the day and could change as the demands of the day dictate.
- Stepworks will maintain reasonable cleanliness of this space, and staff who use it for lactation will maintain it as such after using it.

### Use of Break Time

- Female staff will be afforded reasonable break time to allow for expression of milk.
- Breaks must be scheduled ahead with a supervisor at reasonable times and frequency.
- Requests for breaks longer than 30 minutes will be considered if accompanied by a doctor's note explaining why a longer break is required.
- Female staff will be required to clock in and out for the period that they are on a break for the purpose of expressing breast milk.
- Break time in excess of 60 minutes per day (including 30 minutes for lunch break) will be uncompensated.
- Abuse of this break time may result in disciplinary procedures. Examples of abuse of break time include:
  - Extraordinary lengths of breaks (longer than 30 minutes)
  - Use of breaks to intentionally avoid work responsibilities

### Storage

- Bags or bottles containing breast milk must be stored in a sealable container designed for that purpose (e.g. soft cooler).
- Breast milk cannot be stored in patient refrigerators.
- Breast milk may be stored in team member refrigerators provided that the cooler is a reasonable size and does not interfere with the reasonable needs of other team members.

These accommodations will end on the first birthday of the child of the breastfeeding staff member or upon evidence that the breast milk is not being used for the child (e.g. donations).

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## 2.25 Dress Code

In order to maintain a professional recovery environment for our patients and guests, all Stepworks staff will abide by the company's dress code policy. Your personal appearance reflects on the company's standards. Good grooming and an attractive appearance are especially important for healthcare personnel. These guidelines are not all encompassing, so please use good judgment.

### General Guidelines for All Staff

- All staff members should be mindful of modesty: cleavage, midriffs, lower backs, and undergarments must be covered at all times
- No shorts unless specifically permitted by the administrator for special events
- No hats or scarves/bandanas that cover the head (religious head-coverings are permitted)
- Staff located in a facility in which patients are treated should wear closed-toe shoes
- All jeans/pants must be in good repair: no holes or rips
- No leggings, yoga pants, or other athletic attire, e.g. jersey or sweatpants

### Administrative, Therapists, and Clerical Staff

- Professional or business casual clothing
  - For males: a tucked-in collared shirt with slacks or jeans
  - For females: blouses, slacks, jeans, capris, knee-length skirts/dresses
    - If wearing a sleeveless top without a cardigan or blazer, the straps must be at least three inches across.
- If located in an outpatient facility, clerical staff may choose or be directed to wear scrubs

### Nursing Staff

- Scrub top and scrub pants with shoes that cover the toes and top of the foot, e.g. tennis shoes or clogs without holes
- If located in a residential facility, the scrubs must have the Stepworks logo or be worn with a Stepworks jacket

### Recovery Coaches and other Facility-based Staff

- Stepworks scrub top with slacks or jeans. Capri pants are acceptable for females.
- Shoes that cover the toes and top of the foot, e.g. tennis shoes or clogs without holes (this is for the team member's protection in case of exposure to blood or other potentially infectious materials (OPIM))
- Stepworks hoodies may be worn over the scrub top

- Special event attire will be determined by the facility administrator

### **Friday Dress**

- Staff members may wear a Stepworks shirt with jeans on Fridays. Capri pants are acceptable for females. If not choosing to wear a Stepworks shirt, then the regular dress code applies. Weekend only staff should abide by the regular dress code.

Anyone dressed inappropriately or in a manner that is distracting to patients will be asked to correct their dress before continuing to work. Staff members may be asked to return home and change clothes if necessary. Time taken to go home and change will be unpaid.

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## 2.26 Team Member Addictive Substance Use and Abuse

**Stepworks Recovery Centers treats patients diagnosed with substance use disorders. Therefore, it is vitally important that all staff abstain from the use of substances that can lead to a substance use disorder.**

- All Stepworks team members will abstain from the use of all illegal substances.
- The use of legal addictive substances is allowed provided that there are no negative impacts to job performance. Examples of negative impacts include:
  - Frequent absenteeism or tardiness
  - Inability to perform job duties due to consequences of continued use
  - Arrival at work suffering from a withdrawal symptom (e.g. hungover)
  - Evidence of acute intoxication
  - Evidence of recent use (e.g. smell of alcohol or marijuana use)
  - Negative impact on Stepworks reputation
- Stepworks reserves the right to perform random, unannounced, and observed drug testing on all team members without cause. Drug testing may include oral, urine, and hair testing.
- Any team member testing positive on confirmation for an addictive substance will undergo a mandatory confidential substance use evaluation by the chief medical officer or their licensed designee. The team member may opt for an independent evaluation at his or her own cost.
  - The results of the substance use evaluation will be reported as follows:
    - Does the team member meet criteria for a substance use disorder? If so, what substance(s)?
    - What level of treatment, if any, is recommended?
    - Is the team member at low, medium, or high risk for continued use/misuse of the substance?
  - The results of the substance use evaluation will be reviewed by an ad hoc committee consisting of the chief medical officer, clinical services director, employee supervisor, and other corporate officers as may be deemed necessary. The committee will review all employment information available on the team member including the substance use evaluation, history of absenteeism, tardiness, disciplinary actions, and current job duties. Options for a corrective plan will include one or more of the following:
    - No action
    - Drug monitoring at a frequency of no less than monthly for the first three months
    - Implementation of a zero-tolerance policy for further substance use
    - Mandated treatment with proof of attendance
    - Immediate suspension with treatment

- Immediate termination
- The team member will be asked to sign a corrective plan and agree to its provisions.
- Refusal to sign or comply with the corrective plan will result in immediate termination with cause.

### Special Considerations

- Tobacco Use
  - Although the use of tobacco products generally meets the criteria for a substance use disorder, this substance will be excluded from the list of non-allowed substances.
  - Use of tobacco products that negatively impacts job performance could result in disciplinary action including termination. Examples of negative impact includes:
    - Excessive break times for tobacco usage
    - Frequent absenteeism due to the medical consequences of continued tobacco use (e.g. COPD, asthma exacerbations, chronic bronchitis)
    - Inability to perform job functions as a result of continued tobacco use (e.g. shortness of breath impacting physical demands of job)
- Alcohol Use
  - Excessive alcohol use by team members is prohibited. This includes:
    - Drinking more than four alcoholic drinks (females) or more than five alcoholic drinks (males) during a 24-hour period
    - Drinking alcohol within 8 hours of a scheduled shift
    - Breath alcohol test > 0 while on duty
    - The presence of alcohol withdrawal symptoms (CIWA >4)
    - The presence of alcohol hangover (fatigue, nausea, headache following alcohol usage)
- Marijuana Use
  - Given the unique nature of our business and our belief that “addicted to one substance means addicted to all,” the use of any marijuana products or synthetic marijuana products by a team member is prohibited.
  - The medical use of marijuana is highly controversial and not substantiated by accepted medical literature. Therefore, the use of marijuana for a medical condition is not allowed unless prior approval by the chief medical officer. Approval or non-approval will be based solely on the specific medical condition being treated and the current prevailing scientific opinion regarding the efficacy of such treatment. Failure to provide supporting medical records will result in non-approval. Simply possessing a valid prescription is insufficient for approval.
  - Even if the recreational use of marijuana is legalized in Kentucky, it remains the company’s policy that the use of any marijuana by a team member is prohibited. This prohibition policy is due to the unique nature of our business and the potential risk that a team member’s use poses to our

patients.

- Any drug testing showing the confirmed presence of THC without the prior approval of the chief medical officer may result in termination regardless of a legal prescription.
- Prescription Drugs
  - With the exception of marijuana, use of prescribed medications are allowed. Examples include, but are not limited to:
    - Opioids for chronic pain
    - Benzodiazepines for anxiety disorders
    - Amphetamines for ADD, ADHD, narcolepsy, and weight loss
    - Methadone or buprenorphine for opioid use disorder
  - The chief medical officer will be the final authority on any unusual prescriptions.
  - Refusal to cooperate with verification procedures for a prescribed medication may result in disciplinary action including termination.
  - The use of prescribed medications must not impair the team member's ability to fulfill their job duties.
  - Team members are strictly prohibited from discussing their prescribed medication use with patients.
- Psychoactive Substances
  - All substances of abuse have at least one characteristic in common - they are psychoactive. In short, this means that they impact a person's thought processes. There are a number of legal psychoactive substances that are readily available without a prescription. Examples include, but are not limited to:
    - Kratom
    - Bath Salts
    - Spice
    - Salvia
    - Kat
    - Inhalants
  - Use of psychoactive substances are prohibited unless specifically approved by the chief medical officer BEFORE an unexpected drug test is obtained.

Failure to adhere to any portion of this policy may result in disciplinary action, up to and including termination.

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## 2.26.a Team Member Drug Screening

Team member abstinence from illicit drug use is absolutely essential for the safe and effective operation of Stepworks Recovery Centers. Team members with their own history of substance use disorders provide valuable insight and experience to Stepworks. However, substance use disorders are chronic and a return to use is not uncommon. Therefore, Stepworks must be diligent to ensure that our team members remain healthy and free of substance use. Drug testing is a valuable tool when used appropriately and judiciously.

Stepworks reserves the right to request a sample of urine or saliva for the purpose of testing for illicit drug use at any time and with or without cause. Refusal to submit to specimen collection is considered an admission of illicit drug use and may lead to termination with cause.

### Reason to Conduct Team Member Drug Screens

Stepworks may request a drug screen of an individual team member for the following reasons:

- unusual behavior such as irritability, mood swings, or angry outbursts
- evidence of illicit drug use (e.g. paraphernalia)
- evidence of active withdrawal symptoms
- missing controlled substances from the facility
- rumors of illicit drug use
- frequent tardiness or unexpected lost days of work
- part of a probationary monitoring program
- other reasons that provide reasonable suspicion to the team member's supervisor

Stepworks may also choose to drug test multiple team members for the following reasons:

- missing controlled substances from the facility
- complaints from patients indicating a possibility of drug use by one or more team members
- periodic random screening as part of a deterrence program

### Definitions

- **Random Test:** test performed without prior knowledge by the subject
- **Scheduled Test:** test performed when the date and time is known by the subject
- **Unobserved Test:** collection of the sample without direct observation of the sample entering the testing container.
- **Observed Test:** collection of the sample under direct observation of the sample entering the testing

container.

- **Presumptive/Screening Test:** testing method that has relatively low sensitivity and specificity and is designed to rapidly screen for the presence of an illicit substance. Results are considered presumptive but not definitive.
- **Definitive/Confirmatory Test:** a highly specific test that is considered accurate and true in the detection or lack of detection of a substance.
- **Positive Result:** indicates that a specific substance was detected in the sample regardless of presumptive or definitive test method.
- **Negative Result:** indicates that a specific substance was not detected in the sample regardless of presumptive or definitive test method.
- **Expected Result:** the sample tested positive for substances known to be present (e.g. buprenorphine in the case of MAT) AND negative for substances not being used.
- **Unexpected Result:** the sample tested positive for substances not known to be present or tested negative for substances that should be present.

### Principles of Team Member Drug Testing

- Random drug testing is always preferred over scheduled testing.
- Unobserved testing is always used unless there is prior evidence of invalid results (low temperature, low specific gravity, presence of adulterants, etc.).
- Observed testing requires the prior approval of the chief medical officer.
- A presumptive unexpected result must be confirmed by definitive testing.
- All results are strictly confidential and subject to HIPAA regulations. Results are shared on a need-to-know basis only.

### Drug Testing Procedures

When testing multiple team members, all applicable team members should be brought into a single room (if feasible) and tested one at a time. There should be one primary testing collector. This person should be (in order of preference):

- Outside staff member of at least a director level
- Facility Administrator
- Facility Registered Nurse
- Therapist

If the highest available testing collector is eligible for testing, an alternative collector should be used.

- Those being tested should not take any items with them, including coats or purses, into the bathroom.
- If it is a single bathroom with a sink, the water should either be turned off at the sink, use tape to secure the faucets, or the collector should monitor the door for the sound of running water. Hand sanitizer should be provided as an alternative to hand-washing.
- A collected specimen should immediately be sealed with tamper resistant tape, either by or in the presence of the donor. The tape should be dated and initialed by the donor.
- Only the donor and the collector should handle the specimen.
- The collector should perform a cursory check for temperature, color, scent of specimen.
- Do not leave specimens unattended.
- Specimens should be sent to Stepworks' testing vendor for presumptive testing and confirmation of all positives and, in the case of a suspected substance, negative results.
- If a collected sample has insufficient volume for presumptive and definitive testing, the sample should be sent for definitive testing only.
- A log of all collected specimens sent to the laboratory should be kept and stored.

## Shy Bladder

If a team member states that they cannot produce a sample, they should be asked to try anyway as only a little is needed to test. If they cannot produce a sufficient sample, the team member should be encouraged to drink up to 40 ounces of liquid. They have three hours to produce another urine sample. During this time, they should not be allowed to leave the facility and return to test. If, after three hours, they are unable to produce a urine sample, this should be considered a refusal to test.

## Unexpected Results

Refusal to test will be considered a positive, unexpected result. All unexpected results should be reviewed with the chief medical officer PRIOR to any disciplinary action.

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## 2.27 Boundaries

At Stepworks, a boundary is a line that divides appropriate and inappropriate interactions between staff and patients. Simply put, you are a professional staff member and patients are patients. You are not their friend or confidant. This distinction lasts even after the patient is discharged from our services.

Professional boundaries are very important for Stepworks team members: failure to observe professional boundaries can damage a patient's recovery and jeopardize a team member's personal safety.

The following principles should be applied to all interactions between Stepworks' staff and patients. Further training will be provided on Stepworks University.

- Personal conversations with patients should further their recovery; staff should not engage in conversations with patients that are inappropriate or not helpful to the patient.
  - Inappropriate conversations include secrets, anything sexual, information about other patients, information about other staff, or information that would be considered intimate or special. A quick guide: If you do not want your supervisor to overhear what is being said, then do not say it or listen to it.
- Recognize manipulative behavior from patients as a symptom of their addiction. Staff should provide redirection if a patient engages in manipulative behavior. An example might be a patient complimenting a team member every day or attempting to flirt with the team member.
- Be aware of transference: if a team member starts having strong feelings or attachment toward a patient, they should speak with their supervisor. It is NEVER okay to enter into a romantic relationship with a present or past patient. It is NEVER okay to flirt with a patient.
- Limit self-disclosure. Team members should limit what personal information they discuss with patients: keep conversations focused on the patient and their recovery. This is for their recovery and your safety.
- Model appropriate boundaries for the patients: set boundaries with patients, and if they test or cross them, ask a team member for help redirecting the patient.
- Be vigilant about physical touch. Maintaining an arm's length of space between you and a patient can help preserve appropriate boundaries.
- Keep your teammates accountable. Inappropriate boundaries are sometimes more clearly seen by others. If a team member observes faltering boundaries in a coworker, they should discuss it with the coworker or their supervisor. Team members should also be open and honest about their own boundary issues with their supervisor.

If a team member continues to have inappropriate boundaries, they will be subject to disciplinary action, up to and including termination. The above principles should be followed to prevent misconduct. There are some violations of

boundaries that are never acceptable. The following actions by a staff member with a patient whose most recent discharge occurred within two years could result in immediate termination without notice:

- Fostering a relationship outside of work with a patient, romantic or otherwise.
- Giving patients personal contact information, contacting patients outside of Stepworks' scope of business, giving patients money, providing housing, or providing transportation.
- Befriending or following current or former patients on social media.
- Texting or messaging current or former patients through social media. If a team member receives a message from a former patient, they should congratulate them on their recovery or recommend they get help by calling Stepworks, and politely tell them that they are not permitted to interact with them outside of Stepworks.
- Any sort of romantic or sexual encounter on or off Stepworks' premises.

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## 2.27.a Workplace Romantic Relationships

Stepworks team members must maintain clear boundaries between their personal and work interactions with other team members. Although this policy does not prevent the development of friendships or romantic relationships between co-workers, it does establish boundaries as to how relationships are conducted during working hours and within the working environment. Team member *off-duty* conduct is generally regarded as private, as long as such conduct does not create problems within the workplace.

### General Guidelines

- Romantic or sexual relationships between managers and direct reports are strictly prohibited
- Team members engaging in any form of discrimination or harassment will be terminated
- Parties involved in a romantic/sexual relationship must notify HR
- Team members should behave professionally at all times
- Team members should not discuss personal matters in the workplace
- Team members should not engage in behavior that is distracting, disruptive, or counter to our company's values and culture
- During non working time at the workplace, such as lunches, breaks, and before and after work periods, team members should continue to observe professional boundaries
- Team members are strictly prohibited from engaging in physical contact on company premises that would in any way be deemed inappropriate in the workplace whether during working hours or not

Team members failing to adhere to the above guidelines, or who allow personal relationships with co-workers to adversely affect the work environment, will be subject to disciplinary action including and up to termination.

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## 2.28 At-Will Employment

All employment with Stepworks is “at-will.” Therefore, team members retain the freedom to leave their employment at any time, with or without notice. In turn, Stepworks retains the right to terminate the employment of any person, at any time, at management’s sole discretion, with or without prior notice and with or without cause. This excludes any reason that is illegal per federal and state laws and regulations. Nothing in this personnel manual is intended to create an implied contract for continued employment.

Stepworks reserves the right to change a team member’s position, wage or salary, and status with or without cause and with or without prior notice.

This policy may not be modified or amended except through an express contract between Stepworks and the team member, signed by the team member and the CEO of Stepworks.

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## 2.29 Team Member Performance Appraisals and Promotions

Stepworks' team members and contractors will be evaluated on an annual basis to ensure that a high level of performance is being maintained, to identify areas needing improvement, and to establish goals for each team member.

Stepworks' team members and contractors will be evaluated by their supervisor within 90 days of their anniversary date using Stepworks' standardized performance evaluation.

All team members are given the opportunity to review the performance evaluation and submit written comments on a printed copy of the evaluation. The team member will also be required to sign the performance evaluation: the evaluation will then be uploaded to the team member's personnel file.

The team member is evaluated in the following areas:

- personal relations
- job competencies
- professional demeanor
- cooperation
- knowledge of work
- quantity of work
- quality of work
- ability to learn new duties

The supervisor will also consider the team member's potential and contributions the team member has made beyond the normal requirements. The supervisor may also consider input received over the previous year from the team member's peers, other supervisors, or patients. All of this is summarized in an overall performance evaluation of outstanding, very good, good, satisfactory, or unsatisfactory. The supervisor will also discuss recommendations for development with the team member. This may include cross-training for a new position or training to develop another area of expertise. The team member is then given the opportunity to collaborate with their supervisor on areas needing improvement and measurable goals for the upcoming year.

### Promotions

Due to the unique makeup of Stepworks' licensed workforce composition, promotions are rare. However, if a promotion or lateral transfer is available, eligible team members will be given the opportunity to apply for those positions. Preference will be given to those team members with "outstanding" and "very good" performance evaluations over seniority.



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Date last Reviewed:	April 2023		NARR D.10.c, D.13.a-b

## 2.30 Disciplinary Guidelines

Stepworks follows established disciplinary guidelines and work rules to assure a positive working environment for all who work within the organization. It is Stepworks policy to discipline a team member whenever he or she violates a rule, a regulation, or performs unsatisfactorily. In each instance, the disciplinary action taken is to be just and in proportion to the seriousness of the violation. In addition, discipline is to be administered privately, out of sight and sound of the team member's coworkers or patients. Discipline will be administered by the team member's supervisor as soon as it is practical.

Prior to taking disciplinary action, the supervisor will review the violation, giving full consideration to the following:

- Does management know all the facts accurately?
- In this instance, is the rule that has been violated reasonable?
- Did the staff member know the rule, or should he or she reasonably have known it?
- Has the rule been strictly enforced in the past? If not, what recent notice to team members warned of crackdown on violations of certain rules?
- Is this team member personally guilty of violation or only guilty by association with another?
- Can the team member's guilt be proved by direct, objective evidence, or is the evidence circumstantial or hearsay?
- Does the team member have a reasonable excuse for the infraction of this rule?
- What is the team member's record of past violations, warnings, disciplinary action, etc.?
- What is his or her length of service?
- Is the team member receiving the same treatment others received for the same offense?
- Does the punishment fit the offense?
- If a supervisor is pressing the disciplinary action, is he or she level-headed, fair, impartial, and without malice toward the team member involved?

Under normal conditions, four types of discipline are recognized: verbal warning, written warning, suspension, and termination. Stepworks also reserves the right to place a team member on probation should performance deficiencies arise, but they are within the team member's ability and desire to correct (see [Probationary Period](#)). As a reminder, Stepworks is an at-will employer: progressive disciplinary policies are not a guarantee of the progressive disciplinary process. Stepworks reserves the right to terminate the employment of any team member with or without cause and with or without prior notice.

### Verbal Warning

The first step in progressive discipline is an oral reprimand as documented in the team member's personnel file. Even though it is spoken, it must still be documented in the team member's personnel file.

**Written Warning**

This is a written reprimand. This step is taken if the team member continues to violate the same rule as in the previous verbal warning. It should be signed by the team member.

**Suspension**

Suspension is defined as temporary separation from work without pay at the will of the employer. Suspensions may be waived at the discretion of management if management believes the severity of the offense warrants immediate termination. Suspensions may also be used during investigations of alleged infractions. If subsequent investigation finds the suspension unwarranted or unjust, the team member will incur no loss of pay or employment status and the results of the investigation will be included in the team member's record.

**Performance Management Note**

This is a warning or discussion documented in the team member's personnel file prior to a verbal warning. This is intended to notify the team member of a rule that the team member has broken or to inform the team member that they are failing to meet expectations in a certain area. It may be used as a catalyst for further training and serves as documentation of a discussion between the team member and their supervisor about a specific issue. The performance management note may or may not be used as a basis for a verbal warning. The supervisor, at their discretion, may skip the performance management note and proceed through the disciplinary process.

**These important factors will be considered in all applications of disciplinary action:**

1. The seriousness of the offense
2. The team member's past record and seniority
3. The circumstances surrounding the particular case

**The following list shows rule violations that will be cause for the disciplinary action prescribed above.**

These rules are published for your information and to minimize the likelihood of any team member, through misunderstanding or otherwise, becoming subject to any disciplinary action. Violation of any rule cannot be ignored by management. It is only fair that team members should be familiar with those rules that Stepworks considers to be of importance.

*No set of guidelines can cover all employment situations. Misconduct not defined here will be handled in a manner consistent with these guidelines.*

1. Failing to meet the company's core values, violating the company's mission, or violating the code of conduct
2. Inappropriate boundaries with patients
3. Removing any items from the premises without written permission from management
4. Ignoring safety rules, common safety practices, or disorderly conduct of any kind
5. Failing to report an injury promptly to a supervisor
6. Unauthorized solicitation of funds or distributing material, literature, or other work on Stepworks property
7. Unauthorized posting or removal of signs, notices, or writing in any form on bulletin boards or company property at any time
8. Excessive or habitual tardiness
9. Excessive absenteeism
10. Failing to give timely notice to a supervisor of an absence or tardy
11. Leaving an assigned working area during working hours without authorization from the supervisor, except for lunch, breaktime, and going to and from the restroom
12. Leaving work before the end of the shift or not being ready to begin work at the start of a shift
13. Sleeping during working hours
14. Working overtime without permission from management
15. Loafing or spending unnecessary time away from the job
16. Inefficiency, negligence, or lack of effort on the job
17. Causing or contributing to unsatisfactory work relationships
18. Unauthorized possession or use of any company property, equipment, or materials
19. Contributing to unsanitary conditions or poor housekeeping or eating at workstations
20. Smoking in unauthorized or restricted areas
21. Use of Stepworks' property or time for the personal financial gain of a team member other than the employment as a team member of Stepworks
22. Using company time for personal purposes (e.g., cell phone use, social media, watching TV, doing homework, or working on any other personal work during company time)
23. Willfully clocking another team member in or out; permitting someone else to clock you in or out; failing to clock in or out when leaving or entering the building, except when on company business

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## 2.30.a Grounds for Immediate Termination

A team member can be discharged at any time for any lawful reason. If you commit a gross violation of rules, discharge will be immediate and without notice. Gross neglect or violations may include, but are not limited to, the following:

1. Failing to meet the company's core values, violating the company's mission, or violating the code of conduct
2. Fostering or pursuing relationships, romantic or otherwise, with patients outside the bounds of Stepworks' policy
3. Insubordination—refusal to accept work as assigned or lack of cooperation with a designated supervisory staff member having responsibility for a given area or task
4. Discourteous or inconsiderate treatment of patients or co-workers
5. Dishonesty or fraud—including not reporting dishonesty committed by a coworker
6. Gossip—idle or malicious talk about your fellow coworkers and/or patients
7. Falsifying an employment application, time records, production reports, or other company records
8. Excessive, habitual, or unexplained absence from work
9. Any grossly neglectful or careless act which results or *could* result in property damage or personal injury to the offender or anyone else
10. Acts of sabotage or other interference with company projects
11. Defacing company property
12. Unauthorized disclosure of confidential information, including but not limited to patient confidential information. Stepworks may initiate legal proceedings against the team member depending on the confidential information released.
13. Unauthorized access of confidential information, patient or otherwise
14. Possession, carrying, selling, or being under the influence of intoxicating beverages or other legal or illegal substances on Stepworks property
15. Possessing or using a controlled substance that has not been prescribed by your physician
16. Urine drug screens positive for illicit substances
17. Stealing or attempting to steal property from any individual on Stepworks' premises, or stealing or attempting to steal property from Stepworks
18. Bodily assault or fighting on Stepworks property
19. Immoral or indecent conduct on Stepworks' premises
20. Possession of firearms or any dangerous weapons (e.g. explosives) on Stepworks' property
21. Threatening, intimidating, coercing, interfering, or directing abusive or threatening language at other team members or patients

22. Representation (written or verbal) of Stepworks directly or indirectly without the consent of the Stepworks board
23. Engaging in conduct detrimental to the company's reputation—even if it does not take place on company premises
24. Gambling on company property
25. Conviction of a felony
26. Inciting other team members to riot
27. Participating in a work stoppage or slowdown, or interfering with the normal activity of Stepworks
28. Encouraging violation of work rules

**A team member's absence for two consecutive working days without notifying the company is considered their resignation from the company without notice.**

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## 2.31 Team Member Resignation and Termination Process

### Team Member Resignation

Employment is at-will and team members are free to resign with or without notice. However, Stepworks requests that team members give written notice of their intention to resign with the last day of work indicated on the letter of resignation. Department supervisors and licensed staff are expected to give at least a 4-week (30-day) written notice. All other team members are expected to give a 2-week (14-day) written notice prior to their resignation. This notice must be for actual hours worked, excluding holidays or previously scheduled vacation or PTO.

If notice is given and fulfilled according to the stipulations above, accrued but unused vacation time will be paid out to the team member on their final paycheck. The team member will also be eligible for reemployment.

*Failure to give or fulfill the requested notice will result in the forfeiture of unused vacation time and the loss of eligibility for reemployment.* When asked for a reference from future employers, Stepworks will communicate whether or not the team member is eligible for reemployment.

Vacation or paid time off may not be requested from the date of notice to the date of resignation. PTO days will not be paid by the company upon resignation. If the team member's anniversary date falls within the resignation notice period, vacation will not accrue.

During the resignation period, a team member absent from work for any period of time without notifying a supervisor shall be considered as having abandoned their job.

### Layoff

Stepworks reserves the right to reduce, permanently or indefinitely, its current workforce. Layoff decisions shall be based on longevity and/or the current needs of the company. The company will attempt to provide two weeks' advance notice should this occasion arise.

### Exit Interview

Each terminating team member will have a confidential exit interview with their supervisor. This interview is to discuss the reason for termination and discuss the termination of benefits, options through COBRA, and collection of keys or any company property (if applicable).

### Disclaimer

No discharge or dismissal of any team member may occur without the consultation of management. It is recognized that the team member's immediate supervisor is normally the best informed authority to judge the merit of a termination. It is therefore not generally the function of management to question the supervisor's decision to discharge a team member unless there is just cause for an investigation.

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## 2.32 Personnel Grievance Resolution

An eligible team member may make a request for resolution of any dissatisfaction arising from interpretation and application of work rules, policies, procedures, practices, etc., with no reprisal for making such a request. An eligible team member is defined as one who has completed the probationary period with a status of regular full-time or qualified part-time. Temporary and PRN team members are not eligible.

An eligible team member must provide:

1. Clear statement of the circumstances which affected the team member and resulted in dissatisfaction; and
2. Clear statement of the requested remedy to resolve the dissatisfaction.

Compliance with the time frames outlined in each step of the procedure must be followed in order for the request of resolution to be considered timely. If the team member does not follow the prescribed time frame, the request becomes outdated, and the last response made will become final. If the party responding to the team member's request does not follow the time frame, the response becomes outdated, and the team member may proceed to the next step of the procedure. Such time frames may be extended by written mutual agreement occurring within the time frames outlined in each step. To ensure compliance with time frames involving written requests and written responses, all correspondence should be copied to the human resources director. All responses will be sent by email or certified mail to the most recent address in the personnel file. When presenting the dissatisfaction and requested remedy at each step, the team member must provide all prior requests, responses, and documentation.

An eligible team member who is discharged may proceed directly to **step 4** of this procedure within seven days of the discharge date. Dissatisfaction issues related to position/classification, evaluation issues, performance appraisals, voluntary resignations, or layoffs are not included for resolution under this procedure.

At any step of the procedure, an additional eligible team member may accompany the eligible team member seeking resolution in a supportive role, but he or she will not be an active participant in the resolution procedure.

### **Step 1: Verbal Discussion with Supervisor/Manager**

Within 14 calendar days after the team member knows, or reasonably should know, of the occurrence giving rise to stated dissatisfaction, the team member must have a verbal discussion with the respective supervisor or manager for resolution. If the matter is not satisfactorily resolved, the team member will proceed to step 2.

### **Step 2: Written Request to Supervisor/Manager**

Within 7 calendar days of the verbal discussion (step 1), the team member must submit a written request for resolution to the supervisor or manager using the “Personnel Grievance Form.” This form can be obtained from the HR director. A written response must be provided to the team member within 7 calendar days of receipt of the request. If the matter is not satisfactorily resolved, the team member may proceed to step 3.

### **Step 3: Written Request to Stepworks Leadership Team**

Within 7 calendar days of receipt of the response from step 2, the team member must submit the personnel grievance form and all documentation to the HR director. This will be reviewed by the chief operating officer, the immediate supervisor’s supervisor, and HR. A written response must be provided to the team member within 7 calendar days of receipt of the request. If the matter is not satisfactorily resolved, the team member may proceed to step 4.

### **Step 4: Review of Report by CEO**

Within 14 calendar days of receipt of the response from step 3, the team member may request a review by the CEO. The personnel grievance form and all written documentation, including the responses from the earlier steps, should be sent to the HR director indicating the team member is requesting review by the CEO. An administrative interview will then be conducted by the CEO as deemed appropriate. The decision of the CEO will be final and binding.

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## 2.33 Reemployment

Former team members of Stepworks may be considered for reemployment. However, former team members are not *entitled* to either reinstatement or rehire: these decisions will be at the sole discretion of management. Former team members may be given priority over other equally qualified external applicants, provided they:

1. Were considered eligible for reemployment at the time they terminated their previous employment;
2. Left employment in good standing with a satisfactory record of performance and proper notice; and
3. Continue to meet the requirements for the position for which they are applying.

Stepworks observes the same standards for reemployment as for initial employment. In evaluating a reemployment application, the applicant's history, including prior experience, is reviewed carefully.

### Reinstatement

A team member may be reinstated if they return to employment or active status within six months of separation from any affiliated entity. Seniority is based on the original date of hire. Prior to being considered for reinstatement, former team members separated for medical reasons may be required to submit medical documentation of the ability to perform the essential duties of the positions for which they are applying. The regular waiting periods for benefits will apply. While the original date of hire will be the basis for the amount of vacation and PTO accrual, the team member is not entitled to any previous time earned and their anniversary date will be adjusted to the rehire date.

### Rehire

A team member may be rehired if they return to employment after six months or more of separation from the company. Seniority and accrual of vacation and PTO is based on the date of rehire.

After a separation of employment of six months or more, the rehired team member shall be treated as a new team member and will be subject to the following requirements:

- Attendance at staff orientation
- Pay at the rate of a new hire
- Initial probationary period
- Regular waiting period for benefits entitlement

### Workforce Reduction

Regular team members who are laid off because of a workforce reduction shall maintain reinstatement rights for a period of six months from the time of layoff. Workforce reduction is the reduction of working hours to zero for any regular team member or group of team members for a period that exceeds 14 calendar days.

Reinstatement from a workforce reduction is the process whereby a regular team member is recalled to active payroll

within six months of layoff, without loss of accumulated benefits or seniority. Persons with reinstatement rights shall be given preference over other equally qualified external applicants for vacancies occurring with their job classification, or in other classifications of similar grade and level of skill where no other team members have recall rights.

**Reinstatement Rights for Veterans**

The law requires Stepworks to maintain reinstatement rights for veterans when they reapply for employment after honorable discharge within 90 days of separation from active duty in the armed forces. To be considered for reinstatement, a veteran must submit a copy of discharge/separation orders to the HR director. The team member shall be entitled to reinstatement to the former position or a position of similar grade, status, and pay, and to have accumulated seniority for this period of military service.

**Retirement Plan**

If you terminated employment after participating in the retirement plan, and you are subsequently rehired as an eligible team member, you will enter the plan on the later of your rehire date or your entry date. If you terminate employment prior to satisfying the minimum age and service requirements, and you are subsequently rehired, you will have to re-satisfy the eligibility requirements in order to participate under the plan.

**Salary Consideration**

If reinstatement to a regular position takes place within six months from time of separation and the reinstated team member returns to the former position or to a position carrying the same job grade, he or she shall be paid at the previous rate of pay.

A person who is reinstated within six months to a position other than one carrying the same title or grade as the former position shall be paid at the appropriate rate as if there were no break in service and the team member was transferred, promoted, etc. The anniversary date of a person who is reinstated within six months shall be adjusted to reflect the length of separation.

A former team member who is rehired after six months of separation shall receive a salary commensurate with experience and qualifications.

**Temporary to Regular Reemployment**

A temporary team member who terminates in good standing and is reemployed within six months to a regular position equal or similar in responsibility, content, and pay to the temporary position previously held, may receive credit for prior temporary service.

The team member shall be eligible for benefits after the successful completion of the eligibility period.

**Regular to Temporary Employment**

A former regular team member who is rehired in a temporary position within six months shall be treated as a temporary team member except in regard to the retirement plan.

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## 2.34 Investigations and Law Enforcement

In the event of subpoenas, search warrants, or legal investigations, every effort to maintain patient confidentiality will be exercised. Stepworks is committed to following federal privacy regulations.

1. At the time of legal presentation, either in person, courier, or mail, the facility administrator will be notified.
2. If the facility administrator is not on the premises, the legal entity will be requested to wait, and the facility administrator will be contacted by phone.
3. The facility administrator will investigate the request for information after consulting with the leadership team. The leadership team may seek legal counsel as needed.
4. Without a valid court order or patient consent, medical records cannot be released.
5. Full cooperation is intended for searches for at-large criminals, illicit drugs, or weapons pursuant to a valid search or arrest warrant.

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## 2.35 News Media Relations

Information provided to any media will be accurate and should be provided by Stepworks' chief operating officer. At no time should anyone except the COO discuss any matters, including policy, patients, or other staff members, with the media.

- Any media contact in any form, whether in person, telephonic, or electronic shall be handled with professional courtesy and with patient confidentiality in mind.
- In-person contact should result in:
  - the media representative greeted with respect;
  - the media representative escorted to a private office so that patient confidentiality can be maintained;
  - a request that camera or recording equipment not be used until permission can be obtained;
  - explanation that our company philosophy and policy is for all media communication to be channeled through the company's executive team; and
  - collection of the media representative's contact information with acknowledgment that you will forward the contact information to the COO.
- Telephonic contact should result in:
  - the media representative greeted with respect;
  - explanation that our company philosophy and policy is for all media communication to be channeled through the company's executive team; and
  - collection of the media representative's contact information with acknowledgment that you will forward the contact information to the executive team.
- Electronic contact should result in:
  - explanation that our company philosophy and policy is for all media communication to be channeled through the company's executive team; and
  - forwarding of the media representative's communication with acknowledgment that you will forward the information to the executive team.

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## 2.36 Corporate Social Media Policy

Stepworks' staff will monitor its social media pages to ensure appropriate content and positive recovery content. Additionally, Stepworks' staff members will never share personal information about persons served using either the company social media accounts or their own personal accounts.

1. Staff will receive notifications from the social media sites when comments or other notifications are posted to Stepworks' social media pages.
2. Staff will monitor the notifications for appropriate content in a timely fashion.
3. Inappropriate content may include vulgar language, breaches of patient confidentiality, or extremely negative comments about Stepworks' program or staff members.
4. Comments considered by administrators to be inappropriate will receive a response from administrative staff only.
5. In the event that a patient's confidentiality has been breached, staff will delete the comment and send a private message to the author explaining the deletion and requesting the comment be resubmitted without naming a patient or otherwise violating confidentiality.
6. If a violation of confidentiality has occurred in a social media post and there is no way for Stepworks' staff to delete or hide the post, Stepworks will request that the post's author delete the post or edit it to remove the violation.
7. Stepworks' staff members will always obtain permission from persons served who appear in photos before posting them to the company's social media pages.

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## 2.37 Annual Policy and Procedure Review

Stepworks' personnel manual, code of conduct, and all training documents and procedures will be available to team members on Zenefits or Stepworks University. These may be accessed or referred to by the team members at any time. All supervisors will also have a hard copy. Annual review of the code of conduct, HIPAA, OSHA, and applicable policies and procedures will be required for all team members.

Stepworks will perform an annual review of the company's personnel manual and policies and procedures. The goals of this review include:

- review and revise old policies
- review and approve new draft policies
- remove redundancies and simplify policies
- execute and deliver final policies to Stepworks staff

### Policy Drafts

New policies, or revisions to current policies, shall be submitted as drafts by supervisors for consideration by the leadership team. Suggestions from other staff members may be submitted to their supervisor. Input will be gathered from department supervisors on the draft policies as appropriate. Once approved by the leadership team, the policies will be placed in the docket for either immediate publication or quarterly update, depending on urgency.

### Policy Organization

All policies should be dated according to their issue, revision, and last review. Policies corresponding to CARF or Kentucky regulations should be tagged as such. A channel log will be kept of all policy changes. If a policy is edited or discontinued, the policy in its original form should be stored in an online file management system with its edited or discontinued date.

### Publication

*Immediate Publication:* a policy that requires immediate change may be distributed via Stepworks University at any time. Supervisors will be notified, and team members will be required to read and sign acknowledgement of the new policy within seven days. Hard copies will be made available to all supervisors for inclusion in their hard-copy manuals.

*Quarterly Update:* policies that have minimal changes or are not urgent will be published quarterly on Stepworks University. At the time of the quarterly update, supervisors will be notified, and team members will be required to read and sign acknowledgement of the new policy within seven days. Hard copies will be made available to all supervisors for inclusion in their hard-copy manuals.

If there are significant changes, Stepworks may require all team members to review all the policies and procedures applicable to them and sign acknowledgement of receipt, regardless of time of hire. In this instance, a new hard-copy manual will be made available to all supervisors. Failure to sign new policies may result in disciplinary action, up to and including termination.

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## Conclusion

Congratulations, you have completed your review of the *Stepworks Personnel Manual*! If you have any questions, please contact your supervisor, the HR director, or the compliance department. We look forward to having you as a part of our team.