

Legal and Contractual Compliance Policy and Procedure

Policy: AD.2.1

Effective Date: 4.16.15

Approved: , CEO

Revised: 3.17.16

Reviewed: 3.17.16

SCOPE: This policy applies to all Senior Resources (SR) employees and volunteers including those who are part time, temporary and contractual hereby referred to as “staff.”

POLICY: Senior Resources is committed to full compliance with all applicable laws, regulations, and contractual agreements. The Code of Ethics and Conduct Policy provides standards of ethical business practices and establishes the expectation of full legal, regulatory, and contractual compliance during the performance of all job duties. This policy is required to be followed by all Senior Resources staff.

MI Choice HCBS services will be delivered in accordance with the most recent MDHHS Contract Agreement and Waiver Program Operating Criteria for the MI Choice Waiver Program.

State Care Management (CM), Case Coordination & Support (CCS), and Long Term Ombudsman/Options Counseling service programs will be delivered in accordance with the most recent Michigan Aging and Adult Services Agency (AASA) Care Management Performance Criteria and Operating Standards for Service Programs. Operations as a designated Area Agency on Aging will be delivered in accordance with the most recent AASA Operating Standards for Area Agencies on Aging.

All other contractual agreements in which Senior Resources enters into with another entity shall be honored and services rendered in accordance with that contract.

PROCEDURE: Senior Resources adheres to standards, obligations, and guidance from the Michigan Department of Health & Human Services, the Centers for Medicare and Medicaid Services, and the Michigan Adult & Aging Services Administration related to area agency on aging operations, programs, human resources, civil rights, contracting, HIPAA, and other laws affecting the agency’s daily operations.

Senior Resources’ leadership communicates regularly with leadership of other, similar organizations about a variety of topics including legal requirements and obligations. As necessary, Senior Resources will consult with legal counsel for additional guidance.

Senior Resources undergoes an independent financial and single program audit annually. Senior Resources also regularly consults with our auditing firm related to matters of financial reporting requirements, generally accepted accounting principles, and Office of Management and Budget standards.

REFERENCES:

[HR1.3 Code of Ethics and Conduct](#)

[FC.1.21 Risk Management Plan Policy and Procedure](#)

Corporate Citizenship Policy and Procedure

Policy: AD.2.2

Effective Date: 4.29.15

Approved: *Pam Curtis*, CEO

Revised: 10.12.2015 Reviewed: 3.17.16

POLICY: Senior Resources strives to be a responsible corporate citizen. We endeavor to operate in a manner that is sustainable - economically, socially, and environmentally – and in the best interest of long-term success for our agency.

Senior Resources' core values are based on the fundamental rights of every individual, such as the protection of privacy, freedom of opinion and expression, freedom of association, nondiscrimination, and the right to be heard.

PROCEDURE:

Our stakeholders are key to our success. We base our human resources policies and practices on fairness, openness, and mutual respect.

- We pay competitive and fair wages, which clearly exceed what is needed to cover basic living needs.
- We provide work-life balance, allowing employees reasonably flexible schedules and generous paid time off allowances. We want our employees to have time for family, social activities, volunteerism and leisure.
- We strive to provide our employees with a stimulating and challenging working environment with opportunities for personal and professional development, while expecting from them a high level of performance and commitment to the success of Senior Resources.
- We believe in constructive dialogue between employer and employees and support the principle of freedom of association.
- The health and safety of our employees, neighbors, participants and all others affected by our business activities, as well as protection of the environment, have priority in all our activities.
- Employees are encouraged to hold positions on local human service boards as appropriate and have involvement in community organizations and service groups.
- We strive to make efficient use of natural resources and minimize the environmental impacts of our activities.

We care about the expectations and concerns of our stakeholders.

- We recognize the interest of our stakeholders, employees, participants, neighbors, governmental authorities and the public at large in our social behavior, and the health, safety and environmental impacts of our business. We provide relevant information and actively listen to stakeholders. In assessing processes and technologies, we seek dialog with all stakeholders.
- Improving the standard of living of all people is a shared responsibility between the private sector, the public sector and other stakeholders. Senior Resources actively supports efforts toward the improvement of the standard of living.

We integrate the principles of good Corporate Citizenship into our business strategies.

- We manage the implementation process actively, consistently and effectively. Our organization establishes proper structures and allocates sufficient resources to meet corporate citizenship goals.
- We measure progress and verify compliance with this Policy, related guidelines and regulatory requirements through internal and external audits and management reviews.
- We encourage our business partners, suppliers and contractors to share our societal and environmental values, and we support their efforts to promote these values through their business activities.

- We foster awareness of and commitment to this Policy among our employees; to this end, we provide appropriate information and training to develop their skills.
- Senior Resources promotes the practice of recycling, the use of environmentally friendly products, carpooling and grouping agency business to reduce mileage. All employees shall comply with this Policy, related guidelines, and regulations applicable to their area of operational responsibility.

VIOLATIONS: Violations to this Corporate Citizenship Policy will be reported to the designated compliance officer, Senior Resources Officer Manager, in the manner outlined in the Employee Complaint Policy.

REFERENCES:

HR1.3 [Code of Ethics and Conduct](#)

HR.1.10 [Employee Complaint Policy](#)

AD.2.1 [Legal and Contractual Compliance Policy](#)

Cultural Competency Policy and Procedure

Policy: AD.2.3

Effective Date: 4.29.15

Approved: , CEO

Revised: 4.29.15

Reviewed: 3.17.16

SCOPE: This policy applies to all Senior Resources employees and volunteers, including those who are part time, temporary and contractual, hereby referred to as “staff.”

POLICY: It is the policy of Senior Resources to maintain a written Cultural Competency and Diversity Plan that describes how the linguistic and cultural needs of our participants are met. It is our policy to effectively provide services to participants of all cultures, age groups as defined by our mission and funding sources, races, gender, sexual orientation, socioeconomic status, languages, ethnic backgrounds, spiritual beliefs and religions in a manner that recognizes, values, affirms, and respects the worth of the individuals and protects and preserves the dignity of each person. Senior Resources adheres to the equal employment opportunity policy and non-discrimination practices.

TERMS: This policy applies to all individuals while under the care of any staff and/or contractual agencies within the provider network as well as stakeholders, and will influence all Senior Resources employee interactions.

For the purposes of this policy, a cultural group may be identified as individuals:

- whose understanding of health, mental health, illness, or disability is sufficiently different from the cultural mainstream and creates a risk of sub optimal service as a result;
- whose family customs, social patterns, child-rearing practices, and religious values are sufficiently different from the mainstream to create a risk of inaccurately assessing family functioning;
- whose primary language is not English or whose means of communication is sufficiently different from mainstream as to risk misunderstanding essential elements of the clinical or professional interaction; or
- whose history of experiencing war or ethnic, racial, social, or class-related discrimination is likely to have produced trauma or stressors beyond the norm.

PROCEDURE:

For Participants:

1. As part of the assessment process of the participant, the following shall be considered:

A. Assessment: The assessment process of culturally diverse participants shall include:

1. a review of the participant’s cultural background;
2. the role of the cultural context in the expression and evaluation of symptoms; and
3. the understanding of how cultural differences may have an effect on the relationship between the consumer and the health or service provider.

B. Plans of Care and Service Delivery: Supports Coordinators shall be knowledgeable about and skillful in the use of services available in the community and broader society and be able to make appropriate referrals for their diverse participants. Development of the Plans of Care and the delivery of services shall be congruent with the person centered plan approach of which:

1. An interdisciplinary team of professional staff from Senior Resources and its service contractors work together with the participant as a partner in their health; and

2. Considers the participant's preference for linkages with the medical/healing community (whether traditional or alternative), religious and spiritual resources, community, in-home service and meal providers as applicable.

For Staff:

1. Training: Staff shall participate in a minimum of one cultural competency/diversity training per year. Attendance will be recorded via a sign-in attendance log that can be retrieved upon request. Staff will also be offered opportunities to attend training opportunities within the community as budget allows and can substitute for in-house trainings as long as prior approval is given by their supervisor and proof of attendance is provided.

For Other Stakeholders:

1. Agencies/businesses/organizations under contract with Senior Resources will be encouraged to provide their employees with cultural competency and person centered thinking training. Senior Resources will provide linkages to cultural competency information to contractors through the vendor communication network.

REFERENCES:

[HR.1.2 Equal Opportunity for Employment Cultural Competency Plan](#)
[CC.1.19 Person Centered Planning Policy](#)

Equal Opportunity in the Provision of Services, Activities and Programs Policy and Procedure

Policy: AD.2.4

Approved: *Pam Curtis*, CEO

Effective Date: 10.22.04

Revised: 11.6.15

POLICY: Senior Resources of West Michigan does not discriminate against, exclude from participation in, nor deny benefits to any eligible recipient of services on the basis of race, color, creed, national origin, age, marital status, religion, sex or disability in accordance with Title VI of the U.S. Department of Health & Human Services Act 45 C.F.R., Part 80: ‘no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.’

PROCEDURE:

- Individuals believing they have been discriminated against or excluded from or denied benefits or services are encouraged to first discuss the complaint with the Chief Executive Officer (CEO) of Senior Resources of West Michigan.
- The CEO will investigate and issue a written response. All attempts will be made to resolve the complaint or satisfy the individual’s expectations.
- If the complainant does not feel their concern has been heard he/she may file the complaint in writing whether on paper or electronically within ten business days of receiving a response from the Chief Executive Officer to the executive committee of Senior Resources’ Board of Directors.
- The executive committee(s) will investigate the complaint and issue a response to the complainant within thirty days of receipt of the complaint.

ENFORCEMENT: The Chief Executive Officer of the agency, Board of Directors, managers and staff are responsible for enforcing this policy. All suspected breaches or violations are to be reported to the CEO.

REFERENCE:

Elliott-Larsen Civil Rights Act of 1975 (Public Act 453, Section 209)

Michigan Civil Rights Act, P.A. 453 of 1976, as amended; the Michigan Handicappers’ Civil Rights Act, P.A. 220 of 1976 Americans with Disabilities Act, P.L. 101-336, 1990; Title VI of the Civil Rights Act of 1964 (P.L. 88-52)

Michigan Handicapper’s Civil Rights Act of 1975 (P.S. 220)

U.S. Department of Health and Human Services (45.C.F.R. Part 80)

Open Meeting Policy and Procedure

Policy: AD.2.5

Approved: *Pam Curtis, CEO*

Effective Date: 01.01.07

Revised: 11.6.15

POLICY: Senior Resources Board of Directors and the Finance and Program and Planning Advisory Committees operate in compliance with the provisions of the Michigan Open Meetings Act (P.A. 267). Senior Resources Board of Directors, having the responsibility and authority to conduct the business of the agency, conducts meetings on a monthly basis operating in compliance with the provisions of the Open Meetings Act.

Date, times and place of regular meetings for the current year are posted by January 10th of that year. Any changes in the regular meeting schedule are posted within three (3) days of the meeting at which the change is made, with the exception of meetings cancelled due to inclement weather.

Persons shall be permitted to address the Senior Resources Board of Directors, Finance Committee and the Program and Planning Advisory Board during their respective meetings using the following procedures.

PROCEDURE: Any person or persons wishing to address the Senior Resources Board of Directors, Finance Committee or Program and Planning Advisory Board on a topic relevant to the responsibilities of either Board or the Committee shall notify the chairperson to indicate their desire to speak.

The presentation will be placed on the agenda at the discretion of the chairperson. The chairperson will also determine the amount of time the person will be allowed to speak.

Each group or organization shall designate a spokesperson who will address the Board.

It shall be at the discretion of the Board whether to terminate or allow continuance at another meeting any presentation made before their respective memberships.

Any presentation written or oral will become part of the minutes of that meeting.

REFERENCE:

Michigan Open Meetings Act, Act 267 of 1976

Social Media Policy and Procedure

Policy: AD.2.6

Effective Date: 2.17.16

Approved: : *Sam Curtis*, CEO

Revised: 2.17.16

Policy: Senior Resources uses social network and social media (SNSM) technologies and has approved agency employees using SNSM during the course of agency business and approved agency employees representing the agency on social media in the normal course of business. Senior Resources uses social media platforms to disseminate information, enlist, engage and encourage the public to take action on behalf of our mission.

Senior Resources Implementation: To protect the position, image and information assets of Senior Resources, the use of SNSM services is intended for agency purposes only. Senior Resources recognizes the potential marketing benefits of a SNSM presence and its use is meant to promote and market the mission and goals of Senior Resources.

Senior Resources employees are prohibited from using personal accounts for any agency related business on any SNSM site.

Procedure:

Senior Resources Chief Executive Officer (CEO) designates the Communications Director as responsible for overseeing the Senior Resources brand identity and key messages communicated on the SNSM sites.

- A. The Communications Director is responsible for oversight and management of all agency accounts with SNSM providers.
- B. Authorization for the engagement with agency SNSM accounts is a function of the Communications Director. Written approval from the Communications Director is required prior to compilation and publishing using these accounts.
- C. Authorized individuals who have obtained written permission from the Communications Director must use non-administrative login accounts.
- D. The Communication Director will provide the agency’s director with documentation detailing the authorized SNSM service providers, the current account names, the master passwords and person(s) authorized to use the accounts.

The following statements also apply to SNSM usage:

- A. All state and agency policies and guidelines pertaining to e-mail also apply to SNSM, including, but not exclusive to, policies regarding solicitation, obscenity, harassment, pornography, sensitive information, and malware.
- B. Agency SNSM sites reflect the Senior Resources name. Usernames, comments, photos, videos, etc., should be appropriate for a professional environment and selected in good taste.
- C. Respect copyright laws and reference sources appropriately. Identify any copyrighted or borrowed material with citations and links.
- D. It is inappropriate to disclose or use Senior Resources’, an employee’s or a respective client’s confidential or proprietary information in any form of online media.
- E. When representing Senior Resources in any SNSM activity, the approved employee should be aware that all actions are public and the employee(s) will be held fully responsible for any and all said activities.
- F. An approved employee must disclose that he or she is affiliated with Senior Resources and must respect the privacy of colleagues and the opinions of others.

- G. Avoid personal attacks, online fights, and hostile personalities.
- H. Ensure material is accurate, truthful and without error.
- I. Content that could compromise the safety or security of the public or public systems, solicitations of commerce, or promotion or opposition of any person campaigning for election to a political office or promoting or opposing any ballot proposition shall not be posted to SNSM sites. Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, with regard to public assistance, national origin, physical or mental disability, or sexual orientation shall not be posted to SNSM sites.
- J. Do not conduct any online activity that may violate applicable local, state or federal laws or regulations.

Ethics and Code of Conduct

These guidelines are intended to be similar to guidelines in the physical world – using common sense and good judgment in accordance with ethical guidelines and policies already established at Senior Resources. This policy is meant to protect both Senior Resources and Senior Resources staff as the organization expands its social media use and engagement.

Guidelines for an electronic world are the same as guidelines employees are expected to follow every day. If an employee is asked to post on behalf of Senior Resources, the employee’s online presence will be held to a higher standard. Posters should only use a SR-identified email address or other SR-related identifier such as a job title or function for valid business reasons. Valid business reasons may include:

- Providing updates and information about Senior Resources work
- Network with current and prospective supporters, participants or their families
- Promote services and programs of partner organizations
- Provide statistics related to our mission
- Share success stories (with pseudonyms or first names, unless we have signed release forms)
- Share photos, videos and/or articles to engage, educate and promote interest

General guidelines for social media designated posters:

- Do post regularly
- Link back to the Senior Resources website. One goal of social media is to drive traffic to SR website, www.seniorresourceswmi.org.
- Meet with the Communications Director, if you are a designated poster, to discuss analytics and trends of the page(s) maintained.
- Upload photos. Make sure to have signed releases for participants who may appear in photos.
- Use proper grammar and spelling. Proofread for typographical errors. This reflects on the agency.
- Acknowledge and correct mistakes promptly.
- Research relevant information to post. Social media is as much about sharing other content as it is creating something unique. Cite with links when appropriate.
- Do not post material that will violate HIPAA.
- Do not post material that is unlawful, obscene, defamatory, threatening, harassing, abusive, slanderous, hateful or embarrassing to any other person or organization.
- Fact-check before re-posting, re-tweeting or linking to another article.
- Do not violate privacy.
- Senior Resources reserves the right to remove any communications that violate these standards.

Senior Resources staff members are encouraged to share work-related information and comment on any of Senior Resources’ official social media. Employees should always remember they’re in public, that anything posted online is public and what is posted should be assumed to be there forever. If an employee does not want a manager or coworker to see certain photos or comments, it is not wise to post them on the Internet.

Records Management and Open Records

Monitoring

SNSM traffic is logged and reviewed. Logging activity may help in the event an agency account is compromised or improper information is posted to the agency SNSM account.

Logging should at a minimum include the following information:

- Name of user
- Date/Time of use
- User's activity

Users should have no expectation of privacy. Supervisors may request or be provided reports of Internet usage by employees from the agency information security officer or state chief security officer, as applicable, as needed to monitor use.

Any employee found to have misused or abused a SNSM service or violated this policy may be subject to disciplinary action, up to and including termination of employment.

Communication

Senior Resources will use SNSM as another tool to connect with media, other agencies and the general public in times of crisis and to assist with emergency, disaster or crisis communications. Information to be published on the agency SNSM sites may include potential delays or closures of sites or services as deemed applicable and prudent by the Senior Resources CEO.

For assistance with this policy, please contact the Communications Director.

Public Relations Media Policy and Procedure

Policy: AD.2.7

Approved: *Pam Curtis*, CEO

Effective Date: 12.28.06

Revised: 11.6.15

SCOPE: This policy applies to all staff, volunteers and members of Senior Resources.

PURPOSE: Senior Resources recognizes the importance of media relation to public trust to provide current and accurate information to the public and consistent messages to the media about Senior Resources or any aging concerns. In times of crisis, maintaining effective media relationships will be particularly critical in bolstering public confidence in the aging services network as a whole.

POLICY: All requests to Senior Resources for information, opinion or comment by the public or media will be referred to the Chief Executive Officer (CEO) of the agency first. If the CEO is not available then those requests will be referred to the Director of Public Relations/Communications.

PROCEDURE:

Requests for General Information or Presentations

Requests for general information, presentations to groups or participation in community events regarding Senior Resources and its services or programs will be referred to the following staff:

- Chief Executive Officer (CEO)
- Director of Public Relations/Communications
- Director of Community Services
- Director of MI Choice

If none of these directors are available, the person receiving the request will ask if there is a number where the caller can be reached or request they call back when one of the directors is available.

Recognition will be given to the Michigan Department of Health and Human Services when addressing the MI Choice Waiver program in any publication, paper, or presentation. Recognition will be given to the Michigan Adult & Aging Services Administration (AASA) when addressing any AASA funded program in any publication, paper, or presentation.

Request for Comment or Opinion

Requests by media, candidates or organizations for comments or opinion will be referred to the CEO who will serve as spokesperson for Senior Resources and will interact with the media and other inquirers. If the CEO is not available, the person receiving the request will ask if there is a number where the caller can be reached or request they call back when the CEO is available. In some cases the CEO may authorize the Director of Public Relations/ Communications or other pertinent staff to serve as spokespeople.

Crisis Communications

All crises are to be reported to a supervisor and/or the CEO immediately. The CEO will serve as spokesperson and will interact with the media and other inquirers. In some cases the CEO may authorize the Director of Public Relations/Communications or other pertinent staff to serve as spokespeople.

In instances whereby the CEO is not available and immediate communication during a crisis is critical, the Chairperson of the Board of Directors or other Officer of the Board shall be contacted who will authorize and appoint the crisis spokesperson.

Only the crisis spokesperson and back-up spokespeople, who are appointed and authorized by the CEO, shall release information to the media and to the general public. All other staff, board and committee members should be professional and helpful to the media by connecting them with the CEO or appointed spokespeople, but will neither speak to the media, nor provide any information.

The Director of Public Relations/Communications will be responsible for directing and coordinating all aspects of Senior Resources' response including managing the release of messages to the media.

All comments should be guided by professionalism and transparency, and serve to mitigate the crisis while reinforcing the leadership role of Senior Resources. Responses will be proactive, responsive, and action-oriented.

"No comment" is never an acceptable response. If an answer is unknown or cannot be immediately answered, make note of the question, tell the inquirer you will get back with him/her, and do so. If the question cannot be answered due to a policy (such as sharing personnel information, etc.) let the inquirer know that. Personnel matters are to remain confidential.

Speaking Engagements Policy and Procedure

Policy: AD.2.8

Effective Date: 12.28.06

Approved: *Pam Curtis*, CEO

Revised: 11.6.15

BACKGROUND: To have consistency in community presentations and to manage staff time committed to speaking before groups, conferences, seminars and festivals efficiently, only selected staff will be available to the public for speaking engagements.

The primary staff selected for general agency speaking engagements is the Director of Communications/Community Development. MMAP staff will speak on Medicare/Medicaid and related issues.

POLICY: All speaking engagements will be provided by the Director of Communications/Community Development, the Management Team, or selected Medicare/Medicaid Assistance Program (MMAP) Coordinators or Volunteers. Staff will not commit to a speaking engagement without scheduling through supervisors or appropriate staff. All public speaking requests must be registered with the Director of Communications/Community Development.

PROCEDURES: All requests for general agency speaking engagements will be referred to the appropriate staff listed in this policy. Once per month, the Director of Communications/Community Development will send a group email to all Senior Resources employees requesting information on the next month's community speaking requests.

All MMAP speaking engagements will be scheduled through the MMAP Regional Coordinator or MMAP Coordinator Assistant. Callers requesting a speaker will be referred to the MMAP coordinators who will select the appropriate speaker after reviewing the topic and checking MMAP volunteer availability.

This policy does not apply to supports coordinators or evidence based program trainers who receive specialized health related training and are required to provide a pre-determined number of trainings/hours each year, i.e. Alzheimer, Diabetes and End of Life Care.

Recognition will be given to the Michigan Department of Health and Human Services when addressing the MI Choice Waiver program in any public speaking engagement. Recognition will be given to the Adult & Aging Services Administration (AASA) when addressing any AASA funded program in any public speaking engagement.

Staff Response to Service of Legal Document Policy and Procedure

Policy: AD.2.9

Effective Date: 4.16.15

Approved: , CEO

Revised: 11.6.15

SCOPE: This policy applies to all Senior Resources (SR) employees and volunteers including those who are part time, temporary and contractual, hereby referred to as “staff.”

POLICY: This policy sets forth guidelines for staff response to the service of a legal document, including warrants, summons, subpoenas, court orders, and other official legal documents. Senior Resources is committed to maintaining the confidentiality of all records, including those of staff and clients, while maintaining compliance with all lawfully mandated requirements for disclosure.

TERMS:

Subpoena: Judicially enforceable document directing the appearance of a person to testify, or to produce specified materials at a designated time and place. A subpoena does not grant authority to search the premises.

Search Warrant: Judicially enforceable order authorizing the search of specific premises for materials described in the search warrant with reasonable particularity.

Court Order: An order in proper form entered by a judge of a court of competent jurisdiction. A court order will specify actions required, materials to be produced, and timeline for compliance.

Process Server: An individual, authorized by law or court of relevant jurisdiction, to deliver (serve) legal papers (process) for matters of court proceedings. A process server is typically a professional service entity or governmental official such as sheriff, deputy, marshal, officer, etc.

PROCEDURE:

Universal Procedures

1. No staff member should accept a hand-delivered summons, subpoena, search warrant, or other court order that is addressed to another individual or the agency in general, unless that individual or the agency has specifically authorized the staff member to accept it.
 - a. Only members of the management team are authorized to accept a hand-delivered summons, subpoena, search warrant, or other court order that is addressed to the Agency.
2. Staff members that do not have specific authority to accept a document addressed to another individual or the agency must tell the process server that they do not have such authority. Staff member will then inform the process server that he/she has the option of waiting in the reception area until an authorized staff member is available or leaving their contact information so that an alternate time can be arranged.
3. The staff member must immediately inform their supervisor of the attempted service of process. If the staff member’s supervisor is not immediately available, another supervisor or member of the management team must be contacted.
4. Always treat the officer, agent, or process server with respect and courtesy.
5. Insist that law enforcement officials serving summonses, subpoenas, search warrants, or other court orders present official identification, including a photograph. Document the name, office/precinct, badge number, and any other relevant information.
6. Thoroughly document all relevant information, including identification information of process server.

Service-Specific Procedures

1. Subpoena or Court Order Not Requiring Immediate Compliance– Accepted only if staff member is specifically listed on subpoena or court order, or has been approved to accept subpoena or court order on behalf of the listed individual or agency.
 - a. Immediately contact supervisor to inform them of service.
 - i. If the supervisor is not immediately available, another supervisor or member of the management team must be contacted.
 - b. Immediately following contact, scan and email, fax, or hand-deliver a copy of the subpoena or court order to designated member of management team.
 - c. Do not provide any information or take further action until instruction is received from supervisor or designated member of management team.
 - d. If instruction is not received from supervisor or designated member of management team by deadline established in subpoena or court order, take necessary actions to provide only requested information no earlier than deadline.
 - i. Protected Health Information may only be released if number 1, and any one of 2 through 4 is true:
 1. The information released does not contain the Protected Health Information of any individual other than the individual listed on the subpoena or court order AND where at least one of items 2 through 4 below is true OR if at least one of items 2 through 4 below is also true for that individual.
 2. The information requested is for an individual for whom a valid release of information has been produced and said release specifies what information may be released.
 3. The subpoena or court order is signed by a valid court official.
 4. The subpoena is accompanied by a valid court order requiring release of the information.
 - ii. Only the minimum amount of Protected Health Information required to comply with the subpoena or court order may be released. Overly broad or non-specific subpoenas or court orders may be challenged.
2. Search Warrant or Court Order Requiring Immediate Compliance – Accepted only when officer or agent serving such warrant or order has provided satisfactory identification of self and a copy of the warrant or order has been provided.
 - a. Carefully review warrant or order to ensure that it is valid. Court orders generally have a date by which compliance with order is needed. If immediate compliance is not required request a delay.
 - b. Do not hinder or unnecessarily delay or restrict the search of properly identified officers or agents.
 - c. Request that search not be started until designated member of management team has been contacted and may be present.
 - d. Immediately contact supervisor and request instruction. If supervisor is not immediately available, another supervisor or member of the management team must be contacted.
 - e. Cooperate with the search to ensure that only materials/information identified in the warrant or court order are viewed, copied, scanned, or confiscated.
 - f. Carefully document all materials/information that are viewed, copied, scanned, or confiscated.
3. Other Legal Documents/Requests
 - a. Provide no immediate information upon receipt of any other legal documents or requests for information or access to information.
 - b. Immediately contact supervisor and request instruction. If supervisor is not immediately available, another supervisor or member of the management team must be contacted.
 - c. Do not provide any information or take further action until instruction is received from supervisor or designated member of management team.
4. If Presented with No Written Authority

- a. Only in cases of public health emergencies, situations that present clear and present danger to individual or individual to others, or certain federal investigations, may information be released without written authority as categorized above.
 - i. Insist that law enforcement officials requesting information present official identification, including a photograph. Document the name, office/precinct, badge number, specific nature of request, justification for request, and any other relevant information.
 - ii. Immediately contact supervisor and request instruction. If supervisor is not immediately available, another supervisor or member of the management team must be contacted.
 - iii. If request falls within a category as described in a., cooperate to the extent necessary to address the situation and provide no additional information unless it is directly relevant to the inquiry.
 - iv. Carefully document all materials/information that are viewed, copied, scanned, or confiscated.
- b. If request does not fall into a category as described in a., please take the following actions:
 - i. Insist that individual requesting information present official identification, including a photograph. Document all information, including details of request.
 - ii. Provide requestor with contact information for agency management and defer all requests to the agency's management staff.
 - iii. Provide no other information.
 - iv. Immediately contact supervisor and provide all relevant information. If supervisor is not immediately available, another supervisor or member of the management team must be contacted.

Writing and Maintaining Senior Resources Policy & Procedure

Policy: AD.2.10

Effective Date: 4.16.14

Approved: *Tom Curtis*, CEO

Revised: 3.31.16

Reviewed: 3.31.16

SCOPE: This policy applies to all Policies and Procedures, current and future, which govern Senior Resources' operations and processes.

DEFINITIONS:

Review Date: This is the date that the policy completed the review process with or without revisions.

Revision Date: This date is reflective of the end of the 14 day formal review process when a substantive change was made, or if appended after the first date, the date of a technical update.

Effective Date: This is the date that the policy first became effective.

POLICY: Senior Resources' policies and procedures will be developed as the need for new policies are identified, such as when new programs or procedures are introduced. Existing policies and procedures will be reviewed annually for relevancy and accuracy. They will be used as practical guides that steer the business of the organization. Senior Resources will have a designated Policy and Procedure Coordinator to ensure the procedure for new policies and annual review are carried out. Primary stakeholders in the policy will be consulted to determine existing processes, problem areas, and to ensure that the policy document developed will not impede the ability of others in the organization to conduct business.

PROCEDURE:

New Policy
Template

All new policies and procedures will be drafted using the Senior Resources Policy and Procedure template.

Formal Review Process

- New draft policies and procedures must be submitted to the Policy and Procedure Coordinator for review. The policy will be assessed for compliance with applicable laws, contractual requirements, and regulations, conformance to other Senior Resources policies, and delegations of authority. This review period will be no longer than 14 days from the submission of new draft policy. If the Policy and Procedure Coordinator finds any deficiencies, ~~they~~ s/he will contact the author/workgroup of the policy for resolution.
- Once the final draft has been submitted, the Policy and Procedure Coordinator will distribute the draft policy to the full management team for review and comments. The review period will be 14 days. The review period may be extended if the draft requires additional review, such as by members of the Board of Directors.
- When the review period closes, the Policy and Procedure Coordinator will amend the draft policy and procedure to address any comments received during the review that can be resolved without further consultation of the author/workgroup. Changes requiring substantial revision or additional input from the author/workgroup will be sent back to the author/workgroup.

Final Approval Procedures

Upon completion of the final draft, the Policy and Procedure Coordinator will assign a policy number, attach authorized signature and place in the appropriate policy and procedure manual.

Existing Policies

Annual Review

All Senior Resources policies will be reviewed annually. Reviews may take place sooner as required by changes in processes, technologies, laws, contractual obligations, etc. Reviews are tracked on the Policy and Procedure Master Table. The Policy and Procedure Coordinator notifies the staff person responsible for the review with an annual list of review dates. The staff person responsible for the review of the policy and procedure by their committee will ensure the review is completed. The Policy and Procedure Coordinator will follow up to ensure policies are reviewed by the necessary date.

Substantive Changes

When substantive changes have been made the approval procedures will follow Formal Approval Procedures as found above. The revision date that is placed on the updated policy is the date that the Formal Approval Procedure is completed. The previous revision date(s) are deleted.

Technical Update

After a policy and procedure review is completed that resulted in a technical update, a revision and review date is placed on the policy and updated in the appropriate policy and procedure manual. The previous review and revision dates are deleted.

Periodic Technical Updates

Technical updates are updates that occur between review cycles to provide clarification or minor procedural changes (e.g., changing a department name in procedures to reflect an organizational change). Technical changes can be requested and made without completing the formal review process or final approval process. Technical updates cannot be used to make substantive changes to policy or procedures. The number of technical updates to a single policy document must be minimal. When a policy requires multiple technical updates, it indicates that the policy requires a full formal review to be fully updated. Technical updates will not be made to policies that are due for a full formal review, but may be made on policies that would otherwise be reissued.

Revision Dates

When a technical update is made to a policy document, an additional revision date is appended. The additional revision date does not modify the normal review cycle for the policy. The policy will still require a full review and update annually.

REFERENCES:

[Senior Resources Policy and Procedure Template](#)

[Policy and Procedure Master Table](#)

Strategic Planning Policy and Procedure

Policy: AD.2.11

Effective Date: 4.16.15

Approved: , CEO

Revised: 11.6.15

POLICY: Senior Resources will establish an ongoing strategic planning process by which it translates its mission and values into actionable and measurable goals, strategies, initiatives, and programs. The plan will provide direction for both long and short-term decision-making by the Board of Directors and senior leadership to fulfill the mission of the organization and make choices among competing demands for capital investment, philanthropy, facilities, and human resources.

TERMS: The strategic planning process will incorporate the following components:

- Mission statement
- Values statement
- Long term vision statement
- Community health needs and assets assessment
- Environmental factors assessment
- Critical assumptions about the future
- Three-year, written, Board-approved Strategic Plan that includes:
 - Long-term vision statement (time horizon – 5-10 years)
 - Major initiatives and goals (time horizon- 2-3 years)
 - Annual plan and goals (time horizon – 1 year)
- Standard format for cascading overall strategic plans and goals into aligned plans for departments, managers and employees
- Strategic performance measurement report format
- Active engagement in the process at all levels of the organization.

PROCEDURE: Long-term visioning. At certain times, organizational leaders will determine the need exists to engage in a strategic visioning process with long time horizon, such as five, ten or twenty years, in order to make decisions about organizational direction, major capital investments, master facility plans, program commitments, or corporate structure. The resulting long-term vision will create an overarching strategic context for an ongoing strategic planning.

1. **Rolling, multi-year strategic plan.** The organization will engage in a rolling strategic planning process so the organization's strategic initiatives and goals are always as current as possible, reflecting contemporary conditions.
2. **Calendar.** The organization's fiscal and planning year is October through September. The strategic plan will drive the financial plan.
3. **Three-year plan.** Every three years, the organization will engage in a comprehensive, data-driven assessment and adoption of a strategic plan. Data gathering may include input from:
 - Community health needs and assets assessment
 - Environmental assessment, including national, state and local trends in grant funding and advocacy efforts; payment systems; competitive market; capital financing; technology; staff; etc.
 - Opinions of organizational leaders, including the Board of Directors, senior executive team, clinical staff, and operating unit/department managers
 - Expert panels of community and industry leaders
 - Opinions of local community and stakeholder leaders.
 - Client and caregiver satisfaction surveys

- Senior Advocates Coalition
 - Annual performance reviews/feedback by State and Federal regulatory bodies
4. **Annual plan.** Every year, the organization will adopt annual performance goals and make adjustments to the plan based on changing conditions. The annual planning cycle will be:
 - Data-gathering: January – April
 - Board/leadership strategy retreat – June
 - Board approval of Strategic Plan Update – September
 - Annual budgeting process begins - September
 - Board approval of annual budget - November
 5. **Continuous monitoring.** Senior management will continuously monitor changes in the critical assumptions underpinning the strategic plan as well as the organization’s actual performance in achieving its strategic goals. A material change in critical assumptions or actual performance may prompt a recalibration or revision of the strategic plan at any time.
 6. **Integrated planning.** The strategic plan is an overarching document that should drive related organizational plans for such areas as quality improvement.
 7. **Alignment.** There will be one mission and vision statement and one set of core values. Strategic plans for subsidiaries, operating units, and departments will be aligned with and supportive of the organization-wide mission, vision, values, strategic plan. Financial plans (including annual budgets and long-term capital plans) and regulatory funding mandates will be tied directly to the strategic plan. Directors and managers will be held accountable for the goals in their plans.
 8. **Communications.** Senior management will be responsible for communicating the strategic plan to key stakeholders and participants and engaging? them in achieving the goals of the plan. This can be accomplished via website distribution or written material upon request.

Role of the Board

The Board of Directors will play an active role in the strategic planning process while ensuring it does not usurp management’s responsibilities.

The board will:

1. Adopt a policy committing the organization to a mission-driven strategic planning process that includes broad inclusion of organizational leadership to create and carry out the plan
2. Adopt a compelling long-term vision statement for the organization
3. Formally approve multi-year and annual strategic plans
4. Adopt an annual plan for board and committee work that focuses on strategic priorities of the organization, and determine if the board will utilize a Strategic Planning Committee or carry out its strategic planning responsibilities as a whole
5. Allot time on every board meeting agenda for discussion of strategic-level issues. Focus on the critical strategic issues facing the organization and avoid routine operational matters
6. Monitor progress toward achieving strategic goals and require corrective actions and adjustments as necessary to changing conditions
7. Participate in at least one annual strategic planning session
8. Avail itself of education and information to stay current with community and environmental trends
9. Raise questions and contribute expertise
10. Bring insights from and help communicate the plan to key stakeholders.
11. Convene board appointed financial committee to monitor and adopt financial strategy.

Role of Senior Executive Management Team

1. Engage the board to fully utilize its experience, expertise and knowledge of community and stakeholder needs
2. Bring objective analysis and recommendations to the board for deliberation and decision making
3. Structure presentations to the board on strategic topics to allow sufficient time for questions and board feedback/guidance
4. Plan at least one annual board/leadership planning session

5. Provide education on community needs and healthcare/industry trends, opportunities and challenges
6. Review progress on implementation of the strategic plan regularly. Provide to the board a concise, Strategic Performance Measurement Report showing progress toward the key goals and measures in the strategic plan. Include the report in board packets/board portal sent out prior to board meetings. All agency employees have access to the Strategic Performance Measurement Report via email and/or monthly employee staff meeting.
7. Annual report will be available to all stakeholders, employees, community organizations and community members via website and printed material. The report will align itself with the strategic plan, showing progress toward the key goals and measures in the strategic plan.

REFERENCES:

Michigan Office of Services to the Aging Dashboard Report www.mi.gov/osa

[Senior Resources Annual Implementation Plan](#)

[Multi-Year Implementation Plan](#)

Administration for Community Living Strategic

Plan http://www.acl.gov/About_ACL/StrategicPlan/docs/ACL_Strategic_Plan.pdf

National Association of Area Agency on Aging Annual Platform www.n4a.org

[Technology Plan](#)

Succession Plan Policy

Policy No. AD.2.12

Effective Date: 11.6.15

Approved: *Sam Curtis*, CEO

Revised: 11.6.15

POLICY: To ensure continuity in key positions and develop knowledge capital and relationships Senior Resources will maintain a document that provides guidance and direction to the Board of Directors and Management staff in the event of an unplanned or temporary leadership change or planned resignation. It is critical to the success of the organization and will provide a process that recognizes, develops and retains top leadership talent.

Positions requiring emergency or short-term succession plans include all members of the Management Team: (Chief Executive Officer, Chief Financial Officer, MiChoice Waiver Director, IT Manager, Community Services Director, Director of Communications/Community Development and Human Resources Manager) as well as the Data Department Manager, and Quality & Education Coordinator.

Positions requiring specific procedures for planned resignations are the Chief Executive Officer, the Chief Financial Officer and the Network Manager.

The succession plan is linked to the mission and strategic goals of Senior Resources with the intent of keeping the organization moving forward. Succession plans will be included, reviewed and updated as part of the ongoing strategic planning process.

REFERENCES:

[Senior Resources Executive Succession and Staff Contingency Plan](#)

Public Hearings for Area Plan Development Policy

Policy: AD.2.13

Effective Date: 4.16.15

Approved: *Pam Curtis, CEO*

Revised: 4.16.15

POLICY: Senior Resources will conduct a minimum of two public hearings for the purpose of obtaining input for the development of the Multi-Year Area Plan (MYP), and one public hearing in years in which only an Annual Implementation Plan (AIP) is required. Persons notified of the public hearing(s) will include older persons, elected officials, service providers, and the general public.

Public Hearings are generally scheduled in April or early May and held in an accessible facility in Muskegon, Oceana, and/or Ottawa Counties.

PROCEDURE:

Notices are disseminated to media, older persons, service providers, professional organizations, public officials, nutrition sites, senior centers, and the general public a minimum of thirty (30) days preceding the hearing(s). All notices state that a copy of the draft plan is available, upon request, through Senior Resources office 15 days prior to the hearing.

Conduct of Hearing

- Senior Resources Community Services Director, the planner, presides over the hearing.
- Staff briefly explains the plan, service priorities, program development activities, administration of any direct services and a summary budget. If applicable, staff will also discuss regional services definitions and any proposed transfers of funds.
- Older persons are given the opportunity to comment before service organizations.
- Questions and comments for the floor are recorded in the minutes, including the person’s name, if disclosed, and the specific comment.
- Written comments, including emails, are submitted into the meeting records.
- Included in the hearing file is the sign-in sheet and summary of the hearing.

Any comments receiving substantial support are brought before the Program and Planning Advisory Board for possible consideration into the plan.

Public Hearing for Plan Amendments

Substantive Amendment

- A proposed addition or deletion of any area plan objective is presented for public comment prior to submission to the Adult & Aging Services Administration (AASA) Notices of the plan amendment are disseminated throughout the PSA preceding the hearing. Substantive amendments are accepted between February 1 and February 28, June 1 through 30, or as designated by AASA.
- Hearings are scheduled during a regularly scheduled board meeting.
- The Senior Resources Board Chairperson and Community Services Director preside over a plan amendment hearing.
- Comments are recorded.
- The Board of Directors enters a motion regarding the amendment followed by a vote.
- Amendments take effect upon approval by the Michigan Commission on Aging.

Administrative Revisions

- A proposed reduction of unit or client levels of a service objective by 10% or more; a proposed increase of unit or client levels of a service objective by 20% or more.
- Administrative revisions may be submitted to AASA between February 1 and July 31 of each fiscal year.
- Administrative revisions take effect upon written approval by AASA

REFERENCE:

Adult & Aging Services Agency, Operating Standards for Area Agencies on Aging

Witnessing Documents Policy

Policy: AD.2.14

Effective Date: 11.6.15

Approved: , CEO

Revised: 11.6.15

SCOPE: This policy applies to all Senior Resources employees and volunteers including those who are part time, temporary and contractual, hereby referred to as “staff.”

POLICY: Senior Resources employees are not authorized to witness documents. Personnel shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the employee’s direct supervisor. Personnel are authorized to countersign documents such as intake forms, authorizations (i.e., release of information form), treatment plans, etc. as directly related to their job duties.

Employees who are certified as Notary Publics may witness documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts for clients, personnel, and other stakeholders in accordance with applicable state laws. The person who witnesses a document should be neutral and have no financial or other interest involved.

Barrier Free Policy

Policy: AD.2.15

Effective Date: 11.6.15

Approved: *Tom Curtis*, CEO

Revised: 11.6.15

SCOPE: This policy applies to the offices and business location of Senior Resources of West Michigan in the Tanglewood Park building as well as those agencies that are sub recipients of Older Americans and Older Michiganian funds through Senior Resources to provide services to the aging.

POLICY: Senior Resources, being the recipient of Older Americans and Older Michiganians Act funding, is required to ensure that that any agency, program, or service utilizing these funds be provided in a facility that is readily accessible to and usable by all individuals. This includes reasonable accommodations as outlined in the Americans with Disabilities Act, 1990 as amended.

PROVISION: The Aging and Adult Services Agency recommends the following guidelines under which the barrier-free requirement for sub grantors may be waived.

- The applicant has no more than **five (5)** employees.
- The applicant has requested no more than **\$10,000** from Senior Resources.
- The services to be provided under contract with Senior Resources are services that are normally conducted outside of the facility where the applicant maintains its offices. These services include, but are not limited to: Case Coordination & Support, Care Management, In-Home Services, Transportation, Elder Abuse Prevention Services, and Ombudsman Services.

PROCEDURE: Before consideration for a funding opportunity, the proposing agency must sign the Assurance of Compliance Form declaring that they are in compliance with the Americans with Disabilities Act Guidelines.

REFERENCES:

Americans with Disabilities Act of 1990

(ADA): <http://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm>

Michigan Handicapper's Civil Rights Act of 1975 (P.S. 220)

Code of Ethics for Governance Policy

Policy: AD.2.16

Effective Date: 6.19.07

Approved: , CEO

Revised: 5.21.15

SCOPE: This policy applies to all members of Senior Resources' Board of Directors.

PURPOSE: To establish a set of principles and practices of the Senior Resources' Board of Directors that will provide parameters, guidance and direction for board conduct and decision making.

POLICY: Members of the Board of Directors of Senior Resources are committed to observing and promoting the highest standards of ethical conduct in their responsibilities on the board of Senior Resources. Board members pledge to accept this code as a minimum guideline for ethical conduct and shall:

Accountability

- Faithfully abide by the Articles of Incorporation, by-laws and policies of Senior Resources.
- Exercise reasonable care, good faith and due diligence in organizational affairs.
- Fully disclose, at the earliest opportunity, information that may result in a perceived or actual conflict of interest.
- Fully disclose, at the earliest opportunity, information of fact that would have significance in board decision-making.
- Remain accountable for prudent fiscal management to association members, the board, and non-profit sector, and where applicable, to government and funding bodies.

Professional Excellence

- Maintain a professional level of courtesy, respect, and objectivity in all Senior Resources activities.
- Strive to uphold those practices and assist other Senior Resources members of the board in upholding the highest standards of conduct.

Personal Gain

- Exercise the powers invested for the good of all members of the organization rather than for his or her personal benefit, or that of the non-profit they represent.

Equal Opportunity

- Ensure the right of all organization members to appropriate and effective services without discrimination on the basis of geography, political, religious, or socio-economic characteristics of the state or region represented.
- Ensure the right of all organization members to appropriate and effective services without discrimination on the basis of the organization's volunteer or staff make-up in respect to gender, sexual orientation, national origin, race, religion, age, political affiliation or disability, in accordance with all applicable legal and regulatory requirements.

ENFORCEMENT: The Board of Directors will monitor itself and staff will assure all board members sign a Conflict of Interest form. Supervisors will monitor employees and the Board of Directors will enforce compliance with Code of Ethics.

REFERENCES:

Senior Resources By-laws

Employee Handbook/Personnel Policy Manual

HIPAA Policies

Board of Directors Declaration of Conflict of Interest

Staff Declaration of Conflict of Interest Policy

Michigan Elliott-Larsen Civil Rights Act of 1975 (Public Act 453, Section 209)

Restrictions of Political Activities Policy

Policy: AD.2.17

Effective Date: 11.6.15

Approved: *Tom Curtis, CEO*

Revised: 11.6.15

PURPOSE: This policy addresses the restrictions on political activities paid with federal or state funds. The intent is to ensure all staff and sub-recipients receiving payments from Senior Resources of West Michigan, a 501(c) 3 organization, are aware that these payments are made from federal, state, or Medicaid funds and is therefore, restricted from supporting any political activities or lobbying.

POLICY: By law, none of Senior Resources' staff time or resources can be used for partisan political purposes. Examples of staff activities that are not allowed:

- Making statements that favor or oppose candidates or political parties at any Senior Resources event or meeting or in any Senior Resources official publication, including the website.
- Posting comments that favor or oppose candidates or political parties on any Senior Resources social media, including its blogs, Facebook pages, Twitter accounts (including staff e-mail or social media accounts that are associated with Senior Resources), etc.
- Giving a candidate, political party, PAC or any group working in a partisan political way any Senior Resources mailing list. Making statements or handing out literature supportive or critical of a candidate, political party or PAC at a Senior Resources event.
- Using Senior Resources' copier or postage machine to make copies of campaign materials or to mail them.
- Making or receiving telephone calls in support or opposition of a candidate using Senior Resources' phones. If you receive such calls at work, advise the caller to call you at home or on your cell phone in the evening or on the weekend.
- Wearing political buttons or t-shirts while representing Senior Resources at any event or meeting or in the office.
- Putting partisan political signs, bumper stickers or political buttons up in your office area or office window.
- Requesting reimbursement for attending political events hosted by political parties, campaigns other entities.

In addition, service providers, partners and other local organizations that receive federal or state funded grant or contract payments from Senior Resources of West Michigan are prohibited from using these funds for political activities or lobbying. These organizations are also prohibited from receiving reimbursements from federal grants or contracts for costs of such activities.

Prohibited political activities include, but are not limited to, the following:

- Attempts to influence the outcomes of any federal, state, or local election, referendum, initiative, or similar activity through in-kind or cash contributions, endorsements, or publicity.
- Establishing, administering, or contributing to, or paying the expenses of, a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcomes of elections.

REFERENCES:

- OMB Circular A-122, "Cost Principles for Nonprofit Organizations."
- 2 CFR Part 225 Appendix B – Cost Principles for State, Local and Indian Tribal Governments
- 29 CFR Part 93.100 – New Restrictions on Lobbying
- 20 CFR Section 667.200(e) – Restrictions on Lobbying

Administration Person Centered Planning Policy and Procedure

Policy: AD.2.18

Effective Date: 4.29.14

Approved: , CEO

Revised: 7.16.15

SCOPE: This policy applies to all Senior Resources employees and volunteers including those who are part time, temporary and contractual, hereby referred to as “staff”. This policy applies to all individuals while under the care of any Senior Resources staff, Senior Resources staff and/or contractual agencies within the provider network.

POLICY: Senior Resources supports Person-Centered Planning Process (PCT), which includes assessing, planning, implementing, and evaluating. This process must have an individualized focus and incorporate the principles of Person-Centered Planning, self-determination, informed choice, and equity. Input from the person and their Person-Centered Planning Team will guide and direct this process.

Components of the Person Centered Thinking Process will be employed when interacting with Senior Resources Coworkers and/or contractual agencies within the provider network.

PROCEDURE:

Employee Training:

1. Within thirty (30) days of employment with Senior Resources, new hires will have successfully completed the online Person Centered Thinking training module. Certificate of completion will be filed in employee file.
2. Within one hundred eighty (180) days of hire, all employees will attend a two (2) day Person Centered Thinking Training led by master level trainers in the MI Office of Services to the Aging Person Centered Thinking Training Curriculum.

Employee/Stakeholder Training

Senior Resources offers Person Centered Process Training twice yearly to all new organizational staff, focal points, purchase of service and grant providers, members of the Aging & Disability Resource Collaboration of the Lakeshore and advisory and executive board members. This training may be a PCT full training or components of PCT training curriculum.

REFERENCES:

Person Centered Planning Modules 1-4
Person Centered Planning Person Workbook
Participant Rights and Responsibilities
PCP Online Training

Information Technology Policy

Policy: AD.3.1

Effective Date: 11.6.15

Approved: *Tom Curtis*, CEO

Revised: 11.6.15

SCOPE: This policy applies to all technology used by Senior Resources employees and volunteers including those who are part time, temporary and contractual, hereby referred to as “staff.”

POLICY: Information technology is an integral part of Senior Resources business strategies and practices. Senior Resources will proactively plan and take measures to avoid potential threats and ensure uninterrupted access to systems and data. Methodology used includes determining and accessing user needs and requirements to immediate supervisor and shared with the IT Administrator. The Technology Plan will be updated annually or as needed.

TERMS:

The Senior Resources of West MI information technology plan includes, but is not limited to the follow items:

1. Hardware purchases or leases
2. Software purchased or leases
3. Security of assets and network data
4. Confidentiality of data, as well as password protection
5. Backups, data protection and offsite storage
6. Disaster recovery preparedness
7. Virus Protection and protection of software on all systems
8. Assistive Technology

REFERENCES:

164.308(a)(7)(ii)(A)
Technology Plan 2016