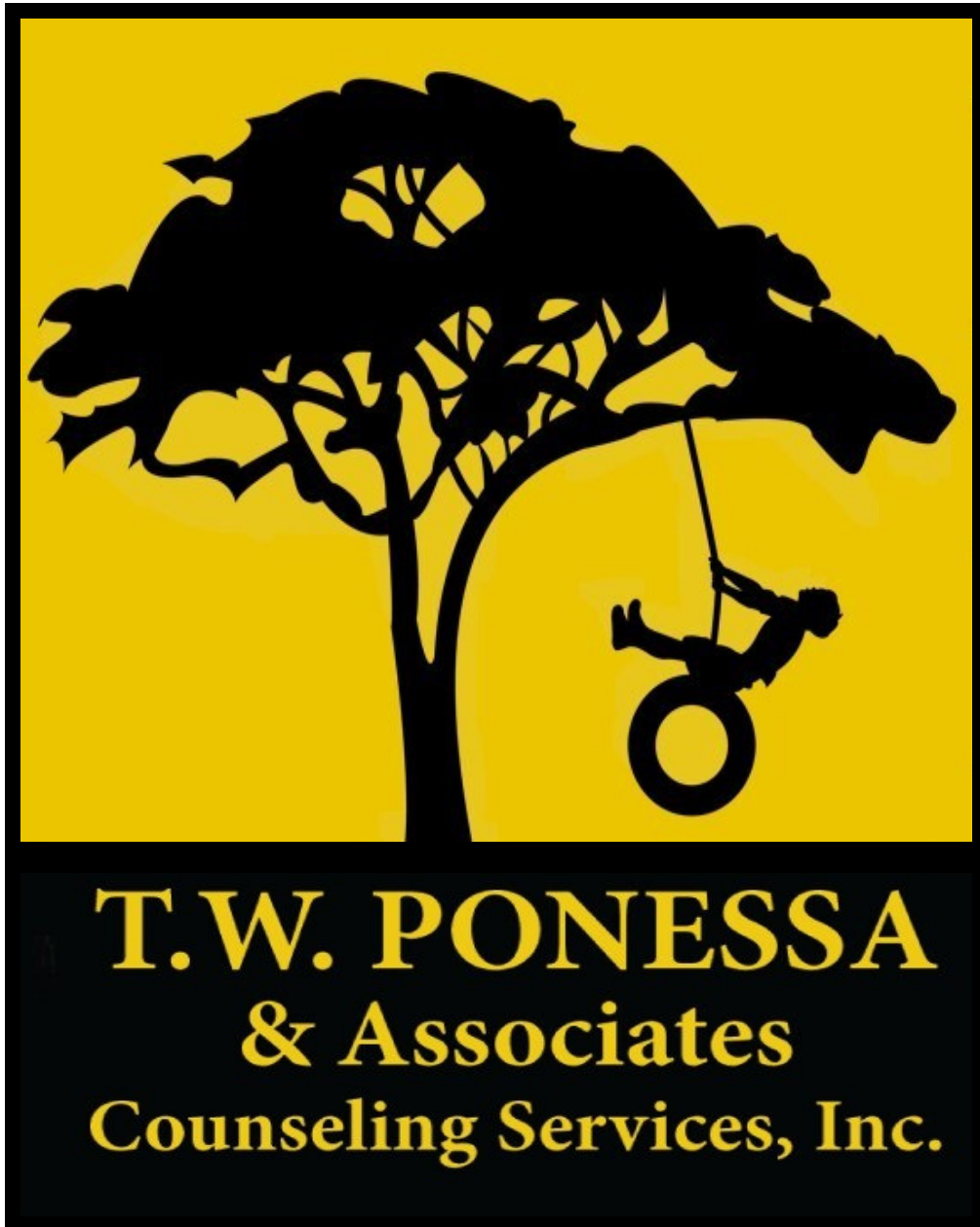


EMPLOYEE HANDBOOK



“Helping People Back into the Swing of Life”

DECEMBER, 2015 EDITION

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WHO WE ARE



A Word from our President & Founder:

We all have pivotal figures in our life that make the difference in who we become. For me, it was my father. An immigrant from Italy, he understood hard work and in word and action he instilled in me the values of sacrifice and generosity; humility and sincerity; dedication and loyalty. This man of modest means was rich in character and strength and served his family and community by entering the Cornwall/Lebanon mines daily for 30 years. His dedication is the epitome of what TW Ponessa & Associates Counseling Services, Inc. stands for and it is in his legacy that I chose to use the family name. It is my daily reminder of the call to social responsibility and service.

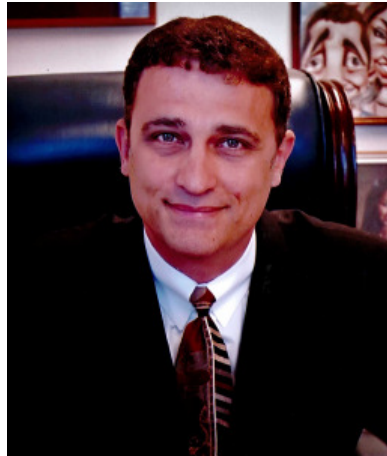
The fulfillment of that call became a reality in the forming of TW Ponessa & Associates Counseling Services, Inc. Since the practice opened in 1991, I have maintained a fervent interest and vision to deliver quality services to those within our communities. You are joining a dedicated team of knowledgeable professionals who work daily toward the nurturance, safety, permanency and well-being of the children, adults and families we serve. There have been many changes over the years and the corporation has seen it's most significant growth under the daily leadership of CEO, Catherine A. DeGuire, MS, JD, MBA since 2005. A progressive leader, she brings extensive knowledge and expertise in business administration, law, clinical psychology, management and social work. We work jointly to harness the best that each TW Ponessa & Associates staff member has to offer while proactively addressing the evolving mental health needs of South Central Pennsylvania.

We feel truly blessed, and welcome you to TW Ponessa & Associates Counseling Services, Inc. as we continue to expand and diversify, reach more families and communities, and strive to reach new levels of excellence every day. To those of you new to our team, we hope that you are also excited about your role and we feel confident that your experience, knowledge and skills will enhance our capabilities as we join together in accomplishing our mission to *help people back into the swing of life*. Be assured that your immediate supervisor and coworkers will assist you as you integrate into the TW Ponessa & Associates family.

Again, welcome aboard, and please don't hesitate to drop Cathy or me a line to let us know how you are acclimating here at TW Ponessa & Associates Counseling Services, Inc.

Best Regards,

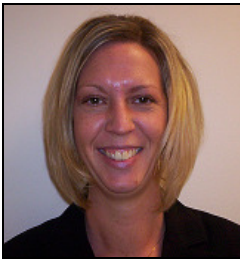
Thomas "Tom" Ponessa, MS, MEd
tponessa@twponessa.com



Open Door Policy

To ensure open communication and help facilitate the resolution of employee concerns, TW Ponessa & Associates Counseling Services, Inc. will operate under an "open door" policy. Generally, job-related issues and concerns can best be addressed in discussion with the immediate Supervisor, but if those efforts are unsuccessful or an employee has a specific concern about his/her immediate supervisor, the employee may contact Human Resources or any member of the Administration for assistance. The goal is to provide a variety of avenues of support to ensure that the issue or concern can be addressed and resolved in a fair and reasonable manner. This does not override the use of the Conflict Resolution procedure but may provide an alternate contact to initially hear the concern and begin to facilitate the process.

We Are Here to Help You!



Catherine A. DeGuire, MS, JD, MBA
Chief Executive Officer



Dee Dructor, LCW
Acute Partial Hospitalization Director



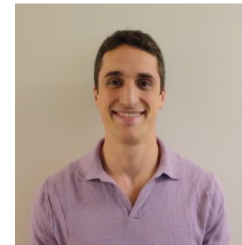
Dr. Felicia DeJesus
Medical Director/ Psychiatrist



Christy Harnish, MS
BHRS Director



Michelle Blake, MS, LPC
Mental Health Outpatient Director



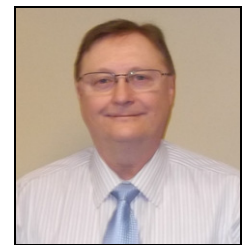
Joel Ponessa, BA
Billing Coordinator



Deb Bard, BA, CAC
Drug & Alcohol Facility Director



Jim Doughty, MS
School Based Outpatient Director



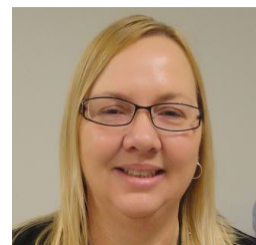
Gene Nelson, Psy D
Internship Director/Psychologist



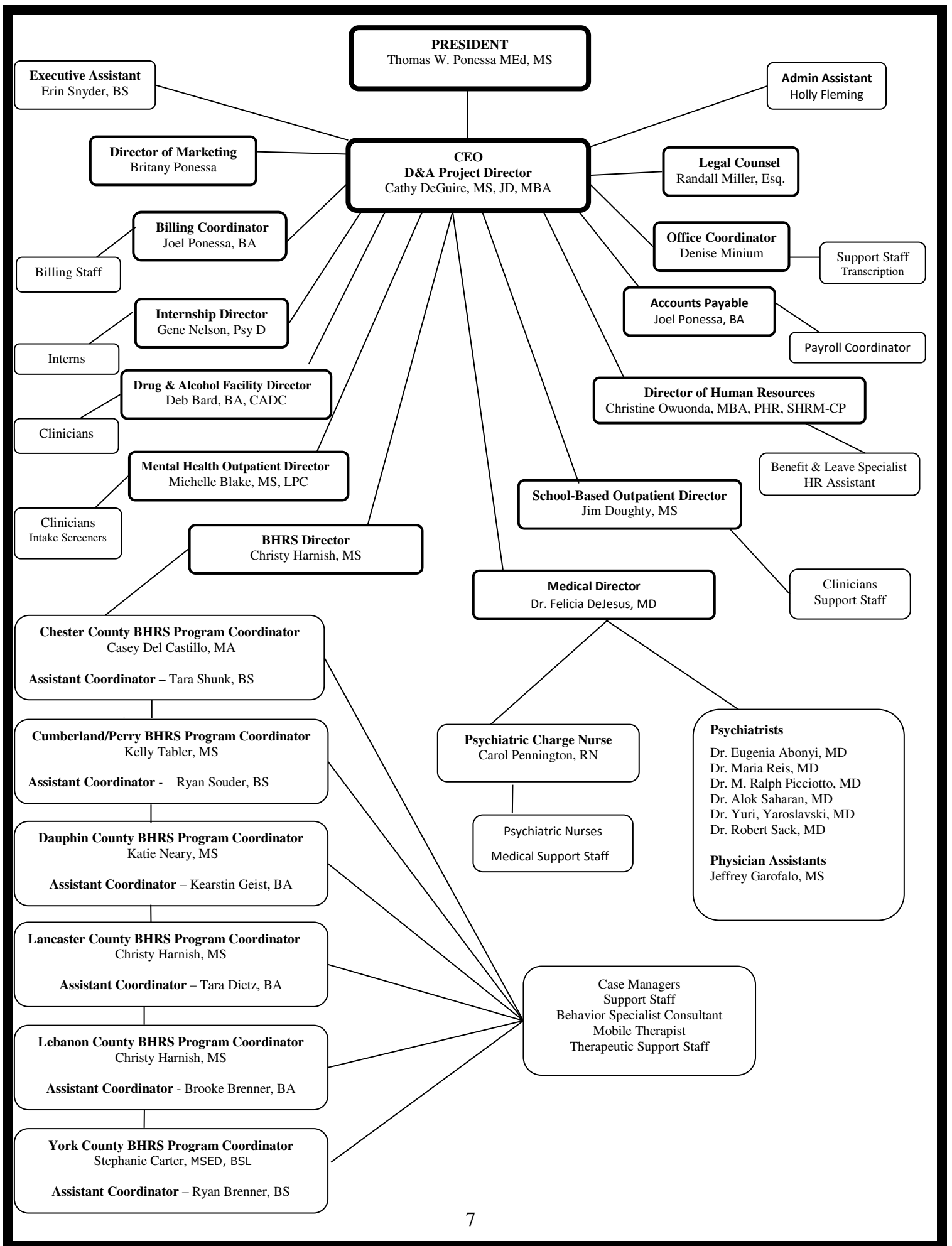
Christine Owuonda, MBA, PHR, SHRM-CP
Director of Human Resources

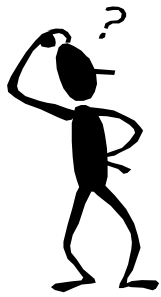


Brittany Ponessa
Director of Marketing



Denise Minium
Office Coordinator





TWP DIRECTORY - WHO TO CALL FOR WHAT.....



**When an issue arises and you need to know who to call –
Check the list below to see who can best assist you.
Note that there are various names on the list, each having their own specialties.
Please direct your call to the person who is responsible for your concern.**

Who to Contact:	Position & Email Address:	For What:
Denise Minium	Office Coordinator denise.minium@twponessa.com	Everything related to Support Staff at all locations, Office Supplies (pens, paper, etc), Copier/Fax issues, Household supplies (napkins, tissues)
Holly Fleming	Administrative Assistant holly.fleming@twponessa.com	Computer Issues, Email issues, Badge issues, TW Post Inquiries
Joel Ponessa	Billing Coordinator joel.ponessa@twponessa.com	Billing Issues/Questions
Stacie Basham	Billing Support Stacie.basham@twponessa.com	Credentialing with Insurances
Christine Owounda	Human Resources Director christine.owounda@twponessa.com	Company Policies, Employee Benefits, Compensation, Employment Verifications
Ilka Akers	HR Assistant ilka.akers@twponessa.com	ID Photos/Questions, New Hire Clearances, ADP password set up, General assistance, Closed personnel files
Brittni Krajnak	Benefit & Leave Specialist brittni.krajnak@twponessa.com	Healthcare benefit changes/enrollment, FMLA, leaves of absence, Worker's Compensation
Joel Ponessa	Payroll Coordinator joel.ponessa@twponessa.com	Paycheck questions, Taxes, Garnishments
Brittany Ponessa	Marketing Director brittany.ponessa@twponessa.com	Marketing ideas, TWP Employee Perks Program, staff recruitment, community liason
Gene Nelson	Internship Director/Training Coordinator gene.nelson@twponessa.com	Internship program and staff questions/training suggestions and questions
Michelle Blake	MH Outpatient Director mblake@twponessa.com	Mental Health Outpatient Issues, Questions & Concerns
Jim Doughty	School Based Director jdoughty@twponessa.com	School Based Issues, Questions & Referrals
Deb Bard	Drug & Alcohol Director deb.bard@twponessa.com	Drug & Alcohol Issues, Questions & Concerns
Felicia DeJesus	Medical Director felicia.dejesus@twponessa.com	Medical Department Questions or concerns (Psychiatrist or Nurse)
Dee Dructor	Acute Partial Hospital dee.dructor@twponessa.com	Acute Partial Hospital Issues, Questions & Concerns
Jim Carroll	Maintenance Person propertymaintenance@twponessa.com	Building issues – cleaning, heating/cooling, insects, Building repairs
Randall Miller	Corporate Attorney randall.miller@twponessa.com	Legal Questions/concerns about clients, subpoenas
Cathy DeGuire	Corporate Compliance corporatcomplaince@twponessa.com	Corporate Compliance Questions/Concerns
Marshall Reeser	Medical Records medical.records@twponessa.com	Medical Records Questions/Concerns
Christy Harnish	BHRS Coordinator- Lancaster & Lebanon christy.harnish@twponessa.com	BHRS Issues & Questions- Lancaster County & Lebanon County Locations
Vacant	BHRS Coordinator- York	BHRS Issues & Questions- York EB Location
Casey del Castillo	BHRS Coordinator- Chester casey.delcastillo@twponessa.com	BHRS Issues & Questions- Chester County Location
Katie Neary	BHRS Coordinator- Dauphin katie.neary@twponessa.com	BHRS Issues & Questions- Dauphin County Location
Kelly Tabler	BHRS Coordinator- Cumberland/Perry kelly.tabler@twponessa.com	BHRS Issues & Questions- Cumberland/Perry Location

How We Operate



Equal Employment Opportunity

TW Ponessa & Associates is committed to equal employment opportunity and will not discriminate against applicants or current employees with regard to race, color, creed, religion, sex, sexual orientation, age, disability, ancestry, national origin or any other classification protected by law. Further, employment decisions will be based on merit, qualifications, abilities and business needs.

ADA and ADAAA

Title I of the Americans with Disabilities Act of 1990 (ADA) and the ADA Amendments Act of 2008 (ADAAA) prohibits private employers, state and local governments, employment agencies and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training and other terms, conditions and privileges of employment. A qualified individual with a disability is one who, with or without reasonable accommodation, is able to fulfill the essential functions of a position. It is the policy of TW Ponessa & Associates Counseling Services, Inc. to comply with all federal and state laws concerning the employment of persons with disabilities and act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC).

TW Ponessa & Associates Counseling Services, Inc. will enter into the dialogue process with all qualified applicants or current employees about the reasonable accommodations necessary for those qualified individuals with a disability to perform the essential functions of a job. All requests will be given full consideration and a reasonable accommodation will be provided unless it causes undue hardship to business operations. Requests should be made directly to the Human Resources Director.

Corporate Compliance Manual & Code of Ethics

TW Ponessa & Associates Counseling Services, Inc. employees will receive initial training in the Corporate Compliance Manual and Code of Ethics to govern the standards of conduct for the corporation and its employees. Employees are required to comply with the expectations to ensure that TW Ponessa & Associates Counseling Services, Inc. as an entity is operating ethically, within the confines of all applicable federal, state, local or provider guidelines. Any employee who believes that they or another employee has violated the expectations of the code of conduct is obligated to report such behavior with an assurance that there will be no retaliation or adverse action taken against them. Reports can be made directly to the Chief Compliance Officer in one of three ways; 1) By contacting CEO and Chief Compliance Officer, Catherine A. DeGuire, MS, JD, MBA at 717-560-7917 or cdeguire@twponessa.com, 2) Sending an email to corporatecompliance@twponessa.com, or 3) Sending a description of the violation in writing via inter-office mail to the Corporate Compliance Officer at our Lancaster location.

Health Insurance Portability and Accountability Act of 1996 (HIPAA)

The purpose of HIPAA is to safe guard individually identifiable health information related to the past, present, or future physical or mental health or condition of an individual. Such information is considered a subset of health information and includes demographic information collected from an individual and is created or received by a health care provider, health plan, employer or health care clearinghouse.

Hence, all medical records and other individually identifiable health information held or disclosed by a covered entity in any form, whether communicated electronically, on paper, or orally, is covered by the regulation. This includes and is not limited to a consumer's diagnosis, treatment plans, progress notes, etc. The corporation and all employees are legally bound to protect and uphold the privacy of this information.

No protected health information should be shared outside the course of treatment and the provision of services except in circumstances in which a signed authorization has been obtained. The role of Chief HIPAA Compliance Officer for TW Ponessa & Associates is held by the Chief Executive Officer. Any concerns or violations, consistent with the Corporate Compliance Manual and Code of Ethics, should be reported to the Chief Executive Officer for investigation.

Religious Accommodation Policy

TW Ponessa & Associates Counseling Services, Inc. respects the religious beliefs and practices of all employees and will make, upon request, an accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship for the Corporation.

An employee whose religious beliefs or practices conflicts with his/her job, work schedule, or with the company's policy or practice on dress and appearance, or with other aspects of employment and who seeks a religious accommodation must submit a written request for the accommodation to his/her immediate Supervisor. The written request will include the type of religious conflict that exists and the employee's suggested accommodation.

The immediate Supervisor, in collaboration with Human Resources and the CEO, will evaluate the request considering whether a work conflict exists due to a sincerely held religious belief or practice and whether an accommodation is available which is reasonable and which would not create an undue hardship for the Corporation. The supervisor and employee will meet to discuss the request and decision on an accommodation. If the employee accepts the proposed religious accommodation, the immediate supervisor will implement the decision. If the employee rejects the proposed accommodation, he/she may appeal the decision by following the conflict resolution policy.

The Environment We Promote



Drug-Free Workplace

TW Ponessa & Associates Counseling Services, Inc. supports a drug and alcohol-free workplace to help ensure a safe and productive working environment for all employees and those receiving services. It is unacceptable for any staff member to report for duty under the influence of alcohol, illegal drugs, misused prescription drugs, inhalants, or any other mood altering substance.

Alcohol: Employees are prohibited from using or being under the influence of alcohol while performing company business for TW Ponessa & Associates Counseling Services, Inc, while operating a motor vehicle in the course of business or for any job-related purpose, or while on company premises or a worksite.

Illegal Drugs: TW Ponessa & Associates counseling Services, Inc. employees are prohibited from using or being under the influence of illegal drugs while performing company business or while on a company facility or worksite. You may not use, manufacture, distribute, purchase, transfer or possess an illegal drug while in any office location, while operating a motor vehicle for any job-related purpose or while on the job, or while performing company business. This policy does not prohibit the proper use of medication under the direction of a physician; however, misuse of such medications is prohibited.

Searches: TW Ponessa & Associates Counseling Services, Inc. may conduct searches for illegal drugs or alcohol on company facilities, premises or worksites without prior notice to employees. Such searches may be conducted at any time. Employees are expected to cooperate fully.

Searches of personal property may be conducted when there is reasonable suspicion to believe that the employee has violated this policy or when circumstances or workplace conditions justify such a search. Personal property may include, but is not limited to, cars, purses, briefcases, as well as any company property that is provided for employees use, such as desks, computers, and files.

Assistance: As a provider of treatment for those with alcohol and other drug use, abuse and addiction, TW Ponessa & Associates Counseling Services, Inc. understands the complexity of these issues and desires that all employees struggling with the use/abuse/addiction of alcohol or other drugs receive the necessary support and treatment. Employees seeking treatment options or support may contact the Human Resources Director for information. Any participation in a treatment program(s) will remain confidential. Employees concerned about the drug use/abuse of a co-worker while on the job should report their concern to their Supervisor. Confidentiality will be maintained to the fullest extent possible.

Harassment Free Workplace

Nondiscrimination/Anti-harassment Policy and Complaint Procedures

TW Ponessa & Associates Counseling Services, Inc. is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, TW Ponessa & Associates Counseling Services, Inc. expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment. This includes harassment based on race, color, creed, religion, sex, sexual orientation, ancestry, national origin, age, disability or any other characteristic protected by law. Employees are encouraged to report all perceived incidents of discrimination or harassment to their Supervisor, Human Resources, or a member of the Administration. Incidents will be investigated and no retaliatory action will be taken against anyone reporting a claim of perceived harassment or discrimination.

Definitions of Harassment

1. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and overt behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendos; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; displaying suggestive objects or pictures at the workplace; and other physical, verbal or visual conduct of a sexual nature.

2. Harassment on the basis of any other protected characteristic also is strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, creed, religion, sex, sexual orientation, ancestry, national origin, age, disability, or any other characteristic protected by law or that of his/her relatives, friends or associates, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by email, phone (including voice messages), text messages, social networking sites, etc.

Individuals and Conduct Covered

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or by someone not directly connected to TW Ponessa & Associate Counseling Services, Inc. (e.g., an outside vendor, consultant or consumer). Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the office, such as a field location, trainings, and company-sponsored social events.

Reporting an Incident of Harassment, Discrimination or Retaliation

TW Ponessa & Associates Counseling Services, Inc. encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. In addition, the company recommends that individuals who believe they are being subjected to harassing or discriminatory behavior speak directly to the offender informing them that the behavior is unwelcome and must stop. However, the Corporation recognizes that an individual may prefer to pursue a complaint. Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate Supervisor, Human Resources, or a member of the Administration.

Complaint Procedure

TW Ponessa & Associates Counseling Services, Inc. encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships are broken. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and the Corporate Compliance Manual and Code of Ethics.

Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action as TW Ponessa & Associates Counseling Services, Inc. deems appropriate under the circumstances.

False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be subject to appropriate disciplinary action.

Smoke and Vape-Free Workplace

In keeping with state law, smoking in any form or vaping will not be permitted on any TW Ponessa & Associates Counseling Services, Inc. office location or public area.

Definitions: Smoking refers to the use of traditional tobacco products. Vaping refers to the use of electronic nicotine delivery systems or electronic smoking devices. These are commonly called e-cigarettes, e-pipes, e-hookahs and e-cig.

Recognizing the multiple risks of smoking and smokeless tobacco use, employees desiring to quit are encouraged to speak with their medical professional, seek out services through their health insurance or the American Lung Association. Go to Americanlungassociation.org or to ffsonline.org for their "Freedom from Smoking" program.

Violence in the Workplace

TW Ponessa & Associates Counseling Services, Inc. takes the safety and security of its employees very seriously. Acts or threats of physical violence, including intimidation, harassment and/or coercion will not be tolerated and may lead to disciplinary action and/or legal action where appropriate.

Workplace violence is defined as any intentional conduct which is sufficiently severe, offensive or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends, and/or property, such that the employment conditions are altered or a hostile, abusive or intimidating work environment is created.

Employees who believe threats or acts of violence have been made against them or others should report the details of the incident(s) to their Supervisor, Human Resources or any member of the Administration. All incidents of violence and threats of violence that are reported will be investigated. Failure to report such concerns may be grounds for disciplinary action.

Weapons in the Workplace

The possession of guns or other weapons of any kind is strictly prohibited while on TW Ponessa & Associates Counseling Services, Inc. property, including in motor vehicles. Regardless of whether you possess a concealed weapons permit or are allowed by law to possess a weapon, no weapon is permitted on your person while conducting company business or while attending any company sponsored event. Violations will result in disciplinary action, up to, and including, discharge.

Possession of a weapon can be authorized by the company's President and/or CEO to allow security personnel or a trained employee to have a weapon on company property when this possession is determined necessary to secure the safety and security of company employees. Only the President, or his designee, may authorize the carrying of or use of a weapon.

Signs are posted at all main entrances stating that concealed weapons are prohibited on our property. Anyone who knowingly violates the posted prohibition or refuses to leave after being informed of the prohibition may be arrested for criminal trespass.

Definition

Weapons include any pistol, revolver, shotgun, machine gun, rifle or other firearm, BB or pellet gun, Taser or stun gun, bomb, grenade, mine or other explosive or incendiary device, ammunition, archery equipment, dagger, stiletto, switchblade knife, or knife having a blade exceeding three inches in length. Any other tool that serves to cause harm or is capable of causing harm to another person is also considered a weapon.

Our Expectations Of You



Attendance Policy

Employees are expected to report to work as scheduled and be prepared to begin working. Punctual and regular attendance is an essential responsibility and expectation for each employee at TW Ponessa & Associates Counseling Services, Inc. Your presence is required so that the company can run smoothly and consumers can receive their scheduled services in a timely and prescribed manner. Any late arrival, early departure, or other unplanned absences should be avoided whenever possible.

In the event that you cannot avoid an unplanned absence or tardy arrival, you must call in and speak to your immediate Supervisor at least 30 minutes prior to the start of your shift. While a phone call is preferred, an email or text may be acceptable based on your Supervisor's management style and schedule. This expectation applies to office based employees as well as those working in the field in a school or mobile capacity.

Tardiness: You are expected to report to work on time. If you are delayed from reporting to work as scheduled, you must notify your Supervisor no later than 30 minutes prior to your starting time. This notification does not excuse the tardiness but simply notifies your Supervisor that a schedule change or coverage may be necessary. Excessive tardiness is subject to disciplinary action.

Unscheduled Absence: If an unscheduled absence is unavoidable, you must call in and speak to your immediate Supervisor at least 30 minutes prior to the start of your shift. While phone is the preferred method of communication, email or text may be acceptable. For those working in the field (TSS, MT/BSC, School Based), though you may create your own daily schedule, you are still expected to contact your Supervisor if you will not be working with clients on a normally scheduled workday.

Emergency Situations: If an emergency makes it impossible for you to notify your Supervisor of your absence prior to your shift, you are expected to call in within 1 hour of your normally scheduled start time whenever possible, or have someone call in for you.

Abandonment: Any employee who fails to report to work without notification to his or her supervisor for a period of three days or more will be considered to have voluntarily resigned and terminated the employment relationship.

Body Art/Piercing(s)

Visible body piercings, other than in the ear, are not permitted and may require the employee to wear a clear post during the workday if the piercing cannot be covered.

Visible tattoos will be covered during the workday with whatever means possible including choosing clothing with long sleeves or pants, opaque stockings, jackets, jewelry, accessories, etc.

Bring Your Own Device Policy

TW Ponessa & Associates grants its employees the privilege of purchasing and using smartphones and tablets of their choosing at work for their convenience. TW Ponessa & Associates reserves the right to revoke this privilege if users do not abide by the policies and procedures outlined below. This policy is intended to protect the security and integrity of TW Ponessa & Associates' data and technology infrastructure. Limited exceptions to the policy may occur due to variations in devices and platforms. TW Ponessa & Associates employees must agree to the terms and conditions set forth in this policy in order to be able to connect their devices to the company network.

Acceptable Use of Devices

The company defines acceptable business use as activities that directly or indirectly support the business of T.W. Ponessa & Associates. The Company defines acceptable personal use during break/lunchtime as reasonable and limited personal communication or recreation, such as reading or game playing. Employees may be blocked from accessing certain websites during work hours/while connected to the corporate network at the discretion of the company.

Devices' camera and/or video capabilities are disabled while on-site.

Devices may not be used at any time to:

- Store or transmit illicit materials
- Store or transmit proprietary information belonging to another company
- Harass others
- Engage in outside business activities

The following apps are not allowed: apps not downloaded through iTunes or Google Play. Employees may use their mobile device to access the following company-owned resources: email, calendars, contacts, documents.

T.W. Ponessa & Associates has a zero-tolerance policy for texting or emailing while driving and only hands-free talking while driving is permitted.

Devices and Support

Smartphones including iPhone, Android, Blackberry and Windows phones are allowed upon review by the IT Coordinator / CEO. Tablets including iPad and Android are allowed upon review by the IT Coordinator / CEO.

Connectivity issues are supported by IT; employees should not contact the device manufacturer or their carrier for operating system or hardware-related issues unless instructed to by the IT Coordinator / CEO.

Devices must be presented to IT for proper job provisioning and configuration of standard apps, such as browsers, office productivity software and security tools, before they can access the network

Reimbursement

The company will not reimburse the employee for a percentage of the cost of the device. The company will not reimburse the employee for the following charges: roaming, plan overages, etc.

Security

In order to prevent unauthorized access, devices such as smartphones, tablets, zip drive, etc. must be password protected using the features of the device and a strong password is required to access the company network. A strong password is at least eight characters long, contains a combination of upper and lowercase letters, numbers and symbols/punctuation characters. An example of a strong passphrase: "P0n3ss@9571"

The device must lock itself with a password or PIN if it's idle for five minutes. After 10 failed login attempts, the device will wipe and reset. Contact IT at holly.fleming@twponessa.com to regain access.

Rooted (Android) or jailbroken (iOS) devices are strictly forbidden from accessing the network. Employees are automatically prevented from downloading, installing and using any app that does not appear on the company's list of approved apps. Smartphones and tablets that are not on the company's list of supported devices are not allowed to connect to the network. Smartphones and tablets belonging to employees that are for personal use only are not allowed to connect to the network. Employees' access to company data is limited based on user profiles defined by IT and automatically enforced.

The employee's device may be remotely wiped if 1) the device is lost, 2) the employee terminates his or her employment, 3) IT detects a data or policy breach, a virus or similar threat to the security of the company's data and technology infrastructure.

Risks/Liabilities/Disclaimers

While IT will take every precaution to prevent the employee's personal data from being lost in the event it must remote wipe a device, it is the employee's responsibility to take additional precautions, such as backing up email, contacts, etc. The company reserves the right to disconnect devices or disable services without notification.

Lost or stolen devices must be reported to the company within 24 hours. Employees are responsible for notifying their mobile carrier immediately upon loss of a device.

The employee is expected to use his or her devices in an ethical manner at all times and adhere to the company's acceptable use policy as outlined above. The employee is personally liable for all costs associated with his or her device. The employee assumes full liability for risks including, but not limited to, the partial or complete loss of company and personal data due to an operating system crash, errors, bugs, viruses, malware, and/or other software or hardware failures, or programming errors that render the device unusable.

T.W. Ponessa & Associates reserves the right to take appropriate disciplinary action, up to, and including termination for noncompliance with this policy.

Cloud Computing Policy

Cloud computing offers a number of advantages including low costs, high performance and quick delivery of services. However, without adequate controls, it also exposes individuals and organizations to online threats such as data loss or theft, unauthorized access to corporate networks, and so on.

This cloud computing policy is meant to ensure that cloud services are NOT used without the IT Coordinator/CEO's knowledge. It is imperative that employees NOT open cloud services accounts or enter into cloud service contracts for the storage, manipulation or exchange of company-related communications or company-owned data without the IT Coordinator/CEO's input. This is necessary to protect the integrity and confidentiality of T.W. Ponessa & Associates data and the security of the corporate network. T.W. Ponessa & Associates' IT department remains committed to enabling employees to do their jobs as efficiently as possible through the use of technology. The following guidelines are intended to establish a process whereby T.W. Ponessa & Associates employees can use cloud services without jeopardizing company data and computing resources.

Scope

This policy applies to all employees in all departments of T.W. Ponessa & Associates, no exceptions. This policy pertains to all external cloud services, e.g. cloud-based email, document storage, Software-as-a-Service (SaaS), Infrastructure-as-a-Service (IaaS), Platform-as-a-Service (PaaS), etc. Personal accounts are excluded. If you are not sure whether a service is cloud-based or not, please contact the IT department.

Policy

Use of cloud computing services for work purposes must be formally authorized by the IT Coordinator/CEO. The IT Coordinator/CEO will certify that security, privacy and all other IT management requirements will be adequately addressed by the cloud computing vendor. For any cloud services that require users to agree to terms of service, such agreements must be reviewed and approved by the IT Coordinator/CEO. The use of such services must comply with T.W. Ponessa & Associates' existing Acceptable Use Policy/Computer Usage Policy/Internet Usage Policy/BYOD Policy.

Employees must not share log-in credentials with co-workers. The IT department will keep a confidential document containing account information for business continuity purposes. The use of such services must comply with all laws and regulations governing the handling of personally identifiable information, corporate financial data or any other data owned or collected by T.W. Ponessa & Associates. The IT Coordinator/CEO decides what data may or may not be stored in the Cloud.

Personal cloud services accounts may not be used for the storage, manipulation or exchange of company-related communications or company-owned data.

Pre-approved cloud computing services

The current list of approved cloud service providers is:

- Zoho Operating System for Businesses www.zoho.com
- EZClaim
- Horizon
- Innova Payroll

Instructions will be made available and support provided to enable access to resources hosted on Zoho.

Responsibilities

Your user account for accessing your T.W. Ponessa & Associates email and cloud storage will be established upon hire. T.W. Ponessa & Associates maintains ownership and rights to all data residing on company resources and any resources of authorized or approved vendors. Employees of T.W. Ponessa & Associates exercising bring-your-own-device options acknowledge and accept the BYOD policies of T.W. Ponessa & Associates.

Employees of T.W. Ponessa & Associates will only access company data through the web interface provided by the service providers designated by the company.

All documents and content created in discharging the duties of employment at T.W. Ponessa & Associates will be kept in the secure cloud storage provided with each company email account and / or on shared cloud storage established by management at T.W. Ponessa & Associates. To facilitate this, each email account provided will include a web-based productivity suite including word processing, spreadsheet, and presentation applications. To maintain consistency and compliance, all content creation will be done using the web-based applications.

Saving copies of data to individual workstations is strictly prohibited. Data and content stored on the cloud may be backed up to designated locations with express consent of the IT Coordinator/CEO. Any exceptions to this policy are at the express discretion of the IT Coordinator/CEO and will only be implemented upon written amendment to this policy. T.W. Ponessa & Associates reserves the right to take appropriate disciplinary action up to and including termination for noncompliance with this policy.

Clearances

All newly hired employees are required to obtain or present a criminal background check, a child abuse history clearance and an FBI fingerprint clearance processed specifically for the Department of Human Services in the required time frames per current regulation. Thereafter, the criminal background check and child abuse history clearance will be updated every two year (following TW Ponessa's set calendar dates) or as directed by the CEO.

Confidentiality

As noted in the Corporate Compliance Manual and Code of Ethics and the Health Insurance Portability and Accountability Act (HIPAA) policy, all information obtained in the course of employment about past or present consumers or employees is considered private and confidential. Employees will comply with these expectations and are cautioned to safeguard any and all information that they may have in hard copy (paper) and/or electronic formats. Any such information should be locked or inaccessible to other consumers, friends, relative, etc. When traveling, consumer information should be in a locked location such as a trunk. Any breach of this policy should be reported to the Supervisor, member of the Corporate Compliance Committee, or via email to corporatecompliance@twponessa.com. Violations may result in disciplinary action up to and including termination.

Conflict Resolution Policy

Problems, misunderstandings and frustrations may arise in the workplace and it is the intent of TW Ponessa & Associates Counseling Services, Inc. to enable our employees to resolve these matters in an effective way to promote a positive and productive working environment. Therefore, an employee who is confronted with a problem may use the procedure described below to resolve or clarify his or her concerns.

Step One: Schedule a time to talk to your Supervisor about your issue or concern, preferably within a week of its occurrence while it is fresh in your mind. If for some reason you do not wish to raise the issue with your Supervisor, contact Human Resources or any member of Administration. Upon the conclusion of this meeting the Supervisor, or other member of Administration, will respond to the employee in writing within five (5) working days.

Step Two: If the initial discussion with the immediate supervisor does not resolve the problem to the mutual satisfaction of the employee and the supervisor or if the supervisor does not respond to the complaint, the employee may submit a written complaint to the Director of the Department. If the employee's immediate Supervisor is the Director of the Department they may go directly to Step 3. The submission of the written complaint is due within five (5) working days from the initial response received in Step 1 and must include:

1. The problem and the date when the incident occurred.
2. Suggestions on ways to resolve the problem
3. A copy of the immediate supervisor's written response or a summary of his or her verbal response and the date when the employee met with the immediate supervisor. If the supervisor provided no response, the complaint should state this.

Employees may request assistance from the Human Resources Department with writing their complaints.

Upon receipt of the formal complaint, the Director of the Department must schedule a meeting with the employee within five (5) working days to discuss the complaint. Within five (5) working days after the discussion, the Director will issue a decision in writing and discuss the decision with the employee filing the complaint.

Step Three: If the employee continues to be dissatisfied with the decision of the Director of the Department, the employee may within five (5) working days, appeal the decision in writing to the Human Resources Director who will then investigate the complaint. Human Resources may gather further information from the involved parties and/or conduct a meeting of all involved parties to facilitate a resolution as deemed appropriate. While the investigation and resolution is pending, and even upon resolution, all involved parties are prohibited from discussing the situation with other staff.

The findings of the Human Resources Director will be shared with the CEO and President for review and a final resolution will be determined. The President will retain the ultimate decision making authority in all conflict resolution determinations.

Please note:

- 1) All requests for conflict resolution must be made in good faith and no retaliation will be taken toward an employee for initiating the conflict resolution process.
- 2) An employee's failure to follow the procedure in the noted time frames will render the issue resolved on the basis of the last decision in the process.
- 3) The conflict resolution process is for individual issues and cannot be initiated by a group of employees.

Criminal Reporting

To ensure compliance with applicable regulations, employees must notify the Human Resources Director or Program Director within 72 hours of any arrest or conviction that may fall under the list of "reportable offenses" as outlined in Act 24 of 2011. A disclosure statement listing these offenses is reviewed at the time of hire and a copy can be requested from the Human Resources Department at any time.

Dress Code

Employees contribute to the corporate culture and professional image of TW Ponessa & Associates Counseling Services, Inc. in the way that they present themselves. A professional demeanor and appearance is essential to developing a favorable impression with consumers, treatment team members, outside vendors and the community. While it is not the intent of the company to hamper self-expression, there will be an expectation that employees present a clean, neat appearance within reasonable guidelines while in the office, serving consumers in the field or attending outside training or company sponsored events. What is considered reasonable may vary based on the assigned activities for the day, but the general guidelines noted below must be followed at all times. If deemed necessary by the Supervisor or member of Administration, an employee will be asked to return home to change.

Dress Code Guidelines:

- Business Casual
- Clothing should be modest and excludes anything that is revealing in any way, excessively tight, short, sexually suggestive, or that contains any slogans or images that may be offensive. Examples of this type of prohibited attire include mini-skirts or dresses shorter than bermuda-type shorts, spaghetti straps, spandex, shirts with pictures or slogans that may be offensive, exposed undergarments, visible undergarments, etc.
- Those staff working within other school district, community or business settings should follow any on site expectations for clothing or footwear that is more stringent than the guidelines noted in this policy.
- Certain staff may be required to meet special dress, grooming and hygiene standards, such as wearing uniforms, depending on the nature of their job. An initial uniform will be provided to those employees.
- At its discretion, a department may, during special occasions, allow staff to dress in a more casual fashion than is normally required. On these occasions, employees are still expected to present a neat appearance and are not permitted to wear ripped, frayed or disheveled clothing, athletic wear, tight, revealing or otherwise inappropriate clothing.
- Clothing should be clean and in good repair. No holes, rips or frayed fabrics.
- Exercise clothing such as sweats, sweat suits, shorts, hiking shoes/boots, etc. will not be permitted.
- Footwear should be appropriate to the environment to provide necessary support and protection to the foot. Those providing services directly to children where physical activity is likely or elopement is possible, should not wear flip flops of any kind.

Casual Friday Dress Code

Casual dress/dress down will be permitted on Fridays, except during specified and announced periods when casual days will be suspended. Some departments may require specific guidelines that differ from the business casual guidelines

In the office setting, jeans may be worn on Friday only, providing that the employee will not be seeing consumers or engaging in professional meetings, etc.

Casual Friday Dress Code is defined as follows:

1. **Shirts:** All shirts with collars, crewneck or V-neck shirts, blouses, golf and polo shirts. *Examples of inappropriate shirts* include T-shirts, shirts with inappropriate slogans, tank tops, muscle shirts, camouflage, sports jerseys/apparel, sweatshirts, hoodies, and crop tops.
2. **Pants:** Casual slacks and trousers and jeans without holes, frays, etc. Examples of inappropriate pants include shorts (except for walking-length shorts), camouflage, yoga pants, leggings and pants worn below the waist or hip line.
3. **Footwear:** Casual slip-on or tie shoes, dress sandals with heel straps and athletic shoes if approved by the department. Examples of inappropriate footwear include floppy sandals or flip-flops.

Driving Safety

It is the policy of TW Ponessa & Associates Counseling Services, Inc. to promote the safety and welfare of our employees. To that end, we ask our employees to follow all state and local laws and use good judgment in regard to the use of any mobile device while driving. Current state law prohibits drivers from viewing, reading or sending text messages while in a moving vehicle. Distracted driving takes many forms such as eating, drinking, talking on a cell phone, internal distractions, music, etc. Be aware of these distractions and limit them to the best of your ability to avoid accidents and injury.

Staff that normally drive within the context of their employment with TW Ponessa & Associates Counseling Services, Inc. (BHRS, School Based, Directors, etc.) are required to notify their supervisor immediately if their license is suspended.

ID Badges

All employees of TW Ponessa & Associates Counseling Services, Inc. are issued a picture ID badge upon beginning employment. ID badges will be worn at all times when on company property and attending trainings and should be readily available by those employees working in the field (school, home or community setting) or worn as appropriate to provide proof of employment. IDs should not be worn when out in the community unless required by a sponsoring facility, such as a camp, in order to maintain the privacy of the consumer who is receiving services.

Some locations require the use of an ID badge that also serves as a "key" to access the building. Employees at these locations must inform their Supervisor and the Human Resources Department immediately if their ID badge is lost or stolen to maintain intended security measures.

Any employee who has a broken or non-functioning ID badge or who has lost their ID badge should contact the Human Resources Department to obtain a replacement. Replacement fees may apply.

Inclement weather

Generally, the Corporation will be open for business but in extreme cases or unforeseen circumstances, a decision to close prior to the work day or even after the work day has begun may occur. Office closings will be broadcast on WGAL-NBC8, WHTM-ABC27, on each office location answering machine (when possible) and on the employee portal of the www.twponessa.com website. As our service area covers over seven counties and many of our employees work in a school setting, please be aware of possible weather conditions and closings before you travel. If an employee is unable to begin or complete their workday due to inclement weather, but the Corporation has not closed, the employee will need to use PTO time (if applicable) to cover the hours or work they were unable to perform or request approval from their Supervisor to take Unpaid Time Off due to the weather emergency.

Media Relations

TW Ponessa & Associates Counseling Services, Inc. will respond to the news media in a responsible and appropriate manner based on the request. If an employee is contacted by any news or other agency, blog, radio station, newspaper, etc. they are not authorized to provide comment of any kind. All contacts and content shared with the media will be authorized solely by the CEO, Cathy DeGuire. Should an employee be contacted, they must refer the request to the Chief Executive Officer. Failure to adhere to this policy, in good faith, could lead to disciplinary action as deemed appropriate.

Nepotism Policy

TW Ponessa & Associates Counseling Services, Inc. wants to ensure that corporate practices do not create situations such as a conflict of interest or favoritism. This extends to practices that involve employee hiring, promotion and transfer. Close relatives, partners, those in a dating relationship or members of the same household are not permitted to be in positions that have a reporting responsibility to each other. Close relatives are defined as: Spouse, Domestic Partner, Parent (in-law/step), Grandparent (in-law/step), Child (in-law/step), Sibling (in-law/step), Aunt, Uncle, Nephew, Niece, and cousins.

Individuals will not be hired or promoted into a position that would create a conflict within the confines of this policy. If employees begin a dating relationship or become relatives, partners or members of the same household and one party is in a supervisory position, that person is required to inform their immediate Supervisor and Human Resources of the relationship. The employees will have 60 days to resolve the situation on their own.

After 60 days, if the employees have not yet resolved the situation on their own by means such as a transfer or employment outside of the company, the employee's supervisor will work with Human Resources to determine the most appropriate action under the circumstances. This may include transfer or if necessary, termination of one of the employees.

TW Ponessa & Associates Counseling Services, Inc. reserves the right to apply this policy to any situation where there is a conflict or the potential for conflict because of the relationship between two employees, even if there is no direct reporting relationship or authority involved. In these situations, the corporation will reassign one of the employees within 60 days.

Outside Employment

Employees may engage in outside work or hold other jobs only if the additional employment meets the following specifications:

- 1) Does not create a real or perceived conflict of interest as outlined in the Corporate Compliance Manual and Code of Ethics,
- 2) Does not constitute employment of a competitive nature as defined by the Restrictive Covenant,

- 3) Does not adversely affect the employee's job performance,
- 4) Does not interfere with providing services or completing assigned work based on the requested schedule of the Supervisor, and/or as reasonably requested by the client, or required by the treatment plan,
- 5) Does not occur in whole or in part while on paid work time for TW Ponessa & Associates Counseling Services, Inc.

To ensure compliance, employees are advised to discuss any outside employment with their Supervisor to ensure compliance with corporate policy.

Resignation/Notice Requirements

We hope your employment with TW Ponessa & Associates Counseling Services, Inc. is long lasting but we understand that circumstances change and employees may need to voluntarily resign at times. Employees should notify their immediate supervisor in writing of their decision and anticipated last day of employment with TW Ponessa & Associates Counseling Services, Inc. To receive payout of any accrued but unused PTO, a departing employee must be in good standing, provide notice as appropriate for their position as listed below and have been employed for at least 6 months.

Psychiatrists:	180 days notice or as per contract
Directors:	6 weeks notice
Coordinators:	5 weeks notice
Assistant Coordinators:	4 weeks notice
Clinicians:	4 weeks notice
Case Managers	3 weeks notice
Therapeutic Staff Support:	3 weeks notice
Nurses	3 weeks notice
Support Staff:	2 weeks notice
Administrative Office Staff:	2 weeks notice

Once an employee has given notice, they are no longer able to use Paid Time Off benefits unless they had been approved prior to the resignation. *Health and other benefits cease on the last day of employment. COBRA benefit continuation option is available-refer to benefit section.*

Social Media Policy

The purpose of T.W. Ponessa & Associates' social networking policy is to allow the company to take advantage of social media's business benefits and promote its products/services, contribute to the relevant online dialog, and better engage with customers and prospects, while avoiding the significant risks involved.

T.W. Ponessa & Associates employees are expected to use the Internet responsibly and productively.

T.W. Ponessa & Associates reserves the right to monitor how employees use company-owned property, including computers and networking equipment, and employees should be mindful that any and all web browsing they do on the company's premises may be monitored.

Employees are forbidden from using social networks to post or display comments about co-workers, supervisors or T.W. Ponessa & Associates that are vulgar, obscene, threatening, harassing, or a violation of T.W. Ponessa & Associates' policies on discrimination or harassment.

Employees may not use social networks to disclose any confidential or proprietary information about T.W. Ponessa & Associates or its employees, customers or business partners.

When appropriate, employees should disclose their relationship with T.W. Ponessa & Associates in their online posts and refrain from speaking on behalf of T.W. Ponessa & Associates when not authorized.

T.W. Ponessa & Associates employees should keep in mind that they are personally responsible for what they post online and be mindful that what they say will be available publicly for a long time.

Social media use is subject to the same workplace policies employees must follow in other situations, including but not limited to T.W. Ponessa & Associates' policies regarding harassment, discrimination, defamation, confidentiality, non-competition and general Internet use.

T.W. Ponessa & Associates reserves the right to take appropriate disciplinary action up to and including termination for noncompliance with this policy.

Social Networking/Web Use

In our current society, communication and the sharing of thoughts and ideas has changed dramatically in a relatively short time. The modes of daily communication are often facilitated by social media and related web-based technologies. While TW Ponessa & Associates Counseling Services, Inc. respects the right of employees to write blogs and use social media for self-expression and self-publication, the Corporation does reserve the right to ensure that your role as an individual and your role as an employee are clearly defined.

If you choose to identify yourself as a TW Ponessa & Associates Counseling Services, Inc. employee, please understand that some readers may view you as a spokesperson for TW Ponessa & Associates Counseling Services, Inc. Because of this possibility, we ask that you state that the views expressed in your blog or social networking areas are your own and not those of the company, nor of any person or organization affiliated with TW Ponessa & Associates Counseling Services, Inc.

Unless specifically instructed by the CEO, Cathy DeGuire, no employee is authorized to speak on behalf of the Corporation or claim to represent the Corporation publicly in any way.

No form of social media will be used to post or display comments about coworkers or supervisors or the corporation that are vulgar, obscene, threatening, intimidating, harassing, or a violation of the TW Ponessa & Associates Counseling Services, Inc. policies against discrimination, harassment or violence in the workplace.

Employees are expected to protect the privacy of TW Ponessa & Associates Counseling Services, Inc. and its current or past consumers and employees. Disclosure of personal employee or consumer information, or any other proprietary and nonpublic information to which an employee may have access is strictly prohibited.

Under no circumstances will TW Ponessa & Associates Counseling Services, Inc. logo be copied and posted for personal purposes.

Bloggers and commentators are personally responsible for their commentary on blogs and social networking sites. Bloggers and commentators can be held personally liable for commentary that is considered defamatory, obscene, proprietary or libelous by any offended party, not just TW Ponessa & Associates Counseling Services, Inc.

Employees cannot use employer-owned equipment, including computers, company-licensed software or other electronic equipment, or company time, to conduct personal blogging or social networking activities.

When social networking, blogging or using other forms of web-based forums, TW Ponessa & Associates Counseling Services, Inc. must ensure that use of these communications maintains our identity, integrity and reputation while minimizing actual or potential legal risks, whether used inside or outside the workplace.

Solicitation

The offices of TW Ponessa & Associates Counseling Services, Inc. are used for business purposes or company sponsored events only. The distribution of any brochures, flyers or other printed materials to sell merchandise, personal items or solicit donations for other organizations is prohibited. The use of company resources, including email may not be used to solicit from employees or non-employees. Employees determined to have solicited on company time or company premises may be subject to disciplinary action.

Examples: Athletic candy bar sales, Girl Scout cookies, Mary Kay, Thirty-One, Lia Sophia, Cookie Lee, Silpada, Tupperware, etc.

Exception to the solicitation policy requires approval from the CEO, Cathy DeGuire.

Pay, Performance, Promotion



Probationary Period (Initial)

Newly hired employees are considered to be on probationary status during their first 90 days of employment. This provides the employee a period to learn and adjust to the expectations and duties of their position and to seek and receive input from their Supervisor. After successful completion of the first 90 days, the immediate Supervisor will conduct a written performance evaluation. Future formal evaluations will occur around the anniversary date of employment and may entail a merit based wage or salary increase, as determined by the corporation each year. At all times, employment with TW Ponessa & Associates Counseling Services, Inc is considered "employment at will," and hence the employee or employer has the ability to end the employment relationship at anytime.

Eligible full time employees will be able to enroll in the benefit programs of TW Ponessa & Associates Counseling Services, Inc. after the successful completion of the first 90 days. While Paid Time Off begins to accrue immediately for full time staff, it is not authorized for use until the completion of the first 90 days. All other company paid benefits are also unavailable until the completion of the first 90 days (Paid Holidays, Jury Duty, Military leave pay).

Probationary Period (Disciplinary)

Current employees may experience a disciplinary action that results in a period of probation for a variety of performance based issues. Such probation can last up to 90 days as deemed appropriate. Employees placed on this type of probation will not be eligible to receive any scheduled Holiday pay during the probationary period nor will they be permitted to use Paid Time Off, unless it had been approved prior to the disciplinary action.

Job Postings

TW Ponessa & Associates Counseling Services, Inc. hopes to provide a positive working environment in which employees will be challenged to grow both personally and professionally. To promote the latter, the company will make employees aware of new job opportunities and available openings by posting those opportunities internally. The corporation will give every consideration to current qualified employees but does reserve the right to choose the most appropriate candidates to participate in the interview process.

Transfer

Employees wishing to transfer to another location within their current position should express that interest to their current Supervisor and the Supervisor at the new location for consideration. Transfer requests will be made based on the availability and business needs in the new location. Full time employees requesting transfer to another location are not guaranteed a full time position in the new location and may need to accept a voluntary status change in order to accommodate the requested transfer.

Promotion

If a new position is of interest, employees should make their interest known by following any posted application procedures and informing their current Supervisor. Employees who have completed further education that would qualify them for consideration in a new role, may discuss their interest with their current Supervisor, the hiring Supervisor or Human Resources. An example would be a TSS receiving their Master's degree who has interest in transitioning to an MT/BSC role. Any granted promotion to a new position or transfer will be executed in a manner that best meets company and consumer needs.

Performance Evaluations

It is the goal of TW Ponessa & Associates Counseling Services, Inc. that all employees receive ongoing feedback concerning their performance during regular supervision meetings and informal discussion with their Supervisor. However, the immediate Supervisor will be charged with providing a written 90 day performance evaluation to new employees and then annually thereafter. Any increase in pay will be considered based on performance in key areas and within a range determined by the Corporation each year during the annual evaluation. Employees with questions or concerns about their pay or performance are encouraged to discuss these matters directly with their immediate Supervisor, Director/Coordinator or Human Resources.

Performance Improvement/Disciplinary Procedures

It is the goal of TW Ponessa & Associates to provide high quality care in a cost effective manner, providing appropriate supervision to staff so that they can improve their professional performance. One method to assist in this process is the disciplinary procedure. Designed to call staff attention to deficits in performance and the need for improvement, the level of disciplinary action taken will vary based on the severity of the offense or infraction and previous similar occurrences. Reviewed on a case by case basis, the disciplinary action chosen will be at the sole discretion of TW Ponessa & Associates Counseling Services, Inc. and may begin at higher levels if the performance or conduct issue jeopardizes the care of a consumer or presents significant financial loss or other liability to the corporation.

Potential Steps in the Disciplinary Action process:

Verbal Warning: When there are concerns about a performance issue(s), infraction or inappropriate conduct a conversation will occur between supervisor and staff to make the staff member aware of the issue, infraction or inappropriate conduct. The conversation will be documented in the personnel file and will identify the following:

- 1) The exact nature of the performance issue, infraction or inappropriate conduct;
- 2) Expectations for future performance/conduct and methods to achieve the desired level of performance or conduct, and;
- 3) Consequences if the issue, infraction or inappropriate conduct continues.

Written Warning: When concerns about performance or conduct continue or a concern is of a serious nature, a formal written warning may be issued to the staff member by their Supervisor. Included in a written warning are the following:

- 1) The exact nature of the performance issue, infraction or inappropriate conduct including the dates/times of specific incidences;
- 2) Any past disciplinary actions;
- 3) Expectations for future performance/conduct including steps that must be taken to reach the desired level of performance/conduct and the assistance available to the employee to reach this goal;
- 4) Time frame in which improvement must be shown;
- 5) Future consequences if the goal is not reached;
- 6) Signature of employee, supervisor, and CEO. The employee is signing to acknowledge receipt and not necessarily agreement with the disciplinary appraisal. Failure to acknowledge receipt may be considered insubordination.

Probation: When performance or conduct issues persist following a prior written warning or if the performance/conduct issue or infraction jeopardizes the care of a consumer or poses a potential loss or liability to the Corporation, a probationary period may be assigned from 30-90 days. During a probationary disciplinary appraisal, the employee is not permitted to use paid time off benefits and they will not receive Holiday pay.

A written warning will accompany the assignment of probation and will include all points noted in the written warning section. The warning will be reviewed with the employee by their supervisor and expectations for future performance will be clearly outlined, including the possible consequences for failure to improve performance or conduct.

Suspension (unpaid): When performance issues or inappropriate conduct persists following a prior written warning or probationary assignment or if the performance/conduct issue or infraction jeopardizes the care of a consumer or poses a potential loss or liability to the corporation, a suspension without pay may be issued for 1 to 5 days based on the severity of the incident(s).

A written warning will accompany the issuing of a suspension and will include all points noted in the written warning section. The warning will be reviewed with the employee by their supervisor and expectations for future performance will be clearly outlined, including the possible consequences for failure to improve performance or conduct.

Termination: If an employee's poor performance, inappropriate conduct or serious infraction(s) occurs or continues following prior disciplinary action, the Corporation may decide to end the employment relationship via involuntary termination. In such circumstances, the employee will receive a written disciplinary action of termination noting the following:

- 1) The exact nature of the performance issue, inappropriate conduct or infraction which lead to the determination to terminate employment including specific incidences;
- 2) Past disciplinary action taken that relates to the reason for termination;
- 3) The rights of the employee to use the conflict resolution procedure;

- 4) Signature of the employee, supervisor and CEO. The employee's signature acknowledges receipt of the disciplinary action and in no way indicates agreement with the action.

Immediate Involuntary Termination: Certain incidents of unacceptable performance or inappropriate conduct may warrant immediate termination, whether or not prior disciplinary action has occurred. In such circumstances, a meeting will generally occur with the employee and a member of the Administration to outline the cause for termination. A disciplinary action for termination will be presented to the employee noting all of the items in the termination section. Below is a listing of examples, though not thoroughly exhaustive, of possible reasons for immediate involuntary termination.

- 1) Violation of professional code of ethics
- 2) Violation of the Corporate Compliance Manual and Code of Ethics;
- 3) Theft from the Corporation;
- 4) Violation of consumer's rights or confidentiality;
- 5) Social contact with a former consumer within two years of discharge;
- 6) New staff who do not respond to verbal and/or written disciplinary actions during their first 90 days of employment;
- 7) Fraudulent billing or forgeries;
- 8) Any incident where the performance issues, inappropriate conduct or infraction(s) pose an immediate threat or harm to a consumer receiving treatment or services and/or to the Corporation.
- 9) Insubordination (Reference below)

Insubordination is strictly prohibited at TW Ponessa & Associates Counseling Services, Inc. Employees that engage in a single act of insubordination or a course of conduct of insubordination are subject to immediate termination without regarding the progressive disciplinary procedure.

For purposes of this handbook, insubordination is any act of defiance, disobedience, dissension or resistance to authority. All employees shall follow the instructions and/or orders issued by supervisory personnel. By not following or ignoring said instructions and/or order, this constitutes insubordination. Any employee who uses profane or obscene language or gestures towards his/her supervisor, or threatens physical violence or attempts to carry out any threat toward said supervisor, commits insubordination. An employee telling his/her supervisor in a private or public setting that the supervisor is incompetent or uses equivalent language, is considered insubordination.

Payroll Procedures & Your Personal Information

Method: Employees will receive their pay via direct deposit on a bi-weekly basis. Newly employed staff will receive instruction on how to set up their on-line payroll account at www.inovapayroll.com along with their first paycheck and are required to establish this account within 30 days of the first pay date. No further pay vouchers will be mailed. Employees are encouraged and expected to review their online vouchers for accuracy and report any possible errors to Human Resources Department personnel immediately for review.

Account Changes: Employees must inform Human Resources Department personnel prior to making any changes or closing accounts used for direct deposit to ensure that funds are not sent to closed accounts and therefore rejected. Rejected funds incur costs and delay that will be the sole responsibility and inconvenience of the employee when Human Resources was not informed of the change in a timely manner.

Requested changes can be turned in by completing a new ACH Authorization form available on the employee portal of the company website at www.twponessa.com or from the Human Resources Department.

Changes in Personal Information: To maintain accurate records for employment and payroll purposes, all employees must maintain up to date information with the Corporation regarding the address where they reside, changes in name, phone numbers, desired tax withholding changes, emergency contacts and beneficiary information (if applicable). A data update form should be completed with the immediate supervisor or Human Resources. Emergency contact forms or beneficiary change forms may be requested from the Human Resources Department.

W-2's: While it will be made available on-line, employees will also receive a printed annual W-2 form which will be post marked no later than the annual deadline of January 31st.

Schedule: Pay is provided on a bi-weekly schedule that is paid two weeks in arrears. The schedule is available on the employee portal of the company website at www.twponessa.com.

Your Benefits



Benefits at TW Ponessa & Associates Counseling Services, Inc.

Full Time employees are eligible for an array of benefits as listed below. Eligibility for benefits begins after 90 days at full time status. If an employee has completed one year of service in a Part Time capacity prior to becoming Full Time then the 90 day waiting period is considered satisfied.

Holidays – Each year, the Company provides a minimum of six paid holidays for eligible full time employees. Holidays that fall on the weekend will be observed the preceding Friday. The Holidays observed are New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Healthcare – The Company strives to offer its full time employees with a comprehensive healthcare plan at a competitive price. The benefit year runs from September through August of each year with open enrollment in late August. Employees are eligible to enroll after working 90 days in a full time status. Plans and programs may change and detailed summaries and certificates of coverage are available from the Human Resources Department.

Each year, the Company will determine the premium co-pay amount for individual employee level coverage. The Corporation will bear a majority percentage of the cost for employee level coverage. Employees have the option to add a spouse, dependents, or same sex domestic partner (affidavit required) at their own expense. The employee's premium co-pay will be deducted via payroll deduction on a pre-tax basis.

Enrollment forms must be completed and turned in to the Human Resources Department within 30 days of initial eligibility, during the yearly open enrollment period in August or immediately following a life event change, such as the birth or adoption of a child, marriage, divorce, or loss of coverage.

Dental – A group dental plan is available for purchase to full time employees via pre-tax payroll deductions. Coverage is available to the employee's spouse, dependents or same sex domestic partner (affidavit required).

Vision - A group vision plan is available for purchase to full time employees via pre-tax payroll deductions. Coverage is available to the employee's spouse, dependents or same sex domestic partner (affidavit required).

Voluntary Benefits Program – Employees carrying 15 hours per week or more are eligible to purchase a variety of supplemental benefits thorough Colonial Life such as accident insurance, short term disability, life insurance, and hospital confinement insurance (full time only). The yearly open enrollment will coincide with the healthcare open enrollment in later august of each year

Professional Liability Insurance – The Company carries a professional liability policy that covers the employee during the course of their employment. Clinicians may carry their own policies in addition, as desired.

Worker's Compensation Insurance – The Company strives to maintain a safe working environment and promote safety awareness among all employees. When an injury does occur, worker's compensation insurance is in place to cover medical expenses and potential lost wages when the injury or illness results in lost wages for seven consecutive days or more. All work related injuries must be reported to your immediate Supervisor and Human Resources within 24 hours of the occurrence, or as soon as possible following the event. Those needing medical treatment beyond first aid are required to use a company panel physician during the first 90 days of treatment.

Unemployment Insurance – The Company participates in the Commonwealth's unemployment insurance program. Requests for applications of unemployment will be processed for current or former employees by the Human Resources Department.

COBRA

The Consolidated Omnibus Budget Reconciliation Act (COBRA) gives workers and their families who lose their health benefits the right to choose to continue group health benefits provided by their group health plan for limited periods of time under certain circumstances such as voluntary or involuntary job loss, reduction in hours worked, transition between jobs, death, divorce, and other life events. Qualified individuals will be charged the full premium cost plus a two percent administrative fee as permitted by law. If an employee of TW Ponessa & Associates Counseling Services, Inc. loses coverage for any of these reasons, an official notice including detailed instructions on how to elect and pay for COBRA continuation coverage will be mailed to the employee or prior employee's most recent home address.

Paid Time Off

The company recognizes that time away from work is needed to attend to other responsibilities and to rejuvenate oneself. To assist you, a Paid Time Off (PTO) benefit is provided to full time employees to cover such absences. Paid Time Off is given in an accrual format based on our payroll schedule and can be used in quarter hour increments. Though schedules may vary a full day of PTO is considered to be 8 hours. Accrual rates are generally granted as follows by position unless otherwise negotiated:

Support Staff/Transcription:	3.07 hours per pay/10 days annually
Administrative Support positions:	3.07 hours per pay/10 days annually
Therapeutic Staff Support:	4.61 hours per pay/15 days annually
Assistant Coordinators:	4.61 hours per pay/15 days annually
Case Managers:	4.61 hours per pay/15 days annually
Nurses:	4.61 hours per pay/15 days annually
Coordinators:	5.85 hours per pay/ 19 days annually
Mobile Therapist:	5.85 hours per pay/ 19 days annually
Behavior Specialist Consultant:	5.85 hours per pay/ 19 days annually
Mental Health Clinicians:	5.85 hours per pay/ 19 days annually
Drug & Alcohol Clinicians:	5.85 hours per pay/ 19 days annually
Directors:	5.85 hours per pay/ 19 days annually
Psychiatrists:	5.85 hours per pay/ 19 days annually

Paid Time Off: Usage

Requests to use Paid Time Off should be provided to your immediate Supervisor for approval at least two weeks in advance to aid in the planning process. When coordinating multiple requests for leave, the Supervisor will make the final decision giving consideration to the order in which requests were received and the length of service for each employee. If you need to take PTO unexpectedly, you must call your Supervisor or any other Supervisor on duty if yours is unavailable to report your absence prior to the beginning of your normal shift. Failure to follow this call in procedure may lead to disciplinary action. A maximum of two consecutive weeks of PTO may be taken at one time for purposes of rest and relaxation.

Paid Time Off Increases

For every five years of full time service, an employee will earn an additional 40 hours/5 days of paid time off. Upon the 5th anniversary, the accrual rate will increase 1.54 hours per pay period to reflect the additional annualized amount going forward. Paid Time Off accruals will not exceed 34 days annually regardless of length of service.

Paid Time Off Carryover

At the end of each calendar year, employees are permitted to carry over up to 40 hours of PTO from one calendar year to the next. The “calendar year” for purposes of PTO will be based on the final payroll cycle of the year which may differ slightly from the actual calendar year. Any hours in excess of 40 may be cashed out at a rate of 60% by submitting a formal written “PTO Cash Out Request” to the Supervisor for approval. Requests are approved at the discretion of the Supervisor and CEO.

PTO Cash Out Request for Full Time employees requesting a change of status to Part Time: To receive payout of any accrued but unused PTO, employees must provide their immediate supervisor with adequate written notice. (Refer to resignation/notice requirements)

Leave Donation Program

At times, a family emergency or personal crisis requiring time off from work may result in time off in excess of the employee's available Paid Time Off (PTO). To address this need, all eligible employees may donate unused PTO to a co-worker in need as outlined below. This is entirely voluntary.

Leave Donation: Guidelines

In order to be eligible to donate, an employee must have been with the company for at least one year and be actively employed. Donations can be made in increments of 4 hours and the maximum donation is 40 hours or no more than 50% of the donating employee's current balance. The employee donating PTO will not be able to receive an advance of PTO should their own life event cause a need for extended time off. To avoid any perceived bias, Supervisors may not donate PTO to subordinates.

Employees eligible to request a donation of PTO need to have experienced one of the following events:

Family Health Related Emergency- Critical or catastrophic illness or injury of the employee or an immediate family member that poses a threat to life and/or requires inpatient or hospice health care. Immediate family member is defined as Spouse, Domestic Partner, Child, Parent or other relationship in which the employee is the legal guardian or sole caretaker.

Other Personal Crisis- A personal crisis of a severe nature that directly impacts the employee. This may include a natural disaster impacting the employee's primary residence such as a fire or severe storm.

Employees who receive donated sick/personal time may receive no more than 480 hours (12 weeks) within a rolling 12 month period.

Leave Donation: Requests/Donations

Forms to request a donation of PTO or to offer such a donation are available from the Human Resources Department. All requests must be reviewed by Human Resources and approved by the immediate Supervisor and the CEO. Donated PTO can only be used for the time needed due to the family health related emergency or other personal crisis. Any donated time that is in excess will be returned to the donating employee.

Unpaid Time Off

Full time employees are expected to fulfill their commitments each week and to utilize PTO if this will not be possible. In certain circumstances, a full time employee can request approval for up to 5 days of unpaid time off once their PTO accrual has been exhausted. Examples of

such circumstances would be for severe weather emergencies, for medical reasons or other circumstances approved by the Administration on a case-by-case basis.

Clinical Supervision toward Licensure

TW Ponessa & Associates Counseling Services, Inc. desires to support the ongoing professional growth and licensure of our staff. When available, the corporation will offer clinical supervision towards licensure for qualified staff. Those meeting the education and experience requirements for their licensure of choice will be considered for the supervision based on the needs of the program for which they work, length of service, and probationary status. Those chosen to receive this benefit will be required to sign a contract to complete a certain period of service upon the completion and receipt of their license or to reimburse the corporation for the clinical supervision rendered to them in the process. Employees who are interested in this opportunity should speak with their direct Supervisor. Supervision for licensure cannot start and hours towards licensure will not be counted until the contract has been signed.

If interested in receiving this benefit, please contact Cathy DeGuire at cdequire@twponessa.com with the following information:

1. What license you are seeking (LPC/LCSW/LMFT).
2. What location/county you currently work out of or would like supervision to occur.
3. How many supervision hours you need/have you completed any of these hours elsewhere.
4. If you are requesting a specific supervisor (this cannot be guaranteed).

Your Leave Options



Bereavement Policy

Full time employees may be granted up to three days of paid bereavement leave upon the loss of a loved one as provided below. The employee must notify their Supervisor of the loss and need for time off as soon as possible and the company reserves the right to request verification of death.

Up to three days of paid leave will be provided for the loss of the employee's Spouse, Domestic Partner, Parent/Step-Parent, Child/ Step-Child, Sibling/Step-sibling or any other relative currently residing in the employee's household.

Up to two days of paid leave will be provided for the loss of a Grandparent, Parent/Son/Daughter-in-law.

Up to one day of paid leave will be provided to attend the funeral of any other relative.

Jury Duty

Employees of TW Ponessa & Associates Counseling Services, Inc. are encouraged to fulfill their civic duty when called upon to serve. Employees called to serve must do the following:

1. Notify their immediate Supervisor as soon as they receive a summons.
2. Forward a copy of the summons to the Human Resources Department.
3. After serving, forward documentation of any non-travel fees received from the court for your service. (*Do not endorse your check over to TW Ponessa & Assoc*)
4. Employees serving on a jury will receive their regular pay less any non-travel related fees earned while serving on the jury, provided all documentation is received for up to 5 days of service.

Thank you for your service.

Family & Medical Leave Act (FMLA)

The FMLA entitles eligible employees to take job-protected, unpaid leave for specific family and medical reasons. To be eligible, you must have been employed by TW Ponessa & Associates for at least 12 months and completed a minimum of 1250 hours during the most recent 12 month period prior to your leave request. The Act provides:

Twelve work weeks of leave in a rolling 12-month period for:

- Birth and care of the employee's child, within one year of birth
- Placement with the employee of a child for adoption or foster care, within one year of the placement
- Care of an immediate family member (spouse, child, parent) who has a serious health condition

- For the employee's own serious health condition that makes the employee unable to perform the essential functions of his or her job
- Any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is on active duty or has been notified of an impending call or order to active duty in the U.S. National Guard or Reserves in support of a contingency operation

Twenty-six work weeks of leave during a single 12-month period:

- To care for a covered service member with a serious injury or illness if the employee is the spouse, son, daughter, parent, or next of kin of the service member (Military Caregiver Leave)

Whenever possible, requests for leave should be made 30 days prior to the need for leave when pre-planned or as soon as possible in an unplanned situation. The Supervisor and Human Resources Department should be notified. A Certification of Health Care provider form will be provided and will require completion if the leave is for you or your family member's serious health condition. During an FMLA designated leave, as other leaves with TW Ponessa & Associates, the employee must use any already accrued Paid Time Off prior to unpaid leave. Intermittent leave will be granted when medically necessary or due to a qualifying exigency. Intermittent leave for any other reason is subject to approval and must be submitted to the supervisor for review prior to approval.

At the conclusion of the FMLA leave, the employee will be restored to the same position or a similar position in pay, benefits and terms. If an employee does not return from leave, the corporation reserves the right to bill for any healthcare premiums paid on the employee's behalf while on FMLA designated leave.

Contact Human Resources directly to initiate your request for FMLA designated leave.

Maternity/Paternity Leave (non-FMLA)

TW Ponessa & Associates Counseling Services, Inc. supports the bonding experience for all of our employees who are welcoming a child into the family, whether or not they yet meet the qualifications for leave under the Family Medical Leave Act. To that end, all new parents will be afforded up to 12 weeks of leave to care for a newborn or placement of a child for adoption. Any already accrued but unused Paid Time Off (PTO) must be used toward the leave prior to the use of unpaid leave. Any group health benefits may be continued at the employee's full expense and every effort will be made to return the employee to the same or similar position at the conclusion of the 12 weeks. Employees will be expected to remain in communication with the Human Resources Department and their Supervisor about the employee's intent to return, providing at least two weeks notice when they are ready to return. Contact your Supervisor or Human Resources to make this request.

Military Leave (USERRA)

TW Ponessa & Associates Counseling Services, Inc. is committed to protecting the job rights of employees absent due to military leave as provided for in The Uniformed Services Employment and Reemployment Rights Act (USERRA). In accordance with federal and state law, it is the company's policy that no employee or prospective employee will be subjected to any form of discrimination on the basis of that person's membership in or obligation to perform service for any of the Uniformed Services of the United States. Specifically, no person will be denied employment, reemployment, promotion, or other benefit of employment on the basis of such membership. Furthermore, no person will be subjected to retaliation or adverse employment action because such person has exercised his or her rights under applicable law or this policy. If any employee believes that he or she has been subjected to discrimination in violation of this policy, the employee should immediately contact Human Resources.

Eligibility: Employees taking part in a variety of military duties are eligible for benefits under this policy. Such military duties include leaves of absence taken by members of the uniformed services, including Reservists, National Guard members for training, periods of active military service, and funeral honors duty, as well as time spent being examined to determine fitness to perform such service. Subject to certain exceptions under the applicable laws, these benefits are generally limited to five years of leave of absence.

Procedures for Military Leave: Unless military necessity prevents it, or it is otherwise impossible or unreasonable, an employee should provide their Supervisor with notice of the need for leave as far in advance as possible under the circumstances. Written notice is preferred, but not required under the law or this policy.

Employees on temporary or extended military leave may use any or all accrued paid time off during their absence, but it is not required during a military leave.

Benefits: Employees on leave for annual training purposes will receive up to two weeks regular pay based on their average earnings over the prior three months less any military pay.

If an employee is absent from work due to military service for a period less than 31 calendar days, benefits will continue as if the employee was actively employed. For leaves 31 days or longer, the employee will have the option to continue group health benefits for a period up to 24 months at 102% of the overall premium.

Employees reemployed following military leave will receive seniority and other benefits determined by seniority that the employee had at the beginning of the military leave, plus any additional seniority and benefits the employee would have attained, with reasonable certainty, had the individual remained continuously employed. An employee's time spent on active military duty will be counted toward their eligibility for FMLA leave once they return to their job at TW Ponessa & Associates Counseling Services, Inc. Additionally, upon reemployment, a covered employee will not be discharged except for cause for up to one year following reemployment.

Reemployment: Employees will be reemployed in the job that they would have attained had they not been absent for military service, or to the pre-service position whichever is applicable. An employee who has engaged in military service must submit an application for reemployment according to the schedule below in order to be entitled to reemployment rights.

1. *If service is less than 31 days (or for the purpose of taking an examination to determine fitness for service) - the employee must report for reemployment at the beginning of the first full regularly scheduled working period on the first calendar day following completion of service and the expiration of eight hours after a time for safe transportation back to the employee's residence.*
2. *If service is for 31 days or more but less than 181 days - the employee must submit an application for reemployment with Human Resources no later than 14 days following the completion of service.*
3. *If service is over 180 days - the employee must submit an application for reemployment with Human Resources no later than 90 days following the completion of service.*
4. *If the employee is hospitalized or convalescing from a service-connected injury - the employee must submit an application for reemployment with Human Resources no later than two years following completion of service.*

Exceptions to Reemployment: In addition to the employee's failure to apply for reemployment in a timely manner, an employee is not entitled to reinstatement, as described above, if any of the following conditions exist:

1. The company's circumstances have so changed as to make reemployment impossible or unreasonable.
2. Reemployment would pose an undue hardship upon the Corporation.
3. The employee's employment prior to the military service was merely for a brief, non-recurrent period and there was no reasonable expectation that the employment would have continued indefinitely or for a significant period.
4. The employee did not receive an honorable discharge from military service.

Documentation: Upon the employee's reapplication for employment, the employee must provide the company with military discharge documentation to establish the timeliness of the application for reemployment, the duration of the military service, and the honorable discharge from the military service. This documentation can be provided to Human Resources for review.

Other Leaves of Absence

Employees requiring a leave that does not fall under the provisions noted for FMLA, Maternity/Paternity or Military Leave may make a request for an "other" leave of absence. Leave may be granted for up to three months time. Contact your direct Supervisor to make such a request.

Your Information



Employee Records

In accordance with state and federal law, personnel records will be maintained and stored in a secure location for all employees. Generally, these files will be on-site with the immediate Supervisor or alternately with another member of Administration. These records will include the application and/or resume, wage or salary information, awards, disciplinary actions, performance reviews, PTO requests, authorizations to reduce pay, leave, and the employment history with TW Ponessa & Associates. The Human Resources Department will maintain separate files related to payroll, benefits, worker's compensation, unemployment compensation, FMLA leaves, Short Term Disability leave or any other medically related information.

Employees wishing to view their personnel file may request an appointment to view their file only. Requests can be made directly to the Human Resources Department who will coordinate with the supervisor a mutually convenient time, during normal business hours, at the location in which the file is maintained for the employee to view their information. The employee may take notes while viewing this material and the Corporation reserves the right to have an agent present during the inspection.

Release of Employee Information

TW Ponessa & Associates Counseling Services, Inc. maintains strict confidentiality of employee records. However, operating requirements of the company do necessitate disclosure of employee information. The purpose of this policy is to outline circumstances in which employee information will be disclosed to external organizations.

Garnishments/Levies/Support Orders: Upon receipt of a properly authorized request to release information or initiate deductions from employee pay, the company will release salary/wage information and begin deductions from pay.

Lenders: Upon receipt of an authorized request that includes the employee's signature, the company will release information, up to and including wage information for the purposes of a loan, such as a mortgage. The company will not provide any wage detail by phone without first receiving an acceptable signed authorization.

Prospective Employers: The Company will provide information for reference purposes which will be limited to job title(s) held, dates of employment, and whether the employee is eligible for rehire with the company.

Credit Agencies/Employment Verification Companies: The Company will provide information for verification of current or past employment, limited to job title and dates of employment.

Other information will be released on former employees pursuant to subpoena, criminal investigation or further order of the court.

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**TW Ponessa & Associates Counseling Services, Inc.
Employee Handbook Acknowledgment**

This employee handbook has been prepared for your information and understanding of the policies, philosophies and practices of TW Ponessa & Associates Counseling Services, Inc. PLEASE READ IT CAREFULLY. Upon completion of your review of this handbook, please sign the statement below, and return it to you immediate supervisor promptly. A reproduction of this acknowledgement appears in the back of the handbook for your records.

I, _____, have received and read the TW Ponessa & Associates Counseling Services, Inc. Employee Handbook which outlines the goals, policies, procedures and benefits of TW Ponessa & Associates Counseling Services, Inc., as well as my responsibilities as an employee.

I have familiarized myself, at least generally, with the contents of this handbook. By my signature below, I acknowledge, understand, accept and agree to comply with the information contained in the Employee Handbook provided to me by TW Ponessa & Associates Counseling Services, Inc. I understand that this handbook is not intended to cover every situation that may arise during my employment, but is simply a general guide to the goals, policies, practices, benefits and expectations of TW Ponessa & Associates Counseling Services, Inc.

I understand that the TW Ponessa & Associates Counseling Services, Inc. Employee Handbook is not a contract of employment and should not be deemed as such, as all employees are employed "at will."

Employee Name (Print)

Employee Signature

Date