

Board of Directors

Dan Gray, Chairman
Patrick Chaing, Vice-Chair
Jon-Michael Rosch, Secretary
Dara L. Aldridge
Emily Chiang
Jennifer Judelsohn
Angie Lathrop
Jennifer McGarey
James Ross
Sue Zywokarte

For the sake of what?

*Does this move us in the
direction of our mission?*

*Is this the best use of
resources?*

*Is this the direction
we said we want to go?*

Our Mission:

Pathway Homes
embodies the spirit
of recovery: embracing an
attitude of hope,
self-determination
and partnering with each
individual on their
personal journey toward
achieving self-fulfillment
and realizing their dreams.

We fulfill our mission by
making available to
individuals with mental
illness and co-occurring
disabilities a variety of
non-time-limited housing and
services to enable them to realize
their individual potential.

PATHWAY HOMES, INC.

Board of Directors

Monday, July 9, 2018
7:00 P.M.
10201 Fairfax Blvd., Ste. 200
Fairfax, VA 22030-2209



- 6:30 Social Half-hour
- 7:00 Call to Order
- 7:05 Presentation – Jennifer Judelsohn and Anna Smith
- 7:30 Approval of Minutes of Meeting April 9, 2018*
- 7:35 CEO's Report – Dr. Sylisa Lambert-Woodard
- 8:00 Treasurer's Report - Brenda Brennan
- 8:05 Chairperson's Report and Comments
- 8:15 Committee Reports
 - 1. Philanthropy Committee—Jennifer Judelsohn
 - 2. Board Development—Patrick Chaing
 - 3. Personnel Practices Committee—Dan Gray
- 8:40 Old Business
- 8:45 New Business
 - 1. Code of Conduct—Dan Gray
 - 2. Special Recognition Award—Dan Gray
 - 3. Emeritus Status Confirmation re: Tom Rowe
- 8:50 Announcements.
- 8:55 Adjournment

* Materials Enclosed in Packet

ADDENDUM TO BOARD AGENDA

July 9, 2018

Pathway Homes has had a resilient quarter! Fundraising and strategic positioning were paramount in our ongoing success to ensure for financial solvency, growth and strong morale. Continuous quality improvement, risk assessment and diversification continue to be key to our growth during our rebuilding phase. We remain laser focused on our mission, and committed to our strategic plan. I look forward to seeing you and answering any questions at our upcoming meeting!

Board Matters:

- The Philanthropy Committee Report- Jennifer Judelsohn, Treasurer's Report- Brenda Brennan, and Board Development report- Patrick Chaing have been provided for your review. Please review these reports before the meeting; any questions or clarifications will be addressed during the meeting.
- Pathway Homes has implemented its first grant in Loudoun County for Mental Health Skill Building Services (MHSS) and is currently providing services to 10 consumers. It is expected that we serve approximately 30-70 by the end of the year.
- Pathway Homes has launched its Northern Virginia Health Foundation award for \$25,000 for the development of a pilot supportive services package/waiver. Pathways is working with a consultant, Managed Care Organizations (MCO's), Housing Authorities and CSBs in the development of this design. Product to be completed by 12/18.
- Pathway Homes formally received \$500,000 from VA Department of Housing and Community Development (VADHCD) to purchase 4, 1-bedroom condos at (1%) interest for our new 2017 Pathway Homes Permanent Supportive Housing First Program. This project will provide permanent, non-time limited housing and supportive service for 4 chronically homeless and/or formerly homeless adults with serious mental illnesses and/or substance abuse issues. All four (4) units have been purchased!
- Due to the loss of Pathways' sole source contract with Fairfax County, Pathways' Calamo property has been sold! Proceeds in the amount of \$403,530.72 will be used to invest in the agencies need to have cash on hand to address any unexpected delays in funding.
- On 9/20/17 Pathways was **verbally** notified that the County is committed to continue its support in FY19 in the amount of **\$267,169** administrative cost for the CoC projects. This funding was approved on 6/21/2018! Further, this contract was

renegotiated to add one 32-hour Manager position, and a 20-hour peer position to ensure adequate operations of this contract totaling an additional **\$120,629**.

- **Renewal**- Pathway Homes is awaiting the HUD announcement of twelve (12) HUD Homeless Assistance renewal grant awards totaling **\$5,290,282**. These grants fund our Supportive Housing Program and Shelter Plus Care (now called Leasing and Rental Assistance) projects serving 306 individuals. The total amount of HUD assistance that the Fairfax-Falls Church Continuum of Care (CoC) receives is \$8,291,071.
- **New Award**- Pathway Homes submitted 5 submissions for the Community Consolidated Funding Pool (CCFP) and received one award totaling \$450,000 for the acquisition of a new 4 -bedroom home in Fairfax County.
- Pathway Homes, submitted a response to an IFB requesting vendors to provide Transitional Group Homes (TGH) and Permanent Supportive Housing in Chesterfield and Albemarle Counties in Virginia (additional sites were offered for vendors to consider, all outside of Northern VA). This bid was not awarded to Pathway Homes.
- **NEW Proposal**- Pathway Homes submitted a RFP to Region 4- Greater Richmond for the operation of a new 8 bed Assisted Living Facility. This proposal was submitted in the amount of \$515,180 to operate this program. If awarded, this will be our third ALF awarded. Anticipated notification of award is 8/18.
- **NEW Proposal**- Christian Relief Services (CRS) made a strategic decision to forgo further sponsorship of the 1991, 1994 and 1995 grants serving 50 individuals in the amount of \$703,690 This decision was made due to internal changes as well as the increased responsibilities associated with being a HUD COC program sponsor. CRS supported Pathway Homes to assume sponsorship for these programs, and the COC Board met on 6/14/18 and unanimously chose Pathway Homes, Inc. as the new sponsor! While approved at the local level, this reassignment of award is contingent upon HUD's approval.
- Pathway Homes has extended its office space to a local non- profit called SPARC (Specially Adapted Resource Clubs). SPARC runs day programming for the Developmental Disability (DD) community. SPARC was operating out of donated office space that was no longer available due to the repurposing of the site. Pathway Homes looks forward to learning more about how SPARC can support those we serve, and possible mutually beneficial business opportunities in the future.
- The Pathway Homes Cookout was held on 6/1/18 and was again a success! The event was held at the Nottoway Park, 9610 Courthouse Rd, Vienna, VA. Residents, Board

Members and staff brought our continued commitment to create a good life for those we serve.

- The Pathway Homes Summer of the Arts Exhibit was held on 6/24/18 at the Jewish Community Center of Northern Virginia, 8900 Little River Tpk, Fairfax, Va. This was a great event that promoted and celebrated the artistic talents of Pathway's Residents! A special thanks to Jennifer Judelson for her special talent in making this event possible!

PATHWAY HOMES, INC.
Minutes of the Quarterly Meeting of the
Board of Directors
April 9, 2018

The quarterly meeting of the Board of Directors was held on April 9, 2018. A quorum being present, the meeting was called to order at 7:09 p.m. by Vice-Chair, Patrick Chaing. The following individuals were present and participated throughout the meeting:

MEMBERS

Dan Gray, Chair (joined at 7:29pm)
Patrick Chaing, Vice Chair
Jon-Michael Rosch, Secretary (joined at 7:24pm)
Emily Chiang
James Ross
Jennifer Judelsohn
Jennifer McGarey
Sue Zywokarte

STAFF

Sylisa Lambert-Woodard, President & CEO
Brenda F. Brennan, CFO
Anna Smith, Director of Development and
Major Gifts
Lauren P. Leventhal, QA Manager

The following individuals notified the office or other Board Members that they would not be present for this meeting: Angie Lathrop, and Dara Aldridge

Also in attendance for the presentation portion of the meeting was Libbie Rozofsky, Fannie Mae Fellow.

PRESENTATION

Barriers to Rental Housing

Libbie Rozofsky, Fannie Mae Fellow

Libbie is Fannie Mae's first Fellow; an attempt to partner with a non-profit to use employee expertise to solve an identified problem. Libbie was with Pathways in order to look at how Pathways leases units, and how we might increase the number of units leased to decrease the wait list.

Jonny and Dan joined the meeting mid-presentation.

Libbie presented a PowerPoint presentation on her findings (enclosed in the Board minutes book).

MINUTES

Dan Gray called for a motion to approve the minutes from January 22, 2018. Jim made a motion to approve the minutes as presented. This was seconded by Sue and approved unanimously.

CEO Report – Dr. Sylisa Lambert-Woodard

Sylisa's report was previously distributed to the Board in their packet (enclosed in the Board minutes book), and she included the following updates:

- We are still waiting on executed grant agreements from HUD.

TREASURER'S REPORT – Brenda Brennan

The Treasurer's Report was distributed prior to the meeting (enclosed in the Board minutes book). There was no additional information.

CHAIRPERSON'S REPORT AND COMMENTS – Dan Gray

Dan announced that attended the staff recognition event at PJ Skidoos, and it was well done. Jim, Emily, Dara, and Sue were also in attendance.

PHILANTHROPY COMMITTEE REPORT – Jennifer Judelsohn

In addition to the written Philanthropy Committee Report (enclosed in the Board minutes book), the committee noted the following:

- RSVPs are due to Anna April 20th for the Steps to Pathways Breakfast
- Approximately 80 individuals confirmed and more expected. We will have up to 30 tables this year.

Jim asked if we could see how the money coming in counteracts the deficit. Sylisa replied that nothing has offset the deficit yet. At the July meeting, there will be an updated chart showing where the money has been applied.

BOARD DEVELOPMENT – Patrick Chaing

Two board meetings are stepping down: Tom Rowe after 25 years, and Maiko Ashby after 8 years. The board thanks them for their service. There will be a dinner to celebrate Maiko and Tom held at Wildfire at Tyson's Corner – Friday, May 11 at 6pm. Please RSVP to Anna; the cost of the dinner will be \$50, and drinks will be paid for by Dan Gray's firm. The Development Committee recommends Tom Rowe be considered for Emeritus status.

Dan called for a vote to bestow Emeritus status on Tom Rowe if he will accept it. Jim made a motion; this was seconded by Jennifer Judelsohn and approved unanimously.

The committee has identified a need for individuals with accounting/finance background in order to fill the Treasurer role. There are also identified knowledge gaps in human resources and communications. There is a need to replenish the board; Sylisa has identified several individuals who may meet these requirements and be potential donors. Any suggestions for new Board members should be sent to the Board Development Committee.

The committee is also trying to increase transparency of officer elections. Current officers provided a brief overview of their backgrounds and the work required for their positions. It is ideal for a board to have regular turn-over of officer positions, but the individuals filling the roles need to have experience. In October, the slate of officers will be vetted by Sylisa. She requested that anyone interested in an officer role express an interest by the July meeting so that there is a quarter in which to discuss preparations and qualifications.

Discussion occurred around the proposed resolution of the board around "Give or Get." Jonny expressed concern about the contractual nature of the \$5,000 statement and requested rewording. Jim questioned whether the initial \$1,500 donation is part of the \$5,000/year total, and would like it to be more clear in any documentation. The response was 'yes,' the \$1,500 is part of the \$5,000/year target. Revisions were made to the resolution so that it reads:

"WHEREAS, the Board of Directors of Pathway Homes, Inc., through the Board Development and Philanthropic Committees presented to the board the recommendation that it is in the best interest of the agency to update of the current formal declaration of their financial support to further the mission of the organization,

AND WHEREAS the Board of Directors has deemed it appropriate to update the "Give or Get" Policy, defined as: the agreement of the Board of Directors to either donate a certain amount of money every year paid for out of their own personal resources ("Give"), or to raise the equivalent amount from others ("Get").

NOW THEREFORE, BE IT RESOLVED each Director will endeavor to "Give or Get" \$5,000 on an annual basis.

FURTHER, incoming board members must make a personal contribution of at least \$1,500 prior to being accepted as a board member, to be applied to the annual "Give or Get" goal.

FURTHER RESOLVED, the Chair Person of the Board is directed to enter a copy of this Adoption Agreement into the records of this Corporation, and into the minutes of the meeting."

Dan called for a motion to approve the resolution as revised. Jim made a motion; it was seconded by Jennifer Judelsohn, and approved unanimously.

Dan gave special thanks to Patrick for the hard work he has done as the chair of the Board Development Committee.

ADVOCACY –

Advocacy Committee information was not included in the packet, but was distributed prior to the meeting. Jonny asked if Sue met with any politicians in Richmond; she reported that she did not attend, but the Consumer Advisory Council had a good experience with the training.

OLD BUSINESS –

None

NEW BUSINESS –

None

ANNOUNCEMENTS –

Anna reminded the board about the Summer of the Arts reception on Sunday, June 24th at the Jewish Community Center. The exhibit opens on June 15th. The Board requested a reminder closer to the event time.

Resident Cookout will be held Friday, June 1st at Nottoway Park.

ADJOURNMENT

There being no further business, Patrick made a motion to adjourn the meeting. This was seconded by Sue and unanimously approved by the Board.

The meeting was adjourned at 9:09 p.m.

Respectfully submitted,

TREASURER'S REPORT-July 2018

Brenda Brennan, Chief Financial Officer

Pathways Living, Inc. has renewed the one-year Housing Assistance Payment Contract (HAP) with the U.S. Department of Housing and Urban Development (HUD), effective July 1, 2018 with a rent increase of 2%. Monthly, the cumulative contract rents will increase by \$185. This HAP contract supports the six homes at 6215 Pioneer, 5626 Sheldon, 2201/2203 Huntington and 2303/2305 Mary Baldwin.

Project Rental Assistance Contracts (PRACs) for Pathway Visions effective August 1, 2018 and Pathway Options effective September 24, 2018 have been submitted to HUD and we are awaiting finalized contracts for the one-year renewals.

The Fiscal Year 2018 Financial and Compliance Audit planning meeting with CohnReznick occurred on Monday, June 11. We reviewed the scope of the audit and included a discussion on significant events that have occurred during the Fiscal Year. Sylisa Lambert-Woodard, Brenda Brennan, Kristina McCullough and Sakin Mire were present from Pathway Homes. From CohnReznick; Winell Belfonte, Glenn Shelton, Micki Lin, Greg Rogers and Chris Griffin, were in attendance. The audit field work is scheduled to begin on Monday, July 23 and continue through August 17.

The Tax-Sheltered Annuity Audit (TSA) to be conducted by CohnReznick will take place during the week of July 16 through July 20, 2018.

All insurance policies; Director and Officer's, Crime, Worker's Compensation, Vehicle, Professional and General Liability renewed effective July 1, 2018.

Effective July 2, 2018, the Pathway Homes 403(b) Retirement Plan transferred from Lincoln Insurance Company to Vanguard.

July 2, 2018 - Philanthropic Report –4th Quarter FY18

April 1, 2018 through June 30, 2018

➤ Financial Contribution Total Received **FY18 \$613,675– FY18 Goal \$586,000**

Campaigns:

- *Holiday Wish List: FY18 \$32,591 – FY18 Goal \$11,000*
- *Help the Homeless: FY18 \$56,159– FY18 Goal \$75,000*
- *Steps to Pathways Breakfast: \$85,669– FY18 Goal \$60,000*
- *Other: YTD \$25,410*

Grants Awarded: YTD \$413,847 - FY18 Goal \$250,000

➤ Upcoming Events:

- Summer of the Arts Exhibit open through July 11th –Jewish Community Center of Northern Virginia, 8900 Little River Turnpike, Fairfax, VA 22031.
- Help the Homeless 5K Walk - Saturday, October 20, 2018 – Fairfax City Hall – 8:30 to 9:00 a.m. registration, walk program begins at 9 followed by the Walk.

➤ Thank You:

- Special thank you to Jennifer Judelsohn who brought 80 people to the breakfast raising over \$7,500 through her efforts! Also, special thank you to Jennifer for curating the Summer of the Arts Exhibit again this year. It looks wonderful and many pieces have already sold.
- Also, special thank you to Jennifer Judelsohn, Jim Ross, Jennifer McGarey, and Sue Zywokarte for attending the Summer of the Arts reception on Sunday afternoon June 24th. It meant a lot to the artists to see your interest in their craft.
- Thank you to all Board members who were part of the aggregate \$40,000+ Give or Get contribution made during FY18.

➤ Action Steps:

- Check your progress toward \$5,000 calendar year commitment. The Director of Development will be sending individual “Give or Get” reports to each member this week. Anonymous report attached to see where you are compared with peers.
- Opportunity to secure sponsorship or sponsor Help the Homeless Walk opportunity to complete commitment. Sponsorship Packet attached. Director of Development will send electronic copy and hard copies will be available at board meeting.

Board Get Report FY18
(July 1, 2017 through June 30, 2018)

Name	Total Amount
Board Member A	\$10,991
Board Member B	\$5,700
Board Member C	\$5,505
Board Member D	\$4,851
Board Member E	\$4,717
Board Member F	\$3,655
Board Member G	\$2,995
Board Member H	\$1,505
Board Member I	\$856
Board Member J	\$505
Board Member K	\$200
<u>Board Member L</u>	<u>\$155</u>
Total	\$41,635

Anonymous Board Give or Get Calendar Year 2018
(January 1, 2018 through July 2, 2018)

Name	Total Amount
Board Member A	\$7,655.00
Board Member B	\$3,500.00
Board Member C	\$2,975.00
Board Member D	\$2,625.00
Board Member E	\$2,185.00
Board Member F	\$1,800.00
Board Member G	\$450.00
Board Member H	\$450.00
Board Member I	\$100.00
Board Member J	0
Total	\$21,740.00



PATHWAY HOMES, INC.
Supportive Residential Mental Health Services

BUSINESS & CORPORATE SPONSORSHIP PACKET

2018 Proposal and Package Options

Share the Vision - Make a Difference

Becoming a business sponsor of Pathway Homes provides you with the unique opportunity to connect with the community, reinforce your reputation as a good corporate citizen, build brand awareness, and show your company's support for the important work Pathway Homes is doing across Northern Virginia. Your business becomes associated with, and part of, the community-wide efforts to provide housing and supportive services to adults with serious mental illnesses.

Mission-centric or Event-specific Sponsorships

Our sponsorship packages are designed to help companies achieve their philanthropic goals while engaging them in our work.

Pathway Homes offers a variety of business sponsorships, including organizational sponsorship packages that offer year-long exposure, or event-specific packages that allow you to reach different key audiences.

No matter the sponsorship package, each offering affords you the opportunity to reach a variety of demographics while providing unique and engaging ways for your company to connect with potential customers in our community.

Sponsorships are available at a variety of giving levels, and we will gladly work with you to tailor a sponsorship package that fits your specific needs.



"Vision without action
is merely a dream.

Action without vision
just passes the time.

Vision with action can
change the world."

- Joel A. Barker

PUBLIC EVENT SPONSORSHIP - Help the Homeless Walk



Can you REALLY have this much fun AND raise money for a noble and worthy cause?? YES!!

For the 19th year, Pathway Homes is proud to announce our annual Help the Homeless Walk. This year's event will be held on Saturday, October 20th, on the grounds of the Fairfax City Hall. With the changes made in scope and location for our annual fundraising walk, we've made it truly a community-wide event.

We are especially excited to present to you our numerous sponsorship opportunities for this, our signature event. This is your opportunity to make a significant local impact helping provide safe housing for those who need a home. What a great way to show potential customers that you and your business care about the community in which we all live.

Levels and Benefits	Complimentary walker registrations	Opportunity to welcome participants from the stage	Dedicated display and presentation space at event	Business logo on walk materials, T-shirt, event signage, website, and social media	Business profile in Pathway Home's newsletter	Sponsor's marketing materials include in goodie-bag	Sponsor listing on walk materials, T-shirt, and social media	Sponsor listing on event signage and website
Platinum Sponsor - \$10,000	25	X	X	X	X	X	X	X
Gold Sponsor - \$ 5,000	20			X	X	X	X	X
Silver Sponsor - \$ 2,500	15					X	X	X
Bronze Sponsor - \$ 1,500	10						X	X
Friends Sponsor - \$ 500	5							X





PATHWAY HOMES, INC.
Supportive Residential Mental Health Services

BUSINESS & CORPORATE SPONSORSHIP PACKET

Sponsorship Registration Form

Please complete the following information so we may accurately process your sponsorship commitment.

Organization Name: _____

Contact Name: _____

Address: _____

City: _____ State _____ Zip Code _____

Phone: _____ Alternative Phone: _____

Email: _____

If paying by check, please make the check payable to "Pathway Homes, Inc."

To make payment with a credit card, you can visit www.pathwayhomes.org, click on the "Click to Give" icon, and choose the desired designation from the drop-down menu on the web form. - OR - Simply complete the information below.

Type: MC / Visa / Discover

Card #: _____

Exp. Date: _____ CSV Code: _____

Name (PRINT): _____

Billing Address: _____

Signature: _____

Please indicate your 2018 Sponsorship choice(s):

☐ Organizational Sponsor - \$25,000

☐ Benefit Breakfast Event Sponsor - \$5,000

☐ Help the Homeless Walk Sponsor:

☐ Platinum level - \$10,00

☐ Gold level - \$5,000

☐ Silver level - \$2,500

☐ Bronze level - \$1,500

☐ Friends level - \$500

☐ Summer Cookout Event Sponsor - \$5,000

☐ Summer of the Arts Event Sponsor - \$5,000

☐ Holiday Party Event Sponsor - \$5,000

Please return this registration form to:

Pathway Homes - Attn: Anna Smith

10201 Fairfax Boulevard, Suite 200

Fairfax, VA 22030-2209

or Fax: 703-876-0394

July 2, 2018 – Board Development Report –4th Quarter - FY2018

April 1, 2018 through June 30, 2018

Committee Members: Patrick Chaing, Committee Chair, Dan Gray, Jim Ross

Staff: Sylisa Lambert-Woodard, Anna Smith

The Board Development Committee (“Development Committee”) met on Friday, June 29, 2018.

The Development Committee discussed ongoing recruitment priorities, logistics and procedures for officer elections at the upcoming Annual Board Meeting, and the *emeritus* designation. On Friday, May 11, 2018, the board honored departing board members Tom Rowe and Maiko Ashby at a farewell dinner. Photos are attached.

Board Recruitment: The Development Committee reviewed materials for several potential candidates, whose skill sets meet current areas of need. The Development Committee will continue to vet suitable candidates and has extended invitations to various individuals to attend upcoming meetings as guests.

The Development Committee would like to remind the Board to continue to provide recommendations on possible candidates for membership. This request includes, but is not limited to, prospective candidates for Board Treasurer and active members (with human resources and media expertise, in particular) consistent with the necessary attributes set forth by the Board in January 2014:

- 1) Openness to making a financial contribution;
- 2) Ability to attend Board meetings, committee meetings, and special events;
- 3) Being a good group decision maker.

If Board members have candidates that meet these criteria, please contact either President and CEO Dr. Sylisa Lambert-Woodard, Board Chair Daniel Gray, or Board Development Chair Patrick Chaing.

Officer Elections: The Bylaws do not specify a process or procedure for officer elections, other than that they must take place at the Annual Meeting, and that officers are elected for a term of one year. The Development Committee reviewed external materials on election procedures, and discussed possible best practices for officer nominations and elections. Please find attached “2018-2019 [Proposed] Nomination & Election Process” document, for further discussion and vote.

Emeritus Status for Tom Rowe: Tom Rowe has accepted the invitation of the Board of Directors to remain as a board member with emeritus status (Bylaws, Article III, Section 19). Accordingly, Tom will be restricted from holding office or voting, but will be entitled to: 1) receive all written notices and information which are provided to the Board of Directors; 2) attend Board of Directors meetings; 3) participate in meetings of the committees in which he served; and 4) attend Pathway Homes events.













Pathway Homes, Inc. Board of Directors
2018-2019 [Proposed] Nomination & Election Process

Current Pathway Homes, Inc. Bylaws, Art. IV, Sec. 1:

“Officers. The officers of the Corporation shall consist of a Chairperson of the Board of Directors, Vice-Chairperson of the Board of Directors, Chief Executive Officer, President, Chief Financial Officer, Secretary, Treasurer, all elected by the board, and such other officers as the board of directors may appoint, including one or more vice-presidents, assistant treasurers and/or secretaries, who shall exercise such powers and perform such duties as shall be determined from time to time by the board. Any number of offices may be held by the same person, unless the Articles of Incorporation or these Bylaws otherwise provide; provided, however, that in no event shall the President and the Secretary be the same person. The Chairperson of the Board of Directors, the Vice-Chairperson of the Board of Directors, the Secretary and the Treasurer shall be members of the Board of Directors. The term of office shall be one year running from one annual meeting of the board to the next (or until a successor officer has been chosen and has assumed the duties of the office). Officers may be removed by the board without notice or reason. A vacancy may be filled by appointment by the Chairperson of the board until the next board meeting. Election or appointment as an officer shall not itself create any contractual rights.”

Nominations

- Nominations to be submitted at any time after the July 9, 2018 meeting. Nomination correspondence must be submitted in writing (i.e., e-mail) to the staff person supporting the Board Development Committee. Anna Smith: asmith@pathwayhomes.org. This information will be collected and presented to the Board Development Committee Chair.
- Any member of the Board of Pathway Homes, Inc. (the “Board”) may nominate or be nominated. Members may be nominated for more than one position, and members may nominate themselves for one or more positions.
- Nominations must be submitted by 5 p.m. EST on the day four weeks prior to the Annual Meeting (currently September 3, 2018).
- Members who are nominated for one or more positions must respond whether they will accept or reject such nomination, by 5 p.m. EST on the day three weeks prior to the Annual Meeting (currently September 10, 2018).
- Reminders of each of these deadlines will be communicated by e-mail to the Board.
- In the event there are no candidates for an open position, the Board Development Committee may issue recommendations to the Board regarding the appointment of a current member, or election of external candidates that may be suitable for such position.

Elections

- Elections take place at the October 2018 Annual Meeting, as prescribed by the Bylaws.
- Each nominee is permitted (and in fact, encouraged) to make a brief statement during the October 2018 Annual Meeting. The Board Development Committee will request and circulate with its report, any brief statement or background provided by the nominees.
- Each member may cast an individual ballot for each position. Abstentions are permitted.
- Elections for October 2018 will proceed in the order of: (i) Chairperson; (ii) Vice-Chairperson; (iii) Secretary; (iv) Treasurer.
- Ballots will be counted and tallied by the Chairperson – initially Dan Gray, then the Chairperson elected for the 2018-2019 term by the Board for remaining positions.
- Positions will be confirmed through a majority of votes. In the event of a tie, the following procedure will be implemented: First, the Board will resubmit ballots in a run-off between the two members who received the most votes in the first round. Second, if the tie is not broken in a run-off, the nominees will meet and confer privately to see if an informal resolution may be reached. Third and finally, the Chairperson will select one of the two tied members, based upon his or her weighting of the following criteria:
 - 1) Suitability and ability to perform the position in question;
 - 2) Tenure and experience as a member of the Board;
 - 3) Dedication and active participation in the work of the Board; and
 - 4) Anticipated availability and willingness to perform such role.
- All members, including candidates for each position, are **strongly** encouraged to attend the October 2018 Annual Meeting. In the event of an absence – planned or unplanned – such absent member may submit his or her votes to the President of Pathway Homes, Inc. (Sylisa) to act as a proxy. However, such absent member acknowledges that his or her vote may be discarded in the event of a tie, if such vote can no longer be honored in the event of a run-off.



Pathway Homes Board Committees and Membership

1. Advocacy Committee – (**Angie**, Jennifer M., and Sue)
2. Board Development (**Patrick**, Dan, and Jim)
3. Finance Committee (Emily, Jim, Dan, and Jon-Michael)
4. Personnel Practices (**Dan**, Dara, and Jim)
5. Philanthropy (**Jennifer J.**, Patrick, and Sue)
6. Strategic Planning (ad hoc committee with involvement from the entire Board during strategic planning years)



BED HOLD POLICY ACKNOWLEDGEMENT

- All residents and tenants of Pathways housing will be notified of the agency's Hold Bed policy at time of orientation.
- Residents and tenants of Pathways housing are responsible for notifying the agency in advance of all anticipated extended absences (in excess of seven days) from housing. For unanticipated extended absences, residents and tenants are responsible for notifying the agency as soon as possible. In the event that Pathways has not been notified of an extended absence, the housing unit will be considered "abandoned" after 30 days and any remaining personal items of the tenant's will be removed.
- In the event of an extended absence, individuals will be offered the opportunity to maintain their current housing provided it is reasonable that they will return to the unit within ninety (90) days. Individuals electing to maintain their housing with Pathways will be financially responsible for all rental or program fees for the duration of the absence.
- Individuals who are recipients of an Auxiliary Grant will be financially responsible for the full amount of the monthly program fee, despite the loss of the Auxiliary Grant, during an extended absence from the program. The individual or the individual's personal representative will be offered the option of paying privately to hold the bed up to the ninety (90) day limit.

Printed Name

Signature

Date

Signature of Staff Explaining Policy

Staff Title

Date



Policy: Bed Hold
Section: Programs and Services
Policy Date: 07/09/2018 (**NEW POLICY**)
Date(s) Revised:
Number of Pages: (1)

Policy Number: 5-B1
This Policy Applies to:
< The agency.

PURPOSE

Pathway Homes, Inc. is committed to providing permanent supportive housing that promotes recovery and stability for individuals experiencing mental health and substance use related disorders.

POLICY

Pathway Homes will work collaboratively with individuals served, and/or individuals in their identified support system, to preserve housing for up to ninety (90) days in the event of an individual's extended absence from the program or housing unit.

PROCEDURE

All residents and tenants of Pathways housing will be notified of the agency's Bed Hold policy at time of orientation.

Residents and tenants of Pathways housing are responsible for notifying the agency in advance of all anticipated extended absences (in excess of seven days) from housing. For unanticipated extended absences, residents and tenants are responsible for notifying the agency as soon as possible. In the event that Pathways has not been notified of an extended absence, the housing unit will be considered "abandoned" after 30 days and any remaining personal items of the tenant's will be removed.

In the event of an extended absence, individuals will be offered the opportunity to maintain their current housing provided it is reasonable that they will return to the unit within ninety (90) days. Individuals electing to maintain their housing with Pathways will be financially responsible for all rental or program fees for the duration of the absence.

Individuals who are recipients of an Auxiliary Grant will be financially responsible for the full amount of the monthly program fee, despite the loss of the Auxiliary Grant, during an extended absence from the program. The individual or the individual's personal representative will be offered the option of paying privately to hold the bed up to the ninety (90) day limit.



Policy: Corporate Compliance
Section: Administration
Policy Date: 03/13/2006
Date(s) Revised: 07/9/2018
Date(s) Reviewed:
Number of Pages: (3)

Policy Number: 1-C2

This Policy Applies to:
< The agency.

PURPOSE

This policy establishes protocol regarding Pathway Homes' Corporate Compliance Program with regard to fraud, waste, and abuse. This policy and its procedures shall constitute the official Corporate Compliance Program of the organization.

POLICY

Pathway Homes shall ensure that delivery of all services is provided in an environment characterized by strict conformance to the highest standards of accountability for administration, clinical, business, marketing, and financial management. Pathway Homes' leadership is fully committed to preventing and detecting fraud, fiscal mismanagement and misappropriation of funds, and to the implementation of a formal corporate compliance program. The corporate compliance program will provide ongoing monitoring of conformance with all legal and regulatory requirements to ensure for the prevention of wrongdoing, whether intentional or unintentional; immediate reporting and investigation of questionable activities and practices with no reprisal; and timely correction of any situation that puts the organization, its leadership or staff, funding sources, or consumers at risk.

The corporate compliance program will also ensure conformance with the **U.S. Department of Justice** (DOJ) Office of the Inspector General (OIG) requirement that prohibits the employment of individuals and entities identified on the List of Excluded Individuals/Entities (LEIE). The OIG exclusion ensures that no Federal health care program payment may be made for any items or services provided by (a) an excluded person/entity or (b) at the medical direction, or on the prescription of an excluded person.

PROCEDURE

The Corporate Compliance Program shall be the overall responsibility of the President and Chief Executive Officer (CEO).

The President and CEO formally designates the Chief Operating Officer as the agency's Compliance Officer (CO) to assist in monitoring the organization's compliance program and provide periodic and/or regular reports to the President and CEO, as needed.

The CO shall ensure that all staff members receive orientation and ongoing training in the organization's Corporate Compliance Plan. Copies of the Corporate Compliance Policy will be disseminated to all employees through access to the Policies and Procedures Manual as well as through direct communication.

The CO shall chair the agency's Corporate Compliance Operation Team (COT) which serves to:

1. Review compliance issues;
2. Serve as a primary point of contact for corporate compliance issues including scheduling necessary meetings of the COT;
3. Provide input and review of relevant policies and procedures; monitor the organization's compliance program including internal and external monitoring, auditing, investigative and reporting processes; reviews procedures and systems; and
4. Prepare, submit, and presents periodic reports to include COT activities to the President and CEO as may be required to provide clear communication to the organization's leadership for compliance oversight.

A report will be prepared annually that will include:

1. A summary of all allegations, investigations, and/or complaints processed in the preceding 12 months in conjunction with the organization's corporate compliance program.
2. A complete description of all corrective action(s) taken.
3. Any recommendations for changes to the organization's policies and/or procedures.

The CO shall maintain copies of all reports that result from investigations of fraud, waste and abuse.

In the performance of his or her duties, the CO shall have direct access to the President and CEO, the Board of Directors, and other agency counsel pertaining to organizational compliance.

Identifying Excluded Individuals

The DOJ OIG updates the LEIE monthly on the OIG website with the following information: the name of the excluded person at the time of exclusion; the person's provider type; the authority under which the person was excluded; the State of residence at the time of exclusion; and a mechanism to verify online search results using Social Security Number or Employer Identification Number. Pathways human resource staff will:

1. Screen all potential employees, contractors, and volunteers through the OIG online database before offering employment. Individuals found to be on the LEIE and whose services would be directly or indirectly, in whole or in part, payable by a Federal health care program will not be employed under that contract.
2. Conduct screening, at least quarterly, of existing employees, contractors, and volunteers whose services are directly or indirectly, in whole or in part, payable by a Federal health care program. Existing employees, contractors, and volunteers found to be on the LEIE would no longer be eligible for funding through a contract directly or indirectly, in whole or in part, payable by a Federal health care program.
3. Require screening documentation of employees and volunteers of contractors whose services are directly or indirectly, in whole or in part, payable by a Federal health care program.
4. Maintain screening documentation of relevant employees, contractors, and volunteers.

Investigating Allegations

Investigating allegations of fraud, waste, and abuse include, but are not limited to:

1. Theft or other misappropriation of organizational assets.
2. Misstatements and other irregularities in organizational records, including the intentional misstatement of fiscal and organizational activities.
3. Forgery or other alteration of any organizational documents/clinical records.
4. Any similar acts.

All staff members are responsible to report any suspicions or allegations of fraud, gross and significant waste, organizational abuse, and/or other wrongdoing in compliance with the Pathway Homes *Employee Grievance and Reporting of Waste Fraud and Abuse Policy*.

Violation of this policy may result in disciplinary action, up to and including termination.

See also *Employee Disciplinary Action Policy, and Criminal Background Check Policy*



Policy: Criminal Background Investigations
Section: Personnel
Policy Date: 01/01/85
Date(s) Revised: 04/08/02, 10/14/2002, 7/03,
04/11/2005; 04/10/2008, 1/12/2009, 07/09/2018
Date(s) Reviewed:
Number of Pages: (2)

Policy Number: 2-C2

This Policy Applies to:
< The agency.

PURPOSE

Pathway Homes is committed to ensuring the health, safety and welfare of residents, staff, and the agency.

POLICY

Pathway Homes requires that criminal background investigations including a Sexual Offender Registry search, child abuse and neglect investigation results, and search results of the Office of Inspector General List of Excluded Individuals/Entities (LEIE) be provided if requested, by all appointees, including employees, volunteers, students, interns and direct service contractors as a condition of employment. Continued employment is contingent upon favorable reports from investigations of an appointee's criminal background.

PROCEDURE

Criminal Background Investigations:

All appointees, if requested, are required to submit to fingerprinting and provide personal descriptive information, during employee orientation or on the first day of employment whichever is sooner, for the purpose of obtaining a national criminal history record and to obtain a search of the registry of founded complaints of child abuse and neglect maintained by the Department of Social Services and the national Sexual Offender Registry, and a search of the LEIE. The appointee will complete a disclosure statement concerning whether they have ever been convicted of or is the subject of pending charges for any offense.

The cost of obtaining the criminal history record, the Sexual Offender Registry search and the registry search of child abuse and neglect shall be borne by Pathway Homes.

Based upon the results of the criminal history record and child abuse registry investigations evaluation, Pathway Homes will determine whether an individual can continue employment. Under state law, an individual is not eligible for employment if there are significant or relevant findings as defined by Virginia Code '37.1-183.3. If an employee is terminated as a result of the criminal history record and disputes the information upon which the termination was based, the Central Criminal Records Exchange shall, upon written request by the applicant, furnish to the applicant the procedures for obtaining a copy of their criminal history record. By federal law, it is provided only for the purpose of challenging the criminal history record.

All background check information will be maintained in a separate personnel file for each appointee.

All Pathway Homes' employees and appointees must notify a management level supervisor or the Manager of Human Resources of any arrest, conviction, and/or any founded complaint of child abuse or neglect, within five (5) workdays of the event.

See also *Corporate Compliance Policy*



Policy: HUD Projects
Section: Administration
Policy Date: 01/12/2009
Date(s) Revised: 04/11/2016, 4/10/2017,
07/09/2018
Number of Pages: (4)

Policy Number: 1-H1

This Policy Applies to:
< The agency.

PURPOSE

Pathway Homes will ensure that all projects funded by the U.S. Department of Housing and Urban Development (HUD) conform to established HUD regulations and requirements.

SUPPORTED HOUSING PROGRAM GRANTS

Draw down requests for SHP grants from the HUD eLOCCS system will be done at least on a monthly basis for funding for net rental expenses incurred and for operating and support service expenses incurred. Documentation to support expenses will be prepared by to the draw down request. Draw down documentation and support documentation will be maintained by the project for each project year.

SHELTER PLUS CARE GRANTS

Draw down requests for Shelter Plus Care Grants from the HUD Line Of Credit Control (LOCCS) system will be done monthly, on a reimbursement basis for net rental expenses incurred by Pathway Homes, Inc., by the Fairfax County Department of Housing and Community Development (DHCD) after receipt of an invoice from Pathway Homes (PHI).

PROCEDURE

1. Pathway Homes, Inc. will prepare monthly invoices for each Shelter Plus Care Grant, which will specify the total amount of rent expense incurred, net rental income received from the residents residing in the specific units, and the monthly administrative expense.
2. Each invoice prepared and submitted to Fairfax County DHCD will be supported by documentation referencing the apartment rent paid by; apartment address, apartment unit, and the resident's name.
3. All paid bills will be maintained by PHI for audit and review by DHCD, HUD,

independent auditors, and any other regulatory authority.

EDUCATIONAL NEEDS OF INDIVIDUALS YOUNGER THAN 25

Homeless individuals younger than 25 years who are served in Pathways HUD projects are provided access to educational and related services.

PROCEDURE

1. Pathway Homes, Inc. will designate a staff person to ensure that individuals younger than 25 years old are enrolled in school and receive educational services as appropriate.
2. The designated staff person will take into account the educational needs of individuals younger than 25 years during the intake assessment and periodically thereafter.
3. The designated staff person will act as liaison with homeless service resources to ensure access to available community supports for these individuals.
4. Pathway Homes Inc. will ensure non-discrimination in the provision of services to individuals younger than 25 years.

HUD FAIR MARKET RENT AND RENT REASONABLENESS

Pathway Homes will ensure that all projects funded by HUD conform to established HUD regulations and requirements to determine rent reasonableness.

PROCEDURE

1. Pathway Homes will conduct rent reviews of units leased and/or rented in projects funded by the U.S. Department of Housing and Urban Development (HUD) based on Fair Market Rent of comparable units in the geographic area.
2. Pathway Homes will utilize the current Fair Market Rent (FMR) for all bedroom sizes published annually by HUD for the specific geographic area supporting the grant funded project.
3. Pathway Homes will compare current rent/leasing charges for specific unit size and within the same geographic area with other units of similar size, age, quality, access to public transportation and shopping published by: apartment leasing communities, Zillow, Rent.com, etc. to determine rent reasonableness. Rent and leasing charges that exceed

published fair market rent and rent reasonableness will not be considered for projects funded by HUD.

HUD ENTERPRISE INCOME VERIFICATION (EIV) SYSTEM

Pathway Homes will ensure proper use, where applicable, of the HUD Employment Income Verification (EIV) system in accordance with HUD administrative guidance. This guidance applies to Pathway Homes' HUD Section 202 Project Rental Assistance Contract, and Section 811 Project Rental Assistance Contract projects.

PROCEDURE

1. Pathway Homes will use the EIV system as a required third-party tenant employment and income verification source, and to reduce administrative and subsidy payment errors.
2. Pathways Homes will identify designated authorized EIV users and require each individual to use a unique USER ID and password when accessing the system. Only Pathway Homes staff with a successful criminal background check will be designated as a user in the EIV system
3. All tenants entering the Section 202/811 HUD projects will complete a HUD 9887 Consent Form to allow access to their information in the EIV system. Each consent will be signed by all adult members of the household regardless of income status. A signed and dated HUD 9887-A Applicant's/Tenant's Consent to Release of Information will also be completed by each tenant.
4. Pathway Homes certification staff will ensure the consents are current prior to accessing employment or income data in the EIV system or requesting information from a third-party source.
5. Each tenant will be provided the EIV Pamphlet, Rent Fact Sheet, and Resident Rights & Responsibilities literature at each annual certification.
6. An EIV Existing Tenant Search will be conducted on all tenants entering the Section 202/811 HUD projects. Subsequent searches will be conducted at re-certification of income or quarterly, whichever comes first.
7. The EIV search will include identity match (social security number), social security benefits match, and new hires, wage and unemployment benefit match.

8. Pathway Homes will obtain independent third-party verification from the source of the EIV data when the tenant is unable to provide acceptable/current document to support information in the EIV system; the tenant disputes the EIV income information; there is an income discrepancy at the time of recertification; or there is incomplete EIV employment or income data for the tenant.
9. Pathway Homes will follow HUD-established administrative guidelines to address incorrect information in the EIV system.
10. Pathway Homes will maintain required documentation of compliance with mandated use of the EIV system in tenants' files, and agency property management system database.
11. Pathway Homes will ensure that printed EIV documents are used only by independent public auditors auditing compliance with income verification and accuracy of rent/subsidy determinations, and the Office of the Inspector General for auditing purposes, when needed.
12. All Pathway Homes staff will follow HUD- and Pathway Homes-established guidelines relating to maintaining confidentiality of protected identifiable information and protected health information.

See also 1-I2 Information Technology Systems policy, and Pathway Homes Tenant Selection Plan.



Policy: Information Technology Systems
Section: Administration
Policy Date: 07/11/2011
Date(s) Revised: 04/08/2013; 07/19/2017,
07/09/2018
Date(s) Reviewed:
Number of Pages: (10)

Policy Number: 1-I2

This Policy Applies to:
< The agency.

PURPOSE

To ensure the security, integrity, efficiency, and accuracy of the organization's information systems, to include clinical, accounting, and property management software, internet access, email, land lines and cellular telephones, and facsimile machines.

POLICY

Pathway Homes will maintain an information technology (IT) system, including hardware and software, that is designed to meet IT and other information needs and requirements in a changing environment, while protecting the confidentiality of protected health information.

PROCEDURES

A. Configuration

Pathway Homes maintains computerized systems that contain clinical, accounting, budget, communications, and other agency-related information and correspondence. These systems are networked to a cloud-based server and/or other approved file storage solutions and are intended for agency use only. Personal files must not be stored on agency computers. File names must never contain electronic protected health information (ePHI). All files are to be saved on the agency network and not on the hard drive of the user's computer or any other removable storage media (flash drives, disks, etc.) to ensure the following:

1. File access is limited to appropriate staff;
2. Confidential data is securely stored and accessed;
3. File backups are completed via the network; and
4. Version history is retained.

B. Purchases

Enhancements or changes to these systems are proposed as part of the capital budget each fiscal year. All purchases will be authorized by the President/Chief Executive Officer (CEO) or designee and executed by the Quality Assurance (QA) Manager.

C. Network Administration

1. *Maintenance and Technical Support:* Computer hardware and software are maintained by a contracted IT support provider in collaboration with the QA Manager. All agency computers are subject to regularly scheduled maintenance checks to ensure all systems are up-to-date and running efficiently.
2. *Installing Software:* No one may install, download, or use software brought in from outside or online without consulting with a supervisor and the QA Manager. In addition, only the IT Support Provider or QA Manager may uninstall software that is on Pathways computers, cell phones, or other IT assets. Virus protection software will be installed on all computers.
3. *Care and Safety:* Staff must take appropriate precautions to ensure that all hardware remains in good working order, for example, no food or drinks shall be placed on computer workstations or laptops; and staff must log off at the end of each day. Additionally, staff must reboot computers **at least once a week** and must immediately use the established agency IT support system to report any computer or IT-related problems.
4. *Replacement cost:* Staff will be assessed a replacement cost for damage or loss of any computers, laptops, cell phones, or other IT assets that is caused by a failure to take appropriate safety and security precautions. Repeated loss of, or damage to said items may result in disciplinary action.
5. *Replacement process:* Staff must notify their supervisor and the QA Manager immediately they become aware of damage or loss of any Pathways computer, laptop, cell phone, or other mobile device in their possession. Staff will be invoiced for the damaged or lost item and must pay the invoiced amount within 60 days or at termination of employment with Pathway Homes, whichever comes first. If a staff person locates a lost item and returns it in good working condition within 30 days of

being invoiced, the payment, if already made, will be refunded in full. Failure to pay may result in disciplinary action, including termination.

6. *Backup:* Complete file server backup will be done nightly onsite. Secondary nightly backup is conducted offsite through a credible vendor.
7. *Password Protection:* The network is password protected. Staff must take the following steps to ensure that their computers are adequately password protected:
 - a. Use strong passwords (at least ten characters; combination of upper and lower case letters, a number and a special character);
 - b. Use password-protected screen savers that activate within 5 minutes of inactivity on the computer;
 - c. Do not write or store passwords in locations where others may have access to the passwords;
 - d. Avoid inadvertently sharing passwords with others; for example, do not type your password while someone else can see your keyboard;
 - e. Do not allow another individual to log in as you or use your computer when you are logged in.
 - f. Log in with his or her own unique username and password; and
 - g. When software can be configured to require users to change passwords at regular intervals, must retain the same password for no more than 90 days.

D. Agency Laptops

All agency laptops are to be stored in a secure manner (e.g. locked filing cabinet; not in cars) and are to be used strictly for agency business. No personal files are to be stored on laptops. In rare circumstances (e.g. no Internet access), confidential information and files may be stored on laptops but not on removable storage media such as flash drives. Such information must be transferred to the agency's server as soon as the user has secure Internet access. To assist in protecting the data on laptops, staff must:

1. Password-protect all laptops in the same way as desk top computers;
2. Ensure that regular maintenance is completed on all laptops, to include software and antivirus upgrades, by responding to any requests from the contracted IT support provider or the QA Manager in a timely manner;

3. Immediately report misplaced or missing laptops to supervisor and QA Manager. IT Support will remotely wipe any email and network-stored data from lost laptops and other mobile devices upon notification that the item is misplaced.

E. Cell Phones

All agency cell phones are to be used strictly for agency business. This includes the use of agency cell phones as Global Positioning Service (GPS) devices, which taps into the agency's data usage allowance. To assist in protecting the data on cell phones, staff must:

1. Password-protect all agency cellphones;
2. Ensure client pictures (if captured by cell phone) are transferred to the agency's server as soon as server access is available, and delete from cell phone;
3. Consult with QA manager about periodic upgrades;
4. Secure cell phones when not in use
5. Immediately report misplaced or missing cell phones to supervisor and QA Manager.

IT Support will remotely lock and wipe all data from lost cell phones upon notification that the item is misplaced.

F. Internet and Electronic Mail

Daily use of the Internet and email at Pathway Homes shall be for work-related purposes. Occasional and limited personal use of the Internet and email during work hours is permitted; however, personal use is prohibited if it: interferes with the employee's productivity or work performance, or with any other employee's productivity or work performance; adversely affects the efficient operation of the agency network or computer systems; or if it violates any provision of this policy or supplemental policy adopted by Pathway Homes, regulation, law or guidance as set forth by local, State or Federal law. All employees must check and respond to email during each work day.

Office 365 is a HIPAA-compliant system that includes Microsoft Outlook, OneDrive, and SharePoint. However, if not used within established guidelines, security of protected

health information (PHI) is not guaranteed. The following guidelines are in place to ensure the security of our confidential information:

1. Always encrypt all email containing PHI if emailing to someone outside Pathway Homes. To encrypt, include “ENCRYPT”, “ENCRYPTED”, or “ENCRYPTION” in the email subject line.
2. For internal email, if using the group feature where Pathway Homes has control over the membership of the group, email containing PHI can be sent without encryption. Do not forward outside Pathway Homes without first encrypting.
3. All other internal email containing PHI must be encrypted.

Individuals who have been identified as needing to send encrypted email will be provided those rights by the IT support provider or QA Manager. After notification that their account is encryption-ready, email may be used to transmit ePHI when the user ensures the following conditions are met:

1. The recipient has the right and appropriate authorization to view the ePHI;
2. The subject line does not include any identifying personal information;
3. No attachments have file names containing identifying personal information;
4. The subject of the email contains a variation of the word “Encrypt”.

G. Prohibited Activities

Certain activities are prohibited when using the Internet or electronic communications. These include, but are not limited to:

1. Sharing confidential information, including attachments, via the Internet unless that information is shared with individuals who have the right to view it, and the information is shared using the agency’s Office365 Services Domain or other approved secure service. No client names, or other protected health information shall be included in internal or external email messages unless the email is encrypted. File names and email subjects must never include ePHI. Employees who are assigned users can electronically share protected health information within the agency’s electronic health record web-based secure system and Box.com;

2. Accessing, downloading, printing or storing information with sexually explicit content;
3. Downloading or transmitting fraudulent, threatening, obscene, intimidating, defamatory, harassing, discriminatory, or otherwise unlawful messages or images;
4. Installing or downloading computer software, programs, or executable files without consulting with the QA Manager and supervisor.
5. Uploading or downloading copyrighted materials or proprietary agency information contrary to policy;
6. Uploading or downloading access-restricted agency information contrary to policy or in violation of agency policy;
7. Sending email using another's identity, an assumed name, or anonymously;
8. Permitting a person who is not authorized by management to use the system for purposes of communicating a message of their own to an individual or organization;
9. Any other activities designated as prohibited by the agency.

H. Security

Servers

Pathway Homes uses SharePoint, a cloud-based server that is accessed by authorized personnel as determined by their job functions. A backup server is located in a locked room and access is controlled by a password protected lock on the door. Distribution of the password is limited to specific employees with related position responsibilities. Periodic changes to the password will occur at least every six months or immediately following a position change or termination of employment of an individual who had authorized access.

The right to edit files in SharePoint is role-based and determines rights to create folders. SharePoint is intended to streamline how we create, manage, store, and share information. As such, duplication of files and folders across sites is strongly discouraged. The best-practice protocol is to have a centralized location for files and folders that are accessed, shared, or edited as needed.

Sharing Files Internally

1. Files can be accessed, viewed or edited based on job role and security rights.

2. When sharing files, use the following options: “Share with people who already have access”, or “Share with specific people.”
3. Do not use “Share with anyone with this link” as this option is not encrypted and can provide access to the document to anyone internally or externally if the link is forwarded. The shared link expires in 60 days.

Do not save files that are shared with you, on your desktop or to other folders.

Sharing Files Externally

1. When sharing files, use only the “Share with specific people” option. The shared link will expire within 60 days and if forwarded, will not work for the new recipient. Staff must include Pathway Homes confidentiality statement, which covers such actions by recipients.
2. Do not “collaborate” with external users (unless in approved circumstances) as this will allow the recipient access to the file in Pathway Homes SharePoint domain indefinitely.
3. Uncheck “can edit” box when sharing files or folders so recipient is limited to view/print rights only unless the recipient is an approved editor for the shared file/folder.

Computers and Laptops

Staff may not leave a secure web-based software session unattended. If not actively utilizing the web-based software, the connection must be closed. In addition, the following steps must be taken to ensure the security of all agency computer systems:

1. All computers and laptops are checked and stripped of any protected health information before they are removed from service and disposed.
2. Only Pathway Homes’ staff are provided access to use agency computers or laptops unless the system has been designated for guest use. On rare occasions, external auditors or trainers may be assigned a Pathways’ computer or laptop for designated use and assigned a temporary password to use the system.
3. All staff will receive IT Security Training at hire and at least once a year.

Removable Storage Media (Flash Drives, Disks, etc.) and OneDrive

The use of flash drives or similar removable storage devices is not permitted on Pathways' computers. In rare circumstances, an exception may be granted in consultation with the agency's Privacy Officer.

1. Staff must save all work containing PHI to the cloud-based server.
2. Employees' working files or individual project-specific files not stored in SharePoint must be stored in OneDrive. Such files are accessible only by that employee and IT administrator, if needed.
3. Staff will be trained on the use of these resources as needed.

Remote Access

Remote access to the computer networks is allowed, based on supervisory approval. Employees who access the Pathways computer network are responsible for ensuring that the hardware and software on their personal system is compatible to those used on the Pathways' network. Usage of the remote access system is governed by the same policies and procedures as all other organization computers. All files must be saved on the network and not on the hard drive of the computer being used or to a disk to ensure the following:

1. File access is limited to appropriate staff;
2. Confidential data is securely stored;
3. File backups are made via the network; and
4. Version history is retained.

Staff using Pathways' laptops and mobile devices may access the agency's electronic health record and property management web-based systems through a public Wi-Fi system. However, the following steps must be adhered to when using a public Wi-Fi:

1. Do not print any information;
2. Ensure the device screen cannot be seen by other people who may be in the area; and
3. Do not leave the device unattended at any time.

I. No Expectation of Privacy

All files, including electronic mail and files on shared drives, cloud-based or web-based locations, and agency equipment are the property of Pathway Homes. No employee shall have any expectation of privacy in any message, file, image or data created, sent, retrieved, or received by use of the agency's equipment and/or access. Pathways has the right, but not the duty, to monitor all communications and downloads that pass through its facilities, including, but not limited to, Internet sites, instant messaging systems, chat groups, or news groups visited by employees, material downloaded or uploaded by employees, and email sent or received by employees. Such monitoring may occur at the sole discretion of the agency, at any time, without notice, and without the employee's permission. Upon separation, email and all IT systems remain the property of Pathways.

J. Security of Communication via Internet, Email and Facsimile

Distribution of electronic communications is difficult to control and routing mistakes can easily occur. Copies of electronic communications can be forwarded without the sender's knowledge or permission to unintended recipients. Therefore, electronic communication should be drafted and sent with at least the same level of care, professional judgment and discretion as paper memoranda or documents.

Employees using the Internet or email on agency equipment for personal use must present their communications in such a way as to be clear that the communication is personal and is not a communication of the agency.

A resident's name, initials or any other protected health information are not to be used in emails and attachments unless those emails are encrypted per the agency's protocols.

Employees who must use the fax to share protected health information shall implement the following security controls:

Incoming faxes

1. Fax machines must be in secure areas, and access to them must be limited;
2. Incoming faxes must be properly handled, not left sitting on or near the machine, but rather distributed to the proper recipient expeditiously while protecting confidentiality during distribution, for example, putting the document in an envelope;

3. Digital faxes that are sent to the fax machine in the Administrative Office go directly to the server. When such faxes contain personal health information, they must be accessed directly from the server and not emailed to recipients; and
4. Speed-dial numbers will be periodically and/or randomly checked to ensure their currency.

Outgoing faxes

1. Use a Pathways-approved statement on all cover sheets;
2. Provide only the minimum information necessary to meet the requestor's needs;
3. Double-check the recipient's fax number prior to sending the fax;
4. Notify a supervisor and the agency Privacy Officer, and complete an incident report for any misdirected faxes.

All work-related emails and faxes must have a Pathways-approved disclaimer message as a footer, or on the fax cover sheet.

Enforcement and Violations

Staff must immediately report violations of this policy to a supervisor. All program managers and supervisors are responsible for enforcing this policy. Staff who violate this policy are subject to discipline up to and including termination from employment in accordance with Pathway Homes Disciplinary Action policy.

See also Disciplinary Action Policy, Service Records Policy, and Telework Policy.



Policy: Payroll
Section: Personnel
Policy Date: 01/01/1985
Date(s) Revised: 10/14/2003, 04/08/2013,
12/01/2016, 07/09/2018
Number of Pages: (3)

Policy Number: 2-P1

This Policy Applies to:
< The agency.

PURPOSE

The purpose of this policy is to ensure that payroll is prepared in accordance with accepted accounting practices and the federal and state laws governing payroll and payroll related taxes.

POLICY

Payroll procedures shall ensure timely and accurate payment of employees for services rendered.

PROCEDURES

All Pathway Homes employees are required to complete a Time Sheet for each pay period in the Human Resources Information System (HRIS), referred to as HRIS.

1. Staff are to report the number of hours worked, the number of leave hours taken off due to annual, sick, holiday compensatory, or other leave appropriately on the time sheet utilizing the correct pay and leave code.
2. All approved overtime will be indicated daily on the time sheet utilizing the correct overtime code
3. Approved overtime hours will be reported in 1/4th hour increments.
4. Staff is required to complete and approve their bi-weekly time sheet no later than 10 :00 am the Monday following the end of the pay period.
5. Payroll will not be processed without a time sheet approved by both the staff person and the supervisor.**
 - a. ***There will be special exceptions that will be made to this policy for emergency situations only.*
6. It is the employee's responsibility to ensure that a Time Sheet is completed and approved at the end of each pay period. Supervisor's will make every effort to approve leave requests

timely, to ensure that an employee has sufficient time to submit an approved time sheet by the deadline.

7. Employees have access to the HRIS from a phone or mobile device with internet service

Pathway Homes' personnel are paid biweekly, a total of 26 pay periods per year. Pay periods run for two weeks beginning at 12:01am on Sunday and ending at 12:00am (midnight) on Saturday two weeks later.

Employees are paid with a direct deposit payroll system for payroll only. All employees are required to sign up for direct deposit at the initial orientation meeting. The direct deposit system electronically deposits an employee's pay at the employee's bank of choice in an account they have specified. The direct deposit transaction is completed, and the money is available in the employee's bank account no later than 8pm each payday. Employees are paid every-other Monday. When Monday payday is a federal holiday and banks are closed, employees will receive their direct deposit on the following Tuesday. Employees, who receive reimbursements for mileage, expenses, etc., will receive those payments also by direct deposit.

Staff will have access to their payroll pay stub on each payday in the HRIS. A detailed summary of; earnings, deductions, benefits, taxes and net pay deposited is included.. Each paystub will also indicate cumulative wages beginning January 1st of that year, along with cumulative federal and state taxes paid. Individuals terminating employment will not be paid in advance of the payday on which they otherwise would receive their pay for the pay period worked. The final payroll remittance slip will be available in the HRIS.

Staff are encouraged to download and save to personal files, paystub information maintained in the HRIS. Active employees will continue to have access to payroll information maintained in the HRIS. Non-active employees will have limited access to payroll information following their termination from the organization.

Employees are responsible for making the necessary updates and/or changes to personnel information maintained in the HRIS. This includes; phone numbers, address, tax withholdings, and emergency contact information which can be changed directly within the HRIS. Other changes; direct deposit bank/account information, and name changes require completion of a form with supporting documentation be submitted directly to Human Resources. All payroll changes must be

entered into the HRIS by the end of business on the Monday following the end of the pay period to be in effect for the payroll being processed.



Policy: Staff Evaluation
Section: Personnel
Policy Date: 01/01/85
Date(s) Revised: 1/13/03, 7/9/2018
Date(s) Reviewed: 06/19/2018
Number of Pages: (2)

Policy Number: 2-S6

This Policy Applies to:
< The agency.

PURPOSE

Pathway Homes is committed to the positive development of all employees and direct service contractors. It is the purpose of the evaluation to advance and encourage employees and direct service contractors while aiding them in the identification of job performance areas requiring further development or deserving of special recognition.

POLICY

Each employee will be individually evaluated annually using a core competency evaluation. It is expected that all employees satisfactorily meet the core competencies.

PROCEDURES

The evaluation of employees shall be considered when determining:

1. Which employees shall be eligible for promotion.
2. Which employees are rendering service of such a low standard that disciplinary measures, suspension or termination should be considered.
3. Employee development needs and plans for meeting them.
4. Eligibility for incentive pay or discretionary bonus.

Pathway Homes will integrate Management by Objective (MBO) tools, that ensure that employees have a clear understanding of the goals and objectives of the agency; and their roles and responsibilities that are consistent with the agency's mission, values, ethics, and strategic plan. Each employee will conduct and complete a self-evaluation, provide performance goals, and participate in tailoring future performance objectives that maximize their professional development in alignment with agency goals.

Evaluation guidelines are intended to provide supervisors, employees, and direct service contractors with a clear understanding of the evaluation process and to assist them in arriving at a fair

and equitable rating in areas of job performance. An additional evaluation should be prepared anytime an employee's performance changes significantly. Should an employee receive an unsatisfactory evaluation (below a numerical score of three), re-evaluation should occur within a six-month period to review progress and improvement in the previously unsatisfactory areas of evaluation and/or to determine the appropriateness of awarding a merit increment at that point in time.



Policy: Supervision
Section: Personnel
Policy Date: 07/09/2018
Date(s) Revised:
Number of Pages: (3)

Policy Number: 2-S7

This Policy Applies to:
< The agency.

PURPOSE

Pathway Homes is committed to maintaining a highly trained and qualified workforce and providing quality, competency-based supervision to all employees. It is the purpose of supervision to support ongoing, two-way communication that serves the dual purpose of agency and employee development, and to provide the employee oversight that ensures the provision of effective and ethical services to all individuals served.

POLICY

All employees will receive regular supervision from an immediate supervisor, or designee, that focuses on professional competencies and the achievement of departmental standards and goals.

PROCEDURES

Supervision may occur as planned/formal supervision in which the sessions are pre-arranged and there is an established, mutual agenda. Supervision may also occur as an informal/unplanned meeting that is generally held in response to a task or an event where it is inappropriate to wait for the next planned supervision. Supervision may be provided through individual or group sessions.

All supervisors are responsible for ensuring the scheduling of consistent supervision with each assigned employee and for documenting all planned and unplanned supervisory sessions. Supervisors are responsible for ensuring that supervision consistently addresses all unsatisfactory performance issues, performance targets identified in the employee's performance evaluation, and professional development needs identified by the supervisor and/or employee.

In order for the supervisory process to be beneficial to both the employee and the agency, all employees are expected to be prepared for supervision (questions, updates, issues, concerns,

recommendations) and actively participate in the process.

Supervision will address, at a minimum, the development of professional competencies in the following areas:

1. Technical knowledge and skills in the field of work,
2. Knowledge of the mission, values and business of Pathway Homes,
3. Knowledge of the agency's policies and procedures,
4. Ability to implement duties and standards outlined in position description,
5. Analytical and decision-making skills,
6. Interpersonal and communication skills, and
7. Professional conduct and judgement.

Clinical Supervision

In addition to the above described practices, clinical supervision is further defined to ensure that direct care staff demonstrate the skills needed for provision of the highest quality of service delivery to individuals served by Pathway Homes. Clinical supervisors will be, at a minimum, a Master's level clinician, meet criteria as a Qualified Mental Health Professional (QMHP), **as established by the Department of Medical Assistance**, and have demonstrated practical experience in the mental health, substance use, and/or nursing fields. It is the responsibility of clinical supervisors to ensure that each supervisee is providing treatment and services that are consistent with accepted standards of care and the unique needs of the individual.

Clinical supervision will address, at a minimum, the development of professional competencies in the following areas:

1. Accurate assessments,
2. Identification of risk factors,
3. Service planning and service plan development,
4. Appropriateness of interventions and fidelity in implementing best practice models,
5. Ethical issues and professional standards,
6. Issues related to human rights and advocacy,
7. Cultural competency, and

8. Service/treatment effectiveness as measured by persons served achieving individual goals.

All Mental Health Skill Building Services provided by a QMHP will be reviewed by a Licensed Mental Health Professional (LMHP) at least once per quarter; and that review will be documented in the services record. An LMHP will conduct all reimbursable skill building and crisis stabilization assessments. All QMHP employees providing MHSS and crisis stabilization services will be supervised by an LMHP or license-eligible mental health professional.