

POLICY MANUAL INDEX

**NOTE: The attached 20 policies
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INTRODUCTION:

This policy manual of the Nevada Affordable Housing Assistance Corporation (NAHAC) is intended to be a useful tool for internal and authorized external parties, that will require use of the same, and is an integral element of NAHAC's overall internal control efforts.

BACKGROUND:

In 2003, the Nevada Housing Division of the Department of Business and Industry (NHD) based in Carson City, Nevada, a state Housing Finance Agency (HFA), formed the non-profit NAHAC. The primary purpose of NAHAC is to assist in lessening the burdens of Nevada government. As such, it has been tasked with assisting the State of Nevada (the "State") by:

- (i) Owning, acquiring, developing, leasing and managing single or multi-family housing located in the State;
- (ii) Providing funds or other benefits to facilitate single or multi-family housing located in the State;
- (iii) Providing subsidies or other benefits to targeted groups of individuals within the State necessary or appropriate to provide affordable or subsidized single or multi-family housing in the State;
- (iv) Promoting affordable or subsidized single or multi-family housing located in the State;
- (v) Financing affordable or subsidized single or multi-family housing in the State;
- (vi) Accepting and making grants for affordable or subsidized single or multi-family housing located in the State, and;
- (vii) Conducting or performing any ancillary or related activity in furtherance of the foregoing.

NAHAC's Board of Directors, subject to the limitations of the Articles of Incorporation and said Bylaws, is ultimately responsible for the activities and affairs of the ~~Corporation~~ Organization (NAHAC) via their delegation to and oversight of NAHAC Management, as they deem necessary.

MISSION AND VISION

Mission Statement

The mission of NAHAC is to provide funds, subsidies, and/or other benefits to Nevada homeowners or other targeted groups of individuals within the State of Nevada in order to assist with affordable or subsidized single or multi-family housing. At a minimum, this will encompass consistently determining what the specific needs of Nevada homeowners are, and any other applicable needs of the individual communities therein. Liaisons with public and private partners, as applicable, will be consistently sought to achieve this overarching objective. NAHAC's qualified and trained team of professionals will provide this service in an efficient and effective manner, making the needs of eligible Nevada homeowners its top daily priority.

Vision Statement

As a support arm for the Nevada Housing Division, NAHAC's vision is to provide appropriate and timely assistance to eligible high-risk Nevada homeowners.

RECORD RETENTION AND DESTRUCTION

Policy Area: Administration	Number: 200.E
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019 Revised Policy Effective Date: 07-27-2022 Revised Policy Effective Date: 06-27-2023 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019 Revision – Date Approved: 07-27-2022 Revision – Date Approved: 06-27-2023 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The purpose of this Policy includes (a) retention and maintenance of documents necessary for the proper functioning of the organization as well as to comply with applicable laws and regulations; (b) destruction of documents which no longer need to be retained; and (c) guidance for the Board of Directors, Officers, employees and other constituencies with respect to their responsibilities concerning document retention and destruction.</p> <p>POLICY:</p> <p>NAHAC, with respect to the retention and destruction of documents and other records, will adhere to all federal and State of Nevada requirements, as well as any relevant agreements, for both hard copy and electronic media (which may merely be referred to as “documents” in this Policy). NAHAC will establish procedures to ensure that this requirement is met.</p> <p><u><i>Responsibilities of Management</i></u></p> <p>As directed by the Board of Directors, NAHAC’s CEO/COO or equivalent management official, shall enforce the administration of this policy with responsibilities including, at a minimum, supervising and coordinating the retention and destruction of documents pursuant to this Policy and particularly the Document Retention Schedule included below. The CEO/COO or equivalent management official shall also be responsible for documenting the actions taken to maintain and/or destroy organization documents and retaining such documentation. The CEO/COO or equivalent management official may modify the Document Retention Schedule from time to time as necessary to comply with law and/or to include additional or revised document categories as may be appropriate to reflect organizational policies and procedures. The CEO/COO or equivalent management official may appoint or delegate certain tasks in carrying out these responsibilities; however, ultimate responsibility for administration of this policy is retained by the CEO/COO or equivalent management official. The CEO/COO or equivalent management official shall communicate this policy to all relevant third parties.</p> <p><u><i>Responsibilities of Constituencies</i></u></p> <p>This Policy also relates to the responsibilities of Board members, employees, and third parties with respect to maintaining and documenting the storage and destruction of the organization’s documents. Employees of the organization shall be familiar with this policy, act in accordance therewith, and assist the CEO/COO or equivalent management official, as requested.</p>	

Responsibilities of Constituencies (Continued):

The responsibility of authorized third parties with respect to this policy shall be to produce specifically identified documents upon the request of management, if the authorized third party still retains such documents. In that regard, after each project in which an authorized third party has been involved, or each term which the authorized third party has served, it shall be the responsibility of the CEO/COO or equivalent management official to confirm whatever types of documents the authorized third party retained and to request any such documents which the CEO/COO or equivalent management official feels will be necessary for retention by the organization (not by the authorized third party). In particular circumstances, the CEO/COO or equivalent management official may require that the contract with the authorized third party specify the particular responsibilities with respect to this policy.

Suspension of Document Destruction; Compliance

The organization becomes subject to a duty to preserve (or halt the destruction of) documents once litigation, an audit or a government investigation is reasonably anticipated. Therefore, if the CEO/COO or equivalent management official becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, the CEO/COO or equivalent management official shall immediately order a halt to all document destruction under this Policy, communicating the order to all affected constituencies in writing. The CEO/COO or equivalent management official may thereafter amend or rescind the order only after conferring with legal counsel. If any member of NAHAC's Board of Directors or any NAHAC employee becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, with respect to the organization, and they are not sure whether the CEO/COO or equivalent management official is aware of it, they shall make the CEO/COO or equivalent management official aware of it. Failure to comply with this policy, especially including disobeying any destruction halt order, could result in repercussions that include, without limitation, disciplinary action including possible termination.

Electronic Documents; Document Integrity

Documents in electronic format shall be maintained just as hard copy or paper documents are, in accordance with the Document Retention Schedule. Due to the fact that the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the CEO/COO or equivalent management official shall attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system; provided, that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the organization.

Privacy

It shall be the responsibility of the CEO/COO, or equivalent management official, after consultation with counsel, to determine how privacy laws will apply to the organization's documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

Emergency Planning

Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the organization in the case of an emergency shall be regularly duplicated or backed up and maintained in an off-site location. The CEO/COO, or equivalent management official shall develop reasonable procedures for document retention in the case of an emergency.

Document Creation and Generation

The CEO/COO, or equivalent management official shall discuss with employees the ways in which documents are created or generated. With respect to each employee or organizational function, the CEO/COO, or equivalent management official shall attempt to determine whether documents are created which can be easily segregated from others, so that, when it comes time to destroy (or retain) those documents, they can be easily culled from the others for disposition. For example, on an employee-by-employee basis, are e-mails and other documents of a significantly non-sensitive nature ~~so that they might be deleted, if not needed, so as to ensure space for preserving even in the face of a litigation hold with respect to~~ other, more sensitive, documents? Are there various drafts or versions of documents that should each be independently preserved? This dialogue may help in achieving a major purpose of the policy – to conserve resources – by identifying document streams in a way that will allow the policy to routinely provide for destruction of documents. Ideally, the organization will create and archive documents in a way that can readily identify and destroy documents with similar expirations.

DOCUMENT RETENTION SCHEDULE:

Assuming there is no active litigation, audit, or government investigation regarding suspension of applicable retention protocols, the following protocols shall generally apply.

Document Type	Retention Period
Accounting and Finance	
Accounts Payable	7 years
Accounts Receivable	7 years
Annual Financial Statements and Audit Reports	Permanent
Bank Statements, Reconciliations & and Deposit Slips	7 years
Canceled Checks – routine	7 years
Canceled Checks – special, such as loan repayment	Permanent
Credit Card Receipts	3 years
Employee/Business Expense Reports/Documents	7 years
General Ledger	Permanent
Interim Financial Statements	7 years
Contributions/Gifts/Grants	
Contribution Records	Permanent
Grant Records	7 yrs. after end of grant period
Corporate and Exemption	
Articles of Incorporation and Amendments	Permanent
Bylaws and Amendments	Permanent
Minute Books, including Board & and Committee Minutes	Permanent
Annual Reports to Attorney General & and Secretary of State	Permanent

Other Corporate Filings	Permanent
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DOCUMENT RETENTION SCHEDULE (CONTINUED):

IRS Exemption Application (Form 1023 or 1024)	Permanent
IRS Exemption Determination Letter	Permanent

Corporate and Exemption (Continued)

State Exemption Application (if applicable)	Permanent
State Exemption Determination Letter (if applicable)	Permanent
Licenses and Permits	Permanent
Employer Identification (EIN) Designation	Permanent

Correspondence and Internal Memoranda

Hard copy correspondence and internal memoranda relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document to which they relate.

Hard copy correspondence and internal memoranda relating to routine matters with no lasting significance	Two Years
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Correspondence and internal memoranda important to the organization or having lasting significance	Permanent, subject to review
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Electronic Mail (E-mail) to or from the organization

Electronic mail (e-mail) relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document to which they relate, but may be retained in hard copy form with the document to which they relate.

E-mails considered important to the organization or of lasting significance should be printed and stored in a central repository.	Permanent, subject to review
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E-mails not included in either of the above categories	12 months
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Electronically Stored Documents

Electronically stored documents (e.g., in pdf, text or other electronic format) comprising or relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document which they comprise or to which they relate, but may be retained in hard copy form (unless the electronic aspect is of significance).

Electronically stored documents considered important to the organization or of lasting significance should be printed and stored in a central repository (unless the electronic aspect is of significance).	Permanent, subject to review
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Electronically stored documents not included in either of the above categories	Two years
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DOCUMENT RETENTION SCHEDULE (CONTINUED):

Employment, Personnel and Pension

Personnel Records	10 yrs. after employment ends
Employee contracts	10 yrs. after termination

Insurance

Property, D&O Directors and Officers (D&O), Workers' Compensation and General Liability Insurance Policies	Permanent
Insurance Claims Records	Permanent

Legal and Contracts

Contracts, related correspondence and other supporting documentation	10 yrs. after termination
Legal correspondence	Permanent

Management and Miscellaneous

Strategic Plans	7 years after expiration
Disaster Recovery Plan	7 years after replacement
Policies and Procedures Manual	Current version with revision history

Property – Real, Personal and Intellectual

Property deeds and purchase/sale agreements	Permanent
Property Tax	Permanent
Real Property Leases	Permanent
Personal Property Leases	10 years after termination
Trademarks, Copyrights and Patents	Permanent

Tax

Tax exemption documents &-and correspondence	Permanent
IRS Rulings	Permanent
Annual information returns – federal &-and state	Permanent
Tax returns	Permanent

BANK RECONCILIATIONS

Policy Area: Finance	Number: 400.E
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 01-27-2021 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 01-27-2021 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC believes the reconciliation of all bank accounts in a timely and accurate manner is imperative. This policy serves to identify who must complete reconciliations, and when those reconciliations must be completed.</p> <p>POLICY:</p> <p>All bank statements will be opened and reviewed in a timely manner. Bank reconciliations will be performed within 20 days of month-end and reviewed within 30 days from the end of the previous month <u>by the individual specified in the internal control program</u>. Any old outstanding items should be minimal and followed-up on as soon as possible.</p>	

FINANCIAL REPORTING

Policy Area: Finance	Number: 400.H
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>In order to increase the likelihood that the Board of Directors has every opportunity to fulfil its duties it is imperative that Management provide concise, relevant, and timely information in a direct, straightforward way prior to each scheduled board meeting.</p> <p>POLICY:</p> <p>The CEO/COO or equivalent management official, will ensure that financial reports are prepared showing budgeted versus actual results of operations and administration, forecasted activity for the fiscal year, and/or other information as requested by the Board of Directors. Such information shall be provided to the Board of Directors on a monthly basis, <u>generally</u> not later than 30 days after the close of the prior month, and be presented at the next scheduled board meeting by a knowledgeable management official or their delegate.</p> <p>In addition, all required program related financial reports, including those required by the US Department of the Treasury, shall be provided in a timely manner, as directed.</p>	

INDEPENDENT AUDIT

Policy Area: Finance	Number: 400.I
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 01-27-2021 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 01-27-2021 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>An audit is a series of procedures followed by an outside experienced professional accountant to test, on a selective basis, transactions and internal controls in effect, all with a view to forming an opinion on whether the financial statements are fairly stated and whether the relevant compliance requirements have been met.</p> <p>POLICY:</p> <p>NAHAC shall engage an independent auditor to prepare audited financial statements annually following the close of the <u>June 30th</u> fiscal year at June 30th. Annual audited financial <u>statements should generally be completed by 120</u> statements are to be completed no later than (120) days after the end of the fiscal year and are due to the Federal Audit Clearinghouse in accordance with the Uniform Guidance. The audited financial statements should also <u>generally</u> be posted to NAHAC's website within 30 days after completion.</p>	

CASH DISBURSEMENTS

Policy Area: Finance	Number: 400.M
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019 Revised Policy Effective Date: 06-27-2023 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019 Revision – Date Approved: 06-27-2023 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To provide general guidance on formulating cash disbursement policies and procedures. Cash disbursement policies and procedures should ensure that cash is disbursed only for valid business purposes after approvals by authorized persons and in compliance with applicable donor, sponsor or regulatory requirements.</p> <p>POLICY:</p> <p>Cash disbursements include all forms of disbursement, including but not limited to: checks, wires, ACH transactions, etc. All vendor, supplier, consultant and contractor invoices shall be routed to the accounting department for processing. Personnel with responsibility over accounts payable shall process the invoices in a timely fashion and in accordance with the terms and conditions of the purchase agreements. All invoices must be matched to the proper supporting documentation and must be approved by authorized personnel acting within the scope of their authority (see Authorization Matrix). Approved invoices shall be paid within 30 days of receipt. Check requests are required when no invoice is available per contract. All electronic fund payments shall be initiated and authorized by separate individuals.</p> <p>Work orders are required for all purchases of services, including appropriate authorization, prior to securing services. Purchase orders are required for all purchases of goods, including appropriate authorization, prior to purchase. In lieu of the above forms, a check request form may be used so long as adequate approvals and documentation is included.</p> <p><u>Employees requesting reimbursement for out-of-pocket expenses for items purchased on behalf of NAHAC must submit the invoice, receipt, or other supporting information showing details of the transaction and the amount, and including proof of payment or a signed statement which certifies the amount has been paid. Employees must not approve their own requests.</u></p> <p>RESOURCES:</p> <p>See Appendix VI – Authorization Matrix – Finance See Appendix VII – Authorization Matrix –Payroll and HR</p>	

TRAVEL

Policy Area: Finance	Number: 400.P
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019 Revised Policy Effective Date: 07-27-2022 Revised Policy Effective Date: 06-27-2023 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019 Revision – Date Approved: 07-27-2022 Revision – Date Approved: 06-27-2023 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC will reimburse employees for reasonable and necessary expenses incurred in connection with approved travel on behalf of the organization. NAHAC strongly encourages use of travel discounts when making travel arrangements.</p> <p>Travelers seeking reimbursement should incur the lowest reasonable travel expenses and exercise care to avoid impropriety, or the appearance of impropriety. Reimbursement is allowed only when travel is related to the business of NAHAC and reimbursement has not been, and will not be, received from other sources. If a circumstance arises that is not specifically covered in this travel policy, then the most conservative course of action should be taken.</p> <p>Business travel policies are aligned with organization reimbursement rules. All business-related travel paid for with NAHAC funds must comply with organization disbursement and procurement policies.</p> <p>POLICY:</p> <p>Employee travel must be authorized in advance. Travelers should verify that planned travel is eligible for reimbursement before making travel arrangements. Within 30 days of completion of a trip, the traveler must submit a Travel Reimbursement form and supporting documentation to obtain reimbursement of expenses.</p> <p>An individual may not approve his or her own travel or reimbursement. Travel reimbursements under \$1,000 must be approved by the CEO/COO or equivalent management official, or their designee. Travel reimbursements over \$1,000 or reimbursed to the CEO/COO or equivalent management official must be approved by a member of the Board of Directors. Designated approval authorities are required to review expenditures and withhold reimbursement if there is a reason to believe that the expenditures are inappropriate or extravagant.</p> <p>DETAILS:</p> <p><i>Personal funds</i></p> <p>Travelers should review reimbursement guidelines before spending personal funds for business travel to determine if such expenses are reimbursable. NAHAC reserves the right to deny reimbursement of travel-related expenses for failure to comply with policies and procedures.</p>	

Travelers who use personal funds to facilitate travel arrangements will not be reimbursed until after the trip occurs and proper documentation is submitted.

Vacation in conjunction with business travel

In cases in which vacation time is added to a business trip, any cost variance in airfare, car rental or lodging must be clearly identified on the Travel Request form. NAHAC will not prepay any personal expenses with the intention of being “repaid” at a later time, nor will any personal expenses be reimbursed.

Exceptions

Occasionally it may be necessary for traveler to request exceptions to this travel policy. Requests for exceptions to the policy must be made in writing and approved by the CEO/COO or equivalent management official or their designee. Exceptions related to the CEO/COO or equivalent management official’s expenses must be submitted to the Board Chairperson for approval. In most instances, the expected turnaround time for review and approval is five business days.

Travel Expenses/Procedures

General information

Authorized business travel for employees that includes prepayments must be pre-approved.

Reimbursement of parking, mileage, and ferry or bus passes do not require advanced requests if they are \$20-30 or less; however, they would follow other NAHAC policies and procedures related to reimbursements or check requests. Requests for reimbursement of travel expenses are to be submitted on a Travel Reimbursement form.

Permissible prepaid travel expenses

Before the travel, NAHAC may issue prepayments for airfare, rail transportation, rental vehicles, conference registration fees and cash advances. Applicable policies and methods of payments for these prepayments follow.

Airfare. Travelers are expected to obtain the lowest available airfare that reasonably meets business travel needs. Airfare may be prepaid by NAHAC. Any changes to air travel which result in price changes must be reported.

If the airfare was not prepaid by NAHAC, an original itemized airline receipt, an e-ticket receipt/statement or an Internet receipt/statement is required. The receipt must show the class of airfare that was purchased, the method of payment, and indicate that payment was made. An email with the appropriate information is also acceptable.

First-class tickets are not reimbursable.

Travelers are encouraged to book flights at least 30 days in advance to avoid premium airfare pricing. First-class tickets are not reimbursable.

Coach/economy class tickets, or its equivalent, must be purchased for domestic or international flights (defined as flight time totaling less than five consecutive hours excluding layovers). A higher-priced coach ticket cannot be purchased for a subsequent upgrade in seating.

A less-than-first-class ticket (i.e., business class) may be purchased at NAHAC's discretion for domestic or international flights (defined as flight time exceeding five consecutive hours excluding layovers).

~~Rail transportation. NAHAC will prepay rail transportation provided that the cost does not exceed the cost of the least expensive airfare.~~

Rental vehicles. NAHAC will pay for approved use of a rental vehicle. See the section on reimbursements below in this section.

Conference registration fees. Conference registration fees can be prepaid with a credit card or check from NAHAC. Business-related banquets or meals that are considered part of the conference can be paid with the registration fees; however, such meals must be deducted from the traveler's per diem allowance. See Meals (per diem) for more detail.

Travel advances. Cash advances are authorized for specific situations that might cause undue financial hardship for business travelers. These situations are limited to employees traveling on behalf of NAHAC. A maximum of 80 percent of the total estimated cost can be advanced.

Expenses associated with the travel must be reconciled and substantiated within 30 days of the return date. The traveler must repay NAHAC for any advances in excess of the approved reimbursable expenses. The department initiating the travel is responsible for notifying the accounting department to deposit any excess funds into the appropriate departmental account.

Travel advances are processed by submitting completed request forms to NAHAC. Reimbursement for any remaining expenses is processed on a form approved by the designated approval authority.

Reimbursements

Requests for reimbursements of travel-related expenses are submitted on a completed form. This form must be accompanied by supporting documentation. If the requested reimbursement exceeds 20 percent of the total pre-trip estimate, the form must be signed by the CEO/COO or equivalent management official, or their designee.

These forms must be submitted to the accounting department within 30 days after the trip is completed. Travel reimbursement forms not submitted within this time frame requires exception approval from the CEO/COO or equivalent management official, or their designee.

Reimbursement of travel expenses is based on documentation of reasonable and actual expenses supported by the original, itemized receipts. Reimbursements that may be paid by NAHAC are shown below.

~~Airfare. If the airfare was not prepaid by NAHAC, an original itemized airline receipt, an e-ticket~~

~~receipt/statement or an Internet receipt/statement is required. The receipt must show the class of airfare that was purchased, the method of payment, and indicate that payment was made. An email with the appropriate information is also acceptable.~~

~~Travelers are expected to obtain the lowest available airfare that reasonably meets business travel needs. Travelers are encouraged to book flights at least 30 days in advance to avoid premium pricing.~~

~~Coach class or economy tickets must be purchased for short duration domestic or international flights (defined as flight time totaling less than five consecutive hours excluding layovers). A higher priced coach ticket cannot be purchased for a subsequent upgrade in seating.~~

~~A less than first class ticket (i.e., business class) may be purchased at NAHAC's discretion for long duration domestic or international flights (defined as flight time exceeding five consecutive hours excluding layovers).~~

~~First class tickets are not reimbursable.~~

Rail transportation. NAHAC will pay for rail transportation provided that the cost does not exceed the cost of the least expensive airfare.

If rail transportation was not prepaid by NAHAC, an original itemized receipt, original e-ticket receipt/statement or Internet receipt/statement is required. The receipt must show the class of ticket purchased, the method of payment, and indicate that payment was made. An email with the appropriate information is also acceptable.

Automobile (personally owned—domestic travel). A valid driver's license issued within the United States and personal automobile insurance are required for expenses to be reimbursed. Drivers should be aware of the extent of coverage (if any) provided by his or her automobile insurance company for travel that is business or not personal in nature.

Reimbursement for use of a personal automobile is based on the Internal Revenue Service's (IRS) standard mileage rates applicable at the time.

In order for NAHAC to maintain appropriate insurance coverage regarding business use of personal vehicles, all employees and independent contractors driving on behalf of NAHAC may be requested to provide a copy of their active auto insurance policy at least annually.

Automobile (rental—domestic travel). Reimbursement for a commercial rental vehicle as a primary mode of transportation is authorized only if the rental vehicle is more economical than any other type of public transportation, or if the destination is not otherwise accessible. Vehicle rental at a destination city is reimbursable. Original receipts or equivalent documentation are required.

NAHAC authorizes reimbursement for the most economic vehicle available. In certain circumstances larger vehicles may be rented, with approval by the CEO/COO, or equivalent management official. The rental agreement must clearly show the date and the points of departure/arrival, the class of vehicle

rented, as well as the total cost. Drivers must adhere to the rental requirements, and restrictions must be followed. Original receipts or equivalent documentation are required.

When vehicle rentals are necessary, NAHAC encourages travelers to purchase collision damage waiver (CDW) and loss damage waiver (LDW) coverage. NAHAC will reimburse the cost of CDW and LDW coverage; all other insurance reimbursements will be denied.

Drivers should be aware of the extent of a coverage (if any) provided by his or her automobile insurance company for travel that is business or not personal in nature.

Parking fees, tolls and other incidental costs associated with the vehicle use are not covered by the rental agreement.

Travelers are strongly encouraged to fill the gas tank before returning the vehicle to the rental agency to avoid service fees and more expensive fuel rates. Reasons for deviating from this rule should be documented.

Conference registration fees. If the conference fee was not prepaid, NAHAC will reimburse these fees, including business-related banquets or meals that are part of the conference registration. Original receipts to support the payment are required. If the conference does not provide a receipt, then a cancelled check, credit card slip/statement or documentation that the amount was paid is required for reimbursement.

A prorated amount for the meals provided must be deducted from the traveler's per diem. See Meals (per diem) for more detail. Entertainment activities such as golf outings and sightseeing tours will not be reimbursed.

Registration fees paid directly by an individual will not be reimbursed until the conference is completed.

Lodging (commercial). The cost of overnight lodging (room rate, tax, and resort fee when applicable) will be reimbursed to the traveler if the authorized travel is 45 miles or more from the traveler's home or primary worksite. Exceptions to this restriction may be approved in writing by the CEO/COO or equivalent management official or by the Board Chairperson.

NAHAC will reimburse lodging expenses at reasonable, single occupancy or standard business room rates. When the hotel or motel is the conference or convention site, reimbursement will be limited to the conference rates.

Only single room rates are authorized for payment or reimbursement unless the second party is representing the agency in an authorized capacity. If the lodging receipt shows more than a single occupancy, the single room rate must be noted. If reimbursement for more than the single room rate is requested, the name of the second person must be included. Additional charges for room service, consumption of mini bar items, and similar fees will not be reimbursed and/or will be deducted from the per diem payment for meals.

Meals (per diem). Per diem allowances are reimbursable for overnight travel that is 45 miles or more from the traveler's home or primary worksite.

NAHAC per diem rates are paid using U.S. General Services Administration (GSA) per diem rates for the applicable locality. The current rates can be located at the GSA website, as found at www.gsa.gov. Incidental expenses, unless specifically cited in this policy, will not be otherwise reimbursed.

Per diem reimbursements are based on departure and return times over the entire 24-hour day and are prorated accordingly.

If a free meal is served on the plane, included in a conference registration fee, built in to the standard, single hotel room rate or replaced by a legitimate business meal, the per diem allowance for that meal may not be claimed. Deductions for such amounts should use rates found under the "Meals and Incidental Expenses (M&IE) Breakdown" section of the www.gsa.gov website.

Receipts are not required for per diem allowances. Per diem allowances are reimbursed after the trip is completed.

Business expenses. Reasonable business expenses, including faxes, photocopies, Internet charges, data ports and business telephone calls incurred while on travel status can be reimbursed. Original itemized receipts are required.

Parking. Original receipts are required for parking fees (including airport parking). The lodging bill can be used as a receipt when charges are included as part of the overnight stay.

Telephone calls. The costs of personal telephone calls are the responsibility of the individual.

Tolls. Original receipts are required for tolls. Toll routes should only be used when necessary, and not just for convenience. Alternate routes without tolls should be used when available and reasonable.

Miscellaneous transportation. Original receipts are required for taxi, bus, subway, metro, ferry and other modes of transportation for each occurrence.

Visa, passport fees and immunizations. If these items are required for international travel, their reimbursement is left to the discretion of the CEO/COO or equivalent management official. If approved by the designated authority, original itemized receipts are required.

Non-reimbursable Travel Expenses

The following items that may be associated with business travel will not be reimbursed by NAHAC:

- Airline club memberships.
- Airline upgrades.
- Business class for domestic flights or first class for all flights.
- Child care, babysitting, house-sitting, or pet-sitting/kennel charges.
- Commuting between home and the primary work location.

- Costs incurred by traveler's failure to cancel travel or hotel reservations in a timely fashion.
 - Evening or formal wear expenses.
 - Haircuts and personal grooming.
 - Laundry and dry cleaning.
-
- Passports, vaccinations and visas when not required as a specific and necessary condition of the travel assignment.
 - Personal entertainment expenses, including in-flight movies, headsets, health club facilities, hotel pay-per-view movies, in-theater movies, social activities and related incidental costs.
 - Travel accident insurance premiums or purchase of additional travel insurance.
 - Speeding tickets or other driving infractions.
 - Other expenses not directly related to the business travel.

Travel for Non-Employees

Additional costs for travel, lodging, meal or other travel expenses for spouses or other family members will not be reimbursed unless the individual has a bona fide organization purpose for engaging in the travel or attending the event. Such travel is generally limited to senior management and should occur infrequently.

CELL PHONE REIMBURSEMENT

Policy Area: Finance	Number: 400.Q
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 04-27-2020 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 04-27-2020 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC will reimburse eligible employees whose job duties include the frequent need for a cell phone to cover business-related costs on their personal cell phone.</p> <p>POLICY:</p> <p>Employees eligible for a cell phone reimbursement include the CEO/COO, or equivalent management official, and any other employees where the CEO/COO, or equivalent management official, determines in NAHAC’s sole discretion that use of the employee’s personal cell phone is necessary to enhance the ability of the employee to perform applicable job duties, including employees working under a telework arrangement.</p> <p>The standard bi-weekly reimbursement shall be \$32.50, or as otherwise approved by the board. No further reimbursement for cell phone costs is available to employees who receive a cell phone reimbursement, regardless of actual cell phone usage.</p> <p>The approved cell phone allowance will be paid as part of the employee’s paycheck and will be non-taxable due to substantial non-compensatory business reasons pursuant to IRS Notice 2011-72. This allowance does not constitute an increase to base pay, and will not be included in the calculation of percentage increases to base pay due to salary increases, promotions, etc. Nor will it be included in calculating overtime, if applicable.</p> <p>The employee must retain an active cell phone plan as long as a cell phone allowance is in place. The employee must provide the organization with their current cell phone number and immediately notify the organization if the number changes. Employees receiving a cell phone allowance are expected to carry the cell phone on their person both on and off duty and respond when called for organization business (with non-exempt employees recording on their <u>timecards/sheettime-cards</u> any and all time spent <u>on their cell phones working, including answering calls</u>, for organization business). Employees may choose the cellular service provider and plan design of their choice.</p> <p>Because the employee owns the cell phone personally, the employee may use the phone for both business and personal purposes, as needed. Use of the phone in any manner contrary to local, state, or federal laws will constitute misuse, and will result in immediate termination of the cell phone</p>	

-reimbursement and if appropriate, disciplinary action up to and including termination of employment. All other policies related to the safeguarding of information and data security should be followed and NAHAC related information should not be saved on the employees' personal devices.

If, prior to the end of the cell phone contract, a personal decision by the employee, or employee misconduct, or misuse of the phone, results in the cell phone reimbursement being discontinued or the need to end or change the cell phone contract, the employee will bear the cost of any fees associated with that change or cancellation. For example, if an employee resigns, and no longer wants to retain the current cell phone contract for personal purposes, any cancellation charges will be the employee's responsibility. Similarly, since NAHAC provides only reimbursement of a portion of the employee's personal cell phone charges and is not providing a NAHAC-owned phone to the employee, the employee bears the exclusive obligation to maintain the cell phone in good working order and bears exclusive liability and responsibility for, and assumes all risks associated with, any damage to the employee's personal cell phone.

EMPLOYEE HANDBOOK

Policy Area: Payroll and Human Resources	Number: 500.B
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 11-18-2015 Revised Policy Effective Date: 06-09-2017 Revised Policy Effective Date: 12-02-2019 Revised Policy Effective Date: 04-26-2021 Revised Policy Effective Date: 07-27-2022 Revised Policy Effective Date: 06-27-2023 Revised Policy Effective Date: 08-23-2023 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 11-18-2015 Revision – Date Approved: 06-09-2017 Revision – Date Approved: 12-02-2019 Revision – Date Approved: 04-26-2021 Revision – Date Approved: 07-27-2022 Revision – Date Approved: 06-27-2023 Revision – Date Approved: 08-23-2023 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	

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I. INTRODUCTION

A. Description of the Handbook

This handbook is intended to provide employees of NAHAC (or the "Organization") with a general understanding of employment policies, benefits and work rules at the Organization. Employees are requested to familiarize themselves with its content and keep it available as a reference.

A handbook is a summary of human resource and payroll-related business policies and cannot anticipate every situation or answer every employment question about employment or business practices. The handbook is not an employment contract and is not intended to create contractual obligations of any kind. The Organization reserves the rights to modify, revoke, suspend, terminate, or change any and all such plans, policies or procedures, in whole or in part, at any time, and with or without notice. Employees will be notified of any material changes in a timely fashion.

If any employee has any questions regarding the material covered in this handbook, they are encouraged to contact their supervisor and may request a copy of any additional applicable policies and procedures for future information. If there is any conflict between the information in the handbook and the information in the Organization's Board-issued policies, the policies will prevail. The information in this manual is current as of the publication date, but is subject to change. Additional operational policies exist outside of this employee handbook. Employees are also expected to be familiar with, and abide by, any and all operational policies of the Organization.

B. Confidentiality

Non-public information about the Organization, the skills and aptitudes of its employees, its applicants, its suppliers, and its vendors must be kept confidential and divulged only to individuals within the Organization with both a need to receive and authorization to receive the information. If in doubt as to whether information should be divulged, err in favor of not divulging information and promptly discuss the situation with a supervisor.

~~All~~ Many of the records and files maintained by the Organization are confidential and remain the property of the Organization. Confidential records and files are not to be disclosed to any outside party without the express permission of the CEO/COO or equivalent management official. Confidential information includes, but is in no way limited to: financial records; business and strategic plans; personnel and payroll records regarding current and former employees; the identity of, contact information for, and any other account information on applicants, vendors, and suppliers; programs, techniques, and processes; and any other documents or information regarding the Organization's operations, procedures, or practices.

This policy is not intended to prevent employees from talking about their wages, talking about the conditions under which they work, or otherwise engaging in discussions that the law protects.

C. Employment At-Will

It is the goal of the Organization to provide a healthy and productive work environment. The Organization is aware that personnel changes may be initiated by employees and management alike; in this regard, it is expressly understood that employment at the Organization shall continue only so long as it is mutually agreeable to both the employee and the Organization. Either the employee or the Organization may terminate employment for any lawful reason, with or without cause, and at any time. No section of this handbook is meant

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to be construed, nor should be construed, as establishing anything other than an employment-at-will relationship, nor does it limit management's discretion to make personnel decisions at any time, and for any lawful reason, with or without notice. Employment begins after an applicant accepts an offer of employment, a date of hire is agreed upon by the Organization, and the employee actually begins work. All employment is at-will. The Organization will endeavor to regularly review an employee's job performance throughout the course of employment.

An employee will be responsible to perform any duties as are necessary to the fulfillment of the functions of the assigned job. Other duties may be assigned from time to time. As the Organization program guidelines and needs are subject to change, job description duties are not meant to be finite or all-inclusive. They serve as a general guide to the employee's essential job responsibilities and the qualifications and other requirements of the positions. The Organization reserves the right to change or modify any aspect of an employee's job duties.

Continued at-will employment with the Organization is contingent upon continued funding and is for no specific duration.

D. Equal Opportunity Employment

The Organization endorses the rights of equal opportunity found within local, state and federal legislation. The Organization offers equal opportunity for all people regardless of race, color, sex, sexual orientation, gender identity, gender expression, pregnancy (including childbirth, and related medical conditions), age, disability (mental and physical), national origin or ancestry, religious preference or creed, military or veteran status, genetic information, or any other legally protected category. Employment selection procedures enhance this commitment as well as providing an environment that encourages training and promotional opportunities free of discrimination.

The Organization will make reasonable accommodations for known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee to enable that individual to perform the essential functions of the position, unless undue hardship would result, or unless to do so would create a risk of harm to an employee or others.

Any applicant or employee who believes they have been subjected to any form of unlawful discrimination, or who believe they require an accommodation in order to perform the essential functions of the job, is encouraged to contact their supervisor or any member of management. The Organization will not retaliate against anyone who comes forward in good faith with a complaint or concern of discrimination, who participates in any investigation pertaining to a claim of discrimination, or who requests a reasonable accommodation as discussed above. Anyone who believes they have been subjected to retaliation is encouraged to report it to their supervisor or any member of management immediately.

E. Nepotism, Employment of Relatives and Personal Relationships

The Organization wants to ensure that corporate practices do not create situations such as a conflict of interest or favoritism. This extends to practices that involve employee hiring, promotion and transfer. The Organization prohibits an employee from working under the immediate supervisor or in the direct line of authority of either (a) someone with whom he/she is having a dating, romantic, or sexual relationship or (b) a close relative (meaning a spouse, registered domestic partner, parent, parent-in-law, grandparent, child, child-in-law, uncle, aunt, nephew, niece, sibling, sibling-in-law, step-relative, cousin, or relative of a registered domestic partner). If employees begin one of the relationships described above (whether with a supervisor or otherwise), or

become relatives, partners or members of the same household (whether temporarily or permanently, and whether with a supervisor or otherwise), ~~and if one party is in a supervisory position, that person is both such individuals are~~ required to immediately inform the CEO/COO or equivalent management official, and the Board of Directors. The Organization reserves the right to apply this policy to situations where there is a conflict of interest or the potential for a conflict of interest, or where circumstances otherwise warrant, because of the relationship between employees, even if there is no direct reporting relationship or authority involved.

Employment of a relative requires the written approval of the Board of Directors.

F. Employee Relative - Vendor Transactions

This section covers restrictions on the use of employee relative-vendor relationships, as suppliers of goods and services (including consultant services).

A relative is defined as an employee's spouse, child, parent, brother, sister, son-in-law, daughter-in-law, father-in-law, mother-in-law, brother-in-law, sister-in-law, and step-relatives in the same relationship. Near relative also includes an employee's ~~registered~~ domestic partner and individuals with one of the above relationships to the domestic partner.

It is the policy of the Organization to separate an employee's private interests from the Organization's business in order to safeguard the Organization and its employees against charges of favoritism in acquisition of goods and services. No vendor arrangements with relatives or near relatives, as defined, are permitted.

G. Harassment

The Organization will not tolerate any form of unlawful harassment in the workplace. This includes harassment on the basis of race, color, sex, sexual orientation, gender identity, gender expression, pregnancy (including childbirth, and related medical conditions), age, disability (mental and physical), national origin or ancestry, religious preference or creed, military or veteran status, genetic information, or any other legally protected category.

No employee should be subjected to unwelcome verbal or physical conduct that is sexual in nature or that shows hostility to any employee because of the employee's sex, gender, gender identity, gender expression, or any of the other categories described above.

Forms of harassment may include, but are not limited to the following:

Verbal Harassment; i.e.: suggestive, insulting, or derogatory comments, innuendoes, sounds, jokes, teasing, whistling, or slurs and unwanted sexual propositions or threats.

Physical Harassment; e.g. impeding or blocking movement, or any unwanted physical contact or interference with normal work or movement, unwanted gender advances, including touching, pinching, brushing the body, sexual contact or assault.

Visual Harassment, i.e.: derogatory posters, cartoons, suggestive objects, pictures, letters, or drawings; also such actions as leering or obscene gestures.

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Sexual harassment is defined as any unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature that, (1) has been made explicitly or implicitly a term or condition of an individual's employment, (2) is used as a basis for employment decisions such as promotions and benefits affecting such individual, or (3) substantially interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

The Organization's policy against harassment applies to employees and anyone who enters the Organization's premises or interacts with its employees. Any employee who believes they have been harassed by a co-worker, supervisor, vendor, applicant or agent of the Organization, or any other third party, is encouraged to immediately report the facts of the incident(s) and the names of the individuals involved to their supervisor or any member of management. [Organization](#)

Individuals may report concerns of harassment verbally or in writing to:

1. Any supervisor
2. Administrator - AJ Gavilanes, agavilanes@nahac.org, (725) 710-9002
3. CEO/COO - Verise Campbell, vcampbell@nahac.org, (702) 570-5579

If the complaint is against the CEO/COO or equivalent management official, the complaint may be directed to:

1. Board Chairwoman - Jeeneah (Nia) Girma, jmgirma@housing.nv.gov, (702) 486-5990

Supervisors who receive complaints of harassment are required to report them immediately, verbally and via email, to the CEO/COO or equivalent management official.

After a report is received, an investigation will be undertaken promptly and impartially. Confidentiality will be maintained to the greatest extent possible. Any supervisor, agent or other employee who has been found by the Organization, after investigation, to have harassed another employee in violation of this policy will be subject to discipline. Discipline may range from a warning to termination of employment.

The Organization will not retaliate against anyone who comes forward in good faith with a complaint or concern of harassment, or who participates in any investigation pertaining to a claim of harassment. Anyone who believes they have been subjected to retaliation is encouraged to report it immediately. Individuals found to have retaliated in violation of this policy will be subject to discipline including the possibility of termination.

If an employee has any questions concerning this policy, they are encouraged to contact their supervisor, or any member of management.

H. Open Door Policy

The Organization is always ready to listen to an employee's good faith complaints or concerns. Any employee who encounters a problem in the workplace should promptly bring it ~~it~~ to the attention of a supervisor, ~~the Administrator~~ [Human Resources Generalist](#), and/or the CEO/COO or equivalent management official. After a concern or complaint is expressed, if the circumstances warrant, an investigation will be undertaken promptly. Any supervisor, agent or other employee who has been found by the Organization, after investigation, to have violated Organization policy will be subject to discipline. Discipline may range from a warning to termination of employment.

II. EMPLOYMENT POLICIES AND PRACTICES

A. Background Checks

To ensure that individuals who join the Organization are well qualified, and given the nature of the Organization's business, it is the Organization's policy to conduct pre-employment background checks on all applicants who accept an offer of employment.

The Organization reserves the right to investigate an individual's prior employment history, criminal background, credit history, DMV records, personal references, educational and other background, as well as other relevant information that is reasonably available to the Organization and to the fullest extent by law.

All offers of employment are conditioned on receipt of a background check report that is acceptable to the Organization. Background checks are conducted in conformity with applicable law. Reports are kept confidential and are only viewed by individuals involved in the hiring process.

The Organization also reserves the right to conduct a background check for current employees to determine eligibility for promotion or reassignment in the same manner as described above.

B. Immigration Compliance

The Organization will comply with applicable immigration laws, including the Immigration Reform and Control Act of 1986 and the Immigration Act of 1990. As a condition of employment, every individual must provide satisfactory evidence of their identity and legal authority to work in the United States. Applicants may provide any form of acceptable identification from a list of documents provided when completing the Form I-9.

C. Employment Classifications

1. Regular Employees

Regular employees are those who are hired to work on a regular schedule. Regular employees may be classified as full-time or part-time.

2. Full-Time Employees

Full-time employees are those who are regularly scheduled to work 40 hours per week.

3. Part-Time Employees

Part-time employees are those who are regularly scheduled to work less than 40 hours per week. Part-time employees who are regularly scheduled to work at least 30 hours per week are eligible for the benefits described in this handbook (although any such benefits are subject to the terms of any plan agreements or summary plan descriptions, which ~~supereedes~~^{supersede} the terms of this handbook and are subject to change in the discretion of the benefits providers). [Paid Time Off \(PTO\)](#) hours may be pro-rated for employees regularly working less than 40 hours per week.

Part-time employees who are regularly scheduled to work less than 30 hours per week are not eligible for benefits.

4. Temporary Employees

Generally, temporary employees are those employed for temporary or short-term assignments. Temporary employees are not eligible for employee benefits except where mandated by law.

5. Inactive Status

Employees who are on an approved leave of absence that exceeds 3 months will be placed on inactive status. During the time the employee is on inactive status, PTO ~~time~~ will not accrue unless otherwise required by law.

6. Temporary Transfers

Employees who request a transfer to another job for medical reasons may be considered for a temporary transfer if a position exists at the time the transfer is requested and the employee is qualified to perform the job. The employee will be paid in accordance with the responsibilities and duties of the temporary job unless otherwise required by law.

7. Job Duties

During the job training period, the employee will be trained in the primary job responsibilities and performance standards. From time to time, employees may be asked to work on a special assignment or to assist with other work necessary or important to the operation of the Organization.

The Organization reserves the right, at any time, with or without notice, to alter or change job responsibilities, reassign or transfer job positions, or assign any additional responsibilities.

8. Exempt Employees

Employees who are classified as “exempt” are exempt from the overtime provisions of the Fair Labor Standards Act. These employees generally are paid on a salary basis. They are not eligible for and will not receive overtime compensation.

9. Non-Exempt Employees

Non-exempt employees are paid for time worked. They receive overtime for hours worked in excess of forty (40) per week and otherwise as required by law.

D. Work Schedules

The Organization’s normal business hours are Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m. Exempt employees are expected to work whatever hours are necessary to fulfill the duties and responsibilities of their positions. Employees are expected to work normal business hours unless the CEO/COO or equivalent management official approves an alternative work schedule. The Organization reserves the right to request employees to work other schedules, including evenings and weekends, if needed to carry out the mission of the Organization.

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The workday (a consecutive 24-hour period) begins at 12:01 a.m. and ends at midnight. The workweek begins on Monday and ends on Sunday.

E. Meal/Rest Periods

The Organization requires employees to take all meal and rest periods to which they are entitled. The scheduling of meal periods at the Organization is set by the employee's immediate supervisor with the goal of providing the least possible disruption to ~~organization~~-Organization operations. If any employee believes they are being denied any meal or rest break to which they are entitled, they should report this immediately to their supervisor or any member of management. The CEO/COO or equivalent management official should also be notified immediately.

1. Mandatory Meal Period

Employees who work at least 8 consecutive hours will be provided a meal break not to exceed 60 minutes. Non-exempt employees are to be completely relieved of all job duties while on meal breaks and must record the starting time and ending time of their meal periods on their timecard/sheet. Meal periods are unpaid and should not be included in the total hours of work per day.

2. Rest Breaks

Employees are permitted a 10-minute rest break for each four hours of work (or major fraction thereof). This means the following:

- (1) If the employee works at least 3.5 hours, but less than 7 hours of continuous work, the employee is entitled to one 10-minute rest period.
- (2) If the employee works at least 7 hours, but less than 11 hours of continuous work, the employee is entitled to two 10-minute rest periods.
- (3) If the employee works at least 11 hours, but less than 15 hours of continuous work, the employee is entitled to three 10-minute rest periods.
- (4) If the employee works at least 15 hours, but less than 19 hours of continuous work, the employee is entitled to four 10-minute rest periods.

Employees on rest breaks are not required to clock in and clock out because rest breaks are paid and considered time worked.

3. Impermissible Use of Meal Period and/or Rest Breaks

Neither the meal period nor the rest break(s) may be used to account for an employee's late arrival or early departure or to cover time off for other purposes—for example, rest breaks may not be accumulated to extend a meal period, and rest breaks may not be combined to allow an extended break from work.

F. Personnel Records

Employees have a right to inspect certain documents in their personnel file, as provided by law, in the presence of a Organization representative at a mutually convenient time. Employees may also request copies of certain portions of their personnel files. Employees may provide documentation for any disputed item which will be maintained in the personnel file along with the original document.

Within the Organization, ~~t~~The Organization will restrict disclosure of the personnel file to authorized individuals ~~within the Organization~~. Any request for information from personnel files must be directed to a designated management representative. Only a designated management representative may release information about current or former employees.

Disclosure of personnel information to outside sources is limited. However, the Organization will cooperate with requests from authorized law enforcement, or local, state or federal agencies conducting official investigations and as otherwise legally required.

G. Employee References

All requests for references must be directed to the Administrator/~~Human Resources Generalist~~. No Organization manager, supervisor, or employee is authorized to release references for current or former employees. The Organization's policy regarding references for former employees is to send the reference request to the Administrator/~~Human Resources Generalist~~, who will disclose dates of employment and the job title of the last position held.

If a current or former employee authorizes such disclosure in writing, the Organization may also provide a prospective employer (or other third party authorized by employee) with information on the amount of salary or wage earned.

H. Termination of Employment

1. Reductions in Force

While the Organization hopes to continue providing employment opportunities for as long as it has funding, business conditions, applicant demands, and other factors are unpredictable. Changes or downturns in any of these or other areas could create a need to restructure or to reduce the number of people employed.

In determining which employees will be subject to layoffs, the Organization will take into account, among other things, operational requirements, and the skill, productivity, ability, past performance and length of service of employees. No one factor is guaranteed to control. On the last day of employment, the employee must return all Organization data and property, including keys, identification cards, organization credit cards, and computers.

2. Discipline and Involuntary Terminations

Compliance with Organization policies and rules is expected of all employees. Where employees fail to comply with Organization expectations, the Organization reserves the right to utilize discipline that may include verbal warnings, written warnings, demotion, suspension and termination. The system does not guarantee that discipline will be used in any particular order, or that each form of discipline will be used in each circumstance. The Organization may, at its sole discretion, utilize whatever form of discipline is deemed appropriate for the circumstances, up to and

including termination of employment without regard to lesser forms of progressive discipline. The Organization's policy of discipline does not limit or alter the at-will employment relationship. When notified of the termination, the employee must return all Organization data and property and must leave the premises by the date specified.

3. Voluntary Termination

An employee who voluntarily resigns their employment or fails to work for three (3) consecutively scheduled workdays without notice to, or approval by, the appropriate supervisor will be considered to have voluntarily terminated employment with the Organization. All Organization-owned data and property must be returned in good working order immediately upon termination of employment.

III. STANDARDS OF CONDUCT

A. Prohibited Conduct

In order to ensure productive operations and provide the best possible work environment, the Organization expects employees to follow rules of conduct that will protect the interests and safety of all personnel and further the mission and objectives of the Organization. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions of rules of conduct that may result in disciplinary action, including suspension, demotion or termination of employment without resort to lesser or progressive forms of discipline.

- Falsification of employment records, employment information, or other records.
- Falsification of timecards/sheets (their own or another employee's).
- Unauthorized use of Organization equipment, time, materials, or facilities.
- Possessing, distributing, selling, transferring, or using or being under the influence of alcohol or illegal drugs or willful misuse of lawful or prescription drugs in the work area or on work time.
- Provoking a physical fight, or physically fighting at any time during working hours or on any premises owned or occupied by the Organization.
- Carrying firearms or any other dangerous weapons, at any time during working hours or on premises occupied by the Organization.
- Insubordination, including but not limited to failure or refusal to obey the lawful orders or instructions of any supervisor or management representative.
- Failing to notify the appropriate supervisor when unable to report to work.
- Excessive unexcused absenteeism.
- Failing to obtain permission to leave work for any reason during normal working hours.
- Failing to observe working schedules, including rest and lunch periods.
- Failing to provide a physician's certificate of fitness for work when requested or required to do so.
- Wearing unprofessional or inappropriate styles of clothing or hair while working (note, however, that hairstyles that are associated with the protected classifications discussed in the Equal Employment Opportunity policy are not considered either unprofessional or inappropriate).
- Violating any safety, health, or security policy, rule or procedure of the Organization.
- Committing a fraudulent act or a breach of trust in any circumstances.

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- Concealing or failing to disclose an actual or potential conflict of interest.
- Unauthorized distribution or release of confidential information.
- Working unauthorized overtime.

This statement of examples of prohibited conduct does not alter or limit the Organization's policy of employment at-will.

B. Drug and Alcohol Abuse

The Organization is concerned about the use of alcohol, illegal drugs or controlled substances as it affects the workplace. Use of these substances can adversely affect an employee's work performance, efficiency, safety, and health. In addition, the use or possession of these substances on the job constitutes a potential danger to the welfare and safety of other employees and exposes the Organization to the risks of property loss or damage, or injury to other persons. Furthermore, abuse of prescription drugs and/or over-the-counter drugs also may affect an employee's job performance.

The following standards of conduct apply to all employees, either on Organization property or during the workday, and forbid:

- Possession or use of alcohol, or being under the influence of alcohol while on the job.
- Driving a vehicle while under the influence of alcohol or any drugs that could impair the ability to safely operate a vehicle.
- Distribution, sale or purchase of an illegal or controlled substance while on the job.
- Possession or use of an illegal, controlled substance or being under the influence of an illegal or controlled substance while on the job.
- Abuse of prescription or over-the-counter drugs in a manner that impairs the employee.

In order to enforce this policy, the Organization reserves the right to conduct searches of Organization property or employees' property including, but not limited to employee lunch boxes, baggage, private vehicles parked on Organization premises or work-site, and to implement other measures necessary to deter and detect abuse of this policy.

An employee who is using prescription or over-the-counter drugs that may impair the employee's ability to safely perform the job, or affect the safety or wellbeing of others, must notify their supervisor of such use immediately before starting or resuming work.

An employee's conviction on a charge of illegal use, sale or possession of any controlled substance while off Organization property will not be tolerated. In accordance with the Drug Free Workplace Act of 1988, the Organization will take appropriate action against a convicted employee up to and including termination, or the satisfactory participation in a drug abuse assistance or rehabilitation program, depending upon the circumstances of each employee's situation.

The Organization will make reasonable accommodations for known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee to enable that individual to perform the essential functions of the position, unless undue hardship would result, or unless to do so would create a risk of harm to the employee or others.

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The Organization will encourage and reasonably accommodate employees with chemical dependencies (alcohol and/or drugs) to seek treatment and/or rehabilitation. Employees desiring such assistance should request a leave of absence in order to obtain treatment or rehabilitation. The Organization is not obligated, however, to continue to employ any person whose performance of essential job duties is impaired because of illegal drug or alcohol use, nor is the Organization obligated to re-employ any person who has participated in treatment and/or rehabilitation if that person's job performance remains impaired as a result of dependency. Additionally, employees who are given the opportunity to seek treatment and/or rehabilitation, but fail to successfully overcome their dependency or problem, will not automatically be given a second opportunity to seek treatment and/or rehabilitation.

C. Punctuality and Attendance

The Organization expects all employees to report to work on a reliable and punctual basis. Unexcused absenteeism, early departures from work, and late arrivals burden other employees and the Organization. If an employee cannot avoid being late to work or is unable to work as scheduled, they are required to notify their supervisor as soon as possible. Once on premises, employees are expected to begin performing their required job tasks. 'Social hour' gatherings that interfere with maintaining employee workloads or that may result in delays in fulfilling job duties (including meeting-excessive socializing with Organization clients) will not be tolerated, and those participating in excessive socialization may be subject to discipline.

An employee is required to inform their supervisor of the expected duration of any absence. The Organization will comply with any applicable laws relating to time off from work but it is the employee's responsibility to provide sufficient information to enable the Organization to make a determination. If a leave is granted, then as the leave of absence is nearing completion, it is the employee's responsibility to either provide a return to work note from his or her medical provider or, if additional leave time is needed, to request and obtain an extension of the leave before the previously approved leave is exhausted.

Excessive unexcused absenteeism may lead to disciplinary action, up to and including termination of employment. However, the Organization will make reasonable accommodations for known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee to enable that individual to perform the essential functions of the position, unless undue hardship would result, or unless to do so would create a risk of harm to the employee or others.

D. Employee Dress and Appearance

Employees contribute to the culture and reputation of the Organization in the way they present themselves. To provide a positive impression to our applicants and other members of the public, all employees must present a professional business appearance at work. Applicants will be seen on Organization premises throughout the work week and as such, professional attire and professional behavior are expected at all times during business hours. The following are some guidelines:

- Clothing must be clean and neat and not constitute a safety hazard.
- All employees should practice common sense regarding good taste and comfort, and avoid any extremes in dress, accessories, fragrances or hair. (Please note, however, that hairstyles that are associated with the protected classifications listed in the Equal Employment Opportunity policy do not violate this policy.)
- Khakis are considered appropriate business attire.

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- Undergarments should not be visible.
- Provocative, tight or revealing clothing is prohibited.
- Jeans which are shredded, contain holes or are cut-off are prohibited, as are tank tops, muscle shirts, crop tops, shorts, halter tops, T-shirts with inappropriate slogans, leggings, jogging suits, flip flops, and slippers.
- Gym wear, beach wear or club apparel is not permitted at any time.

Management may make exceptions to the dress code for special occasions. Business casual is permitted on Fridays except when suspended based on business needs. Employees are encouraged to contact their supervisor for specific information regarding acceptable attire.

If an employee reports to work dressed or groomed inappropriately, they will be asked to clock out and will be sent home to change. ~~The employee may request vacation time PTO or unpaid time off to change clothing.~~ Repeated incidents may result in disciplinary action up to and including termination of employment.

E. Use of Social Media

Employees may not post the Organization's trade secrets, or information about or belonging to the organization's clients, on the Internet or any social media site. Employees are also prohibited from posting obscenities, racial slurs (or slurs based on other classifications discussed in the organization's Equal Employment Opportunity policy) or malicious, obscene, physically threatening, or intimidating statements that could (1) damage the reputation of the organization or its clients; (2) create, foster, or further a hostile work environment amongst Organization employees; or (3) constitute a violation of any contractual or other confidentiality obligations that the Organization owes to third parties.

This policy is not intended to prevent employees from talking about their wages, talking about the conditions under which they work, or otherwise engaging in discussions that the law protects (whether on social media or otherwise).

Employees are prohibited from using and/or editing social media accounts managed by the Organization. The only employees authorized to make edits to organization-managed accounts are designated management representatives or individuals otherwise specified by the CEO/COO or equivalent management official.

Unless prohibited by law, the Organization may monitor content on the Internet. Policy violations may result in discipline up to and including termination of employment.

F. Workplace Violence

Acts or threats of physical violence, including intimidation, harassment and/or coercion that involve or affect the Organization or that may occur on Organization property will not be tolerated. The personal safety and health of each employee is of primary importance.

It is the responsibility of all employees to support safety and health programs by reporting to their supervisor or any member of management any threats received or restraining orders that have been granted against a disgruntled spouse, domestic partner, Organization client, acquaintance or co-worker, or which could otherwise impact the workplace. All incidents of direct or indirect threats and actual violent events will be treated seriously. All incidents will be immediately investigated, and appropriate action will be taken.

G. Workplace Bullying

In no instance will the Organization tolerate bullying behavior, whether intentional or not. The Organization defines bullying as repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work or in the course of employment.

The Organization considers the following types of behavior examples of bullying:

- Verbal Bullying - slandering, ridiculing or maligning a person or his or her family; persistent name calling which is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- Physical Bullying - pushing; shoving; kicking; poking; tripping; assaulting, or threatening physical assault; damaging a person's work area or property.
- Gesture Bullying - non-verbal threatening gestures; glances which can convey threatening messages.

IV. OPERATIONAL POLICIES AND PRACTICES

A. Employer Property

Desks, workstations, computers, vehicles and other designated property are Organization property and must be maintained according to Organization rules and regulations. The Organization reserves the right to inspect all Organization property to ensure compliance with its rules and regulations, without notice to the employee and/or in the employee's absence.

Employees are expected to demonstrate proper care when using the Organization property and equipment. No property may be removed from the premises without proper authorization from a management representative. If the employee loses, breaks, or damages any property they must report it to their supervisor or any member of management immediately.

B. Employee Property

An employee's personal property, including but not limited to, packages, purses, backpacks, etc., may be inspected upon reasonable suspicion of unauthorized possession of Organization property or otherwise as allowed by law.

The Organization is not responsible for loss or damage to personal property. Personal items such as purses, wallets or other valuable items should not be left in areas where theft might occur. This also applies to personal property left in vehicles parked on property.

C. Use of Technology

The Organization's technical resources – including desktop and portable computer systems, fax machines, voice mail, cellular telephones, and electronic mail (e-mail), and any instant messaging platforms – enable employees quick and efficient access and exchange of information throughout the Organization. When used properly, these resources greatly enhance employee productivity and knowledge. In many respects, these tools are similar to other Organization tools, such as stationery, file cabinets, photocopiers and telephones. Because these

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technologies are rapidly changing, it is important to explain how they fit within the Organization and within the responsibilities of employees.

This policy applies to all technical resources that are owned or leased by the Organization, that are used on or accessed from Organization premises, or that are used for Organization business. This policy also applies to all activities using any Organization-paid accounts, subscriptions, or other technical services, such as voice mail and e-mail, whether or not the activities are conducted from Organization premises. For additional information and clarification, employees should reference the Organization's Information Security and Safeguards Program (ISSP) document.

NOTE: As an employee uses the Organization's technical resources, it is important to remember the nature of the information created and stored. E-mail messages sometimes feel casual, like a conversation, and are not as carefully thought out as a letter or memorandum. Like any other document, an e-mail message or other computer information can later be used to indicate what an employee knew or felt. Employees should keep this in mind when creating e-mail messages and other documents. Even after an e-mail message is deleted or a file is closed during a computer session, it may still be recoverable and may remain on the system. Emails and other documents must be retained and preserved in accordance with the Organization's records management, preservation, and destruction policies.

1. Acceptable Uses

The Organization's technical resources are provided for the benefit of the Organization and its applicants, vendors and suppliers. These resources are provided for use in the pursuit of Organization business and are to be reviewed, monitored, and used only in that pursuit.

~~Employees are not permitted to use the Organization's technical resources for non-work purposes. During working time, employees are not permitted to use the Organization's technical resources for non-work purposes. Some limited use of such resources during non-working time, such as breaks, is permissible provided that it complies with Organization policies and procedures, including those pertaining to the prevention of discrimination and harassment and the Information Security and Safeguards Program (ISSP).~~ Accordingly, employees have no right of privacy as to any information or file maintained in or on the Organization's property or transmitted or stored through the Organization's computer, voice mail, e-mail, or telephone systems.

2. Unacceptable Uses

The Organization's technical resources should not be used for personal gain. Except as otherwise allowed by law, ~~during working time, the employee may not access the Internet for personal reasons using Organization resources. Some limited use of such resources during non-working time, such as breaks, is permissible provided that it complies with Organization policies and procedures, including those pertaining to the prevention of discrimination and harassment and the Information Security and Safeguards Program (ISSP).~~

Solicitation for any non-Organization business or activity using Organization resources is strictly prohibited except as otherwise allowed by law. The use of the Organization's technical resources must not interfere with an employee's productivity, the productivity of any other employee, or the operation of the Organization's technical resources.

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An employee is prohibited from sending e-mail or other communications that indicate that they were sent by someone else. An employee should never access any technical resources using another employee's password. Similarly, an employee should only access the libraries, files, data, programs, and directories that are related to their specific work duties. Unauthorized review, duplication, dissemination, removal, installation, damage, or alteration of files, passwords, computer systems or programs, or other property of the Organization, or improper use of information obtained by unauthorized means, is prohibited.

Sending, saving, or viewing offensive or inappropriate material is prohibited. Messages stored and/or transmitted by computer, voice mail, e-mail, instant messaging, or telephone systems must not contain content that may reasonably be considered offensive. Offensive material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments, jokes or images that would offend someone on the basis of his or her race, color, sex, sexual orientation, gender identity, gender expression, pregnancy (including childbirth, and related medical conditions), age, disability (mental and physical), national origin or ancestry, religious preference or creed, military or veteran status, genetic information, or any other legally protected category. Any use of the Organization's technical resources to harass or discriminate is strictly prohibited by the Organization. Violators will be subject to discipline, up to and including termination.

3. Access to Information

When using the Organization's computers, the employee is creating Organization documents using a Organization asset. The Organization respects the individual privacy of its employees. However, that privacy does not extend to an employee's work-related conduct or to the use of Organization-provided technical resources or supplies.

All information, including e-mail messages and files, that are created, sent, or retrieved over the Organization's technical resources are the property of the Organization, and should not be considered private or confidential. Employees have no right to privacy as to any information or file accessed, transmitted or stored through the Organization's computer, voice mail, e-mail, or telephone systems. Any electronically stored information that the employee accesses, creates, sends to, or receives from others may be retrieved and reviewed when doing so serves the legitimate business interests and obligations of the Organization. Employees should also be aware that, even when a file or message is erased, it is still possible to recover the message. The Organization reserves the right to monitor the use of its technical resources to the fullest extent permitted by law. All information including text and images may be disclosed to law enforcement or to other third parties without prior consent of the sender or the receiver.

4. Copyrighted Materials

Employees are prohibited from copying and/or distributing copyrighted materials (e.g., software, database files, documentation, articles, graphics files and downloaded information) through the e-mail system or by any other means unless the employee has confirmed, in advance, with a management representative that the Organization has the right to copy or distribute the material. Failure to observe a copyright may result in disciplinary action by the Organization, among other consequences. Any questions concerning these requirements should be directed to the immediate supervisor.

5. Confidential Information

E-mail and Internet/Web accesses are not entirely secure. Others outside the Organization may also be able to monitor Organization e-mail and Internet/Web access. For example, Internet sites maintain logs of visits from users; these logs identify which Organization, and even which particular person, accessed the service. If an employee's work using these resources requires a higher level of security, please contact the CEO/COO or equivalent management official for guidance on securely exchanging e-mail or gathering information from sources such as the Internet or World Wide Web.

All employees must safeguard the Organization's confidential information, as well as that of applicants and others, from disclosure. Do not access new voice -mail or e-mail messages with others present. Messages and work containing confidential information should not be left visible when an employee is away from their work area.

6. Organization's Software Policy

If an employee has a need to install software on Organization computers, the supervisor must contact the Organization's information technology representative and request to have the software installed. Employees are prohibited from installing any software on any Organization technical resource.

Involving the Organization's information technology representative ensures that the Organization can manage the software on Organization systems, prevent the introduction of computer viruses, and meet its obligations under any applicable software licenses and copyright laws. Computers issued by the Organization to employees are the sole possession-property of the Organization and as such are subject to inspection and monitoring at all times. Employees surfing the Internet and/or introducing a computer virus or other destructive or nuisance software will be subject to discipline up to and including termination of employment.

7. Employee Responsibilities

Each employee is responsible for the content of all text, audio, or scanned images that they place access or send over the Organization's technical resources. Employees may access only files or programs, whether computerized or not, that they have permission to enter or access.

Because all work areas may be subject to frequent client visitations, all client records must be kept in a discrete manner and not subject to viewing by the public or other Organization staff with no direct responsibility relative to the applicant's records.

Violations of any guidelines in this policy may result in disciplinary action up to and including termination.

D. Health and Safety

The health and safety of employees and others on the Organization property are of critical concern to Organization. The Organization strives to attain the highest possible level of safety in all activities and operations. The Organization also intends to comply with all health and safety laws applicable to its business.

To this end, the Organization must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees should be conscientious about workplace safety, including proper operating

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methods and known dangerous conditions or hazards. The employee must report any unsafe conditions or potential hazards to their supervisor immediately (or if immediate reporting is not possible, as soon as possible); even if they believe the problem has been corrected. If an employee suspects a concealed danger is present on the Organization's premises, or in a product, facility, piece of equipment, process, or business practice for which Organization is responsible, it must be brought to the attention of the supervisor or any available manager immediately (or if immediate reporting is not possible, as soon as possible).

Periodically, the Organization may issue rules and guidelines governing workplace safety and health. All employees should familiarize themselves with these rules and guidelines as strict compliance will be expected. Employees may contact their supervisor for copies of current rules and guidelines. Failure to comply strictly with rules and guidelines regarding health and safety or negligent work performance that endangers health and safety will not be tolerated.

Any workplace injury, accident, or illness must be reported to the designated safety coordinator or any available manager as soon as possible, regardless of the severity of the injury or accident. If medical attention is required immediately, the safety coordinator or any available manager will assist employees in obtaining medical care, after which the details of the injury or accident must be reported.

Evacuation drills are scheduled periodically throughout the year. These drills are a critical element of employee safety. Complete cooperation during these drills is required.

In the event of an emergency, employees should immediately contact any manager and the Administrator/[Human Resources Generalist](#) for their location. Emergencies include all accidents, medical situations, bomb threats, other threats of violence, and the smell of smoke. Nevertheless, in cases where the employee is in imminent danger of harm or injury, or where otherwise appropriate, the employee should first evacuate to safety before contacting the appropriate authorities, such as 911. If employees are unable to evacuate during an emergency, they should contact 911.

When events warrant an evacuation of the building/offices, the employee should follow the instructions of management or appropriate law enforcement or safety authorities. In cases of imminent danger of harm or injury, the employee should evacuate to safety immediately without waiting for instructions. Leave the building in a brisk and orderly manner and, if possible, assemble at the designated meeting place to await further instructions or information. If the employee is able to do so without endangering the employee or others, the employee should help evacuate physically disabled persons needing assistance. In the case of fire or smoke when on upper levels, use stairways to exit the premises. Do not use elevators.

Should an emergency result in the need to communicate information to employees outside of business hours, management will be responsible for organizing that effort. The employee should keep their personal contact information up to date by advising the Administrator/[Human Resources Generalist](#) or the CEO/COO or equivalent management official whenever their information changes.

Please also note: employees are expected to comply with all local, state, and national health and safety rules. During a pandemic or other widespread health emergency, employees are expected to comply with any and all applicable health requirements, including, by way of example only, wearing masks or other face coverings, and observing cleaning and disinfecting rules and requirements.

E. Smoking Policy

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Employees, applicants, vendors, and other guests are not allowed to smoke in or immediately near Organization facilities at any time. Smoking is not allowed in applicant areas, Organization vehicles, or in restrooms. [For purposes of this policy, “smoking” includes the use of cigarettes and other tobacco products, as well as vaping.](#)

F. Solicitation and Distribution of Literature

In order to ensure efficient operation of the Organization’s business and to prevent annoyance to employees, it is necessary to control solicitation and distribution of literature and the sale of out-side products and services on Organization property.

No employee shall solicit or promote support for any cause or organization during their working time or during the working time of the employee or employees at whom such activity is directed.

Under no circumstances will non-employees be permitted to solicit or to distribute written material or to sell any product or service on Organization property.

G. Housekeeping

All employees are expected to keep their work areas clean and organized. Common areas such as lunchrooms, restrooms, workshop, etc., are to be kept clean and safe by those using them. Please clean up after meals and dispose of trash properly.

H. Telephone Use

Telephones are a vital part of the Organization’s business as they are used to regularly conduct business. [Personal use of the telephone should be limited to emergencies and unusual circumstances During working time, personal use of the telephone should be limited to emergencies and unusual circumstances.](#) Chronic misuse of Organization telephone lines may subject the violator of this policy to discipline up to and including termination of employment.

V. *BENEFITS*

A. Holidays

The following paid holidays are observed each calendar year:

- New Year’s Day
- Martin Luther King Jr. Day
- President’s Day
- Memorial Day
- Juneteenth
- Independence Day
- Labor Day
- Nevada Day
- Veterans Day
- Thanksgiving Day
- Family Day (Day after Thanksgiving)
- Christmas Day

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Usually when a holiday falls on a Saturday, it will be observed on the preceding Friday. When a holiday falls on a Sunday, it will be observed on the following Monday.

To be eligible for holiday pay, an employee must work the regularly scheduled working days immediately preceding and immediately following the holiday. PTO and other authorized absences are considered time worked for the purpose of determining eligibility for payment of holiday pay, but they are not considered time worked for purposes of calculating overtime.

B. Paid Time Off (PTO)

Regular full-time employees and part-time employees working at least 30 hours per week are eligible to accrue PTO. This does not apply to temporary employees. Employees accrue PTO at a rate of 4 hours per week for each bi-weekly pay period actually worked beginning at the start of the first pay period after completing 30 days of employment ~~at 4 hours per week~~. Eight (8) hours of PTO per pay period is equal to approximately 23 paid days for each year of employment, dependent upon start date of employment. Accrued PTO not used during each year of employment may be carried forward to the following year of employment. Employees may carry over no more than 240 hours of PTO not used during each year of employment. Hours in excess of 240 will be calculated through the last pay period prior to the anniversary date. Once that accrual cap is reached, no further PTO will accrue until the employee uses accrued PTO so as to bring the amount of accrued, unused PTO below the accrual cap.

PTO is available only for the hours accrued as of the prior payroll period. Borrowing against PTO to be accrued in the future is not permitted. PTO requests must be approved in advance by the employee's supervisor and the CEO/COO or equivalent management official. Depending upon Organization needs and business requirements, PTO may be denied at management's discretion.

NAHAC believes that PTO should be used for rest, relaxation, and recreation. For that reason, employees (including exempt employees and hourly employees) who are using PTO are expected to refrain from doing any work during their PTO. This includes refraining from reviewing or responding to emails and voicemail messages. Employees may not perform work while on PTO without the advanced approval of their supervisor. If employees perform any work during their PTO, they are required to report this to their supervisor immediately to ensure the accuracy of timecards/sheets and paystubs. For exempt employees who perform work during their PTO, the exempt employee will be paid their full salary for the day. Separate and apart from the salary to be paid to the exempt employee, a deduction may also be made from the employee's accrued PTO bank as follows: if the exempt employee works 4.00 hours or less while on PTO, then 4.00 hours will be deducted from the employee's PTO bank. If the exempt employee, while on PTO, works more than 4.00 hours in a day, then no deduction will be taken from the employee's PTO bank. Non-exempt employees who perform work during PTO will be paid for the full amount of time actually worked, and their PTO balance will be deducted for the remainder of the PTO day.

Where non-exempt employees arrive late to work or ~~leaves~~ leave early, the Organization reserves the right to deduct the amount of the late arrival or early departure from the employee's accrued, unused PTO. Unless excused, late arrivals, early departures, or other failure to report to work as scheduled may result in disciplinary action up to and including termination of employment.

~~Non-exempt employees who have accrued, unused PTO available, and who arrive late or leave early from work, may also elect to apply PTO time to the time missed from work.~~

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Abuse of the PTO system, and/or failure to report time worked may be grounds for discipline, up to and including termination.

An employee who terminates employment will be paid for unused PTO accrued through the last completed pay period. Employees on unpaid leave will not accrue PTO except as otherwise required by law. Employees will be permitted to cash out a minimum of 40 hours and a maximum of 80 hours of PTO one time per year of employment. ~~This does not apply to hours that must be cashed out in excess of the annual maximum of 240 hours, as discussed above.~~ After the calculation of a cash out, there must be a remaining balance of at least 40 hours. Employees are required to submit the completed PTO cash out form to their supervisor and the CEO/COO or equivalent management official. The request is subject to approval. PTO cash out will be permitted for time earned and not for future accrued hours. Employees must allow up to two pay periods before the cash out will be issued. PTO cash out will be disbursed during a regular payroll cycle. PTO cash out will not be included as wages or time worked when determining applicable overtime rates.

C. Insurance

The Organization offers a competitive insurance plan for all its-eligible regular full-time employees. Coverage commences on the 1st day of the month after completion of 60 days of employment. Employees may elect to enroll their eligible dependents for group coverage. For regular full-time employees, the Organization contributes 100% of the cost for single coverage of the employee only for major medical, dental, vision, long-term disability, and basic group term life. In addition, for regular full-time employees, the Organization contributes the following percentages for dependent or family coverage for major medical only, excluding ancillary medical benefits such as dental, vision, long-term disability and basic group term life: 75% for spouse and 50% for children. Employees are responsible for paying the balance through payroll deduction. Employees on approved unpaid leaves of absence are responsible for paying the full cost of coverage (the normal employee share plus the normal employer share) unless otherwise required by law. Where applicable, coverage may terminate if the employee does not pay the full cost of coverage to the Organization within 30 days of it being due.

Employees may adjust coverage during open enrollment periods or upon a change in family status. The open enrollment period is decided by the Organization. Family status changes include marriage, divorce, death of a spouse or child, birth or adoption of a child or termination of employment of a spouse or registered domestic partner. In the event of any conflict between this policy and the terms and conditions of any health insurance plan or summary plan description, the terms of the plan or summary plan description will control.

D. COBRA

If the organization is eligible, an employee may be entitled to continue insurance coverage under the federal Consolidated Omnibus Budget Reconciliation Act (COBRA) upon termination of employment, as well as for other “qualifying events”. For more information please contact the Administrator/Human Resources Generalist.

The Administrator/Human Resources Generalist will notify individuals of their right to elect COBRA continuation coverage, if eligible. In the event of divorce, legal separation, or a child’s loss of dependent status, the employee or a family member must notify the Administrator/Human Resources Generalist within 60 days of the event. The Organization will supply the documents to apply for COBRA coverage.

E. Leaves of Absence

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The Organization may approve leaves of absence for various reasons, including those outlined in this section. In most cases, leaves of absence are unpaid and require that Employees exhaust all available PTO prior to commencing a leave of absence. Employees on a leave of absence will not accrue PTO unless otherwise required by law.

Leaves of absence may affect an Employee's eligibility to continue coverage under various benefit insurance plans. It is important that Employees requesting a leave of absence understand how the leave of absence may affect benefit eligibility and the costs of such coverage. Employees should address any questions with the Organization as soon as possible when a need for a leave of absence arises.

An Employee on a leave of absence who is enrolled in the Organization's health insurance plan may remain covered under that plan for up to three months. At the end of three months, if the Employee has not returned to work, coverage under the Organization's health insurance plan will terminate unless otherwise required by law. In the event of any conflict between this Handbook and the health insurance plan agreements and summary plan descriptions, the insurance agreements and summary plan descriptions shall control.

If an Employee is enrolled in coverage for life, disability, dental, or vision insurance benefits and the Employee is too sick or too injured to continue working, such coverage may continue during a leave of absence, however, the amount of time an Employee may remain covered varies and is subject to change based on different insurance policies. Except where otherwise required, unpaid leave for reasons other than being too sick or too injured to work will result in termination of coverage under life, disability, dental, and vision insurance policies when the unpaid leave begins.

Employees on an unpaid leave of absence are responsible for paying the full amount of the cost of coverage/premiums (the normal employee share of coverage plus the normal employer share) for any coverage that continues during an unpaid leave of absence, unless otherwise required by law. Because there will be no payroll deduction during an unpaid leave of absence, Employees must make separate arrangements with the Organization to pay those costs. Failing to pay the cost of coverage within 30 days of when a payment is first due may result in termination of that coverage.

1. Medical Leave

The Organization provides reasonable accommodations for individuals with known disabilities to enable such employees to perform the essential functions of their positions and provided that such accommodations would not impose an undue hardship on the Organization and do not constitute a risk of harm to the employee or others. Such reasonable accommodations may, in appropriate circumstances, include an unpaid leave of absence.

If an employee requires a leave of absence, they must inform the Administrator/[Human Resources Generalist](#) and the CEO/COO or equivalent management official at least 30 days in advance where possible. Otherwise, the employee must provide notice as soon as possible. The amount of leave granted will depend on the circumstances. Except as otherwise required by law, employees who take unapproved leave, or who fail to return promptly to work following an approved leave of absence, will be considered to have voluntarily resigned their employment.

Upon return from leave, the employee may be required to submit a return to work authorization from the employee's medical provider. Medical leave is generally unpaid absent use of accrued PTO.

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Depending on the circumstances, long-term and short-term disability benefits may also be available. The Organization may require an employee to utilize accrued PTO for disability leave except as otherwise required by law. Employees on leave will not accrue PTO or other benefits.

2. Pregnancy Disability Leave

The Organization provides reasonable accommodations to employees needing accommodations due to pregnancy, childbirth, or related medical condition, provided that such reasonable accommodations do not impose an undue hardship on the organization or create a direct threat of harm to the employee or others. For purposes of this policy, the phrase “pregnancy, childbirth, or related medical condition” includes any physical or mental condition intrinsic to pregnancy or childbirth, including, without limitation, pregnancy, childbirth, lactation or the need to express breast milk for a nursing child, mastitis or other lactation-related medical condition, gestational diabetes, pregnancy-induced hypertension, preeclampsia, post-partum depression, loss or end of pregnancy, and recovery- from loss or end of pregnancy.

Employees needing reasonable accommodation due to pregnancy, childbirth, or related medical condition should contact the Administrator/[Human Resources Generalist](#) and the CEO/COO or equivalent management official. The Organization will work directly and interactively with the employee in an attempt to find an appropriate and acceptable reasonable accommodation that does not pose an undue hardship on the Organization. Such accommodations might include, depending on the circumstances, a leave of absence (either continuous or intermittent), reasonable break time and a private and shielded location for an employee to express breast milk for her nursing child for one year after the child's birth each time such employee has need to express the milk, or other accommodation. Leaves of absence may also be available under other policies.

The Organization may, under certain circumstances, require documentation from the employee's health care provider as part of this interactive process. The Organization will not discriminate or retaliate against any employee or applicant due to that individual requiring, requesting, or using a reasonable accommodation under this policy.

3. Reasonable Accommodations for Disabled Employees

The Organization does not discriminate against qualified individuals with disabilities regarding application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions, and privileges of employment. In addition, the organization will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to the Organization. Contact the Administrator/[Human Resources Generalist](#) and the CEO/COO or equivalent management official with any questions or requests for accommodation.

The Organization may, under certain circumstances, require documentation from the employee's health care provider as part of this interactive process. The Organization will not discriminate or retaliate against any employee or applicant due to that individual requiring, requesting, or using a reasonable accommodation under this policy.

4. Bereavement Leave

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In the event of a death in an employee's immediate family, the employee may request bereavement leave for up to five (5) working days, ~~with pay~~, to handle family affairs and attend any memorial services. Immediate family is defined as: father, mother, sister, brother, spouse, child, mother-in-law, father-in-law, grandparents, grandchildren, nieces, nephews, sisters-and-brothers-in-law, and registered domestic partners. Of the five (5) days available for bereavement leave, three (3) of those days will be with pay; all remaining days are without pay. PTO may be used for additional requested time off for bereavement. The Organization reserves the right, in appropriate circumstances, to request a copy of an obituary, funeral program, or other proof of bereavement in connection with granting time off under this policy.

5. Personal Leave

A leave of absence without pay for up to ten (10) days may be granted at the discretion of the CEO/COO or equivalent management official. Requests for personal leave should be limited to unusual circumstances requiring an extended absence. Unless otherwise required by law, employees must exhaust available PTO balances before commencing an unpaid personal leave of absence.

The Organization does not guarantee reinstatement following a personal leave. However, the Organization may offer employees returning from a personal leave of absence the same position or comparable position that the individual is qualified to perform, if a position is available.

6. Military Leave

The Organization adheres to the "Uniformed Services Employment and Re-Employment Rights Act of 1994 (USERRA)." Requests for information concerning a Military Leave should be made to the Administrator/~~Human Resources Generalist~~. Employees are not required to exhaust PTO before going on Military leave.

7. Jury Duty or Witness Leave

The Organization encourages employees to serve on a jury or as a witness in a court proceeding, deposition, or administrative hearing when called (if the Employee is not a party to the action). An Employee will be given civil leave with pay for up to five days of service on a jury or up to one full day for service as a witness. At its sole discretion, the Organization may approve additional paid leave if the Employee is required to serve on a jury or appear as a witness beyond these amounts (and additional unpaid leave is available for longer jury duty or witness duties). Employees should notify their supervisor of the need for time off for jury duty or service as a witness as soon as notice or summons from the court or subpoena is received, but must do so at least three days before the Employee's required appearance. Employees must provide a copy of a valid notice of summons or subpoena to their supervisor. Jury duty or witness leave does not affect PTO, and Employees are not required to exhaust PTO as part of such leave.

8. Time Off for Voting

If an employee is unable to vote in a statewide public election, or if it is impracticable to vote in such an election before or after working hours, then time off may be requested to go to the polls. The

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length of paid time that the Organization will provide depends on the distance to the polling location but generally will not exceed two-three hours. Any additional time off will require use of PTO or will be unpaid. Requests Time off for voting time must be approved in advance by the employee's supervisor and the CEO/COO or equivalent management official.

9. Recreational Activities and Programs

Unless required by law, the Organization and its insurer will not be liable for the payments of workers' compensation benefits for any injury that arises out of the employee's voluntary participation in any off-duty recreational, social, or athletic activity that is not a part of the employee's work-related duties.

10. Leave for Domestic Violence or Sexual Assault~~Domestic Violence~~ Victims

Employees who are victims of domestic violence or sexual assault~~domestic violence~~, or whose family or household member is a victim of domestic violence or sexual assault~~domestic violence~~, may be eligible to receive an unpaid leave of absence: (1) for the diagnosis, care or treatment of a health condition related to the act of domestic violence or sexual assault ~~domestic violence~~ committed against the employee or family or household member; (2) to obtain counseling or assistance related to the act of domestic violence or sexual assault ~~domestic violence~~ committed against the employee or family or household member; (3) to participate in any court proceedings related to the act of domestic violence or sexual assault~~domestic violence~~; or (4) to establish a safety plan.

Leave may be used concurrently or intermittently and may be deducted from other applicable leaves. The amount of unpaid leave to be provided is generally up to 160 hours and must be used within twelve months immediately following the domestic violence or sexual assault~~domestic violence~~. Additional leave may be provided where appropriate. Employees may choose to use any accrued PTO for this leave.

While the Organization acknowledges that advanced notice may not always be possible, it requests that employees requiring leave provide at least 48 hours advanced notice if possible. An employee who has taken leave and seeks to take additional leave must, absent extraordinary circumstances, provide the Organization with at least 48 hours advance notice of the need for additional leave.

The Organization will provide reasonable accommodations (that will not create an undue hardship) to an employee who is a victim of domestic violence or sexual assault~~domestic violence~~, or whose family or household member is a victim of domestic violence or sexual assault~~domestic violence~~, as necessary to ensure the safety of the employee, the workplace, the employer or other employees. Employees needing reasonable accommodations should contact their supervisor or any member of management and may be required to submit appropriate documentation. If the accommodation is no longer necessary, the employee must inform the employee's supervisor or any member of management as soon as possible.

The Organization will not discriminate or retaliate against employees on the basis that they are victims of domestic violence or sexual assault~~domestic violence~~, have family or household members who have been the victim of domestic violence or sexual assault~~domestic violence~~, serve as a

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witness or interested party in court proceedings relating to an act of [domestic violence or sexual assault](#) ~~domestic violence~~ triggering the use of leave under this policy, or who request or use leave or other reasonable accommodations under this policy.

VI. PAYROLL/ACCOUNTING

A. Timekeeping Procedures

All employees are required to submit timecards/sheets that document all hours worked and absent during the standard work schedule. [All hourly personnel are required to utilize the designated timekeeping systems, which may include timeclock and electronic timecards/timesheets.](#) ~~Employees~~ All employees must submit timecards/sheets that document [absences for partial and full days](#) ~~of absence (PTO)~~ during the standard workweek. The employee must submit timecards/sheets in accordance with timecard/sheet submission deadlines to avoid delays in paycheck processing. Timecard/sheet deadline is currently on Monday at 9:00 a.m. on payday week.

Any exempt, salaried employee is not required to clock in or out as they are set for a full-time schedule automatically (with “full-time” meaning the amount of time that is required to perform their duties and responsibilities in full). Generally, employees are expected to be available during the Organization’s regular business hours, which are 8:00 a.m. to ~~5:00-30~~ p.m. [Monday through Friday.](#) If in the event the salaried employee takes PTO, then they will have to turn in the form to get approved and place it in the timekeeping system.

Timecards/sheets will be approved by the individual supervisor or another manager in the absence of the supervisor.

All employees working on multiple programs or on both program and non-program activities must allocate their time between such programs or between program and non-program time. These allocations should be submitted in form and substance as indicated by management in order to maintain compliance [with](#) relevant ~~with~~ laws, regulations, and agreements. Such allocations are required to be submitted by both hourly and salaried employees at least bi-weekly, unless otherwise directed.

B. Overtime

Overtime will be paid at one and one-half times the regular rate for non-exempt employees working more than 40 hours in a workweek (or as otherwise required by law). PTO, holidays, or unpaid absences are not considered time worked for overtime purposes.

Employees who anticipate the need for overtime to complete the week’s work must notify the supervisor in advance and obtain approval before working hours that extend beyond their normal schedule. During busy periods, employees may be required to work extended hours.

***NOTE: All overtime must be authorized by a supervisor in advance. Working unauthorized overtime could result in discipline, up to and including termination of employment.**

C. “Off-the-Clock” Work Prohibited

Nonexempt employees must report all time worked on their timecard/sheet. Off-the-clock work is prohibited and failure to accurately record working time is grounds for discipline up to and including termination of employment. Supervisors may not require or allow employees to engage in off-the-clock work.

D. Payment of Wages

All employees are paid bi-weekly. Any errors or discrepancies in an employee’s paystub should be reported immediately.

E. Payroll Advances

The Organization encourages employees to use their banking institutions or other sources whenever loans are needed. Any advance against future earnings will not be permitted.

F. Wage Garnishments

Garnishment of wages results when an unpaid creditor has taken the matter to court. A garnishment is legal permission for creditors to collect part of an employee’s pay directly from the Organization. The Organization is compelled by law to administer the court’s orders. In doing so, management will contact the employee to explain the details of the garnishment and how it affects wages. Employees are encouraged to resolve these matters privately to avoid the Organization’s involvement. However, the Organization will adhere to legally imposed wage assignments and garnishments and will not modify the terms of those legal arrangements unless ordered by a court to do so.

ACKNOWLEDGMENT AND AGREEMENT

This is to acknowledge that I have received a copy of NAHAC's ("the Organization") Employee Handbook and understand that it sets forth the terms and conditions of my employment as well as the duties, responsibilities, and obligations of my employment with the Organization. I understand and agree that it is my responsibility to read the Employee Handbook and to abide by the rules, policies and standards set forth in the Employee Handbook.

I also acknowledge that my employment with the Organization is not for a specified period of time and can be terminated at any time for any reason, with or without cause or notice, by me or by the Organization. I acknowledge that no oral or written statements or representations regarding my employment can alter the foregoing. I also acknowledge that no supervisor or employee has the authority to enter into an employment agreement – express or implied – providing for employment other than at-will.

I also acknowledge that, except for the policy of at-will employment, the Organization reserves the right to revise, delete or add to the provisions of this Employee Handbook. All such revisions, deletions, or additions must be in writing and must be approved by the Board of Directors. No oral statements or representations can change the provisions of this Employee Handbook. I also acknowledge that, except for the policy of at-will employment, the terms and conditions of employment with the Organization may be modified at the sole discretion of the Organization with or without cause or notice at any time.

I understand that the foregoing agreement concerning my at-will employment status and the Organization's right to determine and modify the terms and conditions of employment is the sole and entire agreement between me and the Organization concerning the duration of my employment, the circumstances under which my employment may be terminated, and the circumstances under which the terms and conditions of my employment may change. I further understand that this agreement supersedes all prior agreements, understandings, and representations concerning my employment with the Organization.

Individual Classification: ☐ Employee ☐ Officer/Director ☐ Contractor/Vendor
Classification: ☐ Regular Employee ☐ Temporary Employee

Name

Employee Handbook

Organization (if other than NAHAC) Temporary Agency (if applicable)

Signature

Date

Original to be placed in appropriate file for individual (personnel or temporary employee, officer/director, or contractor/vendor file) with a copy to be placed in the file for a scheduled training, if applicable.

PAYROLL AND TIME TRACKING

Policy Area: Payroll and Human Resources	Number: 500.E
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To ensure employees receive accurate, complete, and timely payment of compensation which is adequately supported by appropriate documentation, and which follows an appropriate control structure.</p> <p>POLICY:</p> <p>Employees are paid on a Bi-Weekly basis and will be processed through a third-party provider. For all hourly employees, <u>timecards/sheetstime sheets</u> shall be completed, reviewed, and approved to support all time spent on behalf of NAHAC. Employee time tracking shall be tracked to include time worked, holidays, leave taken, and benefits. Non-exempt employees are expected to accurately and fully report all time worked. All time shall be appropriately allocated to NAHAC programs based on actual time spent on each program. For salaried employees, time allocations shall be estimated based on a reasonable estimate of time spent based on industry standard estimation methods. Additions, deletions, or changes to the payroll or human resource related functions shall follow the guidelines established in the Payroll and HR authorization matrix.</p> <p>Non-exempt employees are required to complete their own <u>timecards/sheetstimesheets</u> and are not permitted to complete or alter time records on behalf of another employee. Any discrepancies on an employee's paystubs should be reported immediately. Falsification of pay records is grounds for disciplinary action, up to and including termination of employment.</p> <p>RESOURCES:</p> <p>Appendix VII – Authorization Matrix – Payroll and HR</p>	

REPORTING OF WORK RELATED INJURY & ANNUAL SAFETY TRAINING

Policy Area: Payroll and Human Resources	Number: 500.F
Initial Effective Date: 09-02-2016 Revised Policy Effective Date: 12-02-2019 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 09-02-2016 Revision – Date Approved: 12-02-2019 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC strives to provide a safe and secure working environment for all employees. However, when a work-related injury or illness occurs (i.e. injuries and illnesses that arise out of, or are incurred in the course of job-related activities on behalf of NAHAC), NAHAC shall provide <u>access to</u> appropriate medical care and treatment to the injured worker through its Workers’ Compensation program. This policy applies to all employees, Board Members, and where applicable, certain independent contractors (“collectively, Covered Individuals”).</p> <p>POLICY:</p> <p>NAHAC will ensure that Reporting of Work Related Injury Notification exists which will, at a minimum, require any Covered Individual to disclose any possible injury in a timely manner and to provide Covered Individuals with appropriate steps to report an injury. A timely manner means that Covered Individuals should report the injury or illness immediately where it is feasible to do so, and where immediate reporting is not feasible, then timely reporting means that the Covered Individual shall report the illness or injury as soon as he or she is able.</p> <p>NAHAC will ensure that the notification is kept up to date and that it is in compliance with applicable laws and regulations. In addition, employees should receive safety training at least annually and provide an acknowledgement of their understanding of the procedures for reporting work related injuries. NAHAC does not tolerate any retaliation toward individuals who file Workers’ Compensation claims pursuant to this policy. Engaging in retaliatory acts may result in appropriate discipline, up to and including termination of employment.</p> <p>RESOURCES:</p> <p>Appendix VIII – Reporting Work Related Injury Notification and Acknowledgement</p>	

TELEWORKING – CONTRACTORS

Policy Area: Payroll and Human Resources	Number: 500.G
Initial Effective Date: 04-27-2020 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 04-27-2020 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC does not control how and in what manner independent contractors perform work for NAHAC. Rather, NAHAC is only concerned with the outcome of the work for which the independent contractor is retained.</p> <p>While NAHAC does not seek to exert control over Contractor’s method of work, it remains imperative that NAHAC’s non-public, confidential, and otherwise sensitive data be preserved. For that reason, Contractor and NAHAC agree that during any period of time in which Contractor performs work away from NAHAC’s offices that involve access to or use of NAHAC computer systems or data (including non-public, confidential, and/or otherwise sensitive data), the following will apply.</p> <p><i>Workspace:</i></p> <p>It is NAHAC’s expectation that Contractor will implement whatever measures Contractor deems necessary to create an appropriate work environment that is maintained in a safe condition, free from hazards or other dangers to the person and to NAHAC data and equipment. Contractor agrees that Contractor alone bears the responsibility for determining what measures should be implemented to achieve a safe and appropriate remote work environment.</p> <p><i>Communication:</i></p> <p>During any periods in which NAHAC employees are working remotely due to an office closure, national pandemic, or other special circumstance, NAHAC requests that any communications that are necessary for Contractor to perform the services for which Contract was retained (“Services”) occur via electronic meetings and telephone conferences in lieu of in-person meetings.</p> <p><i>Equipment and Other Resources:</i></p> <p>While it generally expected that Contractor will provide Contractor’s own equipment in performing the Services, in the event that equipment or other resources are provided by NAHAC (“NAHAC Resources”), these NAHAC Resources are to be used for NAHAC business purposes only. NAHAC Resources should not be made accessible to third parties. Anyone to whom NAHAC grants access to NAHAC Resources is expected to demonstrate proper care when using NAHAC Resources. If NAHAC Resources are lost, broken, or damaged in any way, this should be reported to NAHAC immediately. Upon termination of Contractor’s Services, all NAHAC Resources, as well as any organization data, information, and/or other property of NAHAC, must be returned to NAHAC immediately, unless other arrangements have been made.</p>	

Security and Data Protection:

Contractor is expected to ensure the protection of non-public NAHAC information while telecommuting. While it is Contractor's responsibility to determine what specific measures are necessary to ensure the protection of such information, in general, such security measures should include the use of physical locks to secure the workspace (where possible), regular password maintenance, protection of login credentials to prevent unintended access, standards for the transmission of public, sensitive, and private data as outlined in Section 2 (Asset Protection) of NAHAC's Information Security and Safeguards Program ("ISSP"), and any other measures appropriate for the environment. Additionally, Contractors should conduct themselves in a manner that is consistent with the NAHAC policy for the acceptable use of NAHAC information assets in their care, as outlined in Section 5 (Acceptable Use) of the ISSP. Data should not be shared and should be safeguarded from outside sources, including family and friends. Contractor is encouraged to refer to the ISSP for additional information regarding the security and protection of information.

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TELEWORKING – CONTRACTORS ACKNOWLEDGMENT

I acknowledge that I have received and reviewed a copy of the Teleworking – Contractors Policy.

I understand and agree to the terms and conditions set forth in the Teleworking – Contractors Policy.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Teleworking – Contractors Policy, and any concerns that I may have.

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Contractor.

Individual Classification: ☒ Contractor ~~Vendor~~

Name

Organization *(if other than NAHAC)*

Signature

Date

Original to contractor ~~vendor~~ file. Copy to training file, if applicable.

TELEWORKING – EMPLOYEES AND TEMPORARY WORKERS

Policy Area: Payroll and Human Resources	Number: 500.G
Initial Effective Date: 04-27-2020 Revised Policy Effective Date: 07-27-2022 <u>Revised Policy Effective Date: TBD</u>	Initial Approved Date: 04-27-2020 Revision – Date Approved: 07-27-2022 <u>Revision – Date Approved: TBD</u>
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To provide for a work arrangement that allows NAHAC employees and temporary workers to work from home for all or some of their regularly scheduled work hours when circumstances dictate. Although not all jobs can be performed satisfactorily from other locations, NAHAC recognizes that, in some cases, telecommuting arrangements can provide a mutually beneficial option for NAHAC and its employees.</p> <p>POLICY:</p> <p>It is the policy of NAHAC to allow eligible employees and temporary workers to telework on a temporary or permanent basis at the discretion of the CEO/COO or equivalent management official. Such arrangements should be for a valid business purpose, including local or national emergencies, inclement weather, medical purposes, or other purposes as approved by the CEO/COO, or equivalent management official. In the absence of the CEO/COO, or equivalent management official, such arrangements should be approved by the Board Chair.</p> <p>The granting of a telework arrangement during an emergency, such as a global health pandemic, or any other temporary telework arrangement, is not an indication that a position is suitable for a permanent teleworking arrangement. Particularly where an employee is responsible for the direct, day-to-day supervision of other employees, <u>or where the employee's duties involve meeting directly with homeowners</u>, both temporary and permanent telework arrangements may not be appropriate to allow the employee to fulfill all essential job functions. Any questions about whether a position is suitable for either a temporary or permanent telework arrangement should be directed to the CEO/COO or equivalent management official.</p> <p>All telework arrangements should adhere to the following guidelines:</p> <p><i>Compensation and Work Hours:</i></p> <p>Compensation, benefits, work status, work responsibilities, or amount of time expected to be worked each day or pay period will not change due to participation in a telework arrangement. Employees are expected to work during their normal scheduled work hours. Any deviations from normal scheduled work hours should be approved by the CEO/COO, or equivalent management official. Exempt salaried employees are expected to continue to dedicate the amount of hours that, in their judgment, is necessary to ensure that all job duties are fulfilled. This may, for example, require that such employees work outside of normal work hours. Hourly employees and temporary workers must <u>notify</u></p>	

~~designated personnel send an email to all personnel for of~~ the times they start and stop working, including any breaks in work hours. For non-exempt employees, all time spent working should be recorded on ~~timecards/sheetstimecards~~, and conversely,

time spent on non-work related matters should not be recorded or claimed as working time.

Workspace:

Employees and temporary workers should establish an appropriate remote work environment that is free from distraction, as much as possible, and dedicate their full attention during normal scheduled work hours. The remote workspace should be maintained in a safe condition, free from hazards or other dangers to the person and to NAHAC equipment.

Communication:

~~Absent special circumstances, in-person meetings are to be replaced with electronic meetings and telephone conferences. All email correspondence (both internal and external) should include (via CC) the person's direct supervisor and CEO/COO, or equivalent management official, as directed. All employees and temporary workers should have a phone call at least daily with their direct supervisor or the CEO/COO or equivalent management official.~~

Equipment and Other Resources:

The organization will provide specific equipment and other resources for those who are teleworking to perform their current duties, as determined by the CEO/COO, or equivalent management official. This equipment and other resources may include hardware, computer software, email, connectivity to host applications, and other applicable equipment or supplies, as deemed necessary by management. These resources are to be used for NAHAC business purposes only, and access to such resources should be limited to use by the designated individual. Personal devices or accounts should not be used to conduct NAHAC business, or access or store non-public NAHAC data, unless authorized in writing by the CEO/COO, or equivalent management official. NAHAC resources should not be made accessible to others not employed or expressly authorized by NAHAC. Individuals who are teleworking are expected to demonstrate proper care when using NAHAC equipment and other resources. If equipment or other resources are lost, broken, or damaged in any way, it should be reported to management immediately. Upon termination of employment, all organization data, information, and property must be returned to the organization immediately, unless other written arrangements have been made. Individuals should refer to the Employee Handbook for additional information regarding use of NAHAC property and other resources.

Security and Data Protection:

Consistent with the expectations of information security for employees and temporary workers working at the office, telecommuting employees will be expected to ensure the protection of non-public information while telecommuting. Such security measures should include the use of physical locks to secure the remote workspace (where possible), regular password maintenance, standards for the transmission of public, sensitive, and private data as outlined in Section 2 (Asset Protection) of the Information Security and Safeguards Program ("ISSP"), and any other measures appropriate for the environment. Additionally, telecommuting employees must adhere to the NAHAC policy for the acceptable use of NAHAC information assets in their care as outlined in Section 5 (Acceptable Use) of the ISSP. Data should not be shared and should be safeguarded from outside sources, including

family and friends. Employees and temporary workers should refer to the ISSP for additional information regarding the security and protection of information.

TELEWORKING – EMPLOYEES AND TEMPORARY WORKERS ACKNOWLEDGMENT

I acknowledge that I have received and reviewed a copy of the Teleworking – Employees and Temporary Workers Policy.

I understand and agree to the terms and conditions set forth in the Teleworking – Employees and Temporary Workers Policy.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Teleworking – Employees and Temporary Workers Policy, and any concerns that I may have.

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Employee, and do not affect the employment-at-will status of the Employee.

Individual Classification: ☐ Employee ☐ Officer/Director ☐ Contractor/Vendor

Classification: ☐ Regular Employee ☐ Temporary Employee

Name

Temporary Agency (if applicable) Organization (if other than NAHAC)

Signature

Date

Original to be placed in appropriate file for individual (personnel, ~~officer/director, or contractor/vendor or temporary employee~~ file) ~~with a copy to be placed in the file for a scheduled training, if applicable.~~

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CODE OF ETHICS, CONFLICTS OF INTEREST, AND BUSINESS CONDUCT GUIDELINES

Introduction

The purpose of these guidelines ("Code") is to ensure that employees of NAHAC act in the best interest of NAHAC, without being partial to any particular organization or their own personal interests; devote to NAHAC their undivided loyalty and uncompromised integrity; conform to the highest standards of business ethics; and give the appearance as well as the fact of such impartiality, devotion and integrity. NAHAC expects employees to comply strictly with this Code and to exercise good judgment and reasonable prudence in carrying out NAHAC business. Different employees have different duties with respect to this code. For example,

- managers have a responsibility to foster high ethical standards in the workplace; to responsibilities for the conduct of their staff, and for making sure that their staff are aware of this code and are sensitive to ethical issues; and
- employees who make assistance decisions, and those employees who procure goods and services for NAHAC, are responsible for ensuring that those decisions reflect good stewardship of NAHAC funds, make effective and efficient use of scarce resources, and ensure that their actions do not give rise to any appearance of favoritism, personal gain or other impropriety.

Violations of this policy will result in discipline, including dismissal. Violations include, but are not limited to, withholding of information concerning unethical conduct and failure by managers to ensure that all individuals working for NAHAC are briefed on this policy.

BACKGROUND

NAHAC's mission is to provide funds, subsidies, and/or other benefits to Nevada homeowners or other targeted groups of individuals within the State of Nevada in order to assist with affordable or subsidized single or multi-family housing. NAHAC administers the Hardest Hit Fund programs and provides assistance to homeowners in Nevada in danger of losing their homes. Because NAHAC uses federal funds and is a highly visible organization, the appearance as well as the fact of impartiality is critical. At-will eEmployment is conditioned upon agreement with this code of conduct and conformance to the highest standards of business ethics in the performance of job duties.

The Code:

1. **Business Ethics.** Each employee shall act at all times with integrity and perform his or her duties in compliance with all applicable federal, state, and local laws, applicable Treasury and program guidelines, and NAHAC policies and procedures.
2. **Impropriety and Appearance Thereof.** Employees will perform their duties in an honest and

objective manner so their performance will not be challenged or impaired. If there is any doubt about whether circumstances may lead to reasonable questions regarding the impartiality of an employee, the matter must be raised with the CEO/COO or equivalent management official in advance. NAHAC relies on the integrity of its employees to avoid even an appearance of impropriety.

3. **Obligation to Refrain from Using Relationship for Personal Benefit.** Except by virtue of a good reputation derived from exceptional service to NAHAC, no employee shall seek to use his or her relationship with NAHAC for personal benefit or advancement.
4. **Conflict of Interest.** Employees shall not enter into any relationship, hold any direct or indirect outside interest, or accept outside employment that would conflict with or have the appearance of interfering or conflicting with, their corporate-job responsibilities and duties, as set forth in the following policies:
 - **Outside Board Service.** Service by any NAHAC Officer (for purposes of this Policy, the term “Officer” shall be limited to corporate officers who are employees of NAHAC) on outside boards shall be subject to advance approval by the Board of Directors. Service by non-officer employees shall be subject to written approval of the CEO/COO or equivalent management official. After receiving written approval, employees may participate on the boards of other organizations and participate in such travel, events, and meals involved in such service but shall be required to immediately seek re-approval if such service or participation reveals one or more conflicts of interest, not previously known, which may require re-evaluation of prior approvals.
 - **Ownership Interests.** No employee or member of an employee’s household (i.e., living at the same address) may acquire any ownership interest in any entity that has, or is seeking to have, a relationship with NAHAC without the prior approval of the CEO/COO or equivalent management official. Employees must make good faith, advanced disclosure consistent with this policy.
 - **Business Interests.** Employees are expected to alert the CEO/COO or equivalent management official in advance to potential conflicts of interest, not only with respect to matters directly or indirectly related to those business interests that they disclose, but also with respect to any other interest or activity that might call into question their impartiality on a given issue.
 - **Paid Outside Appearances, Outside Employment and Compensation.** While employed with NAHAC, no employee may participate in paid outside appearances or accept outside employment which is or could be perceived as a conflict of interest with NAHAC’s mission. Employees should notify the CEO/COO or equivalent management official of any outside employment or engagement that may have the potential or appearance of affecting or influencing the employee in the performance of his or her duties.

Gifts and Business Courtesies

- **Gifts.**
 - *As to ~~company~~ companies who are bidding for or seeking to do work with NAHAC:* NAHAC employees shall not accept gifts from any entity that has, or is actively seeking, a grant, contract, or agreement with NAHAC.
 - *Other circumstances:* Employees shall not accept (1) funds in any amount or (2) tangible items (including tickets to sporting or other events) that have a market value in excess of \$50.00 from any entity that does business or seeks to do business with NAHAC without approval by the CEO/COO or equivalent management official. An employee's use of his or her position at NAHAC to solicit gifts is strictly prohibited.
- **Meals and Entertainment.** NAHAC employees may not use their positions to solicit or obtain business courtesies such as meals or entertainment. Employees may accept unsolicited meals, refreshments or entertainment on an occasional basis if such courtesies are valued at less than \$50 and acceptance will promote good business relations without reflecting a pattern or appearance of impropriety from the same entities or persons.
- This policy also prohibits gifts and business courtesies that may be extended to members of an employee's household resulting from the employee's position at NAHAC. Questions regarding gifts and business courtesies should be brought to the CEO/COO or equivalent management official. Attempts to influence funding decisions must be promptly reported to the CEO/COO or equivalent management official.
- **Conditions on Post-NAHAC Employment.** ~~Employees should be mindful of the appearance of impropriety that might occur at their employment by an entity that has received NAHAC funds, is seeking to receive NAHAC funds, or who has benefited or seeks to benefit from a relationship with NAHAC.~~
- Employees shall inform the CEO/COO or equivalent management official of any active pursuit of employment with any entity (including its affiliates, employees or agents) which has, or is seeking, a beneficial relationship with NAHAC.
- ~~Managerial employees who have had substantial involvement in assistance awards or other NAHAC actions to the benefit of an outside consultant, or who exercised supervisory responsibility for such NAHAC actions, shall not be employed by such outside consultant or that consultant's affiliates, employees or agents for a period of one year following his or her employment with NAHAC without approval by the Board of Directors.~~

STEWARDSHIP

- 5. Obligation to Protect and Conserve Corporate Assets.** Each employee has a continuing obligation to protect and conserve NAHAC money, property and other resources, expending them strictly in accordance with policies adopted by the Board of Directors, and pursuant to procedures duly established by NAHAC.
- 6. Purchasing Responsibilities.** Employees responsible for NAHAC's purchase or acquisition of goods and services, as well as those involved in making discretionary grants, are responsible for using the purchasing or solicitation method best suited for the acquisition-project in question, whether via competitive bid or sole sourcing. All sole-sourcing decisions must be justified and documented.

GRANTEES AND CONTRACTORS

- 7. Grantees and Contractors.** Entities receiving discretionary grants and contracts from NAHAC shall agree to act with integrity and perform their duties in compliance with applicable Federal, state, and local laws; NAHAC contract or grant requirements and otherwise act as efficient and impartial stewards of NAHAC funds. NAHAC managers are responsible for notifying such grantees or contractors of employees' obligation to disclose their pursuit of future employment pursuant to Section 4 hereof, to encourage contractors and grantees to act in accordance with the NAHAC's ethical conduct standards.

OTHER

- 8. Campaign Contributions.** No employee may make or be reimbursed for any contributions to political parties or candidates for public office on behalf of NAHAC.
- 9. Loss of Public Confidence.** In addition to the examples set forth in this policy, each employee shall avoid any conduct that might result in the loss of public confidence in NAHAC's programs and activities, the impairment of efficiency or economy, or might reasonably give the appearance of: (a) the extension of preferential treatment to any person, group, organization, or other entity; or (b) the compromise or loss of complete impartiality of judgment and action; or (c) the making or implementation of a decision outside NAHAC's policies and procedures.
- 10. Prohibition Against Use of Confidential and Nonpublic Information.** No employee shall disclose to others, make personal use of, or permit others to make use of, any information obtained as a result of his or her employment with NAHAC. This prohibition includes information not generally available to the public or is otherwise confidential, whether for direct personal gain or for advice to others with whom he or she has family, business, financial or professional ties.
[Nothing in this provision prohibits employees from discussing wages or working conditions or otherwise engaging in protected, concerted activity under the National Labor Relations Act.](#)

- 11. Other Restrictions: For Special Circumstances, Duties, or Responsibilities.** The Board may reasonably restrict the conduct or interests of specific employees in light of special circumstances, duties, or responsibilities. Such restrictions will be transmitted to the affected individual in writing.
- 12. Notification:** Employee will be notified if it is believed they have breached any of the policies outlined in this document. Disciplinary actions will be based on the severity of the incident; this could include termination of employment.
- 13. Sharing Logins and Passwords:** Employees are prohibited from sharing logins and passwords. This conduct will result in discipline up to and including immediate termination even on the first offense.

ANNUAL ORIENTATION AND RE-CERTIFICATION.

- 14. Re-certification.** All employees will participate, at least once a year, in an orientation or training session to discuss employee compliance with this Code. Additionally, at least once a year, each employee shall submit a signed copy of the Code to be placed in their personnel file.

CODE OF ETHICS, CONFLICTS OF INTEREST AND BUSINESS CONDUCT GUIDELINES ACKNOWLEDGEMENT

I acknowledge that I have received and reviewed a copy of the Code of Ethics, Conflicts of Interest and Business Conduct Guidelines.

I understand and agree to the terms and conditions set forth in the Code of Ethics, Conflicts of Interest and Business Conduct Guidelines and related NAHAC policies.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Code of Ethics, Conflicts of Interest and Business Conduct Guidelines and related NAHAC policies, and any concerns that I may have.

By signing below, I am confirming that at present, I am not aware of any information that would indicate that I or any other employee possess a conflict of interest that I have not already disclosed in writing. *(If I cannot truthfully make such attestation, I understand that I need to immediately inform the CEO/COO or equivalent management official in writing to report the information of which I am aware, after which I will be able to truthfully make this attestation.)*

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Employee, and do not affect the employment-at-will status of the Employee.

~~Individual Classification:~~ ☐ ~~Employee~~ ☐ ~~Officer/Director~~ ☐ ~~Contractor/Vendor~~

Classification: ☐ Regular Employee ☐ Temporary Employee

Name

Title

Organization *(if other than NAHAC)*

NAHAC Manager or Witness Name

Signature

Signature

Date

Date

Original to be placed in appropriate file for individual (personnel, ~~officer/director~~temporary employee, or contractor/vendor_ file) with a copy to be placed in the file for a scheduled training, if applicable.

FRAUD MITIGATION, DETECTION, AND AWARENESS GUIDELINES

Introduction

The Nevada Affordable Housing Assistance Corporation's (NAHAC) Board of Directors has established an anti-fraud policy to enforce controls and to aid in the prevention and detection of fraud, ~~theft~~, waste, or abuse against NAHAC and its programs. This policy applies to any fraud, ~~theft~~, waste, or abuse or suspected fraud, ~~theft~~, waste, or abuse involving any employee (including management), consultant, vendor, contractor, or outside agency doing business with NAHAC or in any other relationship with NAHAC. This policy is supported and supplemented by a variety of existing policies and procedures including the Employee Handbook, the Code of Ethics; Conflicts of Interest; and Business Conduct policy, and various underwriting, accounting and reporting procedures and guidelines. These policies and procedures further provide a framework to support compliance with these guidelines.

The Board of Directors does not tolerate any type of fraud, waste or abuse. NAHAC's goal is to promote consistent, legal and ethical organizational behavior by:

- Assigning responsibility for reporting fraud, ~~theft~~ or abuse;
- Providing guidelines to conduct investigations of suspected fraudulent behavior; and
- Requiring each employee to attend annual fraud awareness training.

Failure to comply with this policy subjects an employee (including management) to disciplinary action, including immediate termination. Failure to comply by a consultant, vendor, contractor, outside agency, or person doing business with NAHAC or in any other relationship with NAHAC could result in cancellation of the business or other relationship between the entity and NAHAC. The Board of Directors will pursue prosecution if the results of an investigation indicate the possibility of criminal activity.

For purposes of these guidelines only, the term *fraud* or *fraudulent* includes ~~theft~~, waste, and abuse as defined below. The term *employee* includes employees in management and non-management positions. The term *management* includes managers, supervisors, key finance personnel, and officers of NAHAC.

Creating a Culture of Honesty and High Ethics

NAHAC has a culture of honesty, integrity and high ethics. Contributing to this are:

- A commitment from the Board of Directors to tolerate only the highest levels of honesty, integrity and ethics.
- A productive workplace environment supported by adequate compensation, benefits and protections.
- Hiring the best-qualified persons and promoting existing employees based on merit.

- Making adequate training opportunities available.
- Issuing discipline in a fair and consistent manner.

Definitions and Examples of Fraud, Waste, and Abuse

Fraud is defined as an intentional deception designed to obtain a benefit or advantage or to cause some benefit that is due to be denied. Fraud can also involve reckless misrepresentations (intent is not required – it can be intentional or unintentional).

Theft is type of fraud known as misappropriation, and is defined as the act of taking something from someone without a lawful right to possess it. An example of theft is taking home a tool or other piece of equipment belonging to NAHAC and keeping it for personal use.

While each circumstance is unique, fraud generally involves (1) a material representation, (2) that is false at the time the statement is made and (3) that is made by a speaker who knew it was false or did not have an adequate basis for claiming it was true, and (4) that is reasonably relied upon by someone who heard or received the statement.

Examples of fraud include:

- Forgery or alteration of a check, bank draft, or any other financial document;
- Theft of a check or other diversion of a client payment;
- Misappropriation of funds, securities, supplies, or other assets;
- Impropropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of NAHAC operations; and
- An employee with access to confidential client information who sells this information or uses it in the conduct of an outside business activity.

Fraud may also include a third party pretending to be NAHAC and offering, for an upfront fee, a mortgage modification/principal reduction through a federal program and no services are delivered.

Waste is the loss or misuse of NAHAC resources that results from deficient practices, system controls, or decisions. An example is not taking advantage of known early bird conference registration discounts.

Abuse is the intentional, wrongful, or improper use of resources or misuse of rank, position, or authority that causes the loss or misuse of resources such as tools, vehicles, computers, copy machines, etc. Examples of abuse include, but are not limited to:

- Using NAHAC equipment or supplies to conduct personal business; and
- An employee using ~~non-confidential~~ client information to get new customers for his/her outside business.

~~*Theft is defined as the act of taking something from someone without a lawful right to possess it. An example of theft is taking home a tool or other piece of equipment belonging to NAHAC and keeping*~~

~~it for personal use.~~

Responsibility to Report Suspected Fraud, ~~Theft~~, Waste, or Abuse

Each employee is required to report, in writing and on NAHAC's prescribed report form, any suspected fraud, ~~theft~~, waste, or abuse or other dishonest conduct. Information on how and to whom to report actual or suspected fraud, ~~theft~~, waste, or abuse can be found in the "Resources" section of www.nahac.org. Management is required to communicate any credible report of fraud, ~~theft~~, waste, or abuse or other dishonest conduct, including reports from employees or other individuals, to the NAHAC Board. The NAHAC Board and its Officers have the authority to determine the merits of a report of suspected fraud including authorizing, if necessary, an internal or external investigation and/or engaging the assistance of legal counsel. The identity of an employee or complainant who reports suspected fraud will be protected to the fullest extent allowed by law as much as possible.

Suspected improprieties and/or misconduct concerning an employee's ethical conduct should be reported in the same manner and to the same reporting entity as fraud, ~~theft~~, waste, abuse or other dishonest conduct. Note that there are many instances of prohibited actions that do not rise to the level of fraud, such as an improper relationship with a vendor. When in doubt, however, employees should err on the side of reporting.

Guidelines for Handling a Report of Suspected Fraud, ~~Theft~~, Waste, or Abuse

Once an employee makes an initial report, the reporting individual should be instructed as follows:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Allow the designated investigative body to conduct the investigation.
- In order to allow for a fair and impartial investigation, do not discuss the case, facts, suspicions, or allegations with anyone else within NAHAC unless specifically asked to do so by the investigative body, police, or NAHAC's Board of Directors.
- Retaliation will not be tolerated. NAHAC will not tolerate any form of retaliation against individuals providing information in good faith concerning fraud or suspected fraud.
- Every effort will be made to protect the rights and the reputations of everyone involved, including the individual who in good faith alleges perceived misconduct as well as the alleged violator(s).
- The identity of an employee or other individual who reports a suspected act of fraud will be protected to the fullest extent possible as provided by this policy.

An initial report made by an external party will be provided to an Officer or Director of NAHAC, or another individual designated by them. Such reports will be investigated, and a determination made as to an appropriate response, if any should be required.

Responsibility of the NAHAC Board

The NAHAC Board of Directors, in consultation with NAHAC Management, legal counsel, and any others designated for such responsibility, shall evaluate the risks of fraud and implement processes, procedures and controls to mitigate those risks. The Board of Directors will be proactive in reducing fraud opportunities by ensuring that the following occur on a regular basis:

- Identification and measurement of fraud risks;
- Steps are taken to mitigate identified risks; and
- Implementation and monitoring of appropriate preventative and detective internal controls and other deterrent measures.

NAHAC's Management, and any other individual(s) designated for such responsibility, shall serve as the primary Fraud and Ethics Advisory Team (Advisory Team) for NAHAC. On receiving a report of fraud, the Advisory Team shall conduct a preliminary investigation to determine the credibility of the report. The Advisory Team may consult and work concurrently with NAHAC's legal counsel during any phase of the investigation. If the report is credible, the Advisory Team shall follow the investigation guidelines provided in this policy.

The Advisory Team shall make every effort to protect the rights and the reputations of everyone involved in the report of suspected fraud, including the individual who in good faith alleges perceived misconduct as well as the alleged violator(s). The Advisory Team shall also make every effort to protect the identity of a person who in good faith reported the suspected fraud; however, disciplinary action may be taken as provided by this policy if a knowingly false report is shown to have been made in bad faith.

The Advisory Team may find it necessary to involve outside agencies to assist in the investigation and may refer questions as to whether the action constitutes fraud to the agency's auditor or outside attorney, as appropriate. The Advisory Team shall report suspected fraud to the U.S. Department of the Treasury, Office of Financial Stability and to the Nevada Attorney General's Office, if applicable.

NAHAC shall immediately disclose to the U.S. Department of the Treasury any discovered credible evidence, in connection with its federal programs, that a management official, employee, or contractor of NAHAC has committed, or may have committed, a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or the Civil False Claims Act (31 U.S.C. §§ 3729-3733) or other violation of federal law.

On determining that a report is not credible or is not a report of fraud, the Advisory Team shall make a determination as to whether any action should be taken and the extent of such actions. Support for a decision to take any actions should be documented and maintained by NAHAC. The NAHAC Board of Directors is responsible for the administration, interpretation, and application of these guidelines. The NAHAC Board of Directors is also responsible for guideline adoptions and revisions.

Guidelines for the Investigation of Suspected Fraud

The Advisory Team is responsible for the investigation of reported wrongdoing and all suspected fraud and for coordinating investigative activities. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know.

Any required investigative activity shall be conducted without regard to the suspected wrongdoer's length of service, position/title, relationship to NAHAC, or any other perceived mitigating circumstance.

The Advisory Team shall maintain appropriate documentation regarding incidents of fraud and restrict access to such information to appropriate personnel until a determination is issued.

If an investigation substantiates fraudulent activities, the Advisory Team will communicate the fraudulent activities to the Board of Directors. The NAHAC designated third-party compliance representatives shall make such communications as soon as possible after the fraud is confirmed and shall document the content of the investigation, the findings, and any disciplinary action taken as a result of the finding.

The U.S. Department of the Treasury shall be notified by the Board of Directors of any suspected fraud and shall be notified of any suspected or discoverable credible evidence of fraud, pursuant to all relevant laws, regulations, or agreements.

If an investigation substantiates fraudulent activities of a possible criminal nature, the Board of Directors shall assess, with the assistance of legal counsel and/or the Office of the Attorney General as needed, whether to refer the matter to the U.S. Department of the Treasury or law enforcement and/or at what level.

Any inquiries from the suspected individual, his or her attorney/representative, or any other inquirer shall be directed to NAHAC's Board of Directors. If necessary, NAHAC's Board of Directors will refer these inquiries to the U.S. Department of the Treasury.

NAHAC's Board of Directors is responsible for the investigation of any reported wrongdoing by the Advisory Team and/or NAHAC's legal counsel. The Board of Directors shall follow the same procedures that have been established for the Advisory Team to follow when investigating and addressing possible wrongdoing.

Any reported wrongdoing by a member(s) of NAHAC's Board of Directors shall be investigated by the Office of the Attorney General, in accordance with the policies and statutes of the State of Nevada.

Disciplinary Action

Failure to comply with any part of these guidelines ~~will~~may be grounds for disciplinary actions, including immediate termination.

An employee who (1) has engaged in any form of fraud, waste, or abuse; (2) suspects or discovers

fraudulent activity and fails to report his or her suspicions as required by these guidelines; or (3) intentionally reports false or misleading information in bad faith is subject to disciplinary action, including immediate termination.

Any member of management who does not pass on to the NAHAC Board a report of suspected fraud made by an employee or other person is subject to disciplinary action, including immediate termination.

NAHAC may seek recovery of any losses from fraud, if necessary, through civil action or other means.

Client Fraud within the NAHAC Assistance Programs

NAHAC has developed very specific procedures and guidelines for dealing with fraud by clients of its assistance programs. NAHAC will take one or more of the following actions whenever it reaches a determination that fraud has occurred:

- Enter into a repayment agreement;
- Terminate assistance;
- Seek recovery of any excess subsidies including damages and legal costs through the civil courts; and/or
- Refer the matter to the U.S. Department of the Treasury or Office of the Attorney General.

Fraud Awareness Training

From time to time, training programs regarding fraud awareness become available to NAHAC through various means. As these programs become available, applicable staff may be asked to attend such trainings. At the very least, all employees of NAHAC will be required to attend an Annual Fraud Awareness Training class. After attending any and all Fraud Awareness training classes, the participating employees must sign a form indicating that they have attended the training and understood its content.

FRAUD MITIGATION, DETECTION, AND AWARENESS GUIDELINES ACKNOWLEDGMENT

I acknowledge that I have received and reviewed a copy of the Fraud Mitigation, Detection, and Awareness Guidelines.

I understand and agree to the terms and conditions set forth in the Fraud Mitigation, Detection, and Awareness Guidelines and related NAHAC policies.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Fraud Mitigation, Detection, and Awareness Guidelines and related NAHAC policies, and any concerns that I may have.

By my signature below, I confirm that I have reported in writing, and in a manner consistent with the requirements of the Fraud Mitigation, Detection, and Awareness Guidelines, any and all actual fraud, waste, and/or abuse of which I am aware.

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Employee, and do not affect the employment-at-will status of the Employee.

Individual Classification: ☐ Employee ☐ Officer/Director ☐ Contractor/Vendor

Classification: ☐ Regular Employee ☐ Temporary Employee

Name

Title

Organization (*if other than NAHAC*)

NAHAC Manager or Witness Name

Signature

Signature

Date

Date

Original to be placed in appropriate file for individual (personnel, [temporary employee](#), officer/director, or contractor/[vendor](#)_file) with a copy to be placed in the file for a scheduled training, if applicable.

**RISK AND CONTROL MATRIX FOR
NEVADA AFFORDABLE HOUSING ASSISTANCE PROGRAM (NAHAC)**

DRAFT

1 GENERAL			
Control Section	Control Objectives and Activities	Frequency	Staff Name / Role
Control Environment	Objective: The entity demonstrates commitment to integrity and ethical values, and the entity holds individuals accountable for their internal control responsibilities		
	<ul style="list-style-type: none"> The board is made aware of key developments that may affect financial reporting or compliance through regular board meetings 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> A code of ethics, conflict of interest, & business conduct exists in policy and in the employee handbook 	Ongoing	Board of Directors
	<ul style="list-style-type: none"> Management, employees, and board members are made familiar with the entity's policies and practices with regard to ethics, accepted operating practices, and positive control environment through signed acknowledgements of the employee handbook for employees or through signed annual conflict of interest agreements for board members 	Annually	Board of Directors / All Employees
	<ul style="list-style-type: none"> Management adopts accounting policies that are appropriate for the entity and consistent with GAAP 	Ongoing	Brian Hardy (CFO) / Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Performance reviews are completed on a regular basis, generally annually, for all employees 	Annually	Verise Campbell (CEO/COO)
	Objective: The board of directors demonstrate independence from management in exercising oversight of the development and performance of internal controls		
	<ul style="list-style-type: none"> The general makeup of the governing board is appropriate and adequate given the nature of the entity, including two members from the NV Housing Division 	Ongoing	Board of Directors

1 GENERAL (CONTINUED)			
Control Section	Control Objectives and Activities	Frequency	Staff Name / Role
Control Environment (Continued)	<ul style="list-style-type: none"> The board is actively involved in oversight of the organization 	Ongoing	Board of Directors
	<ul style="list-style-type: none"> Monthly financial reports are provided to the board members at board meetings 	Monthly	Lori Grimm (Controller) / Brian Hardy (CFO)
	Objective: With oversight from the board of directors, management establishes structures, reporting lines, and appropriate authorities and responsibilities to achieve financial reporting and compliance objectives		
	<ul style="list-style-type: none"> Management periodically evaluates the entity's organizational structure and makes necessary changes based on changes in its activities, circumstances and/or industry 	Ongoing	Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> An organizational structure exists with corresponding job descriptions reflecting the responsibilities of respective personnel 	Ongoing	Management
	Objective: The entity demonstrates a commitment to attract, develop, and train competent individuals in alignment with financial reporting and compliance objectives		
	<ul style="list-style-type: none"> There are formal policies and procedures for recruiting, hiring and retention of employees and for employee performance and compensation 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Employees tend to have the competence and training necessary for their assigned level of responsibility or the nature and complexity of the entity's activities 	Ongoing	Management / Employees

1 GENERAL (CONTINUED)			
Control Section	Control Objectives and Activities	Frequency	Staff Name / Role
Risk Assessment	Objective: The entity specifies objectives with sufficient clarity to enable the identification and assessment of risks related to financial reporting and compliance objectives		
	<ul style="list-style-type: none"> Management adopts accounting policies that are appropriate for the entity and consistent with GAAP 	Ongoing	Management
	<ul style="list-style-type: none"> The entity has established a mission and vision which guide the strategic direction of the organization 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Management identifies risks related to laws and regulations that may affect financial reporting or compliance through ongoing processes and procedures, quarterly internal compliance reviews, and external audits and compliance review 	Ongoing	Management
	Objective: The entity identifies risks to achieving its objectives and analyzes risks to determine how the risks should be managed		
	<ul style="list-style-type: none"> Management identifies and evaluates risks as a part of the internal control program and quarterly compliance reviews and makes recommendations for changes as needed 	Ongoing	Management
	<ul style="list-style-type: none"> The entity objectives are established in accordance with Treasury guidelines, communicates those objectives as needed, and monitors the adequacy of the design and implementation of the controls meeting those objectives 	Ongoing	Management
	Objective: The entity considers the potential for fraud in assessing risks to the achievement of objectives		

1 GENERAL (CONTINUED)			
<i>Control Section</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<i>Risk Assessment (Continued)</i>	<ul style="list-style-type: none"> Fraud risk assessments are an integral part of the risk identification process (see objectives under Fraud and Conflicts of Interest section below) 	Ongoing	Management
	<ul style="list-style-type: none"> The entity's assessment of fraud risk considers incentives, pressures, attitudes, and rationalizations, as well as the opportunity to commit fraud 	Ongoing	Management
	<u>Objective:</u> The entity identifies and assesses changes that could significantly impact the system of internal control		
	<ul style="list-style-type: none"> Management has established triggers, such as differences from budget, findings from internal compliance reviews, and changes in policies; procedures; and structure for reassessment of risks that may impact financial reporting or compliance objectives 	Ongoing	Management
	<ul style="list-style-type: none"> Management communicates the risk assessment and changes in the entity's environment to all appropriate employees 	Ongoing	Management
	<ul style="list-style-type: none"> The accounting and finance department has sufficient knowledge and experience to identify changes in operating practices that may affect the method or process of recording transactions or maintaining compliance with GAAP and other applicable requirements 	Ongoing	Lori Grimm (Controller) / Brian Hardy (CFO)
<i>Information and Communication</i>	<u>Objective:</u> The entity obtains or generates and uses relevant, quality information to support the functioning of internal control		

1 GENERAL (CONTINUED)			
Control Section	Control Objectives and Activities	Frequency	Staff Name / Role
Information and Communication (Continued)	<ul style="list-style-type: none"> Accounting and compliance procedures are sufficiently formal that management can determine whether the control objective is met and documentation supporting the procedures is in place 	Ongoing	Management
	<ul style="list-style-type: none"> Supporting documentation for transactions are included as attachments in the accounting system at the transaction level 	Transaction level	Accountant
	Objective: The entity internally communicates information, including objectives and responsibilities for internal control, to supporting the functioning of internal control		
	<ul style="list-style-type: none"> Financial and program personnel meet with applicable members of management on a regular basis to discuss operating results through weekly and monthly meetings, phone call, or online communications 	Weekly / Monthly / Ongoing	Management / Accountant
	<ul style="list-style-type: none"> Financial reports are provided on a monthly basis to management and the board of directors 	Monthly	Lori Grimm (Controller) / Brian Hardy (CFO)
	Objective: The entity communicates with external parties regarding matters affecting the functioning of internal control		
	<ul style="list-style-type: none"> Management communicates information about the function of internal control over financial reporting and compliance on a timely basis with members of the board at regular board meetings 	Monthly	Management
1 GENERAL (CONTINUED)			

Control Section	Control Objectives and Activities	Frequency	Staff Name / Role
Information and Communication (Continued)	<ul style="list-style-type: none">There is a process for communication of fraud or non-compliance through the entity’s website	Ongoing	NAHAC Website / Brian Hardy (CFO)
	<ul style="list-style-type: none">Management maintains regular conversations with officials from grantors and regulators in order to provide them with constant updates and address any findings in accordance with interpretations and guidance on laws and regulations as provided by Treasury	Weekly / Ongoing	Management / Grantors / Regulators
Monitoring	Objective: The entity selects, develops, and performs ongoing and/or separate evaluations to determine whether the components of internal control are functioning as designed		
	<ul style="list-style-type: none">Management’s ongoing monitoring provides feedback on the effective design and operation of controls integrated into processes, and on the processes themselves	Ongoing	Management
	<ul style="list-style-type: none">Management’s ongoing monitoring serves as a primary indicator of both control design and the operating effectiveness of controls, and of risk conditions	Ongoing	Management
	<ul style="list-style-type: none">The entity has established an internal control program which provides for quarterly compliance reviews to ensure that control objectives are being met, and for management to provide adequate responses to any observations or findings identified	Quarterly	Quality Assurance / Management
	Objective: The entity evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate		
1 GENERAL (CONTINUED)			
Control Section	Control Objectives and Activities	Frequency	Staff Name / Role

Monitoring (Continued)	<ul style="list-style-type: none"> • Reports from external sources (e.g. external auditors, regulators, etc.) are considered for their internal control implications, and corrective actions are identified and taken 	Ongoing	Management
	<ul style="list-style-type: none"> • Findings on an internal control deficiency are reported to (1) the appropriate person who is in the position to take corrective actions and, if applicable, (2) at least one level of management above that person, or the board if necessary 	Ongoing	Management
2 ELIGIBILITY			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role
<p><u>Risk:</u> Incorrect eligibility determination</p> <p><u>Risk:</u> Deed of Trust, Lien Release and/or Note with correct terms not executed/recorded properly or in a timely manner to support the disbursement and recovery of benefits.</p>	<p><u>Objective:</u> Applicant eligibility is properly determined and documented in accordance with program and underwriting requirements (Term Sheet and underwriting guidelines)</p>		
<p><u>Risk Rating:</u> Medium</p>	<ul style="list-style-type: none"> • The HFA/EE has documented underwriting guidelines and policies and procedures that describe in detail the eligibility determination and underwriting requirements over all programs, as amended, that are in accordance with the term sheet for each program 	Ongoing	Veronica Lewis (Senior Operations Consultant) / Jennifer Varsallona (Operations Manager) / Verise Campbell (CEO/COO)
2 ELIGIBILITY (CONTINUED)			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role

	<ul style="list-style-type: none"> A preliminary eligibility determination is made during the electronic application process based on information provided by the applicant(s) <ul style="list-style-type: none"> If eligible, the homeowner is provided with an application and a document request list If ineligible, the system generates a notification of ineligibility 	Individual File Basis	Customer Service Representative / Jennifer Varsallona (Operations Manager) / Veronica Lewis (Senior Operations Consultant) / HOTB System
	<ul style="list-style-type: none"> Once an initial determination of eligibility has been made, a second level review is completed to verify the recommended underwriting decision and to confirm eligibility 	Individual File Basis	HOTB (Contractor)
	<ul style="list-style-type: none"> A quality control review is performed on a sample of completed files to ensure the appropriate documentation has been maintained in the file and the file was appropriately decisioned. In addition, a secondary review is also performed by HOTB. 	Sample File Basis	Quality Control Specialist / HOTB (Contractor)
	<ul style="list-style-type: none"> An escalation committee has been established to assist in the decision-making process for questionable files and in instances in which the homeowner applicant does not agree with the underwriting decision 	As needed	Verise Campbell (CEO/COO) / Veronica Lewis (Senior Operations Consultant)
2 ELIGIBILITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>

	<ul style="list-style-type: none"> Participating housing counselors, legal aid centers, and HFA/EE staff are sufficiently qualified and trained to (1) inquire and obtain the minimum required documentation from potential borrowers to determine eligibility, (2) summarize and document their recommendations based on review and evaluation of the eligibility underwriting process performed <ul style="list-style-type: none"> New users at HCA's and legal aid centers are not granted access to the application system until after they have received adequate training 	Ongoing	Cheryl Newkirk (Outreach Coordinator) / Veronica Lewis (Senior Operations Consultant)
	<ul style="list-style-type: none"> Checklists are used for eligibility reviews <ul style="list-style-type: none"> The entity utilizes underwriting tools and guidelines, including: <ul style="list-style-type: none"> Policies and procedures Guidelines / Operational term sheets Required Documentation Job Aid Hardship Matrix Approval Validation (006 – QC form) <ul style="list-style-type: none"> This form has various versions based on the program for which eligibility is being determined Denial / Withdrawal (003 – QC form) Income Calculator (005) Closing Checklist 	Ongoing	Jennifer Varsallona (Operations Manager) / Veronica Lewis (Senior Operations Consultant)
2 ELIGIBILITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>

	<ul style="list-style-type: none"> The participating housing counselors, legal aid centers, and HFA/EE staff understand the specific program eligibility criteria and require identification of and documentation for each of these criteria in the loan underwriting files 	Ongoing	Veronica Lewis (Senior Operations Manager)/ Cheryl Newkirk (Outreach Coordinator)
	<ul style="list-style-type: none"> Routine review of eligibility/underwriting practices are performed and documented in a timely manner, and instances of non-compliance with guidelines and requirements are remediated 	Ongoing	Management / Veronica Lewis (Senior Operations Consultant)
	Objective: Liens and lien recoveries related to participation in the program are adequately recorded, tracked, and monitored and appropriate communication is made with participants regarding the lien maturity process		
	<ul style="list-style-type: none"> Closing documentation is reviewed directly with participants who are determined eligible to receive assistance 	Individual File Basis	Floater (Temporary Labor) / Veronica Lewis (Senior Operations Consultant) Jennifer Varsallona (Operations Manager)
	<ul style="list-style-type: none"> The State of Nevada's "Simplifile" system is used to electronically record deeds of trust in a timely manner 	Individual File Basis	Floater (Temporary Labor) / Veronica Lewis (Senior Operations Consultant) Jennifer Varsallona (Operations Manager)

2 ELIGIBILITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The organization has designated an individual to oversee the tracking and monitoring of lien maturities and recoveries 	Ongoing	Veronica Lewis (Senior Operations Consultant) Jennifer Varsallona (Operations Manager)
3 FUNDS, PROPERTY AND OTHER ASSETS			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<u>Risk:</u> Misappropriation of funds (both program funds and administrative funds) <u>Risk Rating:</u> Low	<u>Objective:</u> Funds, property and other assets are safeguarded against loss from unauthorized use or disposition		
	<ul style="list-style-type: none"> The entity has documented policies and procedures that describe in detail the requirements over program funds, property and other assets 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Management or board approval of disbursements is required for amounts that exceed established limits according to entity policy 	Transaction level	Jeneeah (Nia) Girma Timothy Whitright (Board Chair) / Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Documentation supporting transactions, including documentation of appropriate authorization, are electronically attached to transactions within the accounting system 	Transaction level	Accountant

3 FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Purchases are reviewed for compliance with the Uniform Guidance and to ensure compliance with existing policies 	Monthly	Lori Grimm (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The general ledger is reviewed by knowledgeable personnel during the month-end close to ensure proper classification 	Monthly	Lori Grimm (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The AP aging ledger is reviewed monthly as a part of the month-end close, and any old outstanding items are addressed to ensure errors are corrected timely 	Monthly	Lori Grimm (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> All supporting documentation is reviewed by designated parties prior to signing a check or authorizing electronic payment 	Transaction level	Verise Campbell (CEO/COO) / Jeneeah (Nia) Girma Timothy Whitright (Board Chair)
	<ul style="list-style-type: none"> Online wire transfers and other online payments require user authentication through use of passwords and/or bank tokens 	Transaction Level	Accountant / Verise Campbell (CEO/COO)

3 FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)	
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>
	<ul style="list-style-type: none"> Bank reconciliations are prepared and reviewed in a timely fashion
	<ul style="list-style-type: none"> Accounts receivable aging is reviewed, when applicable, on a monthly basis and old outstanding items are investigated as applicable
	<ul style="list-style-type: none"> Accounts receivable are compared on a month-to-month basis to ensure reasonableness
	<ul style="list-style-type: none"> Assumptions (amortization period) and methods used in amortization calculations are reviewed regularly to ensure they are reasonable and in line with GAAP and applicable regulations or agreements
	<ul style="list-style-type: none"> The accounting department reviews the general ledger at least monthly to search for prepaid assets or other transactions that should be reclassified to assets such as deposits etc.
	<ul style="list-style-type: none"> The entity has a capitalization and useful lives policy, and the policy has been formally reviewed and approved by management and communicated to departments that request property and equipment purchases

3 FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<u>Objective:</u> Program funds are maintained in interest-bearing bank accounts.		
	<ul style="list-style-type: none"> The entity maintains acceptable bank accounts for program funds and reconciles the bank accounts on a monthly basis 	Monthly	Lori Grimm (Controller)
	<u>Objective:</u> Capital draw requests for program funds are calculated as requested, and documented in accordance with the relevant agreement(s) and program guidelines		
	<ul style="list-style-type: none"> Routine review of program funds, property and other assets are performed and documented in a timely manner, and instances of non-compliance with guidelines and requirements are remediated 	Monthly / Quarterly	Brian Hardy (CFO) / Verise Campbell (CEO/COO)
	<u>Objective:</u> Program funds are properly segregated from unrestricted funds by the HFA/EE		
	<ul style="list-style-type: none"> For program and administrative funds, property and other assets, duties over custody of cash, disbursement approval, recording, reconciling, and report review are adequately segregated 	Ongoing	Varies by transaction type
	<ul style="list-style-type: none"> Payments received in the mail are opened and logged, and a copy is provided to Accountant I and Operations Manager along with all checks/money orders (no cash is accepted) 	Transaction Level	Cheryl Newkirk (Outreach Coordinator)
	<ul style="list-style-type: none"> Accountant verifies the amount received equals the amount recorded on the log, and makes the deposit remotely on a 	Transaction Level	Accountant

	separate computer		
3 FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The CEO/COO verifies that the deposit summary in the accounting system, the image of the remote deposit from the bank and the receipt log all match and signs as evidence of such verification 	Transaction Level	Verise Campbell (CEO/COO)
4 REPORTING			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p><u>Risk:</u> Inaccurate, unsupported or untimely reporting to Treasury; and potential non-compliance with laws or regulations</p> <p><u>Risk Rating:</u> Low</p>	<p><u>Objective:</u> Quarterly program reports, annual independent audit and single audit reports, and any other required certifications or reports are submitted timely to regulatory agencies and online (as required), and amounts reported (financial and non-financial) are complete and accurate and reconciled to appropriate supporting documentation</p>		
	<ul style="list-style-type: none"> The entity maintains an annual reporting calendar which provides for sign-offs from the responsible personnel and providing for the timely completion of all reporting requirements. Copies of significant supporting information related to signed-off procedures is saved within the calendar 	Monthly	Lori Grimm (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Personnel involved in reporting are trained as to the reporting related compliance requirements 	Ongoing	Brian Hardy (CFO)

Objective: To ensure accounting and program activity is recorded and maintained in accordance with GAAP and Treasury compliance requirements, and provide for adequate supporting documentation for all such activity

4 REPORTING (CONTINUED)

<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Management establishes a well-defined process for financial reporting, including a documented monthly checklist completed as a part of the financial close 	Ongoing	Management / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over reporting functions (both internal reporting and external reporting) 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The HFA/EE monitors compliance with laws and regulations as a part of their internal control program 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The HFA/EE has developed and implemented an Internal Control Program (ICP) and Internal Antifraud and Compliance Monitoring Program (IACMP), and the ICP/IACMP and any revisions thereto have been submitted to Treasury 	Quarterly	Quality Assurance
	<ul style="list-style-type: none"> The organization's financial statements are independently audited annually, including a single audit as required, and the financial statements are submitted to regulatory agencies in accordance with the relevant agreement(s). 	Annually	Brian Hardy (CFO) / Houldsworth & Russo, CPAs

5 PROGRAM EXPENSES			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p><u>Risk:</u> Improper use of program funds</p> <p><u>Risk:</u> Timely and accurately starting and ending payments for files funded</p> <p><u>Risk Rating:</u> Medium</p>	<p><u>Objective:</u> The HFA/EE only makes payments to approved servicers for eligible borrowers in the approved amounts for the program(s) and payments made to servicers are adequately supported and made in compliance with program terms and servicer agreements by the HFA/EE</p>		
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over program expenses 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The disbursement policy includes the use of a checklist and an appropriate level of review requiring supervisory sign-offs to ensure supporting documentation is verified by another party 	Transaction Basis	Accountant / Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Routine review of program payments are performed and documented in a timely manner through the month end close process and the quarterly internal compliance 	Monthly / Quarterly	Lori Grimm (Controller) / Brian Hardy (CFO) / Quality Assurance

	reviews, and instances of non-compliance with guidelines and requirements are remediated		
	Objective: The HFA/EE ensures that the servicers apply monthly loan payments to the correct borrower loan account in a timely manner		
	<ul style="list-style-type: none"> For all payments made to servicers, the servicers respond with a payment record (P-record) which confirms the respective accounts and amounts in which payments were applied 	Transaction Basis	Accountant
	<ul style="list-style-type: none"> For all files approved for funding, a review is completed to ensure that funding begins as indicated and ends as necessary in a timely manner. 	Transaction Basis	Accountant / HOTB (Contractor)
5 PROGRAM EXPENSES (CONTINUED)			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role
	Objective: Program expenses are calculated and accounted for in accordance with GAAP, relevant agreement(s), and the Uniform Guidance, and are for actual costs incurred (not estimated or budgeted amounts). Program expenses are recorded in the time period which the expense was incurred and are given consistent treatment between accounting periods		
	<ul style="list-style-type: none"> Payment information in the HFA/EE's loan processing system is entered appropriately into HFA/EE's financial accounting system 	Transaction Basis	Accountant
	<ul style="list-style-type: none"> Experienced, knowledgeable personnel review transactions for possible discrepancies with GAAP, relevant agreement(s), and/or the Uniform Guidance 	Quarterly	Accountant / HOTB (Contractor) Blake Green (Analyst) / Brian Hardy (CFO)

	<ul style="list-style-type: none"> The entity confirms loan information provided by the participant electronically with the applicable participating servicers through an inquiry record (I-record) and receiving back either a verification (V-record) or obstacle (O-record) 	Individual File Basis	Accountant / HOTB (Contractor)
	Objective: Appropriate documentation exists to support program expenses (servicer batch payment records/requests)		
	<ul style="list-style-type: none"> Appropriate levels of review of the loan payment files and documentation are incorporated into the loan approval and disbursement process 	Individual File Basis	HOTB (Contractor) / Escalation Team (See Eligibility Section Above)
6 ADMINISTRATIVE EXPENSES			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role
Risk: Improper use of program funds Risk Rating: Low	Objective: Program-related administrative expenses are in accordance with the approved program budget for administrative expenses (permitted expenses) detailed and approved in the relevant agreement(s).		
	<ul style="list-style-type: none"> Monthly reviews of administrative payments are performed and documented in a timely manner as a part of the month end close process 	Monthly	Lori Grimm (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Routine review of administrative payments is performed and documented as a part of the internal compliance review 	Quarterly	Quality Assurance

	in a timely manner, and instances of non-compliance with guidelines and requirements are remediated		
	Objective: Program-related administrative expenses are calculated and accounted for in accordance with GAAP, the relevant agreement(s), and the Uniform Guidance		
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over program-related administrative expenses 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Access to payroll and HR data and transactions is appropriately restricted 	Ongoing	Verise Campbell (CEO/COO) / ADP (Payroll Provider)
6 ADMINISTRATIVE EXPENSES (CONTINUED)			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role
	<ul style="list-style-type: none"> Standard programmed algorithms perform significant payroll calculations through ADP, and a SOC 1 report is obtained and reviewed regarding the controls at ADP 	Ongoing / Annual (SOC 1)	Integrita (Contractor) Greg Glover (CIO) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> There is adequate segregation of duties among those who prepare, approve, and receive reports for payroll 	Bi-weekly	AJ Gavilanes (Administrator / Payroll Manager)/ Veronica Lewis (Senior Operations Consultant) Kamelah Flintroy (Administrator / HR Generalist) / Melissa Brooks (Accounting Manager) / Verise Campbell (CEO/COO)

	<ul style="list-style-type: none">Payroll registers are reviewed after processing by the accounting department at least monthly and compared to budgeted amounts	Monthly	Lori Grimm (Controller)
	<ul style="list-style-type: none">Changes to salaries or other payroll costs are approved by management	As needed	Verise Campbell (CEO/COO)
	<ul style="list-style-type: none">Check requests are created and attached to corresponding invoices, and are then signed off by the preparer and by a separate individual to ensure adequate documentation prior to obtaining authorization	Transaction Basis	Accountant / Cheryl Newkirk (Outreach Coordinator)
	<ul style="list-style-type: none">Check requests and prepared checks are authorized by the appropriate level based on policy	Transaction Basis	Board of Directors / Management
	<ul style="list-style-type: none">Work orders or purchase orders are prepared for expenses requiring pre-approval. Approvals and check processing follow the same procedures as check requests above	Transaction Basis	Verise Campbell (CEO/COO)
	Objective: Program-related administrative expenses are for actual costs incurred and are identified as direct or indirect costs to the program(s), including salaries and benefits		
6 ADMINISTRATIVE EXPENSES (CONTINUED)			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role
	<ul style="list-style-type: none">For all non-program related time or expenses incurred, time cards and detailed records are kept ensuring that time and associated costs are properly segregated from program funds	Transaction Basis	Accountant / HOTB (Contractor) Blake Green (Analyst) / Lori Grimm (Controller)
	Objective: Appropriate documentation exists to support program-related administrative expenses (vendor invoices, approved work order or purchase orders, canceled checks, and time and attendance records)		

	<ul style="list-style-type: none"> Appropriate documentation supporting transactions are saved to the individual transactions in the accounting system 	Transaction Basis	Accountant
	<ul style="list-style-type: none"> The disbursement policy includes the use of a checklist and required supervisory sign-offs to ensure supporting documentation is verified by management 	Transaction Basis	Verise Campbell (CEO/COO) / Jeneeah (Nia) Girma Timothy Whitright (Board Chair)
	Objective: Administrative expenses are recorded in the time period which the expense was incurred and are given consistent treatment between accounting periods		
	<ul style="list-style-type: none"> Appropriate levels of review of the payment request are incorporated in the disbursement process and entered appropriately into the HFA/EE's financial accounting system 	Transaction Basis	Accountant / Verise Campbell (CEO/COO) / Jeneeah (Nia) Girma Timothy Whitright (Board Chair)
7 FRAUD AND CONFLICTS OF INTEREST			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role

<p><u>Risk:</u> Inadequate controls to prevent and detect instances of fraud and conflicts of interest or undue preference with external vendors or other third party providers</p> <p><u>Risk Rating:</u> Low</p>	<p><u>Objective:</u> The HFA/EE performs tests and review of procedures that extends to any and all third party participants to include evaluation of instances of inappropriate or illegal behavior, potential or actual fraudulent activities, or conflicts of interest and ensure they are detected and remediated in a timely manner</p>		
	<ul style="list-style-type: none">• The HFA/EE has documented policies and procedures that describe in detail the requirements over the prevention and detection of fraud and conflicts of interest	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none">• The documented procedures outline consequences in the event there is evidence of fraud and include a process for reporting issues to Treasury and the SIGTARP Hotline	As incurred	Brian Hardy (CFO) / Verise Campbell (CEO/COO) / Treasury
	<p><u>Objective:</u> The HFA/EE ensures that external business partners/vendors and employees (including direct and indirect employees, 1099 contractors and temporary hires) are selected without conflict of interest and without undue preference</p>		
7 FRAUD AND CONFLICTS OF INTEREST (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>

	<ul style="list-style-type: none"> Formal RPQ and RFP processes exist, and are used in securing participating housing counselors and legal aid centers, credit report companies, title companies, etc. 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Routine training to employees and significant contractors is provided regarding the definition of fraud and what to do when fraud is suspected, and such training is documented 	Annual	Brian Hardy (CFO)
	<ul style="list-style-type: none"> A fraud email address is included on the entity's website for anonymous fraud or non-compliance reporting. A fraud hotline is also maintained by SIGTARP and is referenced on the entity's website 	Ongoing	Brian Hardy (CFO)
	<p>Objective: The HFA/EE ensures that employees (including direct and indirect employees, 1099 contractors, and temporary hires) are not involved in program-related loan underwriting or approval decisions for any family member or related party</p>		
	<ul style="list-style-type: none"> Routine training to employees and significant contractors regarding the definition and prohibition of conflicts of interest 	Ongoing	Management
	<ul style="list-style-type: none"> Documentation is maintained of training related to fraud and conflicts of interest including the date, the materials covered, and the attendees 	Annual	Brian Hardy (CFO) / AJ Gavilanes (Administrator / Payroll Manager)/ Cheryl Newkirk (Outreach Coordinator) Kamelah Flintroy (Administrator/HR Generalist)
7 FRAUD AND CONFLICTS OF INTEREST (CONTINUED)			
Risk Assessment	Control Objectives and Activities	Frequency	Staff Name / Role

	<ul style="list-style-type: none"> Internal compliance reviews include routine checks for instances of conflicts of interest in the internal compliance reviews performed. The internal compliance team is assigned responsibility for monitoring and testing controls for instances of fraud, including selecting sample loan files to check for program eligibility, reviewing financial reports and bank account statements, reviewing external business partner contracts and payments, etc. 	Quarterly	Quality Assurance
8 IT ENVIRONMENT AND DATA SECURITY			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<u>Risk:</u> Access to program data and borrower personally identifying information (PII) is not adequately safeguarded <u>Risk Rating:</u> Medium	<u>Objective:</u> Policies and procedures exist for the accuracy and completeness of information, including the safeguarding of data and borrower PII, authorization and addition of system users, termination of user rights, information back-up and recovery, and retention and destruction of program and borrower data		
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over the IT environment and data security functions 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The HFA/EE monitors and reviews data security and the IT environment for program-related data 	Ongoing	Integrita (Contractor) Greg Glover (CIO) (IT Systems Manager)
	<ul style="list-style-type: none"> The HFA/EE collects and maintains copies of third party service contractors' SSAE 16 reports, reviews the report results and findings, and reviews user control considerations and develops and implements mitigating controls, if necessary 	Annual	Integrita (Contractor) Greg Glover (CIO) Brian Hardy (CFO)
8 IT ENVIRONMENT AND DATA SECURITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>

	<ul style="list-style-type: none"> A process exists to ensure that systems incidents, problems, and errors are reported, analyzed, and resolved in a timely manner via reporting from 3rd party contractors 	Ongoing	Integrity (Contractor)Greg Glover (CIO) / HOTB
	<ul style="list-style-type: none"> The HFA/EE performs vulnerability, penetration and disaster recovery testing on loan system application and data storage systems and has documented these processes and testing outcomes 	Ongoing	Integrity (Contractor)Greg Glover (CIO)
	<ul style="list-style-type: none"> Access to homeowner PII is protected against unauthorized access and is limited to appropriate individuals based on job function, and job functions are properly segregated 	Ongoing	Integrity (Contractor)Greg Glover (CIO) / HOTB / Management
	<ul style="list-style-type: none"> The HFA/EE limits access to borrower PII to authorized users only 	Ongoing	Integrity (Contractor)Greg Glover (CIO) / HOTB
	<ul style="list-style-type: none"> Include routine checks to test the IT security and safeguarding of program-related data and borrower PII in the internal compliance reviews performed 	Quarterly	Quality Assurance
	<ul style="list-style-type: none"> Parties, both internal and external, which are granted access to homeowner PII are made aware of restrictions on copying and disclosing program and borrower information through a routine training program before access is granted and annually thereafter. The training materials and attendees are documented 	Ongoing / Annual	Integrity (Contractor)Greg Glover (CIO)

Appendix I – Descriptions of Groups and Entities

- Board of Directors
 - [Jeneeah \(Nia\) Girma, Affordable Housing Advocate – Nevada Housing Division](#)
 - ~~Timothy Whitright, Deputy Administrator – Nevada Housing Division~~
 - President and Chairman
 - Jim Hastings, President – Hastings Brokerage, Ltd
 - Treasurer and Independent Director
 - Sharath Chandra, Administrator – Nevada Real Estate Division
 - NV Dept. of Business and Industry Director
 - Rande Johnsen, Director – Trustee Corps
 - Vice-President & Vice-Chairperson
 - ~~Jeneeah (Nia) Girma~~[Christine Hess, Chief Financial Officer](#)~~Affordable Housing Advocate~~ – Nevada Housing Division
 - NV Housing Division Director
 - Verise Campbell, CEO/COO – NAHAC
 - Ex Officio Member
- Management
 - Verise Campbell (CEO/COO)
 - Brian Hardy (CFO)
 - ~~Jennifer Varsallona (Operations Manager)~~
 - Veronica Lewis ([Senior](#) Operations Consultant)
 - ~~Greg Glover (CIO)~~
- Accountant (Individual filling role varies due to termination, interim, and subsequent hire)
 - ~~Melissa Brooks (Accounting Manager)~~[Richard Suba \(Senior Accountant\)](#)
 - Michelle Boado-Lopez (Accounting Clerk)
- Quality Assurance Team (Ellsworth & Stout)
 - Melanie Rollo, CPA
 - ~~Gail Romero (new)~~[Kelly Safford \(new\)](#)
- Quality Control Specialist (Internal)
 - ~~Lamar Wyse (Independent Contractor)~~
 - Simone Hunter (Independent Contractor)
- State Housing Finance Agency (HFA)
 - State of Nevada, Department of Business and Industry, Nevada Housing Division (NHD)
- Eligible Entity (EE)

- Nevada Affordable Housing Assistance Corporation

RED FLAGS GUIDELINES

The function of the Red Flags Guidelines is to promote and uphold quality control within the organization as well as substantiate compliance with Nevada's Homeowner Assistance Fund (NVHAF) term sheets and the expectations of the U.S. Department of the Treasury. The result is a coordinated effort in properly authenticating application documentation which will assist in the mitigation of program fraud and misrepresentation.

Identification & Detection of Red Flags

NAHAC has implemented various measures for detecting fraud. This involves examination procedures and red flag indicators. There are a variety of legitimate transactions that can raise a red flag, and the mere presence of a red flag does not automatically indicate suspicious or illicit activity. Rather, they identify files that potentially contain misrepresentations so that actual and potential fraud can be investigated, prevented, and addressed.

Potential red flags have been enumerated here to assist in the processing, underwriting and quality control review of loan files. These Red Flags do not necessarily mean that misrepresentations have occurred.

General

- Multiple document information changes (i.e. increase or decrease in income to meet approval guidelines)
- Power of Attorney
- Application and verification documentation contain inconsistent or contradictory information (i.e. addresses are not consistent with loan origination information regarding Applicant's primary residence)
- There appears to be a relationship between the underwriter and the applicant
- Applicant has an employer listed as one of our vendors
- Applicant uses or has used different names or aliases
- Applicant's signature does not match other signatures on produced documents
- Court documents, i.e. divorce decrees, do not contain a date of filing with the court
- System Generated Duplicate Account Information Warning – warns of duplicate social security number, property address, mortgage loan number, or applicant email address
- System Generated Returning Applicant Warning – warns of applicant with multiple applications in the portal

Assets

- Bank statements contain spelling mistakes (i.e. account vs. account)
- Statements contain squeezed-in letters / corrections / strikeovers / font inconsistencies
- Large decrease in balance over prior 60 days
- A second account holder noted who is not listed as an applicant

- Regular deposits that applicant cites are from employer which are not consistent with income from employment stated income documentation

Pay stubs

- Handwritten
- Contains spelling mistakes (i.e. personal vs. personnel)
- Contains squeezed-in letters / corrections / strikeouts / font inconsistencies
- Does not show name of employer / employee
- Employer address is a PO Box
- Figures are misaligned
- Inconsistent pay periods
- Year-to-date earnings show marked increase from previous year's earnings
- Year-to-date earnings are not consistent w/ annual salary or hourly rate
- Hourly employee with year-to-date income is reflected in round dollar amounts
- Income that is excessive or extremely low compared to position
- Contain additional deductions for debt payments not disclosed

W-2

- EIN is not in the correct format of xx-xxxxxxx
- Handwritten
- Hourly employee with year-to-date income that is reflected in round dollar amounts
- Figures are misaligned
- Figures are squeezed in
- Font is not the same throughout fillable fields of form

1040

- Applicant did not sign / date copies
- Information is not consistent with NVHAF Hardship Affidavit/3rd Party Authorization / W-2
- Social Security Numbers are missing or inconsistent with other documentation in the file
- Income is not consistent with income reflected on loan application and other loan documentation
- Figures are misaligned
- Figures are squeezed in
- Applicant name, SS#, income and deductions have inconsistent fonts
- Strikeovers / alterations found on document (especially for tax year on form)
- Paid preparer hand-writes tax returns or signs all pages of tax return
- Amounts on schedules are not carried over accurately to the 1040 form

Title (County Recorder Website)

- Property is zoned for a different type of property than SFD, Townhouse, Condo or permanently attached manufactured home
- A Co-Applicant shows on title but is not listed on application

Zillow (or Other Public Listing Site)

- Property is listed for sale, auction, pending, for rent

Closing/Funding

- Refused face to face interview and used private notary
- Identification inconsistent

Preventing and Responding to Red Flags

The presence of any of the previously mentioned red flags should alert the reviewer to take a more in-depth look at a particular file and re-verify as much information as possible from sources which are independent from the originator. When efforts to re-verify information contained in the file are necessary, the file should be escalated to a supervisor for recommendation. Re-verification efforts may include the following:

- Attempting to verify employer listing through www.yp.com or a similar site.
- Initiating a formal verification of employment (VOE) or verification through www.theworknumber.com
- Filing the 4506T with the IRS
- Running a Core Logic report (if not already done)
 - Verify additional liens on property
 - Do addresses match up
- Running a credit report (to substantiate mismatched addresses)

Conflicts of Interest

For all intended purposes NAHAC will entertain providing assistance to any past or present employee and any of their family members, acquaintances or otherwise related individuals providing the applicant qualifies and remits all required documentation in accordance with guidelines.

Employees and friends, family members and acquaintances of employees are considered in these guidelines. As such, anyone that falls into this category will require special processing as-before they can be considered for any of NAHAC's programs.

Under no circumstances will any underwriter review or work on a file where they have a vested interest or an affiliation with the applicant.

Employees

Employees must submit their file directly to ~~designated senior management~~the Operations Manager. The file will be fully underwritten by independent underwriting personnel and submitted to ~~designated senior management~~Operations Manager or CEO/COO or equivalent management official for final approval. Notes will be included in the file which reiterate the relationship and special processing of the file.

Employee Affiliates

Friends, family members, and acquaintances of employees must also have their files submitted directly to ~~designated senior management~~the Operations Manager and the nature of the relationship disclosed. In these instances, the file will be assigned to an underwriter which does not share an affiliation with the individual. Once the file has been underwritten and a disposition recommended, ~~the designated senior management~~Operations Manager will conduct a final review to confirm and approve the disposition. Notes will be included in the file which reiterate the relationship and special processing of the file.

Failure to disclose an actual or potential conflict of interest is grounds for disciplinary action, up to and including termination of employment.

RED FLAGS GUIDELINES ACKNOWLEDGMENT

I acknowledge that I have received and reviewed a copy of the Red Flags Guidelines.

I understand and agree to the terms and conditions set forth in the Red Flags Guidelines and related NAHAC policies.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Red Flags Guidelines and related NAHAC policies, and any concerns that I may have.

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Employee, and do not affect the employment-at-will status of the Employee.

Individual Classification: ☐ ~~Employee~~ ☐ ~~Officer/Director~~ ☐ ~~Contractor/Vendor~~
Classification: ☐ Regular Employee ☐ Temporary Employee

Name

Title

Organization (*if other than NAHAC*)

NAHAC Manager or Witness Name

Signature

Signature

Date

Date



Original to be placed in appropriate file for individual (personnel, ~~officer/director~~temporary employee, or contractor/vendor_ file) with a copy to be placed in the file for a scheduled training, if applicable.

Authorization Matrix - Financial

Edits are shown in green.

Action	Accounting Manager/ Accounting Clerk	Executive Director/CEO	Treasurer	President/ Chairperson	Board of Directors
Banking					
ACH/Checks Signing (see Check Limits section) Note: All ACH Require the Same Authorization as Checks		X	Alternate	X	
Wire Transfer Input	X				
Wire Transfer Release		X	Alternate	Alternate	
Electronic Deposits	X	Alternate			
Online Administration		X	Alternate	X	
Credit Card Assignment		X	Alternate	X	
Purchasing, Contracts (PO, WO) (Any 2 signatures required)					
\$0 - \$25,000		X	Alternate	X	
Greater than \$25K					X (Majority)
Capital Assets - Refer to "Check Limits" below					
Check Limits					
\$0 - \$500,000		X	Alternate	X	
Greater than \$500K					Majority
<p>Unless specifically stated herein above, more than one "X" means approval needed from all positions or roles prior to any action being taken. All expenses need to be backed by an executed Purchase Order and/or Work Order - Unless otherwise noted. When there is a conflict and/or authorizations effect the person(s) holding the position or role, then the approval of the CEO/COO or equivalent management official, along with the Chairperson of the Board will be sufficient and override all other approvals, except where Board approval is required in which case approval of the CEO/COO or equivalent management official, Chairperson of the Board and a Majority of the Board is required. When there is a conflict and/or authorizations effect the person holding the position or role of CEO/COO or equivalent management official, the approval of Chairperson of the Board will be sufficient and override all other approvals, except where Board approval is required in which case approval of the Chairperson of the Board and a Majority of the Board is required.</p>					

Authorization Matrix - Payroll and HR

Edits are shown in red.

Action	Accounting Manager	Senior Operations Consultant	Administrator	Controller / CFO	Executive Director/ CEO	President/ Chairperson	Board of Directors
Payroll							
Review	X	Alternate					
Approval		Alternate			X		
Submission/Release		Alternate	X				
Human Resources							
New Position Approval							X (Majority)
Hiring of Existing Position					X	X	
Restructuring (changing scope of work & job titles)							X (Majority)
Org Chart Approval							X (Majority)
Promotion Approval							X (Majority)
Pay Changes (any change)							X (Majority)
Edit/Write Access to Salary and Confidential Personal Information in ADP system	Alternate	Alternate	X		Alternate		
Read Only Access to Salary and Confidential Personal Information in ADP system				X			
Overtime Request Approval					X	X	
Involuntary Termination					X		
Leave Requests					X		
More than one "X" means approval needed from all positions or roles prior to any action being taken. All expenses need to be backed by an executed Purchase Order and/or Work							

REPORTING OF WORK RELATED INJURY NOTIFICATION & ACKNOWLEDGMENT

The Nevada Affordable Housing Assistance Corporation (“NAHAC”) has implemented the following procedure for Covered Individuals to use when reporting work related injuries or illnesses to NAHAC.

NAHAC strives to provide a safe and secure working environment for all employees. However, when a work related injury or illness occurs (i.e. injuries and illnesses that arise out of, or are incurred in, the course of job related activities on behalf of NAHAC), NAHAC provides [access to](#) appropriate medical care and treatment to the Covered Individual through its Workers’ Compensation Insurance program. Coverage is provided for all employees, Board Members, and under certain circumstances, independent contractors who are injured or become ill while acting within the course and scope of their duties. Coverage begins automatically the first day of employment.

For further information on workers' compensation regulations and benefits, contact the Management.

It is NAHAC’s policy to require all work related injuries and illnesses to be reported as promptly and accurately as possible. “Promptly” means that Covered Individuals should report the injury or illness immediately where it is feasible to do so, and where immediate reporting is not feasible, then timely reporting means that the Covered Individual shall report the illness or injury as soon as he or she is able.

Employees must report all injuries and work related illnesses, regardless of severity, to their supervisor or Management (the “Authorized Person”). If the employee’s supervisor is not available, the employee should report the work related injury or illness to the CEO/COO or equivalent management official. Covered Individuals other than employees should report the work related injury or illness to the CEO/COO or equivalent management official.

The Authorized Person will provide the Covered Individual with a form C-1/Notice of Injury or Occupational Disease (Incident Report) to complete. The Covered Individual should then seek medical care if needed and complete a Form C-4/ Employee’s Claim for Compensation/Report of Initial Treatment. The C-4 Form will be provided to the Covered Individual by the Authorized Person. To obtain coverage, medical care must be rendered by one of the workers’ compensation insurance carrier’s authorized medical providers. The Authorized Person can provide the employee with a list of the carrier’s authorized medical providers.

The health and safety of the affected Covered Individual is of utmost importance, therefore if immediate medical attention is necessary, the first priority is to obtain medical attention. In such circumstances, go to the nearest emergency room. The Authorized Person will process the report to the extent possible and it can be completed once the Covered Individual’s medical condition has stabilized to the extent necessary for it to be completed.

REPORTING OF WORK RELATED INJURY ACKNOWLEDGEMENT

By executing this notification and acknowledgment below, Covered Individual acknowledges that he/she has been informed of NAHAC's procedure for reporting work related injuries and illnesses and that he/she has been advised of the following:

(A) Employees have the right and are encouraged to report work related injuries and illnesses; and

(B) Employees will not be ~~are prohibited from~~ discharged ~~ing~~ or in any manner discriminated ~~ing~~ against employees for reporting work related injuries or illnesses.

Individual Classification: ☐ Employee ☐ Officer/Director ☐ Contractor ~~Vendor~~

Classification: ☐ Regular Employee ☐ Temporary Employee

Name

Organization (*if other than NAHAC*)

Signature

Date

Original to be placed in appropriate file for individual (personnel, or officer/director temporary employee, or contractor ~~vendor~~ file) with a copy to be placed in the file for a scheduled training, if applicable.