

EMPLOYEE HANDBOOK



FIRST STEPS

early intervention program

Guiding kids to greater goals



2019 EDITION

EMPLOYEE HANDBOOK | 2019

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SECTION I: INTRODUCTION

I.1 WELCOME TO OUR COMPANY

It is our pleasure to welcome you to FirstSteps for Kids, Inc. (herein referred to as “FirstSteps” or “Company”). We are an energetic and creative team, dedicated to providing the highest quality therapeutic services to our young patients diagnosed with Autism Spectrum Disorders.

We value each one of our employees and hope that you find your work here rewarding and satisfying. This section of our handbook introduces you to FirstSteps’ history, purpose, and goals. Please read it carefully so that you can better understand who we are and what we do. We believe FirstSteps to be a special place, made all the more so by the hard work and dedication of our employees.

FirstSteps is made up of many talented, dedicated, and caring individuals working in one of our five offices listed below:

FIRSTSTEPS for Kids, Inc.
2447 Pacific Coast Highway, Suite 111
Hermosa Beach, CA 90254
T (310) 374-3300
F (310) 374-3307

FIRSTSTEPS for Kids, Inc. - Bay Area
877 Ygnacio Valley Road, Suite 100
Walnut Creek, CA 94596
T (925) 482-3330
F (925) 482-3333

***FIRSTSTEPS** for Kids, Inc. - Calabasas
5741 Las Virgenes Road, Suite A
Calabasas, CA 91302
T (818) 712-8250
F (818) 712-8289

FIRSTSTEPS for Kids, Inc. – West L.A.
3424 Motor Avenue, Suite 201
Los Angeles, CA 90034
T (424) 672-6707
F (424) 672-6819

FIRSTSTEPS for Kids, Inc. – East L.A.
1000 S. Fremont Avenue, Building A-5, Unit 81
Alhambra, CA 91803
T (626) 407-0740
F (626) 407-0799

* New this year

I.2 INTRODUCTION TO FIRSTSTEPS

FirstSteps was founded by Jennifer Harris, Lisa Stoddard, and Laurie Deurmier in January 2005. With a mission to improve the lives of children diagnosed with Autism Spectrum Disorder and related disorders, the three founders worked to help our one young patient in need by providing state of the art, empirically validated ABA treatment. Quickly thereafter, we established partnerships with our local regional centers and schools, and by year-end we were serving 20 children.

Today, we serve over 300 children and their families located throughout California. We have contracts with over 15 school districts, five Regional Centers and the majority of health plan carriers. We continue to strive towards excellence in all aspects of our work at FirstSteps. We insist on providing the most up-to-date and research-based ABA treatment and feel it is important to contribute to our professional field by conducting and presenting research at national conferences. We believe that it is in our patients' best interest to work collaboratively and productively with other professionals in our field including school personnel, speech and language pathologists, occupational therapists, family therapists, physicians, and representatives of school districts, regional centers, and health plans. Ultimately, we believe that the progress of each of our patients will be directly related to the effort and dedication of our team and our collective commitment to excellence in all we do.

1.3 YOUR FIRSTSTEPS TEAM

Your FirstSteps team is made of three departments: Clinical, Administrative, and Training. The Clinical team consists of Instructors, Lead Instructors, Program Managers, Program Directors, Regional Clinic Directors and the Executive Clinical Director. Our clinical team is trained and certified to provide outstanding behavioral therapy to our young patients. The Administrative team (operations, scheduling, billing, technology and human resources) is made up of individuals working hard behind the scenes to ensure the clinical team has the tools they need to provide outstanding therapeutic service. The Training team maintains the clinical skills and experience to guide our Instructors and Leads and the organizational ability to ensure our clinical team is staffed, trained and excelling in their clinical role each day.

Throughout your employment at FirstSteps, all team members will guide you in your work. Please do not hesitate to contact any of us with questions or to just say hello!

1.4 THE FIRSTSTEPS MISSION

The FirstSteps Team is inspired by the belief that every child deserves the opportunity to achieve his or her fullest potential. To that end, our mission is twofold: to provide the best possible evidence-based behavior analytic treatment to our children, and to offer a positive, collaborative, and dynamic work environment for our staff. We are committed to hiring and mentoring a passionate and dedicated staff and providing an environment that fosters growth and learning. Our greatest reward is the progress of our kids and the knowledge that we are making a positive impact on our families and the community.

1.5 THE PURPOSE OF THIS HANDBOOK

We believe that our employees can be more effective if they know what they may expect from FirstSteps and what FirstSteps expects from them. In the preceding sections, we introduced you to our history, values, culture, and goals. We expect you to incorporate that information into your day-to-day job performance, striving to reflect FirstSteps' values in everything you do.



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The remainder of this Handbook will familiarize you with the privileges, benefits, and responsibilities of being an employee at FirstSteps. Please understand that this Handbook serves only to highlight and summarize our policies and practices. For detailed information, please speak with Human Resources.

The Handbook is not, nor should it be considered to be, an agreement or contract of employment, expressed or implied, or a promise of treatment in any particular manner in any given situation. This Handbook states only general Company guidelines. In addition, it is important to note that we are a dynamic

and growing company. As a result, we may revise, rescind, or supplement these policies from time to time. Nothing in this Handbook is contractual. The policies can change at any time, for any reason, and without notice. This Handbook supersedes all prior handbooks, manuals, policies, and procedures issued by the Company. Any violation of the policies and/or procedures set forth in this Handbook may result in disciplinary action, up to and including termination.

SECTION 2: THE EMPLOYMENT RELATIONSHIP

2.1 EMPLOYMENT IS AT WILL

We are happy to welcome you to FirstSteps! We sincerely hope that your employment here will be a positive and rewarding experience. Your employment here is at will. This means that you are free to leave the Company at any time, with or without a reason and with or without notice. The Company also has the right to end your employment at any time, with or without a reason and with or without notice. Although the Company may choose to end your employment for a cause, cause is not required. Furthermore, the Company has the right to manage its workforce and direct its employees. This includes the right to hire, transfer, promote, demote, reclassify, lay off, terminate, or change any term or condition of employment at any time, with or without a reason and with or without notice unless otherwise required by law.

No employee or Company representative, other than Dr. Jennifer Harris, has the authority to change the at-will employment relationship or to contract with any employee for different terms of employment. Furthermore, Dr. Harris may change the at-will employment relationship only in a written contract, signed by Dr. Harris and you or your representative. Nothing in this Handbook constitutes a contract or promise of continued employment.

SECTION 3: FIRSTSTEPS EMPLOYMENT PRACTICES

3.1 COMMITMENT TO EQUAL OPPORTUNITY

FirstSteps is an equal opportunity employer. We enthusiastically accept our responsibility to make employment decisions without regard to race, religious creed, color, age, sex, sexual orientation, gender identity, national origin, religion, marital status, medical condition, disability, military service, pregnancy, childbirth and related medical conditions, or any other classification protected by federal, state, and local laws and ordinances. Our management is dedicated to ensuring the fulfillment of this policy with respect to hiring, placement, promotion, transfer, demotion, layoff, termination, recruitment advertising, pay, and other forms of compensation, training, and general treatment during employment.

Any violation of this policy will not be tolerated and will result in appropriate disciplinary action, up to and including termination. If an employee believes someone has violated this policy, the employee should bring the

matter to the attention of Human Resources or the Executive Director. The Company will promptly investigate the facts and circumstances of any claim and take appropriate corrective measures.

No employee will be subject to, and the Company prohibits, any form of discipline or retaliation for reporting perceived violations of this policy, pursuing any such claim, or cooperating in any way in the investigation of such claims.

3.2 RECRUITMENT

We at FirstSteps acknowledge that we are only as good as our employees. As such, we search as widely as possible for talented and motivated individuals to fill vacant positions. Our recruitment methods include university presentations and postings, career website postings, advertisements in professional conference programs, and referrals. Although these methods have served us well in the past, we know that the field is ever changing and that finding quality individuals is an ongoing and evolving process. As always, we conduct all recruiting in a fair and nondiscriminatory manner.

Employee Referral Bonus

FirstSteps offers an Employee Referral Bonus Program. Employees who refer candidates who are subsequently hired will receive \$50 upon referred employee's completion of 90-day probationary period and an additional \$100 upon referred employee's completion of one year of employment. Employee referral bonuses are paid on the paycheck following the referred employee's 90-day probationary and/or one year period.

3.3 PRE-EMPLOYMENT SCREENING

Before beginning employment and prior to delivering treatment to our patients, FirstSteps for Kids will conduct a pre-employment screening to ensure all federal, state, and specific payer requirements are met. This includes verification of the California Department of Justice (DOJ) State of California and Federal Bureau of Investigation (FBI) fingerprint-based background check, required employment documents as outlined in Section 4.5, and reference checks of previous employment.

Livescan Fingerprinting

Upon hire, employees will receive a Livescan Request Form accompanied by a list of approved Livescan locations. Employees must complete their Livescan background check at least 72 hours prior to their first day of employment. Livescan results will be pulled from the California Department of Justice (DOJ) website and analyzed prior to the first day of employment. If the results contain information other than "no information meeting dissemination criteria," a meeting will be scheduled between Human Resources and the employee to discuss the results and determine future employment status. In the event we receive a delay notice response from the DOJ, the employee will be notified and commencement of employment will be held until the results are received and cleared by Human Resources. Any subsequent notifications received from DOJ pertaining to an employee's criminal record will be addressed immediately and appropriate action will be taken.

Employment Documents

FirstSteps will verify that all required documentation, certifications and trainings, as outlined in Section 4.5, have been submitted on or before your first day of employment. All documentation must be collected before the employee begins direct work with our patients. Delays in the submission of required documentation may lead to a delay in training and a subsequent delay in direct hours. It is the responsibility

of the employee to assure that their employment file is kept up-to-date throughout their employment with FirstSteps.

Reference Checks

FirstSteps will obtain all applicants' authorization to check references via the required Employment Application. We will conduct a reference check of at least three provided references in order to confirm past employment, and may request additional performance information as needed.

Once all information noted above, as well as that listed in Section 4.5, has been received and verified as "cleared," the employee will be notified via email and phone that they are ready to begin the training process. Should any information be received that contraindicates a person for employment or if a potential employee refuses to submit any of the above listed information or that listed in Section 4.5, the potential employee will be deemed to have not met the employment requirements. Similarly, if an employee fails to maintain their employment record, that person's employment may be at risk.

Verification of Professional License/Registration/Certification

Prior to employment and the delivery of direct treatment (both initially and throughout employment), should an applicant/employee state they are/have become licensed, registered, or certified in a related field or area of expertise, FirstSteps will confirm this information via the direct source. For example, if an applicant/employee states they are a Board Certified Behavior Analyst or Registered Behavior Technician, FirstSteps will confirm this by a search of the applicant/employee in the Behavior Analyst Certification Board's online database. Once located, this information will be documented via taking a picture of the screen and saving it to the employee's file. Additionally, the applicant/employee will be required to submit a copy of their certificate, license, or letter of registration. Should the applicant/employee be found to not hold a certification as stated, their potential employment will be at risk and they will not be able to provide direct treatment to FirstSteps' patients until the situation is rectified with proof of license/registration/certification. Similarly, for those currently employed with FirstSteps and holding a license, registration, or certification, they will be required to maintain those standings with the respective boards and demonstrate continued licensing/registration/certification via documentation. Should an employee fail to maintain or renew their license/registration/certification, they will no longer provide direct treatment to patients of FirstSteps and their employment will be at risk.

3.4 PERSONAL RELATIONSHIPS IN THE WORKPLACE/ EMPLOYMENT OF RELATIVES

No relatives of current employees will be hired by the Company if such hiring would create a supervisory relationship between a current employee and that relative. For purposes of this policy, "relative" means spouse, registered domestic partner, mother, father, child, brother, sister, mother and father-in-law, son and daughter-in-law, aunt and uncle.

Current employees who become related, for example, by virtue of marriage, to another current employee, will be permitted to continue employment. However, the Company may transfer one of the employees if a supervisory relationship exists between the employees to avoid an actual or potential conflict of interest.

3.5 THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)

The Health Insurance Portability and Accountability Act (HIPAA), a federal law, is designed to protect the privacy of an individual's medical information. FirstSteps is a covered entity under HIPAA and complies accordingly. If at any time, you have any questions about HIPAA, please contact the HIPAA Officer or Human

Resources. Some records containing personal health information are not covered under the HIPAA guidelines. These records include workers' compensation claim records, family medical leave records, sick leave doctor notes, fitness-for-duty exams and occupational safety and health records. There may also be instances in which the Company is asked to provide employee records as part of a funding source's auditing process. Furthermore, entities with whom we work may also request additional information in order for you to provide treatment at their facility. As such, we have asked that every employee sign an agreement to release Protected Health Information (PHI) during instances of auditing and/or allow other entities to store such information at their facility.

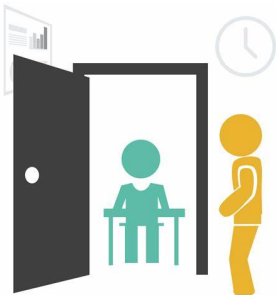
3.6 CONFLICTS OF INTEREST

An employee is required to avoid any conflict of interest during his or her employment by the Company. Any involvement that conflicts with an employee's duties or responsibilities or affects the employee's judgment in making a decision affecting the Company will be considered a conflict of interest. This includes any direct or indirect business, management or financial interest or activity, whether or not for compensation, in any business or entity that is a competitor, supplier or vendor of the Company.

Employees may engage in or have outside business or personal interest activities that do not constitute a conflict of interest with their employment by the Company. FirstSteps requires that these activities or interests do not adversely affect an employee's capacity to perform his or her functions or result in conflicting loyalties.

3.7 OPEN DOOR POLICY

FirstSteps is constantly striving to improve its policies, the services that it provides to its patients, and its relations with employees. You are encouraged to bring suggestions for improvements in any of these areas to the attention of your supervisor or Human Resources.



FirstSteps is committed to maintaining a positive and pleasant environment in which to work, and believes in an open door policy. You should see your supervisor or Human Resources with questions or problems relating to your job. While these procedures cannot result in every problem being resolved to your satisfaction, the Company values your input and you should feel free to raise issues of concern. The Company will listen to your concerns with respect and do its best to solve your problems.

SECTION 4: NEW EMPLOYEE INFORMATION

4.1 NEW EMPLOYEE ORIENTATION

At time of hire, you will receive a link to the external FirstSteps HR Platform [Paylocity]. You will be required to create an account, where you will have the ability to sign all company documents, enter tax withholding information, emergency contacts, direct deposit enrollment information etc. The HR platform will house your personnel file, and you will be required to maintain up to date and accurate contact information and required documents via the website.

Once you begin employment with FirstSteps, you will attend new hire training where you will receive important information about FirstSteps' policies and procedures. You will also be reminded to complete your HR platform account registration where you will digitally sign documents and enter any information that may be outstanding.

Feel free to ask any questions you might have about FirstSteps during the orientation meeting. If additional questions arise after the meeting, please contact Human Resources.

4.2 INSTRUCTOR TRAINING

Training to work at FirstSteps is an exciting process. The learning curve is tremendous, as you will be learning both the theoretical basis of what we do and the application of that theory to our young children diagnosed with autism.

Training at FirstSteps is provided by a BACB certificant and covers all tasks and subtasks in the Registered Behavior Technician (RBT) Task List (developed by the BACB). Employees will receive both didactic and experiential training. A minimum of 40 hours is dedicated to classroom theoretical training, with three of these hours being devoted to training in ethics and professional conduct. In addition, you will receive at least 20 hours of supervised applied training during which you will overlap with experienced Instructors in the field with current patients.

During all training activities, your trainer will discuss therapy techniques, model the appropriate therapy techniques, and will ask you to demonstrate those skills either in a mock role-play situation or with one of our patients. Your trainer will provide feedback on your performance and will expect you to incorporate his or her suggestions when working on that skill in the future.

During training, you are expected to arrive at training sessions on time, ask questions, take notes, and take an active role in your own learning. You will make mistakes; everyone does. Listen to your trainer's feedback and try again! Your training will conclude with your successful completion of a Written Examination, which covers the theoretical portion of training, and your successful completion of the Field Evaluation, which covers the applied portion of your training. Successful completion of the Written Examination is achieved with a passing score of 85% or higher. Successful completion of the Field Evaluation is achieved with a score of 80% or higher. Employees who achieve a score of less than 70% on either measure may not be eligible to retake the exam or evaluation.

Following the successful completion of the above outlined training and 90 days of employment, employees will be assessed via the RBT Competency Assessment in order to become eligible for the RBT credential. (Note: special considerations may be taken into account and an employee may be asked to complete this process prior to 90 days). Once completed and passed, employees will then register and pass a test (through the BACB). Successful completion of such requirements will lead to employees being credentialed as a Registered Behavior Technician. All fees associated with the initial credentialing (i.e., BACB fee and test registration) are paid for by FirstSteps. Should you not pass the exam on its first administration, you will be responsible for subsequent testing fees. Annual renewal fees are the responsibility of the employee.

4.3 ORIENTATION PERIOD

Instructor Orientation Period

The first 90 days of your employment is considered your “orientation period”. During this time, the training team and Program Directors will work to help you learn how to do your job successfully and will ensure you understand what FirstSteps expects of you. We ask that you refrain from taking time off during this time period as it greatly impacts your training and patient relationship building. Both our training team and Program Directors will answer questions you may have, will observe your work and provide frequent feedback, and will evaluate your work performance. During this period, you may be given specific goals, which you will be expected to quickly achieve in order for you to do your job. You will be reviewed at the end of the 90-day orientation period. If you have not met your performance goals, your orientation period may be extended or it may be determined that employment should be discontinued.

Office Staff Orientation Period

The first 90 days of your employment is considered your “orientation period”. During this time, your direct supervisor and team will work to help you learn how to do your job successfully and will ensure you understand what FirstSteps expects of you. We ask that you refrain from taking time off during this orientation period as it greatly impacts your training and relationship building. Both our clinical and administrative directors will answer questions you may have, will observe your work and provide frequent feedback, and will evaluate your work performance. During this period, you may be given specific goals, which you will be expected to quickly achieve in order for you to do your job. You will be reviewed at the end of the 90-day orientation period. If you have not met your performance goals, your orientation period may be extended or it may be determined that employment should be discontinued.

4.3.1 REHIRE ELIGIBILITY AND SERVICE RECOGNITION

Purpose

It is the policy of First Steps to consider rehire of former employees who voluntarily left employment. This policy outlines the rules regarding eligibility for re-employment and bridging of service (service recognition), where appropriate.

Eligibility for Rehire

Employees who voluntarily resigned may be eligible for rehire if they had a satisfactory work record while employed by First Steps.

Ineligibility for Rehire

Former employees who had a less-than-satisfactory work record will not be considered for rehire. This includes employees with a less-than-satisfactory rating in performance evaluations and/or employees who resigned with an unresolved performance improvement plan.

Employees who were involuntarily terminated by First Steps, Inc. or were selected for layoff due to less-than-satisfactory work performance will not be considered for rehire.

Service Restoration Rules for Eligible Employees

If a former employee with more than one year's prior service, with less than a 60 day gap in employment is rehired, the employee's seniority and eligibility to participate in Company benefits plans will be bridged, unless otherwise provide by law.

Example: Marcus is hired on September 3, 2008, and resigns on March 12, 2016. Marcus is rehired on May 3, 2016. Because Marcus' was gone for less than 60 days, his service will reset to his original hire date.

4.4 PROOF OF WORK ELIGIBILITY

Per Federal Government regulations, on or before your first day of work, you must complete the federal Form I-9 and provide documentation proving your identity and your eligibility to work in the United States.

4.5 EMPLOYEE DOCUMENTS AND TRAININGS REQUIRED

In addition to your Form I-9, FirstSteps requires that you have copies of the following documents on file on or before the first day of your employment. Documents that expire or change must be resubmitted so as to ensure your employment file is up to date at all times. Employees are responsible for costs associated with maintaining a current employee file, including the TB Test.

- Resume
- Employment Application
- Livescan Fingerprint Clearance (must include DOJ and FBI)
- Current California Driver's License
- Current Proof of Auto Insurance
- Form I-9 and Proof of Authorization to work in the U.S.
- Form W-4
- Current TB Test Results (within the last 60 days)
- Physical Screening Form
- Proof of Immunizations (*may be declined by completing the declination form)
 - MMR (Measles [also called Rubeola], Mumps, Rubella),
 - Varicella (Chickenpox),
 - Pertussis/DTaP/Tdap (Whooping Cough)
 - Hepatitis B
 - Flu Shot*
- Copy of Highest Degree Received (Note: Official Transcripts, accompanied by Letter of Anticipated Degree Completion on institution letterhead, may be submitted if coursework is completed but diploma has not yet been received)
- Copy of Credentials/Certifications (RBT, BCaBA, BCBA)
- Specialized Training Certificates (CPR Certification, NCI Training, Other Applicable Trainings)
- Signed Agreements:
 - Job Offer Email
 - Wage & Employment Notice per Labor Code section 2810.5
 - Job Description (for current position)
- Signed Handbook Forms:
 - Handbook Acknowledgement
 - Arbitration Agreement
 - Authorization to Release Confidential Protected Health Information
 - Child Protection and Reporting and Domestic Violence Policy

- Confidentiality/HIPAA Agreement
 - Incident Reporting Procedure
 - Harassment Discrimination and Retaliation Prevention Policy
 - Non-Disclosure Policy
 - Photography/Videography Consent
- Schedule of Availability (may only be changed during schedule change periods)

FirstSteps is committed to assuring all employees' trainings across relevant areas occur not just initially, but throughout their employment. Thus, the following trainings will occur at the onset of employment, and/or as dictated by the original training source. Additionally, annual refreshers will occur during staff meetings or pre-scheduled times in the months of June through August of each year.

| TRAINING TYPE | EMPLOYEE TYPE | TRAINING FREQUENCY | REFRESHER |
|---------------------------------------|-----------------------------|-------------------------------------|-----------|
| CPR | All Clinical | Upon Hire + Every 2 years | Annually |
| Non-Violent Crisis Intervention (NCI) | All Clinical | Upon Hire + Every 2 years | Annually |
| Infection Control | All Clinical | Upon Hire | Annually |
| OSHA-Blood Borne Pathogens | All Clinical | Upon Hire | Annually |
| Patient & Personal Safety | All Staff | Upon Hire | Annually |
| Confidentiality | All Staff | Upon Hire | Annually |
| HIPAA | All Staff | Upon Hire | Annually |
| Child/Dependent Abuse | All Clinical | Upon Hire | Annually |
| Domestic Violence | All Clinical | Upon Hire | Annually |
| Epipen | As Needed | As Needed | Annually |
| Hazardous Materials | All Clinical | Upon Hire | Annually |
| Proposition 65 | All Staff | Upon Hire | Annually |
| Patient Rights | All Staff | Upon Hire | Annually |
| No Patient Solicitation | All Staff | Upon Hire | Annually |
| RBT Ethics & Professional Training | All RBTs | Upon Hire | Annually |
| BACB 8 Hour Supervision Course | All Supervisors in Training | Upon Hire/Promotion | Annually |
| Sexual Harassment | All Staff | Upon Hire/Promotion + Every 2 Years | Annually |
| LAUSD Credentialing | All Clinical | Upon Hire | Annually |
| Defensive Driving | All Clinical | Upon Hire + Annually | Annually |
| Active Shooter | All Staff | Upon Hire + Annually | Annually |
| Fraud, Waste and Abuse | All Staff | Upon Hire + Annually | Annually |

4.6 CREDENTIALING PRACTITIONERS

Program Managers, Program Directors and Regional Clinic Directors are required to become credentialed providers with all contracted insurance carriers. During your first week of employment, or during the first week following your promotion, you will be guided on how to complete the steps listed below:

- Obtain an individual National Provider Identifier (NPI) Number
- Obtain a Council for Affordable Quality Healthcare (CAQH) ID
- Complete additional applications and requirements according to individual funding source contracts

Additionally, all Program Managers, Program Directors and Regional Clinic Directors must ensure their Curriculum Vitae (CV) is formatted using the FirstSteps formatted template, and must maintain an up to date CV at all times. In order to assist the above noted clinicians and expedite the credentialing process, FirstSteps may request a practitioner's login credentials for CAQH, as well as any other health insurance

portal with whom they are currently credentialed. Your signature at the conclusion of the handbook authorizes FirstSteps to contact such agencies on your behalf.

4.7 CHILD SUPPORT REPORTING REQUIREMENTS

Federal and state laws require us to report basic information about new employees, including your name, address, and social security number, to a state agency referred to as the State Directory of New Hires. The state collects this information to enforce child support orders. If the state determines that you owe child support, it will send us an order requiring us to withhold money from your paycheck to pay your child support obligations.

SECTION 5: EMPLOYEE CLASSIFICATIONS

5.1 PART-TIME AND FULL-TIME EMPLOYEES

Depending on the number of hours per week you are regularly scheduled to work, you are either a part-time or a full-time employee. Part-time employees are employees who work fewer than 30 hours per week. Full-time employees are employees who work more than 30 hours per week. It is necessary that you understand into which of these classifications you fit as it is important in determining whether you are eligible for some benefits and leave. See Section 8 & 10 for details regarding eligibility.

5.2 EXEMPT AND NONEXEMPT EMPLOYEES

Your entitlement to earn overtime pay depends on whether you are classified as an exempt or nonexempt employee. Exempt employees are those who do not earn overtime because they are exempt from the overtime provisions of the federal Fair Labor Standards Act and applicable state laws. Exempt employees generally work between the hours of 8 AM to 6 PM, Monday through Friday, although this schedule may vary substantially depending on case demands. Working over 40 hours in one week does not entitle exempt employees to additional vacation. Unlike nonexempt employees, compensation for exempt employees is based upon scope of work rather than number of hours worked.

Nonexempt employees are those who meet the criteria for being covered by the overtime provisions of the federal Fair Labor Standards Act and applicable state laws. Please refer to your Compensation Agreement for the FLSA employee classification that applies to you. Any questions regarding your classification should be directed to Human Resources.

SECTION 6: HOURS, BREAKS, OVERTIME

6.1 HOURS OF WORK



FirstSteps' office hours of operation are from 7 AM to 6 PM, Monday through Friday. Although the office is closed before 7 AM and after 6 PM, employees may be able to work outside of these hours and on weekends if desired.

Nonexempt employees are required to complete FirstSteps related tasks during regularly scheduled work time. Overtime must be scheduled and approved in advance by your supervisor. Working more than eight hours in one day or more than 40 hours in one week is not encouraged and is not permitted without prior consent. Overtime without prior approval may result in disciplinary action.

For payroll purposes, the workweek starts on Monday and ends on Sunday. Our scheduling team will provide you with your work schedule based upon your availability and patient requested hours. We will do our best to fill your schedule as requested. Full-time employees should be prepared to work between the hours of 8 AM and 6 PM, Monday through Friday, or the alternative workweek agreed upon at the start of your employment. Full-time employees must be available between 8 AM to 6 PM on designated workdays to maintain full time status. Changes to your availability will be accepted during our annual schedule changes. Changes made outside of this time must be submitted in writing at least 3 weeks in advance to your PD Mentor and scheduling team. Deviations from this, may result in loss of hours for both you and the patients we serve, as well as a loss in benefits and disciplinary action up to and including termination.

6.2 OVERTIME AND DOUBLE TIME FOR NONEXEMPT EMPLOYEES

Overtime

On occasion, we may ask employees to work beyond their regularly scheduled hours. We will always attempt to provide employees advance notice when overtime work is necessary; however, it is not always possible to do so. All overtime work must be approved in writing, in advance, by the employee's supervisor or the scheduling team. Working overtime without permission violates FirstSteps' policy and may result in disciplinary action. For purposes of calculating how many hours an employee has worked in one day or one week, our workweek begins at 12:01 AM on Monday and ends at 12:00 AM on Sunday. Our workday begins at 12:01 AM and ends at 12:00 AM each day. Nonexempt employees are entitled to payment for overtime, in accordance with state and federal requirements and the rules set forth below:

- Vacation time, holidays, or any other paid time during which an employee did not actually work will not be included as hours worked.
- For all hours worked in excess of eight hours in one day or 40 hours in one week, you will be paid at one and one-half times your regular rate of pay.
- Nonexempt hourly employees with multiple rates will have their regular rate of pay calculated by using the Weighted Average Overtime (WAOT) method. Using this method, the regular rate of pay is determined by adding the wages earned at each rate and dividing those wages by the total hours worked, including overtime (see example calculation below).

- Total Hours Worked in a Standard (40 hour) Workweek = 50 hours
 - 40 Hours @ Direct Rate: $\$17.00 \times 40 \text{ hours} = \680
 - 5 Hours @ Office Rate: $\$12.00 \times 5 \text{ hours} = \60
 - 5 Hours @ Drive Rate: $\$10.50 \times 5 \text{ hours} = \52.50
- Total Weekly Compensation Before Adding Overtime Premiums = \$792.50
 - $\$792.50 / 50 \text{ hours (Total Hours Including Overtime)} = \15.85 (Regular Rate of Pay)
 - $\$15.85 / 2 = \7.93 (Weighted Average Overtime Premium)
- Nonexempt hourly employees will be paid for the hours worked once at the rate where the hours were actually worked, and again at the additional half, totaling time and one-half.

Double Time

Nonexempt employees will be paid double time for hours worked in excess of twelve in any workday, or in excess of eight on the seventh day of the workweek. Nonexempt hourly employees will be paid for double time at two times the regular rate of pay using the same method outlined above.

6.3 OFF-THE-CLOCK POLICY

When nonexempt employees are off the clock, no work is permitted. If any work is completed during non-work hours, nonexempt employees must contact their local scheduling team to have the time worked added to CentralReach. Failure to accurately record time worked, even if off the clock, may result in disciplinary action, up to and including termination.

If you find that you are unable to complete your regularly assigned tasks during your regularly scheduled hours, you must speak with your supervisor or Human Resources immediately. Any manager or director who suspects a nonexempt employee is engaging in off-the-clock work should report the incident to Human Resources.

6.4 MEAL AND REST BREAKS

Rest Breaks

Nonexempt employees are entitled to one paid 10-minute rest break for every four hours or substantial portion thereof that is worked. If you work more than six hours in a workday, you will receive one paid rest break during the first half of your shift and one paid rest break during the second half of your shift.

If you are working more than four hours in a school or daycare setting, your Program Director will speak with the teachers and staff at that setting to ensure that appropriate staff is secured to attend to our patient while you are on break. If the school/daycare staff is not provided despite the Program Director's call, please contact the office immediately so the child's parents may be called and/or a substitute FirstSteps Instructor can be arranged. Employees are required to confirm that all meal and rest breaks were completed in CentralReach when converting sessions.

Meal Breaks

All employees who work more than five consecutive hours in a day are required to take at least one 30-minute meal break before the fifth hour of work is completed. Meal breaks are indicated on your weekly schedule and should be completely free of work. You are expected to return to work promptly at the end of your meal period. If you are working more than five hours in a school or daycare setting, your Program Director will speak with the teachers and staff at that setting to ensure that appropriate staff is secured to watch our patient while you are on lunch break. If the school/daycare staff is not provided despite the Program Director's call, please contact the office immediately so that the child's parents may be called and/or a substitute FirstSteps Instructor can be arranged.

Employees are required to confirm that breaks were completed in CentralReach when converting sessions.



Employees who work less than six hours in one day may waive their meal period. This waiver is completely voluntary, must be in writing and signed by you and your direct supervisor. Managers and supervisors are prohibited from coercing or pressuring employees to sign a meal period waiver, and any violation should be immediately reported to Human Resources. Employees are not permitted to use their rest breaks or meal periods to report to work late or leave work early. If, for any reason, you do not take the applicable rest and meal periods, you must notify your scheduling team immediately.

6.5 LACTATION BREAKS ACCOMMODATIONS FOR NURSING MOTHERS

FirstSteps for Kids, Inc. will provide nursing mothers reasonable break time to express milk for their infant child(ren). If you need breaks to express milk, you may use your regular paid rest breaks or may take other reasonable break time when needed. If possible, the break time should run concurrently with scheduled meal and rest breaks already provided to you. If the break time cannot run concurrently with meal and rest breaks already provided or additional time is needed, the break time will be unpaid if you are a nonexempt employee.

If you are nursing, the Company will make reasonable efforts to provide you a private room in close proximity to your work area, other than a restroom, to express breast milk. The room will be clearly designated and either have a lock or a sign on the door to indicate when the room is in use.

Expressed milk can be stored in company refrigerators, refrigerators provided in the lactation room or other location, in a personal cooler. Sufficiently mark or label your milk to avoid confusion for other employees who may share the refrigerator.

You are encouraged to discuss the length and frequency of these breaks with your direct supervisor.

6.6 PATIENT CANCELATIONS AND EMPLOYEE PAY

Over 24 Hours

When a patient cancels a session with more than 24 hours notice, the scheduling team will work to fill your schedule with another clinical session. If no clinical session is available, you may be scheduled for office time (if available) in place of the clinical session. However, if a clinical session becomes available, you will be required to attend the clinical session to fulfill the mission of the company and help our patients.

If you wish to use your accrued vacation time for the canceled session, you may request to do that in place of the canceled session. Should you elect to use vacation time, you will **not** be allowed to do either a clinical session or administrative duties in the office.

Patient Running Late

When a patient is running late to a session, Company policy is for the employee to wait 15 minutes for the patient to arrive. Immediately contact the scheduling team so that the patient may be contacted and arrival time verified. In the event that a patient contacts you directly, please notify the scheduling team of the situation so we may track patterns for future scheduling and make adjustments to CentralReach events when necessary. While you are waiting, you will be paid at your direct rate. Please be cordial to the family at the time of their arrival. If tardiness is a persistent problem, the Program Director will discuss the issue directly with the family and set up a plan to correct the issue.

Cancellations the day of

If you experience a cancellation the day of, you may be offered the option of seeing another patient at that time (if the need exists), OR you may be asked to either report to the office for administrative work (if available) or overlap with another Instructor where there are learning opportunities available for you and/or the patient. If you cover a session, you will be paid your direct rate for the entire session time. If you choose not to work, you may supplement pay with accrued vacation if available. Otherwise, you will not be compensated for the cancellation of the session. In all scenarios, you are expected to resume your regularly scheduled duties for the remainder of the day following the canceled session time.

Last Minute Patient Cancellations and No-Shows

Patient no-shows and late cancellations may happen on occasion. A last minute cancellation is any session that is canceled within 15 minutes of the scheduled start time and includes sessions canceled upon arrival and patient no-shows. It is imperative that the scheduling team and the patient's Program Director be notified in every instance so appropriate action may be taken. Your time is extremely valuable and repeat late cancellations may be cause for service termination.

If you report to work and experience either a last minute cancellation or patient no-show at the time of arrival, immediately call your scheduling team. You will be offered the option of seeing another patient at that time (if the need exists), or will be asked to either report to the office for administrative work or overlap with another Instructor where there are learning opportunities available for you and/or the patient. If you are directed to the office or to an overlap, you will be paid for the duration of the canceled session, up to a maximum of two hours, at your direct rate of pay, and your office rate for any additional time.

If you do not wish to work after learning of the cancellation, you will also be given the option to not work. If you choose not to work, you will not be compensated for the cancellation of the session. In all scenarios, you are expected to resume your regularly scheduled duties for the remainder of the day following the canceled session time.

Last Minute Cancellations - Last Session of the Day More than 15 Miles from the Office

When the last session of your day is more than 15 miles from the office and is canceled at the last minute (i.e. within 15 minutes of start time or at the door), and no cover or overlap is available, you may bill for your Drive Time to and from that last canceled session, and you will be paid for any remaining reporting

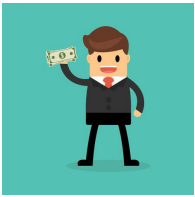
time pay as applicable. Always remember to communicate any changes to your schedule to your scheduling team.

Client Requests to Have Employee Removed from Team

An employee who is requested not to remain on a patient's team due to performance concerns, may experience a temporary reduction in hours. The scheduling team may be able to fill the canceled hours with office time and direct sessions when possible, but in many cases may not be able to replace all canceled hours. Being offered office time in place of canceled sessions as the result of being asked off a team will depend on the office's ability to do so at that time.

SECTION 7: PAY POLICIES

7.1 PAYDAY



Employees are paid two times per month. The pay period runs from the 1st – 15th and the 16th – last day of the month. You will receive your paycheck on the 7th and the 22nd of each month. If a payday falls on a holiday or weekend, you will receive your paycheck on the last workday immediately before that payday. Live paychecks are unable to be cashed prior to the printed check date.

7.2 TIMESHEETS

FirstSteps uses the web-based scheduling / timecard system, CentralReach. You will be given access to the system when your employment begins. All employees are required to document their time worked on a daily basis, including non-billable activities, via CentralReach.

Within CentralReach, it is your responsibility to: 1) verify all scheduled event times occurred as scheduled or make adjustments to start and end times if necessary, 2) add your drive time and mileage when applicable 3) confirm that your scheduled rest and meal breaks were completed and 4) convert completed events including, to time sheets with accuracy by the end of each work day. In addition, for clinical sessions, you may be required to enter a brief clinical description of the patient's session, including behavioral data and skills/goals targeted, and ensure the parent or guardian confirms the session by signature.

Accurate and timely entries and timesheet conversions are mandatory for the processing of your paychecks. Failure to accurately convert your appointments to time sheets by the end of each work day will result in disciplinary action, and repeated failures may be grounds for termination. Additionally, time sheets within a specified pay period not converted by the payroll deadline: end of day on the 15th and last day of the month, will not be paid. To collect payment for late time sheets, you must contact Human Resources.

Welligent (Los Angeles County only)

Los Angeles Unified School District has their own web-based system to track hours and notes for children served in their district. All clinical staff working within Los Angeles County (Hermosa Beach, West LA, East LA, Ventura/North LA) will be assigned a Welligent User ID and password that will allow you to access the system to record your time, clinical notes, and signature with each LAUSD child you see each day. Entries MUST BE completed on the same day the service was provided. Note, you must also record client cancelations in Welligent. Failure to do so may jeopardize the patient's funding and be cause for disciplinary action. For detailed instructions and troubleshooting, please refer to the Welligent Learning Tree provided during new hire training. It is also your responsibility to maintain active Welligent account status. Failure to comply will result in disciplinary action, and repeated failures may be grounds for termination.

7.3 YOUR WAGES

Your pay and pay increases are based upon many factors, including your skills, experience, salary history, education, nature and scope of your job, performance, attendance, and FirstSteps budget. A good performance review neither guarantees a raise nor promises continued employment with FirstSteps.

Nonexempt clinical staff typically receive three separate wage rates: 1) Direct Rate for all direct clinical work with patients in the home, school, clinic or community setting, 2) Office Time Rate for all office / administrative work (e.g. team meetings, filing, stimuli preparation), and 3) Drive Time Rate for time spent driving between patients and between the office and patients. During your first year, you may be asked to attend/observe the therapy sessions of other Instructors and/or Lead Instructors in order to improve your clinical skills. If you are asked to attend a session conducted by another Instructor or Lead Instructor, you will receive your Office/Administrative Rate for that time. The Instructor or Lead Instructor running the session will continue to be compensated at their usual direct clinical rate for any and all training/overlap sessions.

In addition to the standard wages for nonexempt clinical staff, you will also receive a Day Of Cover Bonus for any and all 'day of cover sessions' you complete. This bonus will be paid on the first paycheck of the month for all day of cover sessions completed during the previous month. If you have any questions about your wages, please contact Human Resources.

7.4 DIRECT DEPOSIT

Direct deposit refers to the automatic transfer of salaries and wages directly to the bank account of an employee. If you wish to participate in our direct deposit program, please see Human Resources. Please note that direct deposit is an optional benefit and is not available for your last paycheck. If you choose to receive a live check in lieu of direct deposit, you will be required to retrieve your paycheck from the office and the sign the Paycheck Log.

7.5 RELEASING PAYCHECKS TO OTHERS

Paychecks may be released to someone other than the employee with advance, written authorization by the employee stipulating the name of the individual to whom the check is to be released. That individual will be required to show proof of identification via a California State Driver's License or similar document.

7.6 PAY ADVANCES

FirstSteps is unable to provide pay advances to employees. To ensure you receive your paycheck on time, please complete your CentralReach timecard in an accurate and timely fashion. In addition, you may elect to receive direct deposit to ensure that your paycheck reaches your bank account immediately upon its issue.

7.7 PAYROLL DEDUCTIONS

Your paycheck reflects your total earnings for the pay period, as well as any mandatory or voluntary deductions from your paycheck. Mandatory deductions include Medicare, Federal Income Tax (FITW), Social Security Tax (OASDI), State Income Tax (SITW), and State Disability Insurance (CA SDI). Voluntary deductions are deductions that you have requested and authorized. Such deductions might include your contribution for accessing our health insurance, dental insurance, vision insurance and/or retirement plan. If you have any questions about your deductions, or wish to change your tax withholdings, please contact Human Resources.

7.8 WAGE GARNISHMENTS

A wage garnishment is an order from a court or a government agency directing us to withhold a certain amount of money from an employee's paycheck to be sent to a person or agency. Wages can be garnished to pay child support, spousal support or alimony, tax debts, outstanding student loans, or money owed as a result of a judgment in a civil lawsuit.

If we are instructed by a court or agency to garnish an employee's wages, the employee will be notified of the garnishment immediately. Please note that we are legally required to comply with these orders. If you dispute or have concerns about the amount of a garnishment, you must contact the court or agency that issued the order.

7.9 GENERAL EXPENSE REIMBURSEMENT

From time to time, employees may incur expenses on behalf of FirstSteps. You will be reimbursed for the actual work-related expenses you incur assuming expenses are reasonable, such as parking fees and admission fees for outings. Patient specific items should not be purchased for reimbursement without approval from the Regional Clinic Director (RCD). You must follow these procedures to be reimbursed:

- Prior to incurring the expense, obtain authorization from your immediate supervisor or RCD.
- Make an effort to be cost effective and use approved vendors when possible.
- Retain receipts and other pertinent documents regarding the expense.
- Submit your receipts, along with a completed **Expense Reimbursement Form (signed by your direct supervisor)** to the Regional Administrative Coordinator within 30 days of incurring the expense.
- Include the patients' code name on all reimbursement forms when applicable.

You will receive the expense reimbursement on your paycheck on the 22nd of the month, post taxes.

7.10 SAFE HARBOR POLICY FOR EXEMPT EMPLOYEES

As an exempt salaried employee, you receive a salary that is intended to compensate you for a particular scope of work you do for the Company. This salary will be established at the time of hire or when you become classified as an exempt employee. Under state law, your salary is subject to certain deductions including:

- Full-day absences for personal reasons, if you have exhausted your available paid vacation time.
- Full-day absences for sickness or disability, if you have exhausted your available paid sick leave.
- Intermittent absences, including partial-day absences, covered by the federal Family and Medical Leave Act, if you have exhausted other paid leave available to you.
- To offset amounts received as payment for jury and witness fees or military pay.
- During the first or last week of employment, in the event you work less than a full week.
- Certain types of deductions, such as your portion of health, dental, or vision insurance premiums; state, federal or local taxes, social security; or voluntary contributions to a retirement plan.

In any workweek in which you performed any work, your salary will **not** be reduced for any of the following reasons:

- Partial-day absences for personal reasons, sickness or disability.
- Your absence on a holiday when the office facility is closed, or because the office facility is otherwise closed on a scheduled workday.
- Absences for jury duty, attendance as a witness, or military leave in any week in which you have performed any work.
- Any other deductions prohibited by state or federal law.

If you believe you have been subject to any improper deductions, you should immediately report the matter to Human Resources. Every report will be fully investigated and corrective action will be taken where appropriate. In addition, the Company will not allow any form of retaliation against individuals who report alleged violations of this policy or who cooperate in the Company's investigation of such reports.

7.11 MILEAGE REIMBURSEMENT

Employees who use their own vehicle for FirstSteps' business will be reimbursed at the current IRS mileage rate. Employees are not entitled to separate reimbursement for gas, maintenance, insurance, or other vehicle-related expenses the reimbursement rate above is intended to encompass all of these expenses.

Before using a personal vehicle for work-related purposes, employees must demonstrate that they have a valid California driver's license and adequate insurance coverage. This information will be kept in your personnel file and must be updated if changed or renewed.

To claim mileage reimbursement, you must follow these procedures:

- Enter the miles driven on your CentralReach timecard for each event eligible for mileage reimbursement when converting the event to a timesheet.
- If you anticipate having to travel an unusually long distance, please obtain the approval of a department Director prior to making the trip.
- Mileage reimbursement does not apply to miles traveling to and from your home and work. Only log those miles traveling between patients or between patients and the office.



- This amount will be noted on your paycheck under Deductions as a separate line item from your work hours and is not subject to taxation.

7.12 DRIVE TIME COMPENSATION

In addition to mileage reimbursement, nonexempt employees are entitled to drive time compensation at the state or local city minimum wage rate per hour, whichever is higher. This time includes only drive time between patients or between patients and the office. Drive time compensation is not earned when traveling to and from your home and work appointments.

In the event that you have two sessions and go home or make a stop in between, you should estimate the drive time and mileage from the first session to the next session using google maps. When you must drive to an outing during your session, you may bill for the mileage but not the drive time as your direct time supersedes the drive time.

Daily drive time between patients and the FirstSteps' office should be recorded on your CentralReach timecard. If your drive time is recorded appropriately and accurately on your on-line timecard, your drive time compensation will be included in your hours worked on your next paycheck. As with all work activity, drive time must be entered in CentralReach by the end of each work day. Drive time hours are subject to taxation as they are considered time worked. The use of cell phones for calls, texting, and email is strictly prohibited during your drive time.

7.13 TRAVEL AND EXPENSE POLICY

Travel and Expense Reimbursement

It is FirstSteps policy to reimburse employees for all reasonable business expenses incurred while traveling on authorized Company business. Employees are expected to use prudent judgment in the expenditure of Company funds. Employees should seek reimbursement only for those business expenses that are "necessary" to the conduct and operation of the business and "reasonable" in amount.

Expense Reimbursement Forms submitted must be supported in detail by actual invoices or receipts.

Travel Policies and Standardized Travel Allowances

AIR TRAVEL

Employees should make every effort to secure the most cost-effective airfare, including booking non-refundable and 14-day advance purchase tickets. Benefits accrued from Frequent Flyer programs may be retained and used by the individual employee at his or her discretion. However, an employee's participation in a specific airline carrier's program should not interfere with the selection of the most cost-effective ticket. The company will not pay directly or reimburse employees for costs associated with spouse or non-employee guest travel. The employee is responsible for any and all change fees associated with employee error in booking or tardiness to airport.

LODGING / PER DIEM / RENTAL CAR

Standardized allowances have been set for all travel and, when possible, should not exceed \$175 per night for lodging and \$50 per day for car rental. Each employee is also provided with \$50 per diem to cover meals and travel expenses while away from home.

SECTION 8: EMPLOYEE BENEFITS

8.1 EMPLOYEE BENEFIT PLANS

As part of our commitment to our employees and their well being, FirstSteps provides a variety of benefit plans including:

- Healthcare Insurance Coverage (FirstSteps contributes 70%)
- Dental Insurance Coverage (Access to low cost group rate)
- Vision Insurance Coverage (Access to low cost group rate)
- State Disability Insurance
- Workers' Compensation Insurance
- Family Leave Benefits
- Professional Liability Insurance
- Direct Deposit
- Mobile Phone Data Plan Stipends (per Compensation Agreement)
- Conference Pay and Benefits for eligible employees
- Vacation
- Sick Leave
- 401(k) Plan Participation with Company matching up to 3% (after 1 year of employment)
- Accident Insurance
- Short Term Disability insurance
- EAP (Employee Assistance Program)
- Wellness Incentives (up to \$700)

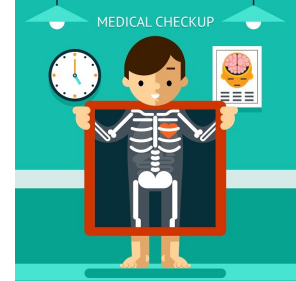
The benefits we provide are meant to help employees maintain a good quality of life both professionally and personally. Most benefits will be described for you during the on boarding process or when your eligibility date is approaching. This Handbook briefly describes some of those benefits.

The official details contained in the plan documents will govern in the event of any conflict or inconsistency with the details listed in this Handbook or with any other written or oral statements or representations. The Company may modify or rescind any benefits provided. If you have any questions about your benefits, please contact Human Resources.

8.2 HEALTH CARE BENEFITS

FirstSteps contributes 70% of an employee's medical premium through two group HMO plans. Should an employee prefer one of the two PPO plans, FirstSteps will provide the same dollar amount contribution towards the HMO plan to a PPO plan. If there is a cost difference between the standard HMO plan offered by FirstSteps and the alternative PPO plan chosen by an employee, the employee will be responsible for paying the difference of that alternative PPO plan, in addition to their regular contribution.

Full-time employees are eligible for participation in FirstSteps' group medical insurance on the first of the month following a 60-day waiting period. To maintain this health care benefit, you must be **available and demonstrate the willingness** to work at least 30 hours per week. Failing to maintain an average of 30 hours per week may jeopardize your eligibility. In addition, FirstSteps offers a group dental plan and a group vision plan at a discounted rate. Employees interested in the group dental or vision plans are responsible for paying the entire premium. Information about the group plans and enrollment will be provided to all qualified employees at the time of hire.



Please note that monthly premiums will be deducted in two parts - 50% of your share of the premiums will be deducted in the first paycheck of the month and the other 50% of the premiums will be deducted in the second paycheck of the month. This split is beneficial to the employee because they will not have a large deduction taken from the first paycheck of the month. When the employee separates from employment, the employee agrees that amounts owed for insurance premiums for the month in which the separation is occurring will be deducted from the final paycheck.

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After proper notification, FirstSteps reserves the right to modify or rescind any health insurance benefits you receive.

8.3 RETIREMENT PLAN PARTICIPATION

After one year of employment with FirstSteps, employees who earned at least \$5,000 during the preceding two calendar years of employment, and who are reasonably expected to earn at least \$5,000 during the current calendar year, are eligible to participate in the FirstSteps 401(k) plan. Employees choose the percentage they wish to contribute, with a maximum contribution of \$19,000 per year. FirstSteps will match the employee contribution equal to 100% of the amount contributed to the plan for each payroll period up to the first three percent of Plan Compensation plus 50% of the amount contributed between three to five percent of Plan Compensation.

Information about the 401(k) plan and enrollment will be provided to all eligible employees upon reaching eligibility. Eligible employees must either waive or enroll in the plan within 60 days of eligibility. Eligible employees who choose to waive enrollment in the plan upon reaching eligibility, will have the opportunity to enroll during the next annual open enrollment period.

Eligible employees may enroll in the FirstSteps retirement plan during the annual open enrollment period taking place from November 1st through November 30th. A notification will be sent to all employees inviting eligible employees to participate 30 days prior to the start of open enrollment. Any eligible employee who waives enrollment during the annual open enrollment period must wait until the next year's annual open enrollment to enroll.

Once your application for enrollment is approved, your payroll deductions will begin. Payroll deductions are pre-tax and are scheduled for each pay period. Elective changes to the amount you contribute by salary deferral may be made once per quarter via written request. Employees may discontinue contributions at any time.

In the event that you end your employment with FirstSteps, you may rollover your vested earnings to a private account through a financial manager of your choice. Please contact Human Resources for more information.

8.4 STATE DISABILITY INSURANCE

Disability is defined as any mental or physical illness or injury that prevents you from performing your regular or customary work according to California Unemployment Insurance Code, Section 2626. If at any time during your employment at FirstSteps you become disabled, state disability insurance may provide you with a percentage of your salary while you are unable to work. For more information, contact the California Employment Development Department at www.edd.ca.gov or call 1-800-480-3287

8.5 WORKERS' COMPENSATION INSURANCE

If you suffer from an illness or injury that is related to your work, you may be eligible for workers' compensation benefits. Reporting promptly helps prevent problems and delays in receiving benefits, including medical care you may need.

If you are injured or become ill through work, contact Human Resources for guidance on accessing workers' comp insurance. If your injury or illness is life threatening, call 911 or visit the nearest emergency room. Should your non-life threatening injury or illness require medical treatment, you will be sent to a facility in the Company's workers' comp Medical Provider Network (MPN). You will need to complete both an internal **Incident Report** form and an insurance claim form called a **Form DWC I**. Present the completed DWC-I form to the treating health care provider. If you do not have the DWC-I form at the time of medical treatment, inform the treating provider of your injury or illness and describe how it is job-related. Contact Human Resources if you have any questions or need any assistance with workers' compensation.

8.6 PAID FAMILY LEAVE BENEFITS

An employee who is off work to care for a child, spouse, parent, registered domestic partner, sibling, grandchild, grandparent or in-law with a serious health condition, or to bond with a new child, may be eligible to receive benefits through the California Paid Family Leave (PFL) program, which is administered by the Employment Development Department (EDD). These benefits are solely financed through employee contributions to the PFL program. As such, the PFL program is solely responsible for determining if an employee is eligible for such benefits.

If you need to take time off work to care for a covered relative with a serious health condition or to bond with a new child, please inform your supervisor and Human Resources and you will be given information about the EDD's PFL program and how to apply for benefits. Employees may also contact their local EDD office for further information. You should maintain regular contact with Human Resources during the time you are off work so we may monitor your return-to-work status. In addition, you should contact your supervisor and Human Resources when you are ready to return to work.



Please note, employees taking time off work to care for a child, spouse, parent, registered domestic partner, sibling, grandchild, grandparent or in-law with a serious health condition or to bond with a new child are not guaranteed job reinstatement unless they qualify for such reinstatement under federal or state family and medical leave laws. Any time off for Paid Family Leave purposes will be designated as leave under the

appropriate leave policy, such as Family and Medical Leave or personal leave, if applicable. Please see the “Family and Medical Leave” policy in this Handbook for eligibility requirements.

8.7 PROFESSIONAL LIABILITY INSURANCE

FirstSteps provides professional liability insurance to all of our employees at no cost to you. This coverage protects you in the event of a malpractice claim. Your policy covers up to \$1 million per occurrence and \$3 million aggregate. Coverage is “occurrence” form, meaning the policy period has lifetime coverage for any claim filed in the future for an incident occurring during the employment period.

The policy also includes the following supplementary benefits:

- All defense costs are covered in addition to the limits of liability.
- Legal services and other expenses incurred in the investigation and defense of disciplinary proceedings up to \$100,000.
- Reasonable legal expenses up to \$100,000 arising out of any act or omission in the furnishing or failure to furnish services as a formal accreditation, standards review or similar board.

If and when you end your employment with FirstSteps, your coverage under this policy is discontinued for any new claims occurring after the employment period concludes.

8.8 DATA PLAN STIPEND

Employees are eligible for a data plan stipend if maintaining an active smart phone that allows for up to date and wireless access to FirstSteps email and web services including CentralReach and Samepage. The stipend will be added to your paycheck post tax in the Deductions category as a negative deduction.

8.9 BACB SUPERVISION

Employees who are interested in pursuing a certification in Applied Behavior Analysis and would like to advance within the company and train to become a Program Director must:

- Demonstrate exemplary performance in all previously held positions in the Company
- Enter a graduate program (M.A. or M.S.) in Applied Behavior Analysis, Psychology, Education or related field that satisfies coursework requirements for BCBA certification **or**
- For those who have completed a Master’s degree in another area, enter a post-graduate program which offers BACB approved coursework
- Complete supervised fieldwork
- Sit for and pass the BCBA exam
- Keep certification current by completing Continuing Education Units

Please note, BCBA supervision is dependent on the availability of the BCBA’s at FirstSteps and is not guaranteed. In exchange for BACB Supervision, an employee must remain employed at FirstSteps for at least 12 months after obtaining certification. Any employee, who leaves prior to 12 months, may be responsible for reimbursing the company for related training and supervision costs (up to \$1,000). Additionally, the sole attainment of a BCBA or BCaBA certification does not automatically afford an employee the title of Program Director, as FirstSteps requires that proficiency be consistently demonstrated across all Program Manager Training Competencies prior to such a promotion, as well as patient need.

8.10 CONFERENCE PAY

FirstSteps' Regional Clinic Directors, Program Directors, Director of Training & Employee Development, Training Managers, and Program Managers who are supervising a caseload may be regular presenters at both state and national ABA conferences, or attend in order to further their knowledge in the field. They are provided with an annual stipend of \$350, per their compensation agreement. To attend a conference and receive paid leave, you must be invited by the Executive Director, Clinical Director or Director of Research. Depending upon your role at the conference, you may receive a stipend up to a maximum of \$350. Membership fees are not eligible for reimbursement.

If you fail to attend a portion of each conference day, you will not receive that portion of the day's pay, and may not be invited to attend future conferences. If you are presenting a lecture, you are entitled to skip the day's talks leading up to your presentation assuming you will be rehearsing. Conferences are considered workdays and should be treated accordingly. Even if you have completed all your CEUs, you are expected to enthusiastically attend all hours of the conference.

SECTION 9: USE OF FIRSTSTEPS PROPERTY

9.1 COMPANY PROPERTY

We ask all employees to take care of FirstSteps property, use it appropriately and in the manner intended. If you encounter problems with equipment or property or deem it unsafe for use, please report it immediately to the Director of Technology & Facilities or the Administrative Coordinator in your office. Please note that we do not allow for the personal use of FirstSteps property. This includes the use of the computers, printers, and iPads.

Employees are responsible for repair or replacement costs to any and all company property damaged as a result of employee negligence. As such, eating and drinking are not permitted while using company property. Further, employees are required to keep company property in a locked location when outside the office. If left in vehicles, the property must be securely locked in the trunk of the employee's car that is not accessible via the main passenger cabin. The employee is responsible for immediately reporting and replacing company property that is lost or stolen.

Failure to use FirstSteps property appropriately, and failure to report problems, theft, or unsafe conditions, may result in disciplinary action, up to and including termination. For information on use of computers, the Internet, and software, see Section 17 of this Handbook.

9.2 TELEPHONE SYSTEM

FirstSteps' telephone system is for business use only. Employees are expected to keep personal calls to a minimum. If you must make or receive a personal call, please keep your conversation brief. Extensive personal use of FirstSteps phones is grounds for disciplinary action.

Please use a professional tone when answering the FirstSteps' phone. We recommend the following: "Good (Morning, Afternoon, Evening), thank you for calling FirstSteps for Kids, this is YOUR NAME. How may I help you?" For information on privacy and telephones, see Section 16 of this Handbook.

9.3 COMPANY POSTINGS

You can find important information about FirstSteps and your employment, information regarding your legal rights, including information about equal employment opportunity laws and wage/hour laws, posted in our employee break rooms. We expect all employees to read the information posted. We may also distribute information of this nature in your employee mailbox, or via email. Please do not post or remove any material from the employee break rooms, and do not distribute any material in employee mailboxes or via email without approval from a department director.

9.4 MAILBOXES AND KITCHEN

Although many of your work hours will take place in the homes and schools of our FirstSteps' patients, we want you to feel at home at the FirstSteps office as well. We have workstations for your convenience, employee mailboxes, and a refrigerator for your use. Please remember to check your mailbox each time you are in the office. You will often find FirstSteps' news, upcoming events, and words of encouragement in your mailbox from the FirstSteps Directors. Please remove food items from the refrigerator each week. Any food items or open beverage containers, including the containers themselves, will be thrown out or donated each Friday. In addition, unwashed containers left in the sink may be thrown out daily.

9.5 EMPLOYEE WORKSPACE

All office staff must keep their office and desk space clean and tidy at all times. Any and all significant added décor should be approved by the Regional Clinic Director. Scented candles are prohibited as they may cause discomfort to other staff and our patients. Music should be kept low so as not to disturb or be audible to office mates, staff or patients.

9.6 PETS IN THE OFFICE

Due to the terms outlined in our office lease agreements, pets are not permitted in any office location. Employees who violate this policy will be financially responsible for any harm that comes to our office property or any injury to employees or patients that occurs as a result of the pet.

9.7 RETURN OF COMPANY PROPERTY

If and when your employment with FirstSteps ends, you must return all FirstSteps property in good condition. This includes training materials, manuals and guides, documents, phones, computers, equipment, keys, garage openers, tools, toys, etc. We reserve the right to take lawful action to recover or protect company property.

9.8 TOY LIBRARY

Use of the FirstSteps Toy Library is optional. If you choose to checkout a toy from the Toy Library, you are responsible for returning the item(s) within two weeks of the checkout date. You are also responsible for returning the toy with all associated pieces and packaging. If you do not return the item(s) within the conditions stated above, FirstSteps has the right to seek reimbursement to cover the cost for replacement of the toy.



SECTION 10: HOLIDAYS, TIME OFF, LEAVES OF ABSENCE

10.1 HOLIDAYS

In addition to earned vacation, all exempt employees, full-time office staff, full-time Program Managers and full-time Lead Instructors are entitled to paid holidays as listed below as well as on the Staff Calendar. Other employees may enjoy these holidays as non-paid days off. In the event an eligible employee works on a scheduled paid holiday, they will be paid for all hours worked at the base rate (including overtime if nonexempt) and another day off with pay to be used by the employee at a later date will be provided.

If a holiday falls on a weekend, FirstSteps may observe the holiday on a weekday during the week preceding or the week following the holiday. The determination for the observed day will follow the holiday calendar of our funding sources and will be listed on the Staff Calendar.

Employees eligible for holiday pay will be compensated at their base rate of pay (not inclusive of bonuses or other compensation) for each of these holidays based on their regularly scheduled hours, but not more than eight hours. Nonexempt hourly employees who are eligible for paid holidays, will have their sessions in CentralReach marked as Paid Holiday (Holiday: Paid Holiday Direct or Holiday: Paid Holiday Office) by the scheduling team. Holiday pay will be applied to every appointment on the holiday. Full-time Program Managers who would be scheduled full time in the office when not scheduled in the field, are eligible for eight hours of holiday pay on each Company holiday. If you are nonexempt and not regularly scheduled on a Holiday, no compensation will be awarded.

Employees on leaves of absence are not eligible for holiday pay. Unused holidays do not accrue and are not paid out at termination.

Observance of Religious Holidays

Vacation time may be used for religious holidays that are not part of the Company's holiday schedule. Employees requesting time off to observe religious holidays must follow the time off request procedure as outlined in the Section 10.2. If the employee has not accrued sufficient vacation time to cover the time off for a religious holiday, the holiday may be taken unpaid, once approved, subject to applicable federal and state law. We will always do our best to accommodate your request to the extent the request does not pose an undue hardship on our business, and may be best able to do so if you can provide additional availability in order to fulfill service hours on another day.

Observed Holidays

- Labor Day
- Thanksgiving Day
- Christmas Eve
- Christmas
- New Year's Day
- Martin Luther King Jr. Day
- President's Day



- Memorial Day
- Independence Day
- Veteran's Day (beginning 2019)

*Holiday Break is between Christmas Eve and New Year's Day.

10.2 VACATION

FirstSteps recognizes that our employees need to take time off occasionally, to rest and relax, to enjoy a vacation, or to attend to personal matters. As such, we offer access to vacation that begins accruing on your first day of employment with the Company.

VACATION ELIGIBILITY

Eligibility for vacation depends on your position and employment status. For all employees, vacation begins accruing on your first day of employment and will be available to use, with approval, as soon as any time has accrued. All employees are eligible to accrue vacation under this policy unless specified in another written agreement signed by the Senior HR Partner.

VACATION ACCRUAL

Accrual is based on the actual hours worked, plus Company holidays, for the particular pay period. Exempt employees are assumed to work a 40-hour workweek, unless their regular work schedule is fewer than 40 hours per week, in which case, vacation accrues based upon that regular workweek. Employees consistently working less than a 40-hour workweek will accrue a prorated amount of vacation. Accrual rates are as follows, unless you receive written notification of a different accrual rate.

Instructor

| Accrual Rate | Vacation Hours Accrued Per Year | Total Maximum Accrual |
|-----------------------------|---------------------------------|-----------------------|
| 1 Hours Per 40 Hours Worked | Up to 52 Hours | 80 Hours |

Lead Instructor

| Accrual Rate | Vacation Hours Accrued Per Year | Total Maximum Accrual |
|-----------------------------|---------------------------------|-----------------------|
| 1 Hours Per 30 Hours Worked | Up to 70 Hours | 105 Hours |

Administrative Team, Training Team, Program Manager, Program Director

| Accrual Rate | Vacation Hours Accrued Per Year | Total Maximum Accrual |
|---------------------------|---------------------------------|-----------------------|
| 3.33 Hours Per Pay Period | Up to 80 Hours | 120 Hours |

For Regional Clinic Directors (with five years or more of tenure in a director role) and Administrative Directors (with five years or more of tenure in a director role), please see the separate Time Away from

Work policy applicable to you. Any questions regarding an employee's rate of accrual should be directed to Human Resources.

***TENURED VACATION ACCRUAL RATES (BEGINNING 2019)**

For employees with three or more years of tenure they will be eligible for an increased vacation accrual rate. See chart below for details by role.

Instructor

| Accrual Rate | Vacation Hours Accrued Per Year | Total Maximum Accrual |
|-----------------------------|---------------------------------|-----------------------|
| 1 Hours Per 30 Hours Worked | Up to 70 Hours | 90 Hours |

Lead Instructor

| Accrual Rate | Vacation Hours Accrued Per Year | Total Maximum Accrual |
|-----------------------------|---------------------------------|-----------------------|
| 1 Hours Per 26 Hours Worked | Up to 80 Hours | 120 Hours |

Administrative Team, Training Team, Program Manager, Program Director

| Accrual Rate | Vacation Hours Accrued Per Year | Total Maximum Accrual |
|---------------------------|---------------------------------|-----------------------|
| 4.17 Hours Per Pay Period | Up to 100 Hours | 140 Hours |

MILESTONE ANNIVERSARIES

Employees will be rewarded with eight banked hours of vacation on their annual anniversary. Additionally, eight hours of paid vacation will be rewarded for every milestone anniversary which happens every five years.

***UNPAID TIME OFF – BEGINNING 2019**

All employees are eligible for five unpaid days off per year. Examples of unpaid days would be a mental health day, car maintenance, DMV appointments or a time where you feel like you need a personal day off. This must be used in hourly increments.

MAXIMUM VACATION ACCRUAL

All employees accrue vacation as they work up to the maximum accruals outlined above. After reaching the maximum accrual, an employee may not accrue additional vacation until the employee uses sufficient vacation to fall below the maximum permissible accruals. Once an employee does so, vacation will resume accruing pursuant to the above schedule. You may check the bottom right of your paycheck stub to view your current vacation balance. Please contact Human Resources if you have any questions regarding your current vacation balance.

VACATION CARRYOVER AND PAYOUT

Accrued vacation carries over from year to year, subject to the accrual caps noted above. If and when an employee leaves the Company, all accrued but unused vacation will be disbursed to the employee at the employee's base rate of pay at the time of separation.

VACATION SCHEDULING

Employees are asked to plan their vacation in January of each year. As FirstSteps follows a school calendar much like teachers, vacation should be scheduled during school holidays including but not limited to "Ski-Week," "Spring-break," the "Summer Months," and "Winter Break" so as not to interfere with the efficient operation of FirstSteps and our commitment to providing intensive ABA services to our patients.

Instructors, Lead Instructors and Program Managers

Instructors, Lead Instructors and Program Managers must have mutual agreement with their supervising Program Director and the scheduling team to use vacation, and must submit a Time Off Request accordingly. The supervising Program Director approves the absence from any and all Team Meetings. All requests must be submitted at least three weeks in advance. All requests, regardless of date submitted, require official approval from your supervisor and the scheduling team. Failure to obtain approval before finalizing travel plans may result in disciplinary action, up to and including termination.

Time Off Requests will be approved based upon a variety of factors including patient need at the time, the order in which the request was received, and with consideration of those who have not yet had the opportunity to take time off. Priority will be given to employees who have accrued sufficient vacation to cover their time off. In addition, employees must have accrued a sufficient amount of vacation to cover their time off by the time their requested time off arrives. We will always do our best to accommodate your request and may be best able to do so if you can provide additional availability in order to fulfill service hours on another day. Failure to adhere to the policy set forth above may result in disciplinary action, up to and including termination.

Office Staff

Office staff must have approval from their direct supervisor to use vacation. Office staff should request time off by emailing their direct supervisor with copy to Human Resources. Clinical office staff who have direct sessions must also obtain approval from their scheduling team. Failure to obtain approval before finalizing travel plans may result in disciplinary action, up to and including termination.

Vacation and Holidays

If a Company recognized holiday falls within a scheduled vacation, the holiday time off will **not** be charged against the employee's accrued vacation.

Absences of Less Than a Day

Employees who utilize vacation for an absence of less than a day will have pro-rata deductions made from their vacation bank.

Checking Voicemail and E-mail

We strongly believe employees should devote their vacation to rest and relaxation. Doing so allows employees to recharge and generally makes for a more productive workforce. Program Directors are

required to notify patients of their upcoming scheduled vacations and secure appropriate case coverage by a fellow PD(s) while they are away. Instructors, Lead Instructors and Program Managers are required to contact all employees covering their sessions prior to taking time off, as well as communicate absences from team meetings to Program Directors. Once your vacation begins, employees are not expected to check their voicemail or e-mail or engage in any work activity.

VACATION TRACKING

Instructors, Lead Instructors, and nonexempt Program Managers who have accrued vacation, will have their appointments in CentralReach marked as Vacation (Vacation: Direct or Vacation: Office) by the scheduling team. Employees who receive approval for a last minute request (any time off request submitted outside of the required three weeks, including requests for day of changes for personal reasons), will also have their appointments in CentralReach marked as Vacation (Vacation: Direct or Vacation: Office) by the scheduling team. Vacation will be applied to every appointment on the scheduled vacation day. You will be required to use accrued vacation for all scheduled direct sessions, but may elect not to use it for your scheduled office time. If you wish to **not** have your accrued vacation applied to your scheduled office time, you may submit this request to the scheduling team. If you have exhausted your accrued vacation, the scheduling team will mark your sessions as Unpaid Time Off, provided the request was approved and to the extent permitted under applicable federal and state law.

Exempt employees must enter their vacation in CentralReach by creating a calendar entry for the applicable number of hours and selecting the Appointment Type titled Vacation and the Service Code titled Time Off: Paid Salary. Existing appointments on those days should have the Service Code changed to Canceled: Canceled by FirstSteps.

Like all other time sheets, vacation sheets must be converted by the payroll deadlines and should therefore be converted before you leave for vacation to ensure you are paid accurately for your vacation time. All inquiries regarding how to document vacation time in CentralReach should be directed to Human Resources.

10.3 SICK LEAVE

All employees are eligible for accrued paid sick leave as follows:

SICK LEAVE ACCRUAL

Accrual begins on the first day of employment. Sick leave for hourly employees will accumulate at the rate of one hour of paid sick leave for every 30 hours worked, up to a maximum of 72 hours. Sick leave for salary employees will accumulate at the rate of three hours per pay period, up to a maximum of 72 hours.

Employees who are exempt from overtime pursuant to the California executive, administrative, and professional exemptions are assumed to work a 40-hour workweek unless their normal workweek is less than 40 hours, in which case, paid sick leave accrues based upon that regular workweek. For purposes of this policy, the year is the consecutive 12-month period beginning on January 1st and ending on December 31st.

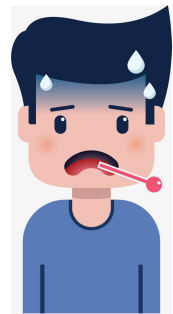
SICK LEAVE CARRYOVER AND PAYOUT

Accrued paid sick leave carries over from year to year, but is subject to the accrual cap of 72 hours. Once the accrual cap is reached, paid sick leave will stop accruing until some paid sick leave is used. The Company will not pay employees for accrued, unused sick leave upon termination of employment.

SICK LEAVE USE

As soon as any time has accrued, the employee may begin to use his/her accrued sick leave, if any. Sick leave may be used for the following reasons:

- For diagnosis, care, or treatment of an existing health condition of, or preventive care for, an employee or an employee's "family member."
- By an employee who is a victim of domestic violence, sexual assault, or stalking for the following purposes:
 - To obtain or attempt to obtain a temporary restraining order, restraining order, or other injunctive relief;
 - To help ensure the health, safety, or welfare of the victim or the victim's child;
 - To seek medical attention for injuries caused by domestic violence, sexual assault, or stalking;
 - To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence, sexual assault, or stalking;
 - To obtain psychological counseling related to an experience of domestic violence, sexual assault, or stalking; or
 - To participate in safety planning and take other actions to increase safety
 - from future domestic violence, sexual assault, or stalking, including temporary or permanent relocation.
 - For any other reason permitted under applicable state or local law.



For purposes of this policy, "family member" means any of the following: (1) child; this definition of a child is applicable regardless of age or dependency status; (2) parent (including parents-in-law or parents of registered domestic partners); (3) spouse; (4) registered domestic partner; (5) grandparents; (6) grandchildren; (7) siblings; (8) any individual related by blood or affinity whose close association with the employee is equivalent of a family relationship; or (9) any other person required by applicable federal, state or local law. The aforementioned child, parent, sibling, grandparent, and grandchild include not only biological relationships but also relationships resulting from adoption and foster relationships, step-relationships, and foster care relationships.

SICK LEAVE NOTICE

To be eligible to receive paid sick leave, employees must provide reasonable advance notice of a foreseeable absence, including prescheduled appointments. In the event of an unforeseen absence or emergency, the employee must contact their local scheduling department in a timely manner by emailing or calling the office phone line. Additionally, Instructors are asked to copy their Program Director/Program Manager so that they are aware that the employee is unable to attend sessions that day. If the scheduling

team is unable to cover your sessions for that day, they will inquire regarding your availability during the weekends for makeup sessions with those patients.

Office employees should alert their supervisor immediately to their unforeseen absence so as to avoid disruption to daily operations.

In addition, if an employee has an unscheduled absence that would otherwise result in an “occurrence” under FirstSteps’ attendance policy, and if the employee elects to use accrued paid sick leave for only part of the unscheduled absence (for example, if the employee is absent for a full eight-hour day of work, but elects to use only four hours of the employee’s accrued paid sick leave for the absence [which the employee is allowed to do]), FirstSteps may count an “occurrence” (or half of an “occurrence”) for the half day of unscheduled absence for which no paid sick leave was used. Only time that is properly taken as accrued paid sick leave is protected from disciplinary action. The same would be true if the employee had a full eight-hour unscheduled absence, but only had available four hours of accrued paid sick leave. The portion of the unscheduled absence not covered by accrued paid sick leave could be subject to disciplinary action under the employer’s attendance policy.

SICK LEAVE DOCUMENTATION

If an employee is absent three or more consecutive full scheduled days of work for a sick leave covered reason, or if an employee requests to use sick leave for a scheduled medical, dental, vision or other health related appointment, FirstSteps requires the employee to provide Human Resources with a doctor’s note and/or medical certification excusing the employee’s absence, to the extent permitted by applicable state and local law prior to returning to work.

Deductions from exempt employees’ sick leave banks will be made in one-hour increments, and will always round down to the nearest hour. For example, if an exempt employee is absent for a covered reason for 2.4 hours, the exempt employee’s paid sick leave balance will be subject to a 2-hour deduction; if an exempt employee is absent 6.7 hours for a covered reason, then his/her paid sick leave balance will be subject to a 6-hour deduction.

Exempt employees who exhaust their sick leave and continue to be absent for reasons of injury or illness will have deductions made from their salary for full day absences only, unless their absences have been designated as intermittent leave under the Family Medical Leave Act and/or the California Family Rights Act. In cases of FMLA/CFRA intermittent leave, the deductions from an exempt employee’s salary will be made consistent with the FMLA/CFRA’s requirements. Exempt employees who believe deductions from their salary have been made because of absences due to illness or injury and which are inconsistent with this policy should immediately bring it to the attention of Human Resources, who will investigate the matter.

SICK LEAVE TRACKING

If you report you are absent for a covered reason, FirstSteps will assume you are requesting a deduction be applied against your paid sick leave balance consistent with this policy unless you advise otherwise.

Instructors and Lead Instructors who have accrued sick time, will have their sessions in CentralReach marked as Paid Sick (Sick: Paid Sick Direct or Sick: Paid Sick Office) by the scheduling team. Sick time will be applied to every appointment on the sick day. If you have exhausted your accrued sick time, the scheduling team

will mark your sessions as Sick: Non-Paid Sick to the extent permitted by applicable federal or state law. If you wish to have your sick time marked as non-paid, you may request this by emailing your local Scheduling team.

Exempt employees must enter their sick time in CentralReach by creating a calendar entry for the applicable number of hours and selecting the Appointment Type titled Sick and the Service Code titled Sick: Paid Sick Salary. Existing appointments on those days should have the Service Code changed to Canceled: Canceled by FirstSteps. All inquiries regarding documenting sick time in CentralReach should be directed to Human Resources.

NO RETALIATION

FirstSteps will not discharge, threaten to discharge, demote, suspend, or in any manner discriminate against an employee for using accrued paid sick days, attempting to exercise the right to use accrued and available sick days, filing a complaint with the state or any local agency, or cooperating in an investigation into allegations of violations of any applicable federal, state, or local paid sick leave law.

10.4 BEREAVEMENT LEAVE

We understand that the death of a family member is a time when you will want and need to be with the rest of your family. Should you lose a member of your immediate family you may have unpaid time off to attend to your obligations and commitments. While Bereavement Leave is unpaid, employees may use their accrued vacation or accrued sick leave. Immediate family members include: employee's spouse, domestic partner, parents, stepparents, siblings, cousins, aunts, uncles, children, step-children, grandparents, parents-in-law, siblings-in-law, children-in-law, or grandchildren.

10.5 FAMILY AND MEDICAL LEAVE AND CALIFORNIA FAMILY RIGHTS ACT

Employees may be entitled to a leave of absence under the Family and Medical Leave Act (FMLA) and/or the California Family Rights Act (CFRA). The FMLA and CFRA provide eligible employees with a right to leave, health insurance benefits and, with some limited exceptions, job restoration. To be an "eligible employee", you must 1) have been employed by the Company for at least 12 months (which need not be consecutive), 2) have worked for at least 1250 hours during the 12-month period immediately preceding the commencement of the leave and 3) worked at a site where 50 or more employees are located within 75 miles of the worksite.

EMPLOYEE ENTITLEMENTS FOR FMLA/CFRA LEAVE

The FMLA provides **eligible** employees up to 12 workweeks of unpaid leave for certain family and medical reasons during a 12-month period. The 12-month period is determined by a "rolling" 12-month period measured backwards from when an employee first uses FMLA/CFRA leave. In some instances, leave may be counted under the FMLA but not CFRA or CFRA but not the FMLA. Leave may be taken for any one, or for a combination, of the following reasons:

- Disability due to pregnancy, childbirth or related medical condition (counts only toward FMLA leave and California Pregnancy Disability Leave (PDL) leave entitlements);
- Bonding and/or caring for a newborn child (counts toward FMLA and CFRA leave entitlements);
- For placement with the employee of a child for adoption or foster care and to care for the newly placed child (counts toward FMLA and CFRA leave entitlements);

- To care for the employee's spouse, domestic partner, child, or parent (but not in-law) with a serious health condition; (counts toward FMLA and CFRA leave entitlements except for time to care for an employee's domestic partner does not count towards FMLA leave, only CFRA leave);
- For the employee's own serious health condition that makes the employee unable to perform one or more of the essential functions of the employee's job; and/or (counts toward FMLA and CFRA leave entitlements);
- Because of any qualifying exigency arising out of the fact that an employee's spouse, son, daughter or parent is a covered military member on active duty (or has been notified of an impending call or order to active duty status in the National Guard or Reserves in support of contingency operations) (counts toward FMLA leave entitlement only).

A **serious health condition** is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, hospice or residential health care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the essential functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities. Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

Intermittent Leave and Reduced Leave Schedules

FMLA/CFRA leave usually will be taken for a period of consecutive days, weeks or months. However, employees are also entitled to take FMLA leave intermittently or on a reduced leave schedule when medically necessary due to a serious health condition of the employee or covered family member or the serious injury or illness of a covered service member. Intermittent leave can also be taken for any qualifying exigency.

Employees are also eligible for intermittent leave for bonding with a child following birth or placement. Intermittent leave for bonding purposes generally must be taken in two-week increments, but the Company permits two occasions where the leave may be for less than two weeks.

Continuation of Health Insurance Benefits

Employees who participate in the Company's group health insurance plan shall continue to participate in the plan while on FMLA/CFRA leave under the same terms and conditions as if they were working for up to 12 weeks. Once FMLA or FMLA/CFRA leave exceeds 12 weeks (for example, in cases of FMLA/PDL leave followed by CFRA birth bonding leave), an employee will be notified of his or her right to continue group health insurance benefits at the employee's cost under COBRA. Employees should make arrangements with Human Resources for payment of their share of the insurance premiums.

Restoration of Employment and Benefits

At the end of FMLA/CFRA leave, subject to some exceptions including situations where job restoration of “key employees” will cause the Company substantial and grievous economic injury, employees generally have a right to return to the same or equivalent positions they held before the FMLA/CFRA leave. The Company will notify employees if they qualify as “key employees”, if it intends to deny reinstatement, and of their rights in such instances. Use of FMLA/CFRA leave will not result in the loss of any employment benefit that accrued prior to the start of an eligible employee’s FMLA/CFRA leave.

The Company may retroactively designate leave as FMLA/CFRA leave for a period of up to 10 days with appropriate written notice to employees, provided the Company’s failure to designate leave as FMLA/CFRA qualifying at an earlier date did not cause harm or injury to the employee. In all cases where a leave qualifies only for FMLA protection, the Company and employee can mutually agree that leave be retroactively designated as FMLA leave.

EMPLOYEE OBLIGATIONS FOR FMLA/CFRA LEAVES

Provide Notice of the Need for Leave

Employees who take FMLA/CFRA leave must timely notify the Company of their need for FMLA/CFRA leave. The following describes the content and timing of such employee notices.

Content of Employee Notice

To trigger FMLA/CFRA leave protections, employees must inform Human Resources of the need for FMLA/CFRA qualifying leave and the anticipated timing and duration of the leave, if known. Employees may do this by either requesting FMLA/CFRA leave specifically, or explaining the reasons for leave so as to allow the Company to determine that the leave is FMLA/CFRA qualifying.

For example, employees might explain that:

- A medical condition renders them unable to perform the essential functions of their job
- They are pregnant or have been hospitalized overnight
- They or a covered family member are under the continuing care of a health care provider
- The leave is due to a qualifying exigency caused by a covered military member being on active duty or called to active duty status
- If the leave is for a family member, that the condition renders the family member unable to perform daily activities or that the family member is a covered service member with a serious injury or illness

Calling in “sick,” without providing the reasons for the needed leave, will not be considered sufficient notice for FMLA/CFRA leave under this policy. Employees must respond to the Company’s lawful questions to determine if absences are potentially FMLA/CFRA qualifying.

If employees fail to explain the reasons for FMLA/CFRA leave, the leave may be denied. When employees seek leave due to FMLA/CFRA qualifying reasons for which the Company has previously provided FMLA/CFRA protected leave, they must specifically reference the qualifying reason for the leave or the need for FMLA/CFRA leave.

Timing of Employee Notice

Employees must provide 30 days advance notice of the need to take FMLA/CFRA leave when the need is foreseeable. When 30 days notice is not possible, or the approximate timing of the need for leave is not foreseeable, employees must provide the Company notice of the need for leave as soon as practicable under the facts and circumstances of the particular case. Employees who fail to give 30 days notice for foreseeable leave without a reasonable excuse for the delay, or otherwise fail to satisfy FMLA/CFRA notice obligations, may have FMLA/CFRA leave delayed or denied.

Cooperating in the Scheduling of Leave

When planning medical treatment for the employee or family member or requesting to take leave on an intermittent or reduced schedule work basis, employees must consult with the Company and make a reasonable effort to schedule treatment so as not to unduly disrupt the Company's operations. Employees must consult with the Company prior to the scheduling of treatment in order to work out a treatment schedule which best suits the needs of both the Company and the employees, subject to the approval of the applicable health care provider. When employees take intermittent or reduced work schedule leave for foreseeable planned medical treatment for the employee or a family member, including a period of recovery from a serious health condition, or to care for a covered service member, the Company may temporarily transfer employees to alternative positions with equivalent pay and benefits for which the employees are qualified and which better accommodate recurring periods of leave.

Medical Certifications Supporting Need for Leave (Unrelated to Requests for Military Family Leave)

Depending on the nature of FMLA/CFRA leave sought, employees may be required to submit medical certifications supporting their need for FMLA/CFRA qualifying leave. As described below, there generally are three types of FMLA/CFRA medical certifications: initial certification, recertification, and a return to work/fitness for duty certification.

It is the employee's responsibility to provide the Company with timely, complete and sufficient medical certifications. Whenever the Company requests employees to provide FMLA/CFRA medical certifications, employees must provide the requested certifications within 15 calendar days after the Company's request, unless it is not practicable to do so despite an employee's diligent, good faith efforts. The Company shall inform employees if submitted medical certifications are incomplete or insufficient and provide employees at least seven calendar days to cure deficiencies. The Company will deny FMLA/CFRA leave to employees who fail to timely cure deficiencies or otherwise fail to timely submit requested medical certifications.

With the employee's permission, the Company (through individuals other than an employee's direct supervisor) may contact the employee's health care provider to authenticate or clarify completed and sufficient medical certifications. If employees choose not to provide the Company with authorization allowing it to clarify or authenticate certifications with health care providers, the Company may deny FMLA/CFRA leave if certifications are unclear.

Whenever the Company deems it appropriate to do so, it may waive its right to receive timely, complete and/or sufficient FMLA medical certifications.

Initial Medical Certifications

Employees requesting leave because of their own, or a covered relative's, serious health condition, or to care for a covered service member, must supply medical certification supporting the need for such leave

from their health care provider or, if applicable, the health care provider of their covered family or service member. If employees provide at least 30 days notice of medical leave, they should submit the medical certification before leave begins. A new initial medical certification will be required on an annual basis for serious medical conditions lasting beyond a single leave year or when an initial medical certification has expired.

If the Company has reason to doubt initial medical certifications regarding an employee's own serious health condition, it may require employees to obtain a second opinion at the Company's expense. If the opinions of the initial and second health care providers differ, the Company may, at its expense, require employees to obtain a third, final and binding certification from a health care provider designated or approved jointly by the Company and the employee. The Company will reimburse employees for any reasonable "out of pocket" travel expenses incurred to obtain second or third medical opinions. Except in very rare circumstances, the Company will not require employees to travel outside normal commuting distance for purposes of obtaining second or third medical opinions.

Medical Re-certification

Depending on the circumstances and duration of FMLA/CFRA leave, the Company may require employees to provide recertification of medical conditions giving rise to the need for leave. The Company will notify employees if recertification is required and will give employees at least 15 calendar days to provide medical recertification. In cases of leave that qualifies under CFRA, recertification will only be requested when the original certification has expired.

Return to Work/Fitness for Duty Medical Certification

Unless notified that providing such certifications is not necessary, employees returning to work from FMLA/CFRA leaves that were taken because of their own serious health conditions that made them unable to perform their jobs must provide the Company medical certification confirming they are able to return to work and the employees' ability to perform the essential functions of the employees' position, with or without reasonable accommodation. The Company may delay and/or deny job restoration until employees provide return to work/fitness for duty certifications.

Providing Medical Recertification Upon Request

Depending on the circumstances and duration of FMLA leave, the Company may require employees to provide recertification of medical conditions giving rise to the need for leave every 30 days (or more frequently in special circumstances). For chronic or long-term conditions, the Company may require certifications every six months. For leave that also qualifies under CFRA, extensions will be requested only when a prior medical certification has expired or is about to expire. The Company will notify employees if recertification is required and will give employees at least 15 calendar days to provide medical recertification.

Reporting Changes to Anticipated Return Date

If an employee's anticipated return to work date changes and it becomes necessary for the employee to take more or less leave than originally anticipated, the employee must provide the Company with reasonable notice (e.g. within two business days) of the employee's changed circumstances and new return to work date. If employees give the Company unequivocal notice of their intent not to return to work, they will be considered to have voluntarily resigned and the Company's obligation to maintain health benefits (subject to COBRA requirements) and to restore their position will cease.

Substitute Paid Leave for Unpaid FMLA Leave

If employees request FMLA/PDL leave because of disability due to pregnancy, childbirth or related medical conditions, their own serious health conditions (excluding absences for which employees are receiving workers' compensation or short term disability benefits), or to care for a covered family member with a serious health condition or bond with a newborn child, they have the option to substitute any accrued vacation time or accrued sick leave for unpaid family/medical leave.

A leave of absence in connection with a workers' compensation injury/illness or for which an employee receives short term disability or State of California Paid Family Leave benefits shall run concurrently with FMLA/CFRA leave. Upon written request, the Company will allow employees to use accrued vacation time or accrued sick leave to supplement any paid workers' compensation, short-term disability or Paid Family Leave benefits. The substitution of vacation time or sick leave for unpaid family/medical leave time does not extend the length of FMLA leaves and the vacation runs concurrently with the FMLA/CFRA entitlement.

Continuation of Health Insurance Benefits

As noted above, during FMLA/CFRA leave, employees are entitled to continued group health plan coverage under the same conditions as if they had continued to work. If paid vacation time or sick leave is substituted for unpaid family/medical leave, the Company will deduct employees' shares of the health plan premium as a regular payroll deduction. If FMLA/CFRA leave is unpaid, employees must pay their portion of the premium by submitting payment via check payable to FirstSteps for Kids, Inc. to Human Resources. The Company's obligation to maintain health care coverage ceases if an employee's premium payment is more than 30 days late. If an employee's payment is more than 15 days late, the Company will send a letter notifying the employee that coverage will be dropped on a specified date unless the co-payment is received before that date.

If employees do not return to work within 30 calendar days at the end of the leave period (unless employees cannot return to work because of a serious health condition or other circumstances beyond their control) they will be required to reimburse the Company for the cost of the premiums the Company paid for maintaining coverage during their unpaid FMLA/CFRA leave.

COORDINATION OF FMLA LEAVE WITH OTHER LEAVE POLICIES

The FMLA does not affect any federal, state or local law prohibiting discrimination, or supersede any state or local law, which provides greater family or medical leave rights. However, whenever permissible by law, the Company will run FMLA leave concurrently with any other leave provided under state or local law. For additional information concerning leave entitlements and obligations that might arise when FMLA/CFRA leave is either not available or exhausted, please consult the Company's other leave policies in this Handbook or contact Human Resources.

QUESTIONS AND/OR COMPLAINTS ABOUT FMLA/CFRA LEAVE

The Company is committed to complying with the FMLA and CFRA and, whenever necessary, shall interpret and apply this policy in a manner consistent with the FMLA and CFRA.

The FMLA makes it unlawful for employers to 1) interfere with, restrain, or deny the exercise of any right provided under FMLA or 2) discharge or discriminate against any person for opposing any practice made unlawful by FMLA or involvement in any proceeding under or relating to FMLA. If employees believe their

FMLA rights have been violated, they should contact Human Resources immediately. The Company will investigate any FMLA complaints and take prompt and appropriate remedial action to address and/or remedy any FMLA violation. Employees also may file FMLA complaints with the United States Department of Labor or may bring private lawsuits alleging FMLA violations.

Additional Definitions

Spouse: a husband or wife as defined or recognized under state law for purposes of marriage in the state where the employee resides, including common law marriage.

Parent: a biological, adoptive, step or foster father or mother, or any other individual who stood in loco parentis to the employee when the employee was a child, son or daughter as defined in paragraph (c) of this section. This term does not include parents “in law.”

Child, son or daughter: for purposes of FMLA/CFRA leave taken for birth or adoption, or to care for a family member with a serious health condition, a biological, adopted, or foster child, a stepchild (including children of a domestic partner), a legal ward, or a child of a person standing in loco parentis, who is either under age 18, or age 18 or older and “incapable of self-care because of a mental or physical disability” or an adult dependent child at the time that FMLA/CFRA leave is to commence.

Incapable of self-care: the individual requires active assistance or supervision to provide daily self-care in three or more of the “activities of daily living” (ADLs) or “instrumental activities of daily living” (IADLs). Activities of daily living include adaptive activities such as caring appropriately for one’s grooming and hygiene, bathing, dressing and eating. Instrumental activities of daily living include cooking, cleaning, shopping, taking public transportation, paying bills, maintaining a residence, using telephones and directories, using a post office, etc.

Mental or physical disability: a mental or physical impairment that limits one or more of the major life activities of an individual. Regulations at 29 CFR 1630.2(h), (i), and (j), issued by the Equal Employment Opportunity Commission under the Americans with Disabilities Act (ADA), 42 U.S.C. 12101 et seq., define these terms.

In loco parentis: persons with day-to-day responsibilities to care for and financially support a child, or, in the case of an employee, who had such responsibility for the employee when the employee was a child. A biological or legal relationship is not necessary.

Adoption: legally and permanently assuming the responsibility of raising a child as one’s own. The source of an adopted child (e.g. whether from a licensed placement agency or otherwise) is not a factor in determining eligibility for FMLA/CFRA leave.

Foster care: 24-hour care for children in substitution for, and away from, their parents or guardian. Such placement is made by or with the agreement of the state as a result of a voluntary agreement between the parent or guardian that the child be removed from the home, or pursuant to a judicial determination of the necessity for foster care, and involves agreement between the state and foster family that the foster family will take care of the child. Although foster care may be with relatives of the child, state action is involved in the removal of the child from parental custody.

Health Care Provider: 1) A doctor of medicine or osteopathy who is authorized to practice medicine or surgery (as appropriate) by the state in which the doctor practices, 2) podiatrists, dentists, clinical psychologists, optometrists, chiropractors (limited treatment consisting of manual manipulation of the spine to correct a subluxation as demonstrated by x-Ray to exist) authorized to practice under the state law and performing within the scope of their practice as defined by state law, 3) nurse practitioners, nurse-midwives, clinical social workers and physician assistants authorized under state law and performing within the scope of their practice as defined by state law, 4) Christian Science practitioners (may be required to submit to second or third certification through examination - not treatment of a health care provider), 5) any other health care provider from whom the employer or the employer's group health plan benefits manager will accept certification of the existence of a serious health condition to substantiate a claim for benefits, and 6) a health care provider who practices in a country other than the United States who is authorized to practice in accordance with the laws of that country and is performing within the scope of his or her practice as defined under such law. For purposes of leave taken to care for a covered service member, any one of the following health care providers may complete such a certification: 1) a United States Department of Defense (DOD) health care provider, 2) a United States Department of Veterans Affairs (VA) health care provider, 3) a DOD TRICARE network authorized private health care provider, or 4) a DOD non-network TRICARE authorized private health care provider.

Domestic Partner: two adults who have established a registered domestic partnership in accordance with the requirements of California law.

10.6 PREGNANCY DISABILITY LEAVE

Employees who become disabled by pregnancy, childbirth or related medical conditions, are eligible (upon hire) to take Pregnancy Disability Leave (PDL). If affected by pregnancy or a related medical condition, an employee is also eligible to transfer to a less strenuous or hazardous position or to less strenuous or hazardous duties, if such a transfer is medically advisable and can be reasonably accommodated. Employees disabled by qualifying conditions may also be entitled to other reasonable accommodation when medically necessary. In addition, if it is medically advisable for the employee to take intermittent leave or work a reduced leave schedule, the Company may require the employee to transfer temporarily to an alternative position with equivalent pay and benefits that can better accommodate recurring periods of leave.

Reasons for Leave

PDL is for any period(s) of actual disability caused by the employee's pregnancy, childbirth, or related medical condition – per pregnancy. Time off needed for prenatal or postnatal care, doctor-ordered bed rest, gestational diabetes, pregnancy-induced hypertension, preeclampsia, childbirth, postpartum depression, loss or end of pregnancy, or recovery from childbirth or loss or end of pregnancy are all covered by this PDL policy. An employee's health care provider ultimately decides if they are disabled by pregnancy.

Duration of Leave

The actual time designated as disability related to pregnancy is determined by the employee's health care provider. An employee is entitled to up to four months, or 17 1/3 weeks, of PDL (per pregnancy) while the employee is disabled by pregnancy, childbirth or related medical condition. For purposes of this policy, "four months" means time off for the number of days the employee would normally work within the four calendar months, following the commencement date of taking a pregnancy disability leave.

PDL is not designed for “baby bonding time” but to provide time off when an employee’s physician states that they are disabled by their pregnancy. After they are no longer disabled, they are not entitled to PDL to stay at home with their new baby. Employees eligible for Family and Medical Leave can use such leave for baby bonding purposes.

Employee Notice Requirements

To receive reasonable accommodation, obtain a transfer, or take a PDL, an employee must provide sufficient notice so the Company can make appropriate plans – 30 days advance notice if the need for the reasonable accommodation, transfer or PDL is foreseeable, otherwise as soon as practicable if the need is an emergency or unforeseeable.

Medical Certification

An employee is required to obtain a certification from her health care provider of her need for PDL, or the medical advisability of an accommodation or a transfer. A medical certification indicating the medical advisability of reasonable accommodation or a transfer is sufficient if it contains: 1) a description of the requested reasonable accommodation or transfer, 2) a statement describing the medical advisability of the reasonable accommodation or transfer because of pregnancy and 3) the date on which the need for reasonable accommodation or transfer became or will become medically advisable and the estimated duration of the reasonable accommodation or transfer. A medical certification indicating disability necessitating a leave is sufficient if it contains: 1) a statement that the employee needs to take pregnancy disability leave because she is disabled by pregnancy, childbirth or a related medical condition, 2) the date on which the employee became disabled because of pregnancy and 3) the estimated duration of the leave.

Upon request, Human Resources will provide you with a medical certification form that you can take to your doctor. As a condition of an employee’s return from PDL, the Company requires the employee to obtain a release to return to work from her health care provider stating she is able to resume their original job duties.

Leave is Unpaid

PDL leave is unpaid. However, the employee may choose to use any accrued vacation time or accrued sick leave as part of their PDL before taking the remainder of their leave unpaid. The use of any paid leave will not extend the duration of the employee’s PDL. The Company encourages employees to contact the EDD regarding eligibility for State Disability Insurance for the unpaid portion of their leave. Employees may be eligible to receive pay pursuant to the state-sponsored Paid Family Leave (PFL) insurance program. See Section 8.6 for more information on Paid Family Leave benefits.

Continuation of Health Insurance Benefits

Employees who participate in the Company’s group health insurance plan shall continue to participate in the plan while on PDL under the same terms and conditions as if they were working. Employees should make arrangements with Human Resources for payment of their share of the insurance premiums. Benefit continuation under PDL is distinct from benefit continuation for employees who also take birth bonding leave under the California Family Rights Act.

Leave Concurrent with Family and Medical Leave

If an employee is eligible for leave under the federal Family and Medical Leave Act, their PDL will also be designated as time off under the Family and Medical Leave policy. Employees should refer to the Family and Medical Leave policy in this Handbook for additional information.

Request for Additional Time Off

Any request for leave after the employee's disability has ended will be treated as a request for Family and Medical Leave under the California Family Rights Act and the federal Family and Medical Leave Act, if the employee is eligible for such leave. Employees who are not eligible for leave under the California Family Rights Act or Family Medical Leave Act will have a request for additional leave treated as a request for disability accommodation.

Return to Work

If an employee does not return to work on the originally scheduled return date, or requests in advance an extension of the agreed upon leave with appropriate medical documentation, the employee may be deemed to have voluntarily terminated her employment with the Company. Failure to notify the Company of her ability to return to work when it occurs, or her continued absence from work because the leave must extend beyond the maximum time allowed, may be deemed a voluntary termination of the employee's employment with the Company, unless the employee is entitled to Family and Medical Leave or a disability accommodation. Upon the employee's return from PDL, the employee will be reinstated to her same position in most instances.

Taking PDL may impact certain benefits and the employee's seniority date. If an employee wants more information regarding their eligibility for a leave and the impact of the leave on his/her seniority and benefits, the employee should contact Human Resources.

10.7 DISABILITY LEAVE

Employees who are disabled and require modified work or a period of leave for reasons related to his/her disability are eligible for Disability Leave. The Company will attempt to reasonably accommodate the disability of any employee if the Company knows of the disability. Reasonable accommodation includes: 1) reassignment to a vacant position 2) part-time or modified work schedules and 3) an unpaid extension of a paid or unpaid leave.

Employees eligible for Disability Leave may choose to use any accrued vacation time or accrued sick leave before taking the remainder of their leave unpaid. Employees who are disabled may be eligible to receive pay pursuant to the State Disability Insurance (SDI) program. See Section 8.4 for more information on SDI benefits.

10.8 WORKERS' COMPENSATION LEAVE

If an employee is injured on the job, he or she will usually be entitled to workers' compensation benefits. The Company carries workers' compensation insurance and will assist employees in obtaining all benefits to which they are legally entitled. If you are injured while working, please report it immediately to your supervisor and Human Resources regardless of how minor the injury may be. Failure to timely report work place injuries or illnesses may result in a denial of workers' compensation benefits.

If your work-related injury requires a leave of absence, this leave may count toward your annual Family and Medical Leave, if you qualify for leave under those programs.

Continuation of Health Insurance Benefits

Employees who access the Company's workers' compensation insurance shall continue to participate in the plan while on workers' compensation leave under the same terms and conditions as if they were working. If the Workers' Compensation Leave goes beyond 12 weeks, the employee will be required to continue their health and welfare benefits through COBRA for the period beyond 12 weeks. Employees should make arrangements with Human Resources for payment of their share of the insurance premiums.

10.9 JURY DUTY AND WITNESS LEAVE

Nonexempt employees who are called for jury duty are entitled to take unpaid time off, as necessary, to fulfill jury obligations. Employees may request a onetime postponement of jury service for personal or business reasons, but the decision to request a postponement is solely up to the employee.

Clinical staff must immediately inform the scheduling team and Human Resources when a jury duty summons is received, and if chosen to sit on a jury, must inform the scheduling team and Human Resources of the trial schedule. You must also check in with us periodically during your jury service, so that we may plan accordingly for your return.

Office staff must immediately inform their direct supervisor and Human Resources when a jury duty summons is received. Exempt Employees who perform **any** work during the workweek while serving jury duty, will be paid at their usual rate of pay for the entire work week.

An employee called for jury duty must submit certification (court summons or proof of service) to Human Resources at their earliest convenience.

10.10 VOTING

Employees may be allowed up to two hours off work at the beginning or end of their shift to vote in statewide elections. Employees who will need to take time off work to vote must inform the scheduling team at least two days in advance and provide documentation of their designated polling site. Employees are expected to work with the scheduling team to ensure that their absence does not have a negative impact on FirstSteps' patients. Employees who take time off to vote must supply Human Resources with proof of voting as provided by the polling site.

10.11 SCHOOL APPEARANCE AND ACTIVITIES LEAVE

School and Child Care Activities Leave

Parents, stepparents, foster parents, grandparents, and guardians with school children from kindergarten through grade 12, or who attend licensed child daycare facilities, may take unpaid time off (up to 40 hours in one calendar year) to participate in school or daycare activities. You must provide reasonable advance notice to your supervisor before taking any time off under this policy. Proof of an employee's participation in these activities may be required.

School Appearance Leave

Parents, stepparents, foster parents, grandparents, and guardians with custody of schoolchildren who have been suspended may take unpaid time off to appear at the school pursuant to the school's request

10.12 CRIME VICTIMS' LEAVE

Employees who have been victims of certain serious or violent felonies specified under California law may take time off work to attend judicial proceedings related to the crime, including any proceeding involving a post-arrest release decision, plea, sentencing, post-conviction release decision, or any proceeding in which the right of the victim is an issue. Employees may also take time off for such reasons if an immediate family member has been a victim of a specified crime. "Immediate family member" is defined as spouse, registered domestic employee, child, child of registered domestic employee, stepchild, brother, stepbrother, sister, stepsister, mother, stepmother, father, or stepfather. Employees who are, or whose immediate family members are, crime victims should consult with Human Resources to determine if they are permitted time off under this policy. All requests for time off under this Policy will be treated as confidential.

Employees eligible for time off under this Policy must give Human Resources a copy of the court notice given to the victim of each scheduled proceeding before taking time off, unless reasonable advance notice to the Company of the need for time off is not feasible. When advance notice is not feasible, the employee must provide the Company with documentation evidencing the judicial proceeding, within a reasonable time after the absence. The documentation may be a police report documenting the individual was a victim of a specified crime; a court order or other evidence from the court, the district attorney or prosecuting attorney's office, or the victim/witness office that is advocating on behalf of the victim; or documentation from a medical professional, domestic violence advocate, or advocate for victims of sexual assault, health care provider, or counselor that the employee was undergoing treatment for physical or mental injuries or abuse resulting in victimization from a specified offense.

Nonexempt employees may elect to use accrued vacation time or accrued sick leave for the absence. If the employee does not elect to use vacation, the absence will be unpaid. Exempt employees will be paid their full salary for any workweek interrupted by the need for time off under this policy.

10.13 DOMESTIC VIOLENCE AND SEXUAL ASSAULT AND STALKING VICTIMS' LEAVE

Victims of domestic violence, stalking or sexual assault may take up to 12 weeks off unpaid to obtain help from a court, seek medical attention, obtain services from an appropriate shelter, program, or crisis center, obtain psychological counseling, or participate in safety planning, such as permanent or temporary relocation. We may require proof of an employee's participation in these activities. Whenever possible, you must provide your supervisor reasonable notice before taking any time off under this policy. You may substitute any accrued vacation time or accrued sick leave for the unpaid leave provided under this policy. Leave under this policy does not extend the time allowable under the Family and Medical Leave Act Policy in this Handbook.

The company will not discipline, discriminate or retaliate against an employee because the employee is a known victim of domestic violence, stalking or sexual assault.

An employee who is the victim of domestic violence, stalking or sexual assault may request reasonable accommodation with respect to his or her safety while at work. Reasonable accommodation may include the implementation of safety measures, including a transfer, reassignment, modified schedule, changed work telephone, changed work station, installed lock, assistance in documenting domestic violence, sexual assault, or stalking that occurs in the workplace, an implemented safety procedure, or another adjustment to a job structure, workplace facility, or work requirement in response to domestic violence, sexual assault, or

stalking, or referral to a victim assistance organization. Eligible employees desiring an accommodation should notify Human Resources. Human Resources will then engage in an interactive process with the employee to determine possible effective reasonable accommodations. As part of the interactive process, Human Resources may require the employee to provide appropriate certification. An employee who no longer needs an accommodation must notify Human Resources of his/her change in circumstance. Similarly, an employee who has been provided an accommodation must notify Human Resources if he or she requires a new accommodation.

10.14 REHABILITATION LEAVE

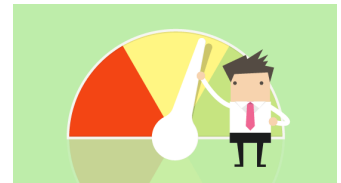
FirstSteps will reasonably accommodate any employee who wishes to voluntarily participate in an alcohol or drug rehabilitation program. This accommodation may include an adjusted work schedule or time off without pay, provided the accommodation does not impose an undue hardship on the Company. You may use any accrued vacation time or accrued sick leave while on leave under this policy. However, additional benefits will not be earned during the unpaid portion of the leave of absence. A leave of absence under this policy will be subject to the same provisions and rules as apply to medical leaves of absence. The Company will attempt to safeguard the privacy of an employee's participation in a rehabilitation program.

SECTION 11: PERFORMANCE

11.1 YOUR JOB PERFORMANCE

Each and every employee at FirstSteps contributes to the success of our company and the progress of every patient we treat. We are a team and function optimally when each member of our team gives their all to our patients and the Company. Mediocrity will not be accepted – our work is simply too important!

As a member of our clinical team, your job will be performed in various locations. The majority of your time with children will be spent either working 1:1 in the child's home, as a shadow in the school/daycare setting, or in the office for Center Based Sessions. In addition, you will attend mandatory team meetings at the office up to twice per month for every patient you see. While in the office, you may also have the opportunity to perform patient related office tasks such as stimuli preparation, log book filing, general filing, etc.



As a member of our admin team, your job will be performed in the office. You will typically adhere to a set schedule, with your regular working hours set between the hours of 7 AM and 6 PM. Nonexempt members of the admin team are not permitted to work outside of the office. Exempt members of the administrative team may at times work outside of the office, with pre-approval from their direct supervisor.

11.2 WORKING IN THE HOMES OF PATIENTS

Instructional Sessions

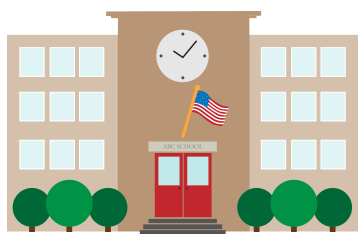
As an Instructor, your primary responsibility is to provide behavioral instruction to patients. During each Instructional Session, you will focus on teaching your patient a variety of target skills, such as language, play, social, motor and self-help skills. In addition, you will work toward decelerating and decreasing your patient's maladaptive behaviors, including non-compliance, tantrums, self-stimulatory behaviors and aggressive behaviors. These goals will be achieved through the application of the principles of Applied Behavior Analysis.

Please keep in mind that our patients have special needs, and as such, require a great deal of patience and dedication from all those involved in their treatment. Work to establish a special bond with each patient. Be playful and nurturing, and encourage each child's skill development with a positive attitude. General Guidelines for working in the homes of our patients:

- Be on time! This means that you must ensure that you arrive with enough time to park, walk to home, and greet the family before your scheduled start time begins with the child.
- Dress professionally and appropriately. Wear clothing that will not prohibit you from addressing child's problem behavior. You must wear closed toe shoes that are suitable for running if needed. Pants and tops should be professional – please avoid anything low-cut as you will frequently be bending over to help our patients. Instructors with long hair may wish to pull it back to avoid hair pulls. Long necklaces and earrings are prohibited. Nails both natural and artificial must be kept at a length that will not cause harm to our patients or employees.
- Come prepared! Have all of your materials ready and organized so you may get right to work with the child. Your goal is to present constant learning opportunities.
- During the summer months, you may need to attend outings with your patients that require swim attire and sunscreen. Be prepared and keep these items in your car in the event you need them.
- Do not discuss anything but the child with the family/caretakers. Any and all discussion with family/caretakers should be for the sole purpose of training and educating them to be effective with their child.
- The use of cell phones for calls, texting, and email is strictly prohibited during your session. Any violation of this policy may lead to disciplinary action, up to and including termination.
- You are not responsible for changing diapers or cleaning toileting accidents while working in the home setting. Please notify the parent/caretaker if the child is in need.

11.3 WORKING IN SCHOOLS

Very often we are employed by school districts to work with their students in the school setting. Often times our role can vary depending on the needs of the child and the level of support we utilize – from students who require consistent supervision and physical guidance, to our students with “secret shadows.” In certain circumstances, in order to allow our students to access the least restrictive setting in the classroom, we may behave as if we are part of the school staff as a “teacher's aide.”



The following guidelines serve to protect both you and our students in the school setting and ensure mutual respect between FirstSteps and the school staff.

- Be on time. You must park, sign-in and get your badge at the office, and be in the classroom by the time your session is to begin.
- Dress appropriately. Many schools have dress codes that must be followed. Typically, open-toed shoes, jeans, tank or spaghetti strap tops, low-rider pants, and t-shirts with writing or graphics are prohibited. In addition, in order to help maintain student confidentiality, you may **not** wear FirstSteps t-shirts in the school setting. Nails both natural and artificial must be kept at a length that will not cause harm to our patients or employees.
- Be respectful of the teacher/school staff and greet everyone with a smile.
- Make yourself indispensable. Help make the classroom smoother and the teacher's job easier.
- Be proactive, think ahead, and anticipate classroom need and child behavior.
- With approval from your Program Director, establish yourself as a source of reinforcement for all of the kids so that you may encourage children approaching you to interact with our child.
- Maintain Confidentiality. Do NOT discuss your student or your purpose/role in the school setting with anyone without prior approval from the Program Director and parent.
- Take good data that is legible and written using proper behavior analytic terminology.
- Turn in badge and sign-out in the office at the completion of your session.
- There should always be another adult present while you are working with our student. If directed to a private room to work with your student, the door should remain open where school staff can observe you with our student. If you are asked to take our student outside, you should go to a location where you will remain visible to school staff.
- Ensure your student follows the general rules and procedures of the school. Though you are there to assist the child, the goal is to enable the child to benefit from the school experience in the same manner as their peers.
- If a parent is late for pick up, your student should follow the procedure designated by the school. Typically, you will take the child to the office and leave the child with the designated school personnel.
- You are not permitted to take responsibility for the care and safety of the other students. If asked to "watch the kids," politely decline, explaining that you are prohibited from doing so. Any questions may be directed to the school principal and all incidents should be reported to the patient's Program Director.
- FirstSteps employees are not permitted to administer health care or medication to any child. Children in need should be directed to the on-campus nurse.
- FirstSteps employees are prohibited from disciplining the other students on campus. You may not deliver ANY feedback to the other students. If you witness problem behavior that is impacting your student, immediately move your student to another area and contact the patient's Program Director who will schedule a meeting with the teacher. Please note, in the extremely unlikely situation where another student's behavior is threatening the health or safety of any child (including the perpetrator), you are to take immediate action if no other school personnel are present.
- You may not discuss the behavior, academic performance, conduct, or discipline of the students with others. We may only discuss the conduct or behavior of our student with members of the IEP team (which may include the principal, assistant principal, general education teacher, resource or special education teacher, occupational therapist, speech therapist, adaptive physical education teacher, and parents). You must maintain confidentiality in the school setting at all times.

11.4 WORKING IN THE OFFICE

Team Meetings

Team meetings are scheduled for every patient on a monthly or semi-monthly basis. These meetings are a crucial component of each child's treatment plan and are mandatory for all clinical staff. At team meetings, the Program Director will begin by asking the parents and team whether there are any new concerns or problems that have occurred in the past weeks. Parents often will want to discuss new behavioral problems or changes they are observing and may seek guidance from the team of how best to address the behavior. This will initiate a group discussion of how both parents and the team may work to improve the target problem behavior. Following the discussion of behavioral issues, the Program Director will review the child's individual programs frequently beginning with those programs in need of modification or troubleshooting. It is imperative that the team members demonstrate the programs so the Program Director can effectively address the child's current needs. Program updates will be verbally communicated to the team by the Program Director and will be documented in the child's team meeting notes and in each individual program within the logbook. It is your responsibility to ask questions, take notes, and understand how and what to do with each and every program by the end of the meeting.

Please remember that time is limited. Keep comments and questions succinct and topic driven. Be professional in both how you dress and behave during these meetings. Greet the parents, child, and fellow team members upon entry. Do not use casual and potentially offensive descriptions of child behavior (e.g. "freaking out," "lazy bones," etc.). In addition, do not bring food or telephones into these meetings.

Team meetings should be therapeutic for the child. Please, with your fellow team members, keep the child actively engaged in appropriate activities. This can be challenging when you are also taking notes, preparing to demonstrate programs, or simply listening to parent comments. Team members should alternate the responsibility throughout the meeting. Remember, team meetings can be an excellent time to share new reinforcers you have discovered, model instructional strategies, and further demonstrate your care and knowledge of the child to parents and caretakers. Nothing makes a parent happier than to see their child having fun and learning from you!

If you must miss a team meeting, you are responsible for notifying both the scheduling team and the patient's Program Director as listed in the procedures outlined in Section 10. Furthermore, if you must miss a team meeting, please send notes regarding the child's programming, behavior, or anything else that may assist the Program Director in guiding the treatment plan. Please note that some Team Meetings may also occur in our patients' homes. Regardless, the same expectations are held.

Clinical Work with Patients at the Office (Center Based Sessions)

If you are providing a center-based session with a patient, you are responsible for not only providing learning opportunities and excellent treatment, but also for the safety and wellbeing of our patient. This may include taking your patient to use the restroom and diaper changes. In both scenarios, you must have another FirstSteps clinical staff member in attendance. Please assist that individual but do not come in contact with the diaper as special training is required. Only employees with current Bloodborne Pathogens Training and a signed Diaper Changing & Toileting Consent form on file are permitted to change diapers.

When working in the office setting, please be cognizant of the hazards outside of our team meeting rooms. Our patients should never be around scissors, sharp kitchen items, paper shredders, laminators, hot water tanks, coffee makers, and other potentially dangerous office materials. Furthermore, please do not allow our patient to play with our office equipment not designated for children, including but not limited to computers, printers, television sets, music players, and paper shredders.

Office Time

In addition to working with our patients in the office, you may at times be scheduled for administrative office work ('Office Time'). Office Time is mandatory when scheduled, and it is therefore required that you arrive when scheduled. The scope of this work may vary depending upon the needs of the Company at that time, as well as your role in the Company. Office time may include logbook filing, general filing, reception duties, scanning and distributing research material, or specific patient related activities. Office time is not guaranteed and is based on the needs of the Company at the time. Furthermore, you may also be rerouted from your office time to provide treatment to one of our patients, as their treatment takes precedence over all. As all of the above listed activities are essential to the day-to-day functioning of our clinical practice, and our patients' outcomes, your attendance at your scheduled Office Time is required. Should an individual center not be in need of additional assistance in the office or have an additional session for you during your scheduled Office Time, you will be notified.

Please, enjoy your time with your colleagues and make an effort to learn more about our general operations but do not use this time to attend to personal matters. Checking personal email, engaging in social media related activities, making personal phone calls, completing schoolwork or doing other personal work is strictly prohibited and will result in disciplinary action.

All Office Time must be approved ahead of time by the scheduling team and should never cause you to work more than four hours without a 10-minute rest break, and no more than four hours and 59 minutes without a 30-minute meal break, and no more than eight hours in a day, unless approved by your supervisor or the scheduling team.

Office Time Tracking

At the start of an Office Time session, please sign in on the Office Time Log and indicate the task you will be completing during your Office Time. If a task is related to a particular patient, please write the patient's code name in the log as well. The scheduling team will enter your Office Time in CentralReach, and you are responsible for converting to timesheets by the end of the day. All Office Time will be paid at your office rate of pay.

Sessions are always a priority for our patients. Failure to attend a session in place of Office Time will result in the loss of Office Time and may result in disciplinary action. If you show up for Office Time after declining a cover session, you will be sent home and will not be allowed to complete the Office Time. We always ask that our patients' treatment take precedence over administrative activities. If in the event you are unwell and unable to attend your direct sessions for the day, you will not have the option to substitute with Office Time.

Administrative Time

Outside of Office Time, each Instructor and Lead Instructor will have administrative time ('Admin Time') on their schedule if they are not already scheduled for Office Time on a given day. Admin Time may be used outside of the office, patients' homes, and schools (i.e., in an employee's own residence). This time is provided so that you may complete administrative activities required of you (e.g., converting your CentralReach sessions or Welligent sessions, reading and/or responding to emails from FirstSteps, or any other variety of administrative tasks). Because Instructors and Lead Instructors have different job requirements, the duration of Admin Time is distributed accordingly. Furthermore, instructors and Lead Instructors are not permitted to adjust this time unless prior approval is given by the scheduling team first when an extension is needed..

11.5 PERFORMANCE REVIEWS

Instructors and Lead Instructors

Formal and informal performance reviews are part of your ongoing clinical development. The more feedback you receive and attend to, the better clinician you will become. As such, all Instructors and Lead Instructors are not only required to participate in their review process but also encouraged to seek feedback when feeling unsure or just have questions. Each patient's Program Director will support you by popping in to observe your sessions, modeling programs and behavior interventions, answering any and all questions, and anything else you need. As part of the learning process, Program Directors may videotape your sessions from time to time. Please DO NOT BE NERVOUS. Recordings are tremendously helpful in that you have the opportunity to directly analyze how your clinical intervention impacted the child's learning and continue to hone your clinical skills.

Formal performance reviews will be annually and you may also receive performance feedback on an ongoing basis. Parents, teachers, Program Directors, and the admin team will submit written feedback regarding your clinical skills, professionalism, and administrative work. In addition, your attendance/reliability and team participation and effort will also be reviewed and factored into your overall performance review. Any write-ups you have received will also be discussed. The process will conclude with an individual review meeting with your supervising Program Director. At this meeting, your supervising Program Director will review your clinical skill development, highlight areas of strength and need, and set goals with you for the next review period. These meetings are not to be anxiety provoking but rather are an opportunity for communication and learning. To learn more about our performance review system, contact your supervising Program Director. You are also encouraged to view the written evaluation forms so as to familiarize yourself with the evaluation process and performance expectations.

Office Staff

Performance reviews for office/administrative staff will take place annually as well. Much like the clinical team, Instructors, Lead Instructors, and all office staff will provide feedback regarding your performance. Measures include, but are not limited to, job performance and completion, commitment, dedication, teamwork, adherence to policies and procedures, measureable metrics, and initiative to improve systems and processes for the benefit of the company.

11.6 JOB DUTIES

All employees are required to have a signed job description for their current position on file. From time to time, you may be directed to work on special projects or assist with other work necessary or important to the operation of the Company. The Company reserves the right, at any time, with or without notice, to

alter or change your job duties, reassign or transfer job responsibilities, or to assign you additional job responsibilities.

11.7 DISCIPLINE

Disciplinary Actions/Write ups should be distributed if there are instances of a behavior that violate FirstSteps' Policy or the Employee Handbook. All instances of inappropriate behavior should always be documented on the employee performance page in SAMEPAGE and recorded in Performance Management in Paylocity. This should also be shared with the Supervisor and or PD/PD mentor. Collaboration will occur with appropriate parties regarding the current situation and the appropriate disciplinary action to be taken. Where appropriate, as circumstances may dictate, supervisors and management may implement discipline including but not limited to:

- Verbal counseling,
- Written notification and counseling,
- Final written notification and counseling
- Termination

Any combination of infractions that occur for any reason may result in the heightened disciplinary action. All write ups must include a written employee commitment to improve performance.

If an employee receives a write up, then points may be docked during the next evaluation, which may affect their evaluation score. If an employee is on a FINAL write up then no merit increase will be rewarded until improvements are made and the document has expired. Write ups can be distributed, but are not limited to, the following reasons:

- Substandard work
- Carelessness
- Attendance (Leaving early, Tardiness, Absent)
- Inappropriate Behavior/Conduct
- Intoxication
- Timekeeping (Unconverted Time)CR and Welligent
- Insubordination
- Employee documentation (session notes, welligent notes and signatures)
- Other behaviors not listed above that violate Company policy or the Employee Handbook.

The purpose of any disciplinary action is to correct the problem, prevent recurrence and help the employee attain satisfactory performance in the future. All written notifications based on disciplinary action remain active in an employee's personnel file for a period of six months.

The Company reserves the right to administer discipline in a manner it deems appropriate to the circumstances and may, in its sole discretion, terminate an employee without prior discipline or without following a particular order of discipline. In determining which disciplinary measure is appropriate, the seriousness of the infraction, the past record of the employee and the circumstances surrounding the situation will be taken into consideration. Nothing in this discipline policy alters the Company's at will

employment policy, which provides that you or the Company can terminate your employment with the Company with or without cause and with or without notice.

SECTION 12: WORKPLACE BEHAVIOR

12.1 PROFESSIONALISM IN THE WORKPLACE

Professionalism is expected from all FirstSteps employees. We are a team of dedicated individuals who share the commitment of helping children and their families. As a team, we are also committed to working together in a positive and collaborative way. As such, you are expected to do your best, represent our agency and fellow employees to the best of your ability, and abide by all guidelines in this handbook and those set forth for paraprofessionals and professionals working in mental health practices. Individuals who act unprofessionally will face discipline, up to and including termination of employment.

12.2 PUNCTUALITY AND ATTENDANCE

Instructors and Lead Instructors

Punctuality and reliability are required at FirstSteps. Our families have spent time and money securing service hours from funding agencies. Once services are secured, FirstSteps is contractually bound to provide those services. As the intensity or hours of service has been empirically correlated with positive outcome, missed sessions are simply unacceptable. Our families and the schools, regional centers, and health plans with whom we contract demand that FirstSteps fulfill all services hours that have been allotted to our young patients. Therefore, the clinical team is expected to positively contribute to FirstSteps' goal of fulfilling all client service hours by enthusiastically covering sessions and/or preparing others to cover sessions.

If you anticipate being late or absent, you are required to notify the scheduling team as soon as possible so appropriate arrangements may be made. Email or call your local scheduling team by 7 a.m. that morning. Any notifications after 7 a.m. will be documented as a late call out. You are responsible for providing the Instructor covering your session or sessions all pertinent patient information including but not limited to behavior management strategies, potential reinforcers, driving/parking directions, relevant school information, etc.

Punctual and regular attendance is an essential responsibility of each employee at FirstSteps. Employees are expected to report to work as scheduled, on time and be prepared to start working. Employees are also expected to remain at work for their entire work schedule. Late arrival, early departure or other absences from scheduled hours are disruptive and must be avoided. This policy does not apply to absences covered by the Family and Medical Leave Act (FMLA), California Family Rights Act (CFRA), Pregnancy Disability Leave (PDL), or leave provided as a reasonable accommodation under the Americans with Disabilities Act (ADA). These exceptions are described in separate policies. Failure to comply with the aforementioned may result in disciplinary action, up to and including termination.

The following list references those behaviors that may result in an "occurrence."

Three or more "occurrences" in one month is considered excesses.

- Call outs after 7 a.m. - (late call out)
- Excessive call outs prior to 7 a.m. - may be subject to discipline if all sick leave is exhausted and not otherwise excused
- No call/No show - unexcused absence
- Arriving late or leaving early

Discipline for attendance violations may include but are not limited to:

- Verbal counseling,
- Written notification and counseling,
- Final written notification and counseling
- Termination.

Office Staff (Clinical and Admin)

You are required to work a minimum eight hour work day between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday. Your work at FirstSteps is extremely important to the overall operation and mission of the Company. You are expected to be at work on time and be available to others in the office during all of your working hours that the office is open. Further, additional absences beyond those taken for vacation and sick time, such as unplanned, unpaid absences that are not otherwise excused are subject to disciplinary action, up to and including termination.

12.3 EMPLOYEE APPEARANCE AND DRESS

Please dress appropriately for your position and job duties, and ensure you are neat, clean, and professional at all times. When working in the office, professional business attire is preferred. When working with patients, please dress accordingly. You must be able to safely bend over, run, lift and climb in the clothing you wear. Body piercings and other jewelry should be removed prior to reporting to work and long hair should be pulled back to prevent injury to you or our patient if pulled. Open-toed shoes, heels, low-cut blouses and low-rider pants are strictly prohibited.

Please note, if you are assigned a patient who demonstrates aggressive behavior, you will be required to wear protective gear. In these cases your Program Director will provide you with the equipment and show you how to appropriately wear it. If for any reason you do not have your protective gear, contact the office immediately for assistance. Under no circumstances are you permitted to work with your patient without protective gear if it was prescribed by the Program Director. Any violation of this policy will result in disciplinary action.

12.4 PRANKS AND PRACTICAL JOKES

Although we want our employees to enjoy their jobs and have fun working together, we cannot allow employees to play practical jokes or pranks on each other or with patients. At best, these actions disrupt the workplace and dampen the morale of some; at worst, they lead to complaints of discrimination, harassment, or assault. Employees who play pranks or practical jokes will face disciplinary action, up to and including termination of employment.

12.5 THREATENING AND ABUSIVE LANGUAGE

We expect our employees to treat everyone they meet through their job with courtesy and respect, particularly given our work involves daily interactions with children. Unlawful threatening or abusive language is prohibited. It destroys morale and relationships, and it impedes the effective and efficient operation of our business. As a result, we will not tolerate unlawful threatening or abusive language while employees are at work, conducting FirstSteps business, or attending company-related business or social functions. Employees who violate this policy will face disciplinary action, up to and including termination.

12.6 FIGHTING

Verbal or physical fighting among employees is prohibited. Employees shall not engage in, provoke, or encourage a fight. Those who violate this policy will be disciplined, up to and including termination.

12.7 SLEEPING ON THE JOB

We do not allow employees to sleep while at work. Employees who feel sick or unable to finish the day due to illness, should use sick leave and take the rest of the day off. For information about our sick leave policy, see Section 10 of this Handbook.

12.8 CONFIDENTIALITY

Patients' personal information should be held in the strictest of confidence. This includes names, addresses, phone numbers, diagnoses, and any other identifying information. The only persons authorized to disclose personal, confidential information are the parents or legal guardians of our patients.

In accordance with HIPAA, all "identifying" information (e.g. full name, address, phone number, student ID number, SSN, DOB) must be "de-identified" if traveling outside of the office or when stored in unlocked file cabinets/drawers. If traveling in your vehicle, information must be kept inside a locked bag, glove compartment, or trunk. In addition, discussion of patients must occur behind closed doors when possible. Be sure to use first names only. No identifying information is to be revealed in public conversation.

During your employment at FirstSteps, you will likely work with a number of different families, many of whom know one another from parent support groups and organizations. Despite their familiarity with one another, we must respect and maintain the confidentiality of each patient. As such, please refrain from discussing patients with other FirstSteps families. Families will appreciate your dedication to protecting confidentiality, and will be assured that their own child's confidentiality will also be respected. When in doubt, simply say, "I'm sorry, I cannot discuss other children or families with you."

12.9 PATIENT NON-SOLICITATION

During the term of employment with FirstSteps, and for 12 months following the employee's separation from FirstSteps, the employee shall not, directly or indirectly, for themselves or on behalf of, or in conjunction with, any other person, company, partnership, corporation or business of any nature: 1) solicit, or permit anyone else to solicit, any patient of FirstSteps to transition treatment to the employee's new place of work for any reason whatsoever; or 2) take, or permit anyone else to take, any action that results, or might reasonably result, in any patient of FirstSteps to transition their treatment to the employee's new place of work. Contact the Executive Clinical Director if you have any questions regarding patient non-solicitation.

12.10 OFF DUTY CONDUCT

Conflict of Interest

The Company expects its employees to devote their full work time, energies, abilities, and attention to our business. Employees are expected to avoid situations that create an actual or potential conflict between the employee's personal interests and the interests of the Company. Employees who, because of other work or activities, cannot make this commitment may be asked to end their employment with the Company.

A conflict of interest exists when an employee's loyalties or actions are divided between the Company and a competitor, supplier, or customer. Employees who are unsure whether a certain transaction, activity, or relationship constitutes a conflict of interest should discuss the situation with their supervisor or a member of management for clarification. Any exceptions to this policy must be approved in writing by Human Resources. Some examples of the more common conflicts that should be avoided by employees include, but are not limited to:

- Accepting personal gifts or entertainment from competitors, parents, vendors and potential vendors
- Working for a competitor, vendor, or patient while employed by the Company
- Engaging in self-employment in competition with the Company
- Using proprietary or confidential Company information for personal gain or to the Company's detriment
- Having a direct or indirect financial interest in or relationship with a competitor, patient, or supplier
- Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to the Company
- Committing the Company to give its financial or other support to any outside activity or organization without appropriate written authorization.

Failure to adhere to this policy, including failure to disclose any conflict or seek an exception to this policy, may result in disciplinary action, up to and including termination.

12.11 BOUNDARIES

Personal Relationships

As an employee of FirstSteps, you will be working in various environments with our patients (e.g., homes, schools, etc.). When interacting with persons in these environments, please keep your personal life and information **personal**. Do not spend the patient's treatment time discussing your weekend plans, friends, or significant others. Similarly, if parents/guardians/teachers/etc. begin to share aspects of their personal life with you, that are not relevant to the child's treatment, you must politely excuse yourself from the discussion and return to working with the child.

It is also crucial for you to establish and maintain clear professional boundaries with each of our clients. The term client, as used here, is broadly applicable to whomever FirstSteps employees provide services, whether a patient, a parent or guardian of a patient, an organizational representative, a public or private organization, a firm, or a corporation. As such, FirstSteps employees are prohibited from fraternizing, dating, baby-sitting, socially networking, accepting social media requests to connect, or engaging in any other personal association with any clients. Employees must always be sensitive to the potentially harmful effects of multiple relationships, because such relationships may easily impair judgment or become exploitative. Refer to the BACB Professional and Ethical Compliance Codes 1.06, Multiple Relationships and Conflicts of Interest and, 1.07, Exploitative Relationships.

If you find that, due to unforeseen factors, a multiple relationship has arisen, you must immediately contact your direct supervisor or Human Resources.

Gifts and Invitations

As a professional, it is also imperative that you understand the boundary implications of client gifts and party invitations. Some of our clients and families may want to express their gratitude to FirstSteps and may give extravagant gifts. Please understand that while it is heartwarming to be appreciated, you are not permitted to accept gifts. The Company has asked clients and families limit their kind gestures to hand made gifts or notes of appreciation. This policy helps to maintain boundaries and will prevent employees and clients and families from perceiving that the employee is indebted to the clients or family due to a monetary gift. If you do receive a token of appreciation, please immediately thank the family/client. If you need assistance in responding to parent gifts, please see your supervising Program Director or direct supervisor who will be happy to help.

FirstSteps staff is permitted to attend “Thank you Parties” hosted by families under strict guidelines. However, to protect the privacy of our patient, the guest list should be limited to family and FirstSteps employees. You may not bring significant others or friends to the event. Further, though within your legal rights, you are discouraged from consuming alcohol while with our parents.

Communication with Parents

Communication regarding employees’ and patients’ schedules is to be communicated to parents and caregivers by the local scheduling team only in order to avoid confusion or misinformation. All employees must refrain from such discussions and refer families to their local scheduling department should they have any questions regarding the employees’ or their child’s schedule.

12.12 PARENT | GUARDIAN PRESENCE

For the protection of our patients and employees, we require a parent or guardian to be present for the duration of each Instructional Session that takes place within the home. This ensures that a child receives meals, diaper changes, and any medical attention required throughout the session. If a parent or guardian attempts to leave while you are working with a child, remind the parent of FirstSteps’ policy and politely ask the parent to postpone their departure to the conclusion of the session. Do not, at any time, allow the parent/guardian/caretaker to leave you alone with the child. If necessary, have the child go with the parent/guardian/caretaker while you wait for their return, or end the session early.

When working in the home setting, the parent/guardian/caretaker is responsible for directly participating in all self-care programs including toilet training, hand/face washing, teeth brushing, hair brushing, dressing/undressing, and feeding. If the parent/guardian/caretaker cannot participate in these programs, do not target those skills on that day and notify your supervising Program Director of the issue.

12.13 DRIVING PATIENTS

FirstSteps employees are prohibited from driving patients. If a child’s program includes skills that must be targeted in community locations (e.g. grocery store, park), please ask the parent/guardian to drive the child. The parent/ guardian should remain present for the duration of the outing, as he or she would if the session were being conducted in the home.

In the case of an extreme emergency, in which the child requires immediate medical attention or it is necessary to leave the home and no car is available, an employee may call the paramedics for hospital transport and/or may drive the patient to ensure his or her safety. The child should be placed in the backseat and the seatbelt should be used. In the unlikely event that driving a patient is indicated, you must complete an Incident Report at the FirstSteps office as soon as it is safe to do so. See Section 15 of this Handbook for more information on Incident Reports.

12.14 PARKING TICKETS & RELATED FEES

As with any job, it is your responsibility to check street signage to ascertain whether parking is prohibited. You are responsible for payment of any and all parking violations or towing costs you may incur while parking at the homes and schools of our patients or at the FirstSteps offices.

12.15 CHILD ABUSE AND NEGLECT REPORTING ACT

The Child Abuse and Neglect Reporting Act (CANRA) requires all licensed professionals and paraprofessionals to report suspected child abuse. As designated “mandated reporters,” you are legally obligated to advise local government agencies if you suspect child abuse or neglect.

If you suspect child abuse or neglect, please contact the patient's Program Director (or any Program Director or Regional Clinic Director available). The Director will assist you in completing the reporting requirements and documenting the report. Failure to immediately report suspected abuse/neglect is grounds for criminal prosecution and immediate termination.

12.16 VIDEOTAPE SURVEILLANCE

Instructional Sessions Videotape Surveillance

FirstSteps families are encouraged to video record their child's instructional sessions. Please be advised that your sessions may be recorded with or without your knowledge. Videotaping allows parents to observe their child's progress, facilitates parent generalization efforts, and allows for troubleshooting Instructor specific problems. In addition, videotaping creates a visual progress record for parents and funding sources alike. In addition to protecting you from being falsely accused of wrongdoing, videotaping is an extremely valuable clinical tool for ensuring programming is appropriate and sessions are conducted properly.

Office Video Surveillance

In order to promote the safety and well being of our patients, visitors and employees of FirstSteps, the Company may conduct video surveillance of common areas of its facilities. Video cameras will be positioned in areas within and around the Company's offices and meeting rooms and will be used in order to help promote the safety and security of the children/patients, visitors and staff alike. Accordingly, employees should have no expectation of privacy in any common areas of the Company's facilities, including but not limited to the team meeting rooms. These video data are collected to assess patient well-being. Office recordings are not used for clinical or therapeutic purposes, though clinical video may be captured separately. See Section 11 for FirstSteps policy on video captured for clinical purposes.

12.17 COMMUNICATION IN THE WORKPLACE

FirstSteps requires timely communication from their staff. Please return all phone calls and emails from the Company within 24 hours. Phones and computers are available for you use at each FirstSteps office for your convenience.

12.18 ALL STAFF MEETING ATTENDANCE

FirstSteps conducts regular All Staff Meetings at which both administrative and clinical aspects of our work are discussed. You are encouraged to actively participate in these meetings, demonstrating a desire to collaborate with your colleagues for the betterment of our Company. All Staff Meetings are planned a year in advance as indicated on the Staff Calendar and attendance is required. If you cannot attend an All Staff Meeting, you will need to request the time off as you would with any other work absence and provide appropriate documentation. If you miss an All Staff Meeting, you must visit Samepage where you may view the agenda recap. Failure to attend All Staff Meetings without approval may result in disciplinary action, and repeated unexcused absences may result in disciplinary action, up to and including termination. The examples below are considered reasonable excuses:

- Vacation (approved)
- Leave of Absence
- School
- Scheduled day off based on current availability
- Sick Leave
- Jury Duty

SECTION 13: CONFLICT RESOLUTION POLICY

13.1 CONFLICT RESOLUTION POLICY PURPOSE

Problems, misunderstandings and frustrations may arise in the workplace. It is FirstSteps' intent to be responsive to its employees and their concerns. The purpose of this policy is to provide a quick, effective and consistently applied method for an employee to present his or her concerns to management and have those concerns internally resolved.

13.2 CONFLICT RESOLUTION PROCEDURE

Step 1: Discussion with Supervisor

Initially, employees should bring their concerns or complaints to their immediate supervisor. If the complaint involves the employee's supervisor, the employee should schedule an appointment with that supervisor to discuss the problem that gave rise to the complaint within five working days of the date the incident occurred. The immediate supervisor should respond in writing to the complaint within five days of the meeting held with the complainant employee. We hope that the majority of concerns will be resolved this way.

Step 2: Written Complaint and Decision

If the 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 employee's director/department head. Employees may request assistance with writing their complaints from Human Resources. The employee's director/department head should forward a copy of the complaint to Human Resources.

The submission of the written complaint is due within five working days of the response from the supervisor. The complaint should include:

- The problem and the date when the incident occurred.
- Suggestions on ways to resolve the problem.
- 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.

Upon receipt of the formal complaint, the director/department head must schedule a meeting with the employee within five working days to discuss the complaint. Within approximately five working days after the discussion, the director/department head should issue a decision both in writing and orally to the employee filing the complaint.

Step 3: Appeal of Decision

If the employee is dissatisfied with the decision of the director/department head, the employee may, within five working days, appeal this decision in writing to Human Resources. Human Resources may call a meeting with the parties directly involved to facilitate a resolution. Human Resources may also refer complaints to a review committee if it believes that the complaint raises serious questions of fact or interpretation of policy. Human Resources may gather further information from involved parties. All involved individuals, other than Human Resources, may not discuss the situation with any other employee or with the complaining employee. Within five working days following the appeal meeting, Human Resources will inform the employee, in writing, of their **final** decision.

If an employee fails to appeal from one level to the next level of this procedure within the time limits set forth above, the problem should be considered settled on the basis of the last decision, and the problem should not be subject to further consideration. Because problems are best resolved on an individual basis, the conflict resolution procedure may be initiated only by individual employees and not by groups of employees. All complaints must be made in good faith.

13.3 CONFLICT RESOLUTION OUTCOME

FirstSteps reserves the right to impose appropriate disciplinary action for any conduct it considers to be disruptive or inappropriate. The circumstances of each situation may differ, and the level of disciplinary action may also vary, depending on factors such as the nature of the offense, whether it is repeated, the employee's work record and the impact of the conduct on the organization.

No FirstSteps employee will be subject to retaliation for filing a complaint under this policy.

SECTION 14: HARASSMENT, DISCRIMINATION AND RETALIATION PREVENTION

14.1 HARASSMENT DISCRIMINATION AND RETALIATION PREVENTION

FirstSteps is an equal opportunity employer. The Company is committed to providing a work environment free of harassment, discrimination, retaliation and disrespectful or other unprofessional conduct based on sex (including pregnancy, childbirth, breastfeeding or related medical conditions), sex stereotype, race, religion (including religious dress and grooming practices), color, gender (including gender identity, gender expression and transgender), national origin (including language use restrictions and possession of a driver's license issued under Vehicle Code section 12801.9), ancestry, physical or mental disability, medical condition, genetic information, marital status, registered domestic partner status, age, sexual orientation, military and veteran status or any other basis protected by federal, state or local law or ordinance or regulation. It also prohibits discrimination, harassment, disrespectful or unprofessional conduct based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

In addition, the Company prohibits retaliation against individuals who raise complaints of discrimination or harassment and participate in workplace investigations. All such conduct violates company policy.

14.2 SEXUAL/HARASSMENT PREVENTION

The Company's policy prohibiting harassment applies to all persons involved in the operation of the Company. The Company prohibits harassment, disrespectful or unprofessional conduct by any employee of the Company, including supervisors, managers and co-workers. The Company's anti-harassment policy also applies to vendors, customers, independent contractors, unpaid interns, volunteers, persons providing services pursuant to a contract and other persons with whom you come into contact while working.

Prohibited harassment, disrespectful or unprofessional conduct includes, but is not limited to, the following behavior:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations, comments, posts or messages;
- Visual displays such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures;
- Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race or any other protected basis;
- Threats and demands to submit to sexual requests or sexual advances as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors;
- Retaliation for reporting or threatening to report harassment; and
- Communication via electronic media of any type that includes any conduct that is prohibited by state and/or federal law or by company policy.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as 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 work environment.

While it is not possible to identify every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment:

- Unwelcome requests for sexual favors;
- Lewd or derogatory comments or jokes;
- Comments regarding sexual behavior or the body of another;
- Sexual innuendo and other vocal activity such as catcalls or whistles;
- Obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature;
- Repeated requests for dates after being informed that interest is unwelcome;
- Retaliating against another for refusing a sexual advance or reporting an incident of possible sexual harassment to the Company or any government agency;
- Offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and
- Any unwanted physical touching or assaults, or blocking or impeding movements.

14.3 NON-DISCRIMINATION

The Company is committed to compliance with all applicable laws providing equal employment opportunities. This commitment applies to all persons involved in Company operations. The Company prohibits unlawful discrimination against any job applicant, employee or unpaid intern by any employee of the Company, including supervisors and coworkers.



Pay discrimination between employees of the opposite sex or between employees of another race or ethnicity performing substantially similar work, as defined by the California Fair Pay Act and federal law, is prohibited. Pay differentials may be valid in certain situations defined by law. Employees will not be retaliated against for inquiring about or discussing wages. However, the Company is not obligated to disclose the wages of other employees.

14.4 WHISTLEBLOWER/RETALIATION PREVENTION

The Company will not retaliate against you for filing a complaint or participating in any workplace investigation or complaint process and will not tolerate or permit retaliation by management or employees.

14.5 REASONABLE ACCOMMODATION

Discrimination can also include failing to reasonably accommodate religious practices or qualified individuals with disabilities where the accommodation does not pose an undue hardship.

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, the Company will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any job applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact Human Resources and discuss the need for an accommodation. The Company will engage in an interactive process with the employee to identify possible accommodations, if any, that will help the applicant or employee perform the job. An applicant, employee or unpaid intern who requires an accommodation of a religious belief or practice (including religious dress and grooming practices, such as religious clothing or hairstyles) should also contact a Company representative with day-to-day personnel responsibilities and discuss the need for an accommodation. If the accommodation is reasonable and will not impose an undue hardship, the Company will make the accommodation.

The Company will not retaliate against you for requesting a reasonable accommodation and will not knowingly tolerate or permit retaliation by management, employees or co-workers.

14.6 COMPLAINT PROCESS

If you believe that you have been the subject of harassment, discrimination, retaliation or other prohibited conduct, bring your complaint to your direct supervisor or to Human Resources as soon as possible after the incident. Please provide all known details of the incident/s, names of individuals involved and names of any witnesses. It would be best to communicate your complaint in writing using the Harassment Complaint Form, but this is not mandatory.

The Company encourages all individuals to report any incidents of harassment, discrimination, retaliation or other prohibited conduct forbidden by this policy immediately so that complaints can be quickly and fairly resolved.

You also should be aware that the Federal Equal Employment Opportunity Commission (EEOC) and the California Department of Fair Employment and Housing (DFEH) investigate and prosecute complaints of prohibited harassment, discrimination and retaliation in employment. If you think you have been harassed or discriminated against or that you have been retaliated against for resisting, complaining or participating in an investigation, you may file a complaint with the appropriate agency. The nearest office can be found by visiting the agency websites at www.eeoc.gov and www.dfeh.ca.gov.

Supervisors must refer all complaints involving harassment, discrimination, retaliation or other prohibited conduct to Human Resources so the Company can try to resolve the complaint. When the Company receives allegations of misconduct, it will immediately undertake a fair, timely, thorough and objective investigation of the allegations in accordance with all legal requirements. The Company will reach reasonable conclusions based on the evidence collected.

The Company will maintain confidentiality to the extent possible. However, the Company cannot promise complete confidentiality. The employer's duty to investigate and take corrective action may require the disclosure of information to individuals with a need to know.

Complaints will be:

- Responded to in a timely manner
- Kept confidential to the extent possible
- Investigated impartially by qualified personnel in a timely manner
- Documented and tracked for reasonable progress
- Given appropriate options for remedial action and resolution
- Closed in a timely manner

If the Company determines that harassment, discrimination, retaliation or other prohibited conduct has occurred, appropriate and effective corrective and remedial action will be taken in accordance with the circumstances involved. The Company also will take appropriate action to deter future misconduct.

Any employee determined by the Company to be responsible for harassment, discrimination, retaliation or other prohibited conduct will be subject to appropriate disciplinary action, up to, and including termination. Employees should also know that if they engage in unlawful harassment, they can be held personally liable for the misconduct.

SECTION 15: HEALTH AND SAFETY

15.1 SAFETY POLICY

FirstSteps takes employee safety very seriously. In order to provide a safe workplace for everyone, every employee must follow our safety rules:

- Horseplay, rough-housing, and other physical acts that may endanger employees or patients or may cause accidents are prohibited.
- Employees are prohibited from wearing dangling jewelry or apparel, and may be required to pull back hair so as to prevent injury from hair pulls.
- Employees must wear closed-toe shoes at all times.
- All employees must immediately report any workplace condition that they believe to be unsafe to Human Resources.
- All employees must immediately report any workplace accident or injury to Human Resources and promptly complete an Incident Report form.
- Once every two years of employment, clinical staff is required to attend Non-Violent Crisis Intervention (NCI) training to learn safe methods for managing behavioral emergencies.
- Staff may be required to obtain CPR certification.
- All employees must wear protective gear for all patient sessions indicated by the supervising Program Director
- Employees are prohibited from conducting direct sessions with patients while recovering from injury and/or while wearing a required cast, boot, or brace on any extremity. With written doctor's

approval, wrist braces may be permitted. You will be asked to provide clearance from a certified medical professional to continue direct sessions while recovering from an injury.

15.2 Illness and Injury Prevention Plan (IIPP)

Injury and illness prevention is an integral part of daily operations at FirstSteps. The objective is to effectively prevent illness and injury during each employee's time at FirstSteps. The detailed IIPP presented herein will outline clear and concise information as it relates to the daily practices of those employed by FirstSteps. Overall, FirstSteps seeks to maintain the highest possible health and safety standards for employees, clients, and visitors.

RESPONSIBILITY

FirstSteps has a designated IIPP administrator, Nicola Saffrey. She may be reached at (424) 212-7942, or via email at nsaffrey@firststepsforkids.com. As the program administrator, Ms. Saffrey has the responsibility of implementing all procedures and provisions related to this program, as well as responding to employee's questions as they relate to this program.

All Executive Team Members and Regional Clinic Directors are responsible for implementing and maintaining the IIPP in their local office/center, as well as responding to local questions related to the program. A copy of FirstSteps's IIPP is available at each center and available for all to review.

COMPLIANCE

The IIPP administrator is responsible for assuring that all health and safety policies and procedures are clearly communicated to all employees. Additionally, the administrator will disseminate new information, as well as updates to state laws, to all employees. The Executive Team, Directors, and Managers are expected to adhere to all policies and procedures with staff in a fair and consistent manner. Additionally, all employees are responsible for using safe practices while performing their job duties, adhering to safety policies and procedures as set for by the IIPP, and for assisting others in maintaining a healthy and safe work environment. The following is FirstSteps's system for ensuring all employees comply with our health and safety policy and procedures in order to maintain an optimally safe working environment.

- Inform employees of provisions of our IIPP.
- Evaluate safety performance on an ongoing basis.
- This will occur throughout each employee's employment by their Program Director, and will be communicated to our administrator.
- Recognize employees who demonstrate safe and healthy workplace practices.
- Such recognition will occur via in-person acknowledgement, as well as public postings on FirstSteps's internal newsletter.
- Provide supplemental training to employees whose performance is deficient.
- Implement disciplinary action for those employees who are not in compliance with safe and healthful workplace practices. If an employee knowingly violates safety rules or procedures, disciplinary actions may include a verbal warning, written warning, and/or termination.

- All employees will be informed of FirstSteps' IIPP upon hire and during their training. If an employee is a member of the clinical team, they will be informed of and trained on the IIPP by members of the training team. If an employee is a member of the administrative team they will be informed of and trained on the IIPP by their direct supervisor.

COMMUNICATION

In order to assure that FirstSteps remains open and transparent with employees regarding injury and illness prevention, information related to the IIPP will be reviewed on a regular basis and disseminated to employees. The following describes how information will be relayed to all employees.

- New hire orientation. Upon hire, every employee will be trained on specific health and safety policies and procedures.
- Throughout employment, all Managers and Directors will implement Behavior Skills Training in order to effectively demonstrate, coach, and provide feedback to employees as related to remaining safe and healthy in the workplace. Supervision of employees will occur such that every employee is observed actively working at least one time per month.
- Reviews of health and safety in the workplace will be reviewed on a semi-annual basis during all-staff meetings.
- Health and safety tips will also be delivered to all employees via FirstSteps' emails and newsletters.
- Information related to health and safety will remain updated and posted at each center location so that employees may regularly reference it as needed.
- Information related to health and safety will also be distributed as needed, or will be placed on FirstSteps's intranet for employee review.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards will be conducted by FirstSteps on the following schedule:

- When a new IIPP is established
- Whenever new substances, processes, procedures, or equipment are introduced
- Whenever occupational injuries or illnesses occur
- Whenever workplace conditions warrant an inspection
- When we hire or reassign employees to processes, operations, or tasks for which a hazard evaluation has not been previously conducted

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist, and any other effective methods to identify and evaluate workplace hazard.

ACCIDENT/EXPOSURE INVESTIGATIONS

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be completed by FirstSteps (either by IIPP administrator or a local Regional Clinic Director), and will include:

- Making verbal contact with the affected employee
- Visiting/observing the scene as soon as possible
- Examining what factors may have contributed to the accident/exposure/near-accident
- Establishing a corrective action plan to prevent the accident/exposure/near-accident from recurring
- Recording the findings and corrective actions taken on the OSHA 301 form

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices, or procedures will be corrected in a timely manner based on the severity of the hazards, including:

- When a hazard or unsafe practice is observed or as soon as it is discovered
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed employees will be removed from the area except those necessary to correct the existing condition. Employees who are required to correct the hazardous condition will be provided with the necessary protection and training.
- All such actions taken and dates they are completed shall be documented.

TRAINING AND INSTRUCTION

All employees, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established
- To all new employees
- To all employees entering new roles for which training has not been previously provided
- To supervisors in order to familiarize them with the safety and health hazards to which employees under their immediate guidance may be exposed
- To all employees with respect to hazards specific to each employee's job assignment.

This training will include but is not limited to:

- Explanation of our IIPP, emergency action plan, and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed
- Availability of toilet, hand-washing, and drinking water facilities

- Provisions for medical services and first aid, including emergency procedures
- Proper housekeeping, such as keeping stairways and isles clear, keeping work areas neat and orderly, and promptly cleaning up spills. This also includes training in how to properly handle blood borne pathogens.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety
- Prohibiting and correcting unsafe lifting and non-violent crisis intervention (NCI) which may impact safety
- Proper storage to prevent stacking goods in an unstable manner and storing materials and good against doors, exits, for extinguishing equipment and electrical panels.

Where applicable our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment (PPE)
- Information about chemical hazards to which employees could be exposed and other hazard communication program information
- Proper food and beverage storage to prevent them from becoming contaminated.

In addition, FirstSteps provides specific instructions to all employees regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

RECORDKEEPING AND DOCUMENTATION

FirstSteps has taken the following steps to implement and maintain its IIPP. FirstSteps employs 10 or more employees and keeps records as follows:

- Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Hazard Assessment Checklist and the Identified Hazards and Correction (both of which will be maintained for at least one year).
- Documentation of health and safety training for each employee, including the employee's name, training dates, type(s) of training, and training providers are recorded on the Employee Training Instruction Record. This will also be kept for at least one year.
- Hazards and Correction Record.

15.3 WORKPLACE SECURITY

It is every employee's responsibility to keep our workplace secure from unauthorized intruders. At the close of each workday, all entrances must be locked. Directors are permitted to work in the office outside of regular work hours but must do so with the doors locked.

Employees are allowed to have an occasional visitor to the office under strict guidelines. Employee guests must sign-in at the receptionist desk and are prohibited from meeting patients and/or visiting areas in which identifying patient information may be present. Guests must wear a visitors badge while on the premises.

15.4 WHAT TO DO IN AN EMERGENCY

In case of an emergency, such as a fire, earthquake, or accident, take the necessary actions to ensure your safety and the safety of the child with whom you are working. If a parent/guardian/caretaker is injured or unable to care for the child, stay with the child until the proper authorities are available to help. You are permitted to exit the home, school, office, or community location to protect yourself and the child.

If you are working at the FirstSteps office and evacuation is necessary, please proceed quickly and calmly to the fire exits. Do not attempt to take personal possessions with you.

Emergency supplies, including first-aid kits and fire extinguishers, are located in each FirstSteps office. Please reference the office specific Emergency Operations Manual for more information.

15.5 SMOKING IS PROHIBITED

For the health, comfort, and safety of our employees and patients, smoking, including the use of any electronic smoking device that creates an aerosol or vapor or the use of any oral smoking device for the purpose of circumventing the smoking prohibition, is prohibited during work hours. You may smoke during meal or rest breaks only. Employees may not take "smoking breaks" in addition to the regular breaks provided to every employee under our policies. For FirstSteps policy on work and rest breaks, see Section 6 of this Handbook.

Smoking is allowed only outside the building. The building management has posted signs designating smoking and nonsmoking areas. Employees who smoke are required to observe these signs and to smoke in designated areas only. Employees should never smoke in the presence of our patients.

Please be aware that many of our patients are sensitive to odors and may adversely react if you have been smoking prior to working with them. Please take any necessary precautions such as brushing teeth, washing hands, and changing clothing after smoking and prior to your scheduled work with our children.

15.6 VIOLENCE IS PROHIBITED

We will not tolerate violence in the workplace. Violence includes physical altercations, coercion, pushing or shoving, horseplay, intimidation, stalking, and threats of violence. Any comments about violence will be taken seriously—and may result in your termination. Please do not joke or make offhand remarks about violence. No weapons are allowed in our workplace or on your person while working with patients. Weapons include firearms, knives, brass knuckles, martial arts equipment, clubs or bats, and explosives. Any employee found with an unauthorized weapon in the workplace will be subject to discipline, up to and including termination.

If you observe an incident or threat of violence that is immediate and serious, **IMMEDIATELY DIAL 9-1-1** and report the incident to the police. If the incident or threat does not require immediate police intervention, please report the incident verbally and in writing to your direct supervisor or Human

Resources. Any and all reports will be investigated and appropriate action will be taken. You will not face retaliation or punishment for submitting a report.

15.7 USE OF MOBILE PHONES AND PDA'S DURING DRIVE TIME

California employees are reminded that state law requires use of "hands-free" devices to make and receive phone calls and prohibits texting or emailing at all times while driving, even when stopped at a traffic signal. Employees who violate the law are subject to a fine. The Company will not reimburse any employee for any fine imposed as a result of violating this law.

15.8 INFECTION CONTROL

Illness and spreading of infections can be limited and often avoided by following simple hygiene procedures:

- Hand washing is the best way to help prevent the spread of germs that cause flu and other illnesses. When you wash, use warm water and soap. Rub hands together for at least 20 seconds, making sure to scrub the backs of hands, wrists, between fingers, and under fingernails. Rinse well under warm water and use a paper towel to dry your hands. Germs can live for hours on fabric, so do not use cloth towels to dry your hands. Wash your hands regularly and often and use lotion to prevent drying and cracking of skin.
- Cleaning and sanitizing toys, frequently used objects, and surfaces is an important way to prevent and control the spread of illness. Use an approved sanitizer, such as diluted bleach, to kill germs. Always follow label instructions.
- Toys that children have placed in their mouths or that are otherwise contaminated by body secretion or excretion should be set aside until they are cleaned by hand with water and detergent, rinsed, sanitized, and air-dried. Toys that cannot be cleaned and sanitized should not be used.

Report any signs of infectious or communicable diseases to the appropriate agency listed below:

| LOS ANGELES COUNTY | VENTURA COUNTY | CONTRA COSTA COUNTY |
|---|---|---|
| Communicable Disease Control and Prevention Department of Public Health County of Los Angeles 313 N. Figueroa St, Room 227 C Los Angeles, CA 90012 Phone: (213) 989-7161 Fax: (213) 481-9853 | Ventura County Health Care Agency 2240 East Gonzales Road, Suite 220 Oxnard, CA 93036 Phone: (805) 981-5201 Fax: (805) 981-5200 | Contra Costa Health Services 50 Douglas Drive Martinez, CA 94553 Phone: (925)-313-6740 |

Disease Prevention

FirstSteps is committed to keeping our staff and patients healthy. To help prevent the spread of infection, FirstSteps requires that all employees maintain a current negative TB Test on file. We also recommend that staff get plenty of rest, eat a well-balanced diet, and get at least a small amount of exercise during the day to keep immune systems up.

Bloodborne Pathogens Training

All clinical staff will be required to complete annual bloodborne pathogens training which will cover different types of bloodborne pathogens, the ways in which workers encounter these pathogens in the workplace, safety measures that can be taken to help prevent exposure to bloodborne pathogens, and how to respond properly when exposure does occur.

Proposition 65

Proposition 65 is a ballot initiative that was passed by California voters in 1986 to provide warnings about potential exposures to carcinogens and chemicals known to cause reproductive harm in drinking water, air, or in consumer products. In accordance with Proposition 65 requirements, you can find clear and reasonable warnings for exposures to chemicals, including a list of harmful chemicals, posted in common work areas.

CalOsha

The Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA, protects and improves the health and safety of California employees by setting and enforcing standards, providing outreach, education, and assistance, and issuing permits, licenses, certifications, registrations, and approvals.

FirstSteps for Kids maintains an effective Injury Illness and Prevention Plan (IIPP) to ensure workplace safety and health, better morale, increased productivity, and reduced costs of doing business. Please see Human Resources for a copy of the IIPP

15.9 INCIDENT REPORTS

FirstSteps takes reportable events very seriously. When an incident occurs, it must immediately be reported to a FirstSteps Program Director and the local Regional Clinic Director¹. An "Incident Report Note" must also be completed within 24 hours in CentralReach and saved to the patient's file.

FirstSteps will take all actions to prevent client incidents by utilizing behavior analytic procedures with their clients, as well as with their staff and within their clinics. More specifically, FirstSteps utilizes antecedent strategies within sessions in order to prevent escalation events which may result in the need for more intrusive measures. Additionally, FirstSteps reinforces its employees for demonstrating safety during sessions and when applying interventions. Those who are observed to engage in any behavior that is not safe, will face immediate correction and potential disciplinary action. As incidents occur, should immediate additional training be deemed necessary, that will also take place with the appropriate parties. Twice per year, the

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- When an incident occurs with a patient common to Easter Seals of the Bay Area (ESBA) and FirstSteps, the incident must immediately be reported to a FirstSteps Program Director and Regional Clinic Director. Additionally, the employee reporting the incident and their supervisor must report this within 2 days of the incident. The incident report must be sent to BHPN within 48 hours, via encrypted email (see BHPN incident report template) to theBHPN@theBHPN.org.

senior leadership team will conduct an analysis of all incidents, across offices, and devise more global action plans to prevent future occurrences.

Despite such measures, FirstSteps recognizes that incidents may occur. Should one occur at the patient's home, the parent | guardian will be immediately notified. Should an incident occur at one of our centers, the parent | guardian will be immediately notified via phone. Should additional care of the patient be required after the incident, FirstSteps will request that the patient's parent | guardian pick up the child. All parties involved will be debriefed about the incident (to include a review of the event and recommendations) by the child's Program Director or Regional Clinic Director within 24 hours.

Please note, an incident report should be completed for the following reasons, including but not limited to patient fall; accidental contact with furniture, fixtures, or walls; contact with another person all of which may result in skin breaking or bruising, or limb injury. If you have any questions about the specific procedure for filing an incident report, please see the Director of Operations or Human Resources.

SECTION 16: EMPLOYEE PRIVACY

16.1 SEARCH POLICY

The Company provides property to employees for their business use (e.g. email account, Company vehicles, desks, file cabinets, employee cubbies, computers, etc.). To protect employees and the Company from theft, and to enforce Company policy prohibiting other misconduct including the possession or use of drugs, alcohol, weapons, and stolen property, the Company reserves the right to search Company facilities and property, including Company property in the possession of the employee. These searches may be conducted when there is reason to believe Company policy is being violated, or at any time, with or without cause. Employees are expected to cooperate in the conduct of such searches.

16.2 EMPLOYEE RECORDS

FirstSteps has an interest in ensuring that the privacy of its employees and patients are protected and respected. FirstSteps is committed to protecting the privacy of Prohibited, Restricted and Confidential Information within its control in a manner consistent with applicable laws, regulations and FirstSteps policies. As such, FirstSteps will limit the collection, use, disclosure or storage of information to that which reasonably serves FirstSteps business or administrative functions, or other legally required purposes. Such collection, use, disclosure and storage should comply with applicable federal and state laws and regulations, and FirstSteps policies.

Notwithstanding the general policy, FirstSteps may disclose Information in the course of investigations and lawsuits, in response to subpoenas, for the proper functioning of the business, to protect the safety and well-being of individuals or the community, and as permitted by law. FirstSteps has adopted policies governing certain categories of information. These policies are listed below. For more information about FirstSteps' compliance with any of the laws and policies referenced below, please contact Human Resources.

- A. FirstSteps will not use an individual's social security number or driver's license number as a personal identifier unless required by law or approved by the Executive Director and Director of Operations. Prohibited information, including SSNs and DLNs, may be stored electronically only in compliance with the guidelines. If Prohibited Information must be stored on paper, the files must be stored securely with access provided only to authorized persons.
- B. As previously mentioned, individuals have rights with respect to the privacy and security of their health information under federal and state laws and regulations, including the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). As such, FirstSteps will not share such information with others unless employees have signed an the Authorization to Release Protected Health Information. All employees are asked to agree to this release, as FirstSteps frequently must share this information during audits.
- C. All FirstSteps' employees have rights with respect to access to their employment file under California Labor Code 1198.5.

SECTION 17: COMPUTERS, EMAIL, INTERNET

17.1 EMAIL

FirstSteps provides employees with computer equipment, including an Internet connection and access to an electronic communications system to enable successful job performance and communication. The email system is to be used for official FirstSteps business only. It should not be used for personal matters

Email Is Not Private

Email messages sent using FirstSteps communications equipment are the property of FirstSteps. We reserve the right to access, monitor, read, and/or copy email messages at any time, for any reason. Further, given your email is to be used for clinical purposes, it may be subpoenaed as part of the patient record.

Email Rules

All of our policies and rules of conduct apply to employee use of the email system. This means, for example, that you may not use the email system to send harassing or discriminatory messages, including messages with explicit sexual content or pornographic images, to send threatening messages, or to solicit others to purchase items for non-company purposes.

We expect you to exercise discretion in using electronic communications equipment. When you send email using FirstSteps communications equipment, you are representing our Company. Make sure that your messages are professional and appropriate, in tone and content. Remember, although email may seem like a private conversation, email can be printed, saved, and forwarded to unintended recipients. You should not send any email that you wouldn't want your boss or other professionals to read.

17.2 INTERNET USE

We provide you with computer equipment and capabilities, including Internet access, to help you perform your job. Our network and Internet access are for official FirstSteps business only. Use of our network should occur during standard business hours. To prevent the occurrence of virus infection, personal laptops are prohibited from accessing our server in the office either by wireless or cable means.

Prohibited Uses of the Internet

Employees may not, at any time, access the Internet using FirstSteps equipment or links for any of the following purposes:

- To visit websites that feature pornography, gambling, or violent images, or are otherwise inappropriate in the workplace.
- To operate an outside business, solicit money for personal purposes, or to otherwise act for personal financial gain this includes running online auctions.
- To download software, articles, or other printed materials in violation of copyright laws.
- To download or install any software program without the consent of the Director of Technology & Facilities or Executive Director.
- To read, open, or download any file from the Internet without first screening that file for viruses using the Company's virus detection software.
- To complete schoolwork or attend to other personal matters.

Internet Use Is Not Private

We reserve the right to monitor employee use of the Internet at any time. You should not expect privacy in your use of the Internet, including but not limited to the sites you visit, the amount of time you spend online, and the communications you have.

17.3 SOFTWARE USE

It is our policy to use licensed software only in accordance with the terms of its license agreement. Violating a license agreement is not only unethical; it is also illegal and can subject FirstSteps to criminal prosecution and substantial monetary penalties. Employees may not do any of the following without permission from the Director of Technology & Facilities:

- Make a copy of any Company software program.
- Install a Company software program on a home computer.
- Install a personal software program (that is, software owned by the employee) on any Company computer.
- Download any software program from the Internet to a Company computer.

FirstSteps may audit Company-owned computers at any time to ensure compliance with this policy.

17.4 PASSWORDS

Passwords are an important part of our daily workflow and the first line of security and controlling access to sensitive information. All FirstSteps passwords must adhere to the following guidelines:

- Must be at least 10 characters long
- Must contain at least one of each of the following: uppercase letter, lowercase letter, number, and symbol
- Must be unique for each device/service you use (with the exception of file server/Samepage – these systems are bound together to use the same password)
- Must be changed every 90 days

All passwords used at FirstSteps must adhere to these guidelines, including computer, file server, e-mail, CentralReach, etc. It is not required that Mobile Device PINs adhere to guideline two listed above.

17.5 BYOD (BRING YOUR OWN DEVICE) MOBILE DEVICE POLICY

FirstSteps BYOD policy is intended to protect the security and integrity of FirstSteps data and technology infrastructure. The Company allows the use of personal smartphones and tablets for your convenience. FirstSteps reserves the right to revoke this privilege if users do not abide by the policies and procedures outlined below.

Acceptable Use

The Company defines **acceptable business use** as: activities that directly or indirectly support the business of FirstSteps. Employees may use their mobile device to access the following resources: email, calendars, contacts, documents, etc. FirstSteps has a zero-tolerance policy for texting or emailing while driving and only hands-free talking while driving is permitted.

Devices and Support

FirstSteps currently supports Apple iPhone and iPad (iOS 7 or above) and Android (Jellybean 4.1.x and above) devices, but does not support Blackberry or Windows phones. Laptops, smartphones and tablets belonging to employees that are for personal use only are not permitted to connect to the FirstSteps Corporate WiFi, however, they may use the guest WiFi network in the local office. Devices must be presented to the Director of Technology & Facilities 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 pay the employee a stipend to help defer the cost of the device's data plan; no other costs will be covered.

Security

In order to prevent unauthorized access while accessing the Company network, devices must be password protected with a **strong password** using the features of the device. Strong passwords must contain at least 10 characters, a combination of upper and lower-case letters, numbers and symbols, be rotated every 90 days and the new password may not be identical to one of 10 previous passwords.

The device must lock itself with a password or PIN if it is idle for two or more minutes. You must be running a licensed version of iOS or Android OS. Jail-broken (iOS) or rooted (Android) or devices are forbidden from accessing the network.

The device may be remotely wiped of FirstSteps data/email if: 1) the device is lost, 2) the employee terminates his or her employment, or 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

The Company reserves the right to disconnect devices or disable services without notification. Lost or stolen devices must be reported to the Director of Technology & Facilities within 24 hours so that a remote wipe of Company data can be initiated. Employees are responsible for notifying their mobile carrier immediately upon loss of a device. The employee is personally liable for all costs associated with his or her device.

17.6 BLOGGING AND SOCIAL MEDIA

Blogging or other forms of social media or technology include but are not limited to: video or Wiki postings, chat rooms, Facebook and Twitter, personal blogs or other similar forms of online journals, diaries or personal newsletters not affiliated with the Company. FirstSteps respects the right of any employee to maintain a blog and use social media outside of work as a medium of self-expression and public conversation and does not discriminate against employees who use these mediums for personal interests and affiliations or other lawful purposes.

However, to protect the Company's interests and ensure employees focus on their job duties, employees must adhere to the following rules:

- Employees are personally responsible for their commentary.
- Employees cannot use blogs to harass, threaten, discriminate or disparage employees or patients or anyone associated with or doing business with the Company.
- Employees can be held personally liable for commentary that is considered defamatory, obscene, proprietary or libelous by any offended party.
- Unless specifically authorized by the Company to do so as part of employee's position, employees are not permitted to blog or use other forms of social media or technology on the Internet during working hours or at any time on Company computers or other Company-supplied devices.
- Unless specifically instructed, employees are not authorized and therefore restricted to speak on behalf of the Company.
- All rules regarding confidential business information apply in full to blogs and social media. See Section 12 of this Handbook for more information regarding the Company's policies on confidential business information protecting the confidentiality of patients.
- Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed in a blog or on other forms of social media or technology.
- If employees mention the Company in a blog and also expresses a political opinion, or an opinion regarding the Company's actions, the blogger must specifically note that the opinion expressed is his/her personal opinion and not the Company's position.
- Any conduct that, under the law is impermissible if expressed in any other form or forum, is impermissible if expressed through a blog.
- Employees are **never** permitted to post or show patient photos, names, or any other Protected Health Information online or to anyone outside of FirstSteps.

If you have any questions relating to this policy or your personal blog, ask your supervisor or Human Resources.

17.7 INSTANT MESSAGING AND INTERNET CHAT

Public Instant Messaging and Internet Chat (e.g. AOL, GTalk, Yahoo Messenger, Facebook Messenger) are prohibited in the workplace. The Company provides several services in a secure manner for our employees to communicate with each other, screen share and do video conferencing. FirstSteps Jabber and Skype and other like services are available via guidance of the Director of Technology & Facilities.

17.8 KERIO SAMEPAGE

Kerio Samepage is our web-based content management system. Access to Samepage requires a secure connection, username and password. Your individual login information should not be shared with anyone. If you forget your password, please contact the Director of Technology & Facilities for a password reset.

Samepage should only be used during regularly scheduled hours. Should you wish to access Samepage from your smartphone or laptop, you must ensure entry to your device is locked and password protected, that you are accessing via a secure connection, and that you close out of Samepage completely when you are done. If you lose your device, please contact the Director of Technology & Facilities immediately to reset your access. Given the sensitive nature of the data held on Samepage, the aforementioned guidelines must be followed or access will be revoked.

SECTION 18: EMPLOYEE RECORDS

18.1 YOUR PERSONNEL FILE

FirstSteps maintains a personnel file for each employee. The purpose of this file is to allow us to make decisions and take actions that are personally important to you, including notifying your family in case of an emergency, calculating income tax deductions and withholdings, and paying for appropriate insurance coverage.

Your file will contain a minimum of the following digital documents including your employment application, resume, records of training, documentation of performance appraisals and salary increases, and all written communications. If you have any questions about your personnel file, contact Human Resources.

18.2 UP TO DATE RECORDS

Because we use the information in your personnel file to take actions on your behalf, it is important that the information in your file be accurate. Please update the FirstSteps HR Platform whenever any of the following information changes: your name, mailing address, phone number, personal email address, marital status, number of dependents you are designating for income tax withholding, bank account information, the name and phone number of the individual whom we should notify in case of an emergency and any other information. In addition, you are responsible for uploading current copies of all required documents including: driver's license, proof of auto insurance, TB test results, continuing education documentation and

training certificates. For more information on employee records requirements, see Section 4 of this Handbook.

18.3 INSPECTING YOUR RECORDS

Subject to certain limitations, you or your representatives may view or obtain copies of your personnel file, including a copy of your payroll records. The Company will provide the copies within 21 days of your request. You are responsible for paying the reasonable expenses incurred by copying such records for you. Requests to view, or for a hard copy of your personnel file, should be submitted in writing to Human Resources.

18.4 REFERENCE CHECKS, EMPLOYMENT VERIFICATIONS AND LETTERS OF RECOMMENDATION

Reference Checks

All reference checks and requests for verification of employment will be answered by Human Resources. When contacted by prospective employers seeking information about current and/or former employees, FirstSteps will only release the following information: 1) the position(s) the employee held, 2) the dates of employment, and 3) the employee's final salary or rate of pay. If you would like us to give a more detailed reference, you must submit an Authorization to Release Personnel Records form authorizing FirstSteps to provide further information regarding your skills, experience and performance.

Responses to written requests for verification of employment will be made on the form provided only when the request is accompanied by the employee's signed authorization to release such information.

Letters of Recommendation

All requests for letters of recommendation will be reviewed by Human Resources and distributed to the appropriate Director or Training team. Employees should be employed for at least six months before requesting a letter of recommendation. All letters of recommendation will be written to reflect an employee's clinical and/or administrative performance and professionalism. Completion of letter of recommendation requests are at the discretion of the Company.

SECTION 19: DRUGS AND ALCOHOL

19.1 POLICY AGAINST ALCOHOL AND ILLEGAL DRUG USE

FirstSteps is committed to providing a safe, comfortable, and productive work environment for its employees. We recognize that employees who abuse drugs or alcohol at work or are under the influence of alcohol, marijuana, or illegal drugs during work hours harm both themselves and the work environment. As a result, we prohibit employees from doing the following:

- Appearing at work under the influence of alcohol, marijuana or illegal drugs
- Conducting Company business, including driving, while under the influence of alcohol, marijuana, or illegal drugs (whether or not the employee is actually on work premises at the time)
- Using alcohol, marijuana, or illegal drugs at the worksite

- Using alcohol, marijuana, or illegal drugs while conducting Company business (whether or not the employee is actually on work premises at the time)
- Possessing, buying, selling, or distributing alcohol, marijuana, or illegal drugs at the worksite
- Possessing, buying, selling, or distributing alcohol, marijuana, or illegal drugs while conducting Company business (whether or not the employee is actually on work premises at the time)

Illegal drug use includes more than just federal and/or state outlawed drugs such as marijuana, cocaine, or heroin. It also includes the misuse of otherwise legal prescription and over-the-counter drugs. This policy covers times when employees are on call but not working and times when employees are driving FirstSteps vehicles or using FirstSteps equipment. Employees who violate this policy will be subject to employment termination.

Employees are permitted to consume alcohol at social or business functions that we sponsor where alcohol may be served. At these functions, however, employees may not consume alcohol to the point of intoxication or to the point where they endanger their own safety or the safety of others.

SECTION 20: ENDING EMPLOYMENT

20.1 FINAL PAYCHECKS

Employees who resign with adequate (two weeks) notice will receive their final paycheck on their last day of employment. Employees who resign without adequate notice will be sent their final paycheck within 72 hours of their last day of employment. Employees who are terminated or laid off will receive their final paycheck immediately upon termination. Final paychecks will include all compensation earned but not paid through the date of termination including any accrued but unused vacation.

20.2 CONTINUING YOUR HEALTH INSURANCE COVERAGE

FirstSteps offers employees group health insurance coverage as a benefit of employment. If you are no longer eligible for insurance coverage because of a change in availability, excessive absenteeism, or termination of employment, you have the right to continue your health insurance coverage through COBRA. If and when your eligibility for health insurance changes, you will be sent information for enrolling in COBRA from the FirstSteps benefits broker. Your employer sponsored health insurance benefits will be valid through the the end of the month that your eligibility for health insurance changes. For more information, please contact Human Resources.

20.3 EXIT INTERVIEWS

Employees leaving FirstSteps may be asked to complete an exit interview. Prior to the exit interview, employees will be sent a survey link via email. This will provide the employee the opportunity to discuss their employment experience. Hourly employees will be paid for 15 minutes of Office Time for this exit interview and 15 minutes for the Exit Survey. We greatly value your comments and feedback.

The exit interview also gives us a chance to handle some practical matters relating to the end of your employment. You will be expected to return all FirstSteps property, including training materials, office keys,

garage door openers, protective gear, laptops, toys etc. You will also have an opportunity to ask any questions regarding insurance, benefits, final paychecks, references, or any other matter relating to your employment or employment termination.

20.4 GROUNDS FOR DISMISSAL

Failure to uphold and follow the guidelines described in this Handbook may result in termination of your employment at FirstSteps. Additional grounds for dismissal include, but are not limited to:

- Excessive unreasonable cancelations of sessions
- Excessive unexcused absences
- Excessive tardiness
- Failure to communicate with office staff via email and phone communication
- Failure to follow each patient's program plan
- Difficulties relating to a patient | family
- Falsified statements on resume or application
- Lack of professionalism
- Failure to respect employee/patient boundaries
- Insubordination or disrespectful behavior
- Seeking private employment from families of patients
- Fraudulent work-time reporting
- Failure to use on-line time cards promptly and appropriately
- Breach of patient confidentiality
- Failure to develop clinical or administrative skills
- Failure to positively contribute to FirstSteps goal of fulfilling all client service hours

Please be advised that this policy does not change the at-will nature of your employment, which can be terminated by you or the Company at any time, with or without cause and with or without notice.

20.5 VOLUNTARY TERMINATION

Instructors, Lead Instructors and office staff who voluntarily terminate their employment are asked to provide the Company with at least two weeks' notice of intended termination. Program Managers, Program Directors, Regional Clinic Directors and Executives are asked to give at least six weeks notice of intended termination. Employees will also be considered to have voluntarily terminated if they fail to return from an approved leave of absence on the date specified by the Company or fail to report for work without notice to the Company for three consecutive days.

In the event you voluntarily or involuntarily terminate your employment, we ask that you refrain from informing patients, parents, school district employees and others involved with our patients' therapy until you receive approval to communicate about your departure. This will allow the Company time to prepare to seamlessly transition our patients' care and assure that your replacement is well prepared.

SECTION 21: DISASTER AND MASS CASUALTY PLAN

21.1 HERMOSA BEACH

Possible emergencies at this location include: fire and earthquake. In the event of an emergency, the office has two exits. One exit is located in the reception area and the other exit is off the main corridor by the kitchen and workroom. If a power outage should occur during a disaster, the hallway will be lit up by emergency ceiling lights and exit signs. There are six emergency exit signs, leading to each exit.

Once in the building hallway, there are two exits: one towards the front of the building leading to Pacific Coast Highway and the other towards the back with a stairwell leading to the 24th Street level exit.

If it should become unsafe to leave the building, there is a supply of emergency food, water and supplies located in the workroom in the cabinets on the left. In the event of injuries, the first aid kit is in the kitchen in the right cubbies next to the water dispenser.

If an evacuation is needed, children will be accompanied by a parent or guardian. If a parent or guardian is not able to accompany a child, you will be responsible for the evacuation of the child with whom you are working. In the event of:

Fire – Management will assess the situation and the location of the fire in the building, find a safe exit, and lead all occupants in the office out the door. Each individual will stay close to the ground, as they make their way to the stairwell, down the stairs, and out the door, into safety.

Earthquake - During the earthquake, each individual will find safety in a doorframe or under a desk. After the earthquake, management will check the building to find a safe escape route. A manager will lead the other occupants out of the office, to the stairwell, down the stairs, out the door, and away from the building.

21.2 WALNUT CREEK

Possible emergencies at this location include: fire and earthquake. In the event of an emergency, the office has three exits. One exit is off the reception area, another exit is in the kitchen, and the last exit is in the back of the building by the Cloud Room. If a power outage should occur during a disaster, the hallway will be lit up by emergency ceiling lights and exit signs. There are four emergency exit signs, leading to two of the three exits. There is **no** exit sign above the door in the kitchen.

Once in the building hallway, there are two exits: one towards the front of the building and the other on the side of the building with five stairs leading to the street.

If it should become unsafe to leave the building, there is a supply of emergency food, water and supplies located in the workroom next to the Xerox machine. In the event of injuries, the first aid kit is located in the kitchen in the cabinets under the counter, next to the fridge.

If an evacuation is needed, children will be accompanied by a parent or guardian. If a parent or guardian is not able to accompany a child, you will be responsible for the evacuation of the child with whom you are working.

Fire – Management will assess the situation and the location of the fire in the building, find a safe exit, and lead all occupants in the office out the door. Each individual will stay close to the ground, as they make their way out of the office, into safety.

Earthquake - During the earthquake, each individual will find safety in a doorframe or under a desk. After the earthquake, management will check the building to find a safe escape route. A manager will lead the other occupants out of the office, into safety.

21.3 CALABASAS

Possible emergencies at this location include: fire and earthquake. In the event of an emergency, the office has two exits. One exit is in front of the reception area and the other exit is off the rear corridor with access to the external patio. If a power outage should occur during a disaster, the hallway will be lit up by emergency ceiling lights, and exit signs. There are two emergency exit signs, leading to each exit.

If it becomes unsafe to leave the building, there is a supply of emergency food, water and supplies located near the rear corridor. In the event of injuries, the first aid kit is located in the kitchen in the office restroom.

If an evacuation is needed, children will be accompanied by a parent or guardian. If a parent or guardian is not able to accompany a child, you will be responsible for the evacuation of the child with whom you are working.

Fire – Management will assess the situation and the location of the fire in the building, find a safe exit, and lead all occupants in the office out the door. Each individual will stay close to the ground, as they make their way out the door, into safety.

Earthquake - During the earthquake, each individual will find safety in a doorframe or under a desk. After the earthquake, management will check the building to find a safe escape route. A manager will lead the other occupants out of the office, and away from the building.

21.4 WEST LOS ANGELES

Possible emergencies at this location include: fire and earthquake. In the event of an emergency, the office has four exits. Two exits are located on the first floor: one at the front building in the reception area and the other in the back of the building near the restrooms leading to the back parking lot. The other two exits are located on the second floor: one at the front near the water cooler facing towards Motor Avenue and the other in the hallway next to the Instructor cubbies. This door will lead you through a corridor that leads to a staircase that exits the building.

If it should become unsafe to leave the building, there is a supply of emergency food, water and supplies located in the kitchen on the white shelves on the back wall of the room. In the event of injuries, the first aid kit is also located in the kitchen on the white shelves on the back wall of the room.

If an evacuation is needed, children will be accompanied by a parent or guardian. If a parent or guardian is not able to accompany a child, you will be responsible for the evacuation of the child with whom you are working.

Fire – Management will assess the situation and the location of the fire in the building, find a safe exit, and lead all occupants in the office out the door. Each individual will stay close to the ground, as they make their way out of the office, into safety.

Earthquake - During the earthquake, each individual will find safety in a doorframe or under a desk. After the earthquake, management will check the building to find a safe escape route. A manager will lead the other occupants out of the office, into safety.

21.5 EAST LOS ANGELES

Possible emergencies at this location include: fire and earthquake. In the event of an emergency, the office has two exits. Exits are located at the middle and lobby end of the main hallway.

If it should become unsafe to leave the building, there is a supply of emergency food, water and supplies located in the kitchen. In the event of injuries, the first aid kit is also located in the kitchen and in the private restroom.

If an evacuation is needed, children will be accompanied by a parent or guardian, if they are present at the center. If a parent or guardian is not able to accompany a child, you will be responsible for the evacuation of the child with whom you are working.

Fire – Management will assess the situation and the location of the fire in the building, find a safe exit, and lead all occupants in the office out the door. Each individual will stay close to the ground, as they make their way out of the office, into safety.

Earthquake - During the earthquake, each individual will find safety in a doorframe or under a desk. After the earthquake, management will check the building to find a safe escape route. A manager will lead the other occupants out of the office, into safety.

SECTION 22: HANDBOOK ACKNOWLEDGEMENT

I understand that my employment with FirstSteps for Kids, Inc. is for an unspecified term and may be terminated at the will of either the Company or myself, with or without reason or cause, and with or without notice. No words or actions of the Company will be deemed to create an expressed or implied contract of employment or require the Company to have good cause for terminating my employment. No Company representative is empowered or authorized to modify this at-will relationship other than Dr. Jennifer Harris.

I acknowledge I have received a copy of FirstSteps for Kids, Inc.'s Employee Handbook. I understand I am responsible for reading the contents of the Employee Handbook and for complying with the policies and rules outlined therein. I further acknowledge that I have read the Employee Handbook in its entirety in accordance with this responsibility.

I understand that while employed by FirstSteps for Kids, Inc., I must comply with all Company policies and rules. I further understand that any rules, policies, and benefits described in the Employee Handbook may be modified or varied from by the Company at anytime-except as required by law and except for the rights of the parties to terminate employment at will (which may be modified only by an express written agreement signed by both me and Dr. Jennifer Harris).

Employee's Signature

Date

Employee's Name (Print)