

Personnel Policies

Naugatuck Valley Council of Governments

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NVCOG Personnel Policy and Employee Manual
5/19/2015

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Categories of Employment

Full-Time

Employees regularly scheduled to work a full 35-hour work week throughout a 52-week period, who are not assigned to a project with a specific termination date. Employees in this category are eligible to receive the complete package of benefits approved by the Council. Full-time employees may be classified as exempt or non-exempt.

Part-Time

A part-time employee is one who is permanently employed for less than 29 hours per week. Except at the discretion of the NVCOG, all part-time employees shall work on an hourly wage basis. Permanent part-time employees shall be compensated with unemployment and Social Security as required by state law. After six months of continuous employment, all permanent part-time employees shall be compensated with proportionate vacation, sick leave, and holidays. Such employees shall not be compensated with medical benefits except those mandated by State Law.

Temporary

Employees hired to work for a limited duration of less than nine months, including interns, usually for a specific project at either full-time or part-time hours shall not be entitled to medical benefits or other benefits except those mandated by State Law. Such employees working on a full-time basis for an extended, finite period of time may be eligible for some benefits at the discretion of the Executive Director.

Exempt and Non-Exempt Employees

NVCOG employee classifications fall into one of two categories: exempt or non-exempt, as defined by the Fair Labor Standards Act (FLSA). The FLSA requires that certain employees be paid at least minimum wage and overtime for hours worked in excess of 40 hours per week. The FLSA provides that some employees are exempt from this requirement. Employees will be informed of the classification of their positions.

Exempt: Exempt employees have no limits on the hours that may be worked in a given work or pay period. Exempt employees are expected to work the necessary hours to accomplish their responsibilities without extra pay for overtime worked.

Non-Exempt: Non-exempt employees are paid an hourly rate and are eligible for overtime pay at the rate of 1 ½ times their regular hourly rate for hours worked in excess of 40 hours per work week.

Working Hours

Basic working hours shall be from 8:30 to 4:30, Monday through Friday, with an hour lunch period for a total of seven working hours per day. Employees in positions deemed capable by the Executive Director, may opt to work remotely one day per work week, provided that NVCOG and the employee collectively possess the necessary technological infrastructure to support remote work. An employee may remotely work more than one day per week with the approval of the Executive Director.

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Overtime

Non-exempt employees who work in excess of 40 hours in a given week shall be paid overtime. Overtime is paid at a rate of one and one-half (1 ½) the employee's regular hourly rate of pay. Overtime shall only be permitted when the needs of NVCOG require it and when approved by the Executive Director.

Compensatory Time

Compensatory time must be taken within the fiscal year that it is earned. If the compensatory time is earned within two weeks of the end of the fiscal year, that time may be taken during the next quarter with the approval of the Executive Director. All compensatory time earned and taken shall be approved by the Executive Director or their designee, provided that the designee is not approving their own compensatory time.

Non-exempt staff who work in excess of 7 hours per day or in excess of 35 hours per week up to a maximum of 40 hours per week shall be compensated by time off equal to the hours worked in excess of 35 up to 40. Time worked beyond 40 hours per week, on weekends, or on holidays, shall be paid as overtime.

Exempt staff shall earn compensatory time for after-hours work and other work on holidays and weekends as approved by the Executive Director.

Performance and Salary Review

The Executive Director is authorized to employ staff within the monies annually budgeted for each position. The Executive Director shall conduct annual salary reviews of NVCOG staff. Based upon the results of these reviews, the Executive Director may make salary recommendations to the Executive Committee, who will in turn make recommendations to the NVCOG for final action.

Introductory Period

All new employees shall have an introductory period of ninety (90) calendar days, during which time NVCOG may observe and evaluate the employee's performance. This period may be extended up to an additional three (3) months upon approval of the Executive Director. An employee in an introductory period may be dismissed at the discretion of the Executive Director without prior notice. After this introductory period, staff members may be dismissed without cause by the NVCOG with no less than two (2) work weeks' written notice.

Termination of Employment

Staff members may be dismissed by the NVCOG, without cause, with no less than two (2) work weeks' written notice. Staff members may be dismissed with cause with immediate notice. The Executive Director may be dismissed by the NVCOG, without cause, with no less than four (4) work weeks' written notice or with cause with immediate notice, or as otherwise specified in a contract of employment. All staff members other than the Executive Director wishing to terminate their employment shall give the NVCOG written notice of such termination no less than two (2) work weeks' written notice. The Executive Director, if wishing to terminate their employment, must provide the NVCOG written notice of such termination no less than four (4) work weeks in advance, or as otherwise specified in an employment contract. The NVCOG prefers earlier notice of such termination from employees whenever possible.

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Should employment be terminated before the expiration of a full year and vacation hours for that year had already been used, the departing employee shall forfeit out of his final paycheck payment for any vacation hours taken but not yet earned.

Upon termination, employees shall not receive reimbursement for earned but unused sick time.

Employee Benefits

Each staff member shall have twelve (12) paid holidays. The list of regular paid holidays shall be:

New Year's Day	Labor Day
Martin Luther King Day	Columbus Day
Presidents' Day	Veterans Day
Good Friday (or other religious holiday of the employee's choice)	Thanksgiving Day
Memorial Day	Day after Thanksgiving
Independence Day	Christmas Day

Part-time employees who work more than 1,000 hours during the fiscal year are eligible for paid holiday leave based on a 20/35 ratio of full-time leave. This is equivalent to four hours per holiday.

Personal Days

Each full-time employee may elect three (3) personal days off per year subject to approval of the Executive Director.

Vacation with Pay

Each full-time employee is entitled to up to seventy (70) hours of paid vacation time per year, until the fifth year of their employment. Beginning with the fifth year of their employment and ending with their ninth, full-time employees are entitled to one-hundred-and-five (105) hours of paid vacation time. Beginning with their tenth year of employment and ending with their fourteenth, full-time employees are entitled to one-hundred-and-forty (140) hours of paid vacation time. Beginning with their fifteenth year of employment, full-time employees are entitled to one-hundred-and-seventy-five (175) hours of vacation time.

Vacation may be accrued and carried over up to 175 hours.

Full vacation hours will be credited to the employee as of July 1 of each fiscal year. Should the employee separate from the NVCOG before the expiration of a full year and vacation hours for that year had already been used, the departing employee shall forfeit out of his final paycheck payment for any vacation hours taken but not yet earned. Should employment separate before the expiration of a full year and vacation hours for that year had been earned but gone unused, the departing employee shall be compensated for the remaining unused vacation time.

Merger Provision:

For NVCOG Employees who begin employment at NVCOG prior to January 30th, 2015 and if their immediately preceding employer was the Valley Council of Governments (VCOG), the Council of Governments of the Central Naugatuck Valley (COGCNV), or the Central Connecticut Regional Planning Agency (CCRPA), they will be placed upon the vacation

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accumulation schedule based upon their years of service with COGCNV, VCOG, or CCRPA and shall be allowed to accrue and carry over up to 210 hours.

Previous employees of COGCNV may carry over their unused vacation days from their employment at COGCNV to NVCOG.

Sick Leave with Pay

Sick leave with pay shall be credited to each full-time employee at the rate of seven (7) hours per month, eighty-four (84) hours per year. Part-time employees who work more than 1,000 hours during the fiscal year are eligible for sick leave with pay based on a 20/35 ratio of full-time leave, equivalent to four hours per month.

Employees making use of their sick leave or someone else on the behalf of the employee shall contact NVCOG by telephone or e-mail prior to 10:30am on the day of their sick leave use. Employees who do not contact NVCOG by telephone or e-mail by this deadline will not receive compensation for the sick time. Up to 35 hours of sick leave may be used because of illness or other personal obligation in the immediate family of the employee upon prior approval of the Executive Director, unless such illness or personal obligation is of an emergency nature. Twenty-one (21) hours special leave may be used in the event of death in the immediate family.

Upon termination, employees shall not receive reimbursement for earned but unused sick time. Sick days may accumulate up to a maximum of 240 hours. Part-time employees may accumulate up to 35 hours of sick time.

Merger Provision:

NVCOG employees who begin employment at NVCOG prior to June 30th, 2015, if their immediately preceding employer was either the Valley Council of Governments (VCOG) or the Council of Governments of the Central Naugatuck Valley (COGCNV), may convert their unused sick time from COGCNV or VCOG into NVCOG sick time. The decision to perform this action must be made prior to June 30th, 2015. If the employee decides not to convert their sick time, they shall be compensated for their unused sick time at a rate of one hour's pay for every two hours unused sick time.

Parental Leave

Parental leave includes maternity leave and paternity leave.

- (A) A "*maternity leave*" is defined as the hospital stay and any period of time prior to and subsequent to delivery certified by the attending physician as that period of time when an employee is unable to perform the requirements of her job. Depending on the circumstances, this certification may be reviewed by an approved state physician selected by NVCOG
- (B) A "*paternity leave*" is defined as a period of time prior to and subsequent of delivery or adoption when an employee may be unable to perform the requirements of their job in order to provide care.
- (C) During the period of maternity or paternity leave, sick leave shall be granted under the terms outlined in this employee manual.

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- (D) Upon expiration of accrued sick leave, the employee may request, and shall be granted, the use of accrued vacation and any other earned time.
- (E) Upon expiration of paid leave, the employee must request, and shall be granted, a leave of absence without pay, in accordance with the Family and Medical Leave section below.
- (F) All requests for maternity or paternity leave under this policy must be submitted in writing to the Executive Director, accompanied by an acceptable medical certificate. This request shall contain the following information:
 - i. The expected date of delivery.
 - ii. The anticipated use of sick leave, vacation, any other earned time, and paternity or maternity leave.
 - iii. Intentions of returning to work.
- (G) The rules and regulations governing the use and submission of medical certificates shall apply, except that the doctor's original medical certificate will be accepted for absence due to pregnancy and/or childbirth up to six (6) weeks after delivery. (Further absence will require additional medical certificates in accordance with normal procedures.)
- (H) Where not otherwise covered in these policies, eligible employees shall also be entitled to such leave as set forth in State Law and 29 U.S. Code, Section 2611, et seq.

NOTE: Nursing of a child, *per se*, will not be considered a disability for sick leave purposes.

Family and/or Medical Leave of Absence

- a. Employees who are regularly scheduled to work more than 1,250 hours per year may request a short-term leave of absence for any of the following reasons:
 - i. For the birth of a child and to care for the newborn child;
 - ii. For the adoption of a child, for the placement of the child by foster care;
 - iii. To care for the employee's spouse, child, or parent with a serious illness as hereafter defined; and
 - iv. Because of a serious illness, as hereinafter defined, that makes the employee unable to perform the functions of the employee's job.
- b. Upon such request, the Employee shall provide the Executive Director with a signed statement of the employee's intent to return to his or her work position upon the expiration of said leave.
- c. Upon such request, the Employee shall also provide the Executive Director with medical or legal documentation, upon which the Executive Director shall determine if such leave is justified. The Executive Director may grant an unpaid leave of absence lasting up to four weeks. Unpaid leave of absences longer than four weeks may only be granted by the Council in its sole and absolute discretion.
- d. The short-term leave shall not exceed a 16 week period within any 12 month period.
 - i. The leave specified shall be unpaid;
 - ii. The NVCOG shall continue at its expense, the medical insurance coverage program the employee had prior to the leave. However, if the employee would have been required to contribute a portion of the premium if the employee had

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remained an active employee, then and in that event, he or she shall be required to continue that contribution during such leave; and

iii. Employees shall not earn or accrue fringe benefits, including but not limited to sick leave or vacation, during any approved leave.

e. Upon the expiration of any approved leave of absence, unless the employee's medical condition prevents otherwise.

i. The employee may return to the employee's original job from which the leave of absence was provided, or,

ii. If the employee's original job is not available, the employee may return to an equivalent position with equivalent pay, if such position is available and budgeted.

iii. The employee shall then be entitled to accumulate seniority, and other fringe benefits, including but limited to sick leave or vacation.

f. Any employee who fails to return to work as scheduled following the expiration of an approved leave of absence shall be deemed to have voluntarily resigned his or her employment.

g. A serious illness as used herein means an illness, injury, impairment, or physical or mental condition that involves inpatient care in a hospital, hospice, or residential facility; or continuing treatment or continuing supervision by a health care provider.

Special Leaves of Absence

Jury Duty — Regular full-time employees will be compensated for jury duty for the difference between the jury duty pay and their regular NVCOG salary, not to exceed five work days.

Military Leave — Military leave not to exceed two (2) working weeks shall be granted regular full-time employees to serve in the Active Reserves or National Guard. An employee shall receive the difference between his/her military pay and his/her regular salary if the military pay is less than his/her regular salary. All military leave requests must be accompanied with Authorization Orders from the military organization. Regular full-time employees ordered to extended active duty in the Armed Forces will retain re-employment rights at the same or a comparable position upon their release from active duty, provided they return to NVCOG within 45 days of their termination from active duty.

Expenses

Legitimate travel and business expenses will be paid at the discretion of the Executive Director upon submission of an expense voucher. Vouchers shall be submitted at least monthly. Reimbursement vouchers will only be approved when accompanied with receipts. Staff reimbursement vouchers will be paid on regular payroll periods. Staff reimbursement vouchers will *not* be recognized as an NVCOG responsibility 60 days or more from their occurrence, and 30 days or more after the end of the fiscal year.

Personal Vehicle Mileage — Employees will be reimbursed at the mileage rate approved by the Connecticut Department of Transportation (ConnDOT), as specified by the U.S. General Services Administration (GSA), for use of their own vehicle on Council business.

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Evening Meals — Employees will be reimbursed \$20.00 for meals (a receipt is not needed). Meals can be charged to NVCOG up to the maximum limit. If you reside within the area comprising the NVCOG's ("Region") Region and are required to attend an evening meeting in the Region, you may choose to be reimbursed for *either* \$20.00 for a meal *or* mileage from your home and return for that meeting at the ConnDOT approved rate. If you reside outside the Region, you may request \$20.00 reimbursement for a meal only.

Other Travel Expenses — Receipts for tolls (at least a one-way sample), parking, bus, etc. must be attached to travel vouchers.

Conference Expenses — Staff attendance at professional conferences or meetings involving expenses of not more than \$2,500.00 may be authorized by the Executive Director within budgeting limitations. Requests involving expenses in excess of \$2,500.00 may be authorized by the NVCOG. While in attendance at conferences, subsistence expenses up to a maximum of \$35.00/day will be reimbursed by the NVCOG. The maximum can be raised to \$40.00 with the approval of the Executive Director. Meals at conferences, authorized by the Executive Director or the NVCOG will be reimbursed for actual cost (even in excess of \$15.00) excluding all alcoholic beverages.

Prior Approval for Reimbursement — If prior approval from a funding source is required for travel reimbursement, it must be obtained before the expense is incurred.

Tuition - Provided proper provision can be made in the NVCOG budget, employees may request in writing to the Executive Director for assistance (time or money) from NVCOG for college courses related to the profession. If the Executive Director approves of monetary assistance, employees shall submit a tuition receipt and a passing final grade in all courses for which they requested assistance before payment shall occur. NVCOG may assume up to one-half of the cost of tuition for work-related courses or programs taken at an accredited institution. Employees shall not be reimbursed if they are not employed by the NVCOG at the time they present their receipt and final grade. If an employee is not employed at the NVCOG for at least one year after he is reimbursed for tuition, that reimbursement shall be withheld from his last paycheck on a sliding scale based on the number of months he was with the NVCOG.

Insurance Coverage

All full-time NVCOG employees, their spouses and legal dependents will receive a comprehensive medical, hospitalization, prescription, life insurance, disability insurance, dental and vision health benefits plan, subject to any deductibles or co-pays as may be required by the NVCOG Group Plan.

All NVCOG employees age 65 and older and eligible for Medicare shall be provided with a Medicare Supplement Plan offered through the group plan in place of the medical, hospitalization, prescription and life insurance coverage listed in paragraph 1. NVCOG Group Plan coverage for employees on Medicare is extended to the employee only.

NVCOG currently participates in the CT Partnership Plan through the State of Connecticut Office of the Comptroller. If employees use providers in the Plan Network, all expenses are covered in full after any co-pays and deductibles, if required, are met.

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Full-time employees who have medical coverage outside of the NVCOG Group Plan may elect to opt-out of coverage through NVCOG. Full-time employees who opt-out of the NVCOG Group Plan shall receive the equivalent of 1/3 the cost of what the premium would otherwise have been for that employee, spouse and legal dependents.

NVCOG reserves the right, at its sole discretion, to alter the benefits provided, including the specific type of benefit, the provider and benefit amounts.

Merger Provision:

The above insurance policy is intended as an interim (December 1, 2014 through January 31, 2015) policy. By February 1st of 2015, a new insurance policy may be negotiated and the benefits, including the specific type of benefit, the provider, and benefit amounts, may change, at NVCOG's sole discretion.

Retirement Program

Full-time employees are able to participate in one of two retirement benefit plans: Simplified Employer Pension (SEP) or defined contribution. Employees hired by NVCOG after December 31st, 2015 shall automatically be enrolled into NVCOG's defined contribution plan.

Simplified Employer Pension: NVCOG shall contribute to this plan 6% of an enrolled employee's gross annual earnings unless otherwise specified by agreement with the Board.

Defined Contribution: NVCOG shall contribute between 4 and 11% of an employee's gross earnings to all full-time employees enrolled in this plan, using a sliding scale based upon years of service, starting at 4% for the first year and capping at 11% for the 25th year. Employees may, but are not required, to make after-tax contributions of up to 5% of their gross salary annually.

Merger Provision:

Employees previously employed at either VCOG or COGCNV as of December 31st, 2014 who have joined NVCOG on or after January 1st, 2015 may carry forward their retirement benefits from either COGCNV or VCOG, including years of service, with no interruption or change in plan terms or level of benefit. These employees shall continue on these plans until NVCOG consolidates and revises its retirement benefits plans. All such employees shall have the option of choosing another plan at this revision date.

Professional Dues

Recommendation: Employees may submit a request, in writing, that NVCOG reimburse them for membership dues owed to professional organizations recognized by the Executive Director to be related to the mission, programs, or needs of NVCOG. These requests must be filed within 30 days of the transmission of funds from the employee to the professional organization.

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Personnel Policies

Standards of Conduct

NVCOG strives to maintain high professional standards of service, a positive work environment for its employees, and support efficient operations. NVCOG employees are expected to engage only in courteous, respectful, and appropriate behavior in conformity with professionalism, punctuality, and responsibility when officially or unofficially represented NVCOG. Conduct which is immoral, unsafe, unethical, or illegal will not be tolerated. Employees who do not adhere to such standards in a disruptive manner or a manner which reflects poorly on NVCOG or its employees may be subject to disciplinary action up to and including termination.

Conflict of Interest

NVCOG upholds a code of ethics to which employees shall adhere. The following policies are intended to minimize the potential for conflicts of interest on the part of employees and for dealing with such issues as they arise. These policies are not an exhaustive representation of the policies present in the NVCOG Code of Ethics.

NVCOG Employees shall:

- a. Perform work on a project only if there is no reasonably obtained belief that direct financial or personal gain to them, their families, or those living in their households will result from such project. They may perform work on such a project if, after written notification is provided to NVCOG and NVCOG, their employer consents to such work and project.
- b. Accept compensation, commission, rebate, or other advantages perceived to be related to their public office or employment only from NVCOG.
- c. Respect the stated or implied confidentiality of information, when such implication shall be understood by the divulgence of information causing embarrassment or detriment to a client or NVCOG.
- d. Disclose any and all potential conflicts of interest to the Executive Director. When the Executive Director finds that a conflict of interest is clearly present or may be present, the Executive Director shall disqualify the affected employee from participating in all NVCOG activities that could be affected by such conflict of interest.

Violation of these policies may lead to disciplinary action, up to and including termination of employment.

Outside Employment/Public Service

Staff may hold another job outside the NVCOG as long as staff meet and maintain the performance standards of their job with NVCOG. Staff will be evaluated using the NVCOG's performance standards for their job and will be subject to the NVCOG's scheduling requirements, regardless of any existing outside work requirements.

If outside work interferes with job performance or NVCOG's normal business hours, and creates a conflict of interest, staff may be asked to terminate outside employment in order to remain an employee with NVCOG

All outside employment must be reported to and approved by the Executive Director.

Employees are permitted to serve on public boards or committees and run for public office provided they first notify the Executive Director of their intention to serve and that there be no conflict of interest in this activity. Public service should not interfere with the employee's duties with NVCOG.

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The Executive Director may not hold another job outside the NVCOG without notifying the NVCOG of this employment and receiving from the NVCOG a written approval.

Use of NVCOG Property: Phones, Computers, E-Mail, Internet, etc.

NVCOG computers, voice mail, e-mail, Internet access, desks, file cabinets, and other items are NVCOG property and are provided to employees for job-related purposes. Employees shall not use items provided by NVCOG to store personal or confidential information, or for purposes which are illegal, harassing, offensive, or inappropriate. The Internet shall not be used for profit-making ventures, sending chain-letters, or soliciting money. Employees shall exercise care when using NVCOG property and use such property for authorized purposes only. Negligence in the care or use of company property or the unauthorized use of company property are not permitted are cause for disciplinary action up to and including termination of employment.

NVCOG reserves the right to access and inspect all of its property regardless of prior notice. NVCOG has the right to access and review all phone and computer-related communications, electronic mail, voice mail, Internet access, computer files, and information stored on disks, as well as any faxes or mail sent to employees at NVCOG's address. NVCOG property issued to an employee must be returned at the time the employee terminates employment with NVCOG, or if management requests its return. The employee may be liable for the cost of damage or unreturned property.

Employees shall not compromise the existing security measures of computer resources including, but not limited to, disabling anti-virus software, altering computer and share permissions, or running unauthorized file sharing software on workstations.

Employees shall not install personal software or hardware on an NVCOG computer including, but not limited to, USB devices, additional network cards, digital assistants, digital cameras and printers.

Employees shall use the utmost discretion when discussing local and remote access to computer resources. Employees are responsible for keeping their network login information (username, password and domain name) private to outside persons. The Executive Director must approve an employee's disclosure of network log-in information to an outside person, even for work purposes. In such instances, the employee shall immediately change his/her password after the outside person no longer needs to log in to the NVCOG's network.

Employees shall not discuss the NVCOG's static IP addresses, firewall configuration, password policies, and known computer vulnerabilities with anyone outside the NVCOG.

To prevent unauthorized access to computer resources, employees shall log off or lock their workstation if it will be unattended, and shall log off their workstation at the end of each workday.

The Executive Director reserves the right to make exceptions to the above measures and authorize a staff member or a consultant to fulfill the request.

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Dress Code

Employees are expected to present a business-like image and exercise good judgment in their attire. Employees should dress appropriately for the standards of their duties, the organizations they are visiting, or the function they are attending. Appropriate attire for daily office wear shall be business casual or as otherwise approved for the office in general by the Executive Director.

Personnel Records

Individual NVCOG employee personnel records will contain all information that relates to that employee's position, compensation, performance evaluation, or any other information regarding specific employment at NVCOG. Health care insurance and medical records will be maintained in a separate file. Staff will notify the financial manager of any changes in name, home address, contact information, marital status, number of dependents, beneficiary designations, scholastic achievements, individuals to notify in case of an emergency, and so forth.

An employee who wishes to receive their personnel folder may submit a request to the Executive Director, who will arrange for the employee to review the contents of the personnel folder at an appropriate time and place. Single copies of documents contained in the folder will be provided upon request to the employee. The employee may add a document to the personnel folder, supplementing or disagreeing with records contained within the folder. The Executive Director shall enter a notation in the folder of the fact and date of the employee's review of the folder. Requests to review a personnel folder may not normally be granted more frequently than twice a year.

Substance Abuse policies

NVCOG maintains a safe and drug-free work environment. Its policies in furtherance of this environment protect the organization, its employees, customers, reputation, and property from danger which may result from the unauthorized or unlawful use of drugs and alcohol.

Alcoholic Beverages and Tobacco:

Neither alcoholic beverages nor the use of tobacco products are permitted in any working area of NVCOG. Anyone found bringing alcoholic beverages onto the premises, drinking on the job, or showing physical or behavioral signs of being affected by the consumption of alcohol will not be allowed to work and will be subject to disciplinary action up to and including immediate discharge. The Executive Director may permit exceptions to this policy in advance in writing for the purposes of a special office reception, party, or dinner.

Use of Drugs:

Anyone selling, using, or possessing illegal substances or misusing or selling legal drugs will be subject to disciplinary action, up to and including immediate discharge. Staff who report to work under the influence of an illegal substance or whose external drug use could cause damage to NVCOG's business or reputation in any way may be disciplined or terminated. The legal use of drugs is permitted to the extent that it does not adversely affect the performance of duty, the safety of the user, or the safety of others.

Rehabilitation:

Drug abuse and alcoholism are recognized as conditions for which there are effective treatment and rehabilitation. Employees, who suspect they may have a drug or alcohol problem, even in its early stages, are encouraged to seek diagnosis, and to follow through with the treatment prescribed by qualified professionals before disciplinary action become necessary.

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An employee's refusal to accept an NVCOG referral for diagnosis or to follow prescribed treatment may result in termination of employment. Any NVCOG referral for diagnosis and treatment will be based solely on job performance and other employment-related factors.

On-the-Job Accidents

Any on-the-job accident must be reported to the Executive Director immediately. The initial Injury Report must be completed as soon as possible. This will enable NVCOG to assist staff in obtaining proper medical treatment at the time of injury and completing the appropriate documents required under the Worker's Compensation laws and insurance.

Inclement Weather

No leave will be granted for inclement weather if the office is officially open. In that case, every effort should be made by employees to report to work. Tardiness may be excused only by the Executive Director. Early closing of the office will be at the discretion of the Executive Director.

The Executive Director may declare the office to be physically closed in the event of inclement weather. The Executive Director may direct staff in positions capable of remote work to fulfill their duties remotely.

Disciplinary Action

NVCOG has access to types of disciplinary action it may take in response to an employee's substandard performance or conduct, including the following measures:

Oral and Written Reprimand

The Executive Director may issue an oral or written reprimand to an employee as notice that the employee's performance or conduct is substandard and to advise the employee of NVCOG expectations.

Disciplinary Probation

The Executive Director may place an employee on disciplinary probation for up to three months. The employee will receive written notice stating the reasons for the probation and the effective start and end date of the action. At the expiration of the period, the executive Director will notify the employee in writing that the probation has been lifted and whether further disciplinary action will be taken.

Suspension

The Executive Director may temporarily suspend an employee for cause without pay for no more than five consecutive working days. The employee will receive a written notice of suspension which documents the specific acts or omissions on which the suspension is based, the expected corrective action, and the effective start and end dates of the suspension.

Dismissal / Termination

If, after remedial and/or disciplinary measures have been tried and an employee's unsatisfactory behavior does not improve, termination of employment may be necessary. The Executive Director may dismiss an employee for cause upon giving the employee written notice of the reasons for discharge and the discharge's effective date. Immediate dismissal may occur in light of serious offenses or circumstances including but not limited to: theft, acts of violence, conviction of a felony, or reporting to work in an unfit condition.

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Grievance Procedure

An employee who has a complaint or grievance should make contact with the Executive Director within ten (10) working days after the instigating incident. The Executive Director shall initiate an informal conference with the employee and all staff involved with the notice of right to file a grievance if a satisfactory resolution to the problem is not accomplished. This shall be completed within twenty (20) working days of the complaint.

If the aggrieved party is not satisfied, the matter will move to the formal complaint procedure. The complaint must be written in detail, signed, and submitted to the Executive Director within ten (10) working days of results of the informal conference. The Executive Director shall conduct an investigation to attempt a resolution and will present a written determination of the facts based on their investigation. The Executive Director shall make a decision and notify in writing all parties concerned within fifteen (15) working days of the receipt of the formal written complaint. If the parties do not accept the decision of the Executive Director, a request for hearing must be submitted in writing within ten (10) working days after such decision is rendered.

The hearing body is composed of NVCOG officers and will send notice of the hearing in writing to all interested parties within ten (10) working days of the request for hearing. The notice shall include a statement of the complaint; list of invitees; date, place, and time of hearing (which shall be held within twenty (2) working days of the request for hearing) and; references to the relevant laws, procedure, grievance procedures, and pertinent regulations. Those involved may submit written briefs and may bring witnesses and evidence. The complainant has the right to counsel or representatives.

The hearing body shall, within fifteen (15) working days of the hearing, send all parties and their representatives a written determination. This determination shall include a state that the hearing was held, it's time and date, who was present, a statement of the complaint, a finding of facts, the final decision, that decision's rationale, and any action to be taken by complainant and/or the Executive Director.

Other Policies

Equal Opportunity Statement

NVCOG policy and the Executive Director's attitude is expressed in the following:

The Naugatuck Valley Council of Governments hereby declares that equal employment opportunity is available to all without regard to race, color, religion, sex, sexual orientation, gender identity, age, national origin, marital status, physical handicap, criminal record, ancestry, present or past history of mental disorder, mental retardation, or learning disability, including, but not limited to, blindness, except where any of the above is a bona fide occupational qualification or need, or political beliefs in conformance with Title VI and VII of the 1964 U.S. Civil Rights Act, Presidential Executive Orders 11246 and 11375, and the Connecticut Governor's Executive Orders 3 and 17,1 and Connecticut General Statutes – P.A. 90-330.

Moreover, this Council will assure that no members of a protected class (African-Americans, Spanish-Speaking Americans, Gender and Sexual Minorities, Asian-Americans, Aleuts, the elderly, women and the disabled) will be

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discriminated against in any area of the employment process. This will include rates of pay and compensation, upgrades, promotions, transfers, demotions, layoffs and terminations.

This policy is implemented by the following actions:

1. *Distribution* — This resolution is distributed to all current employees and all job applicants.
2. *Coordination* — The Executive Director coordinates equal opportunity efforts.
3. Recruiting
 - a. When recruiting, employment advertisements are placed in the *Waterbury Republican and American* newspapers which serve the largest number of minority group people in the Region.
 - b. Professional positions are advertised nationally. Advertisements are sent to all schools with departments of city planning or similar programs. Professional positions are also advertised in the American Planning Association JOBS Publication. When possible, the NVCOG interviews for positions at national planning conferences. When recruiting, contact is maintained with the following local organizations which are often in a position to refer qualified minority applicants:
United Way - (Association of Private Charitable Agencies in Region)
N.O.W. - (Local Community Action Program [CAP] Agency)
Connecticut Department of Labor, Employment Division
 - d. Present employees are encouraged to refer minority applicants.
 - e. "Equal Opportunity Employer" is placed in all published advertisements, and the fact stressed in contacts with professional organizations, schools, colleges and employment agencies.
 - f. When sending out "Requests for Proposals" to consultants for technical studies, RFP's are sent to minority firms.
4. Hiring
 - a. Hiring of the Executive Director is the responsibility of the NVCOG, who has adopted these policies. The Executive Director is responsible for selection of his staff within appropriations established by the NVCOG. He is instructed to follow a policy of Equal Employment Opportunity in his recruitment and selection. Other staff members who occasionally interview prospective employees are also so instructed by the Executive Director.
5. Sub-professional Interns and Planning Training
 - a. Minority group persons are encouraged to pursue careers in planning through the following measures:
 1. Planning internships are made available to minority group members when the work program calls for personnel of this skill category.
 2. In hiring work-study students, low income and minority group members are given primary consideration.
 3. Scheduled staff meetings and attendance at planning related meetings and conferences assist in broadening planning knowledge and interest.
 - b. All employees are encouraged to increase their skills and job potential through participation in training programs.
6. Placement and Promotion
 - a. Placement and promotion decisions are made by the NVCOG who has adopted this policy. The Executive Director, who makes placement and promotion recommendations to the NVCOG, is instructed to do so without discrimination on the basis of race, color, religion, sex, age, national origin, marital status, physical handicap, learning disability, criminal record, ancestry, or political beliefs.
 - b. Promotion of minority employees is encouraged as they increase their skill and job potential level.
7. Pay, Fringe Benefits, and Working Conditions

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a. Non-discriminatory pay, fringe benefits and working conditions are assured by periodic examination of present employees performing equivalent duties and adjusting for inequities.

8. *Contracts* — Contracts with consultants and other contractors doing work for the Council contain non-discrimination clauses, and the Council encourages non-discrimination practices by contracting with those who have in practice policies on non-discrimination.

9. *Monitoring of Policies* — These policies are monitored; a semi-annual report prepared; and changes and additions to these policies made when and where appropriate.

II. Equal Employment Officer

The Executive Director of the Naugatuck Valley Council of Governments, located at 49 Leavenworth St. Suite 303, Waterbury, CT, 6702 is the NVCOG's equal employment officer.

III Employment Expansion and Numerical Targets

Given the funding vagaries of the NVCOG's federal, state, and local funding sources, a time table for further staff improvement is impossible. It is pledged that when staff leave and/or when new openings occur, the NVCOG will continue the types of efforts described above and will continue to be alert to and take advantage of and for the Volunteer programs, work-study programs, JTPA, Summer CAP programs, and others of assistance to the minority, female and underemployed persons of this NVCOG region.

Affirmative Action Policy Statement

It is the policy and practice of the NVCOG to assure that no person will be discriminated against or denied the benefits of any activity, program or employment process receiving public funds, in or in part, in the areas of employment, recruitment, advertising, hiring, upgrading, promoting, transferring, demoting, layoffs, terminations, rehiring, employment and/or rates of pay and other compensations.

This firm is an Affirmative Action/Equal Opportunity Employer and is strongly committed to all policies which will afford equal opportunity to all qualified persons without regard to an individual's race, color, religious creed, age, sex, marital status, national origin or ancestry, sexual orientation, the request or requirement for genetic background information, present or past history of mental disorder, mental retardation, learning disability or physical disability, including by not limited to, blindness, conviction of a crime unless provisions of Connecticut Gen Statutes 46a-60(b), 45a-80(b), or 46a-81(b) are controlling or there is a bona fide occupational qualification excluding individuals in any of the protected groups. Such action shall include: Employment, upgrading, promoting, demotion or termination; rates of pay or other forms of compensation; and selection of training, including apprenticeship, pre-apprenticeship and/or on-the-job training. This policy and practice applies to all persons, particularly those who are members of the protected classes identified as being African American, Hispanic, Asian, American Indian, Women and persons with disabilities

This firm will implement, monitor, enforce and achieve full compliance with this Affirmative Action Policy Statement in conjunction with the applicable federal and state laws, regulations and executive orders, and the E.E.O. contract provisions listed below:

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1. Civil Rights Act of 1964 as amended
2. Presidential Executive Order 11246 as amended by 11375
3. Title 23 U.S.C. 140
4. Title 49 C.F.R. Part 26
5. Governor's Executive Orders #3, #9, #11, and #17
6. Connecticut Code of Fair Practices (46a-70-81)
7. Connecticut Fair Employment Practices Act
8. American with Disabilities Act of 1990
9. Public Act No.91-58
10. Civil Rights Act of 1991
11. Specific Equal Employment Opportunity Responsibilities
12. Required Contract Provisions Federal Aid Construction Contracts
13. A(76) Affirmative Action Requirements
14. Training Special Provision
15. Minority Business Enterprises as Subcontractors
16. Standard Federal Equal Employment Opportunity Construction Contractor Specification
17. Nondiscrimination Act
18. Sexual Harassment 46a-60(a)-8
19. Connecticut Credit Discrimination Law 36-436 through 439
20. Title I of the State and Local Fiscal Assistance Act of 1972

In implementing this policy and ensuring that equal opportunity is being provided to protect class members, each time a hiring opportunity occurs the NVCOG will contact and request referrals from minority and female organizations, referral sources, and media sources. All advertising will emphasize that the NVCOG is an Affirmative Action/Equal Opportunity Employer.

In order to substantiate the NVCOG's efforts and affirmative actions to provide equal opportunity, the NVCOG will maintain and submit, as requested, documentation such as referral request correspondence, copies of advertisements utilized and follow-up documentation to substantiate that efforts were made in good faith. This firm will maintain internal EEO/affirmative action audit procedures and reporting, as well as record keeping systems.

It is understood by the NVCOG, including the Equal Employment Opportunity Officer and supervisory and managerial personnel that failure to effectively implement, monitor and enforce the NVCOG's affirmative action program and failure to adequately document the affirmative actions taken and efforts made to recruit and hire minority and female applicants, in accordance with our affirmative action program in each instance of hire, will result in the NVCOG being required to recommit itself to a modified and more stringent affirmative action program prior to receiving approval. It is recognized that an approved affirmative action program is a prerequisite for performing services for state and federal contracting agencies. Managers and supervisors are being advised of their responsibilities to ensure the success of the program. The ultimate responsibility for the Affirmative Action Program rests with the Executive Director. However, day-to-day duties will be coordinated the Equal Opportunity Officer for the NVCOG.

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Equal Opportunity Complaint Procedure

The NVCOG's Complaint Procedure will address discrimination complaints regarding race, color, religion, age, sex, gender identity, sexual orientation, marital status, physical disability (including but not limited to blindness), criminal record, national origin or ancestry or mental disorder (or history thereof), from both current and prospective employees. *These individuals have the right to make full utilization of this Complaint Procedure without in any way jeopardizing their current or prospect employment status.* The components of the NVCOG'S Complaint Procedure are the following:

1. The Equal Opportunity Employment Officer will receive all written complaints of discrimination. These may be direct from the employee or upon referral from a supervisor who has received a complaint from an employee.
2. All discrimination complaints filed under this procedure will be accepted for investigation up to and including thirty (30) days after the date of the alleged discriminatory act.
3. All complaints will be recorded on the "Notice of Discrimination Complaint" form and signed by the complainant. At this time, the complainant will be counseled as to the other avenues of redress open to him or her; i.e., the complaint procedure of the Commission on Human Rights and Opportunities and/or the Connecticut Department of Transportation Office of Contract Compliance.
4. The Office of Contract Compliance and the Transportation commissioner will be notified simultaneously of all complaints and of the complaint's ultimate resolution.
5. All complaints will be investigated and processed by the NVCOG's Equal Employment Opportunity Officer within thirty (30) days after their receipt.
6. The complainant will be notified, in writing, by the Equal Employment Opportunity Officer regarding the results of the investigation and the final disposition of the complaint, including any proposed remedial action.
7. Should the complainant disagree with the Equal Opportunity Employment Officer's decision, he or she can still avail himself or herself of any or all, of the other avenues of redress previously explained (see Number 3).
8. In the event of a complaint against the Equal Opportunity Employment Officer, complainants will be advised to utilize the Commission on Human Rights and Opportunities complaint procedure.
9. The Equal Employment Opportunity Officer will take the necessary steps to ensure the confidentiality of all Title VII complaint records and of any counseling done in the course of the complaint procedure.

Sexual Harassment Policy

It is the established policy of the NVCOG to ensure equal employment opportunity and to prevent discrimination in all practices. Sexual Harassment is a type of sex discrimination. It is prohibited by Title VII of the Civil Rights Act, as amended, and by Connecticut General Statute 46a-60 (a) (8) as a Discriminatory Employment Practice.

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Sexual Harassment is defined as: “any unwelcome sexual advance or requests for sexual favors or any conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a *term or condition* of an individual’s *employment*, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.” In addition, Sexual Harassment can include rude or offensive language or jokes of a sexual nature.

Sexual Harassment will not be tolerated by NVCOG and will be grounds for disciplinary action. Complaints of sexual harassment will be processed by our Equal Employment Opportunity Officer through the established Affirmative Action Complaint Procedure.

It is not the NVCOG’s intention to regulate social relationships that are freely entered into by employees. However, it is our affirmative duty to develop and maintain a workplace free of sexual harassment and intimidation. We expect the full support and cooperation of every employee to achieve this goal.

Drug-Free Workplace Policy Statement

NVCOG prohibits unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the NVCOG workplace. Employee violation of the policy will be subject to disciplinary action as specified in the NVCOG’s personnel policies.

To fulfill this policy, as required by Public Law 100-690 Title V, Subtitle D, 41 USC 701 et seq., NVCOG will provide the policy to employees as part of the Council’s personnel policies. Employees must notify NVCOG in writing within five days of a conviction on any criminal drug statute violation. NVCOG is required to notify federal grantor agencies within ten days after receiving a notice from employee. NVCOG may also bear additional notification responsibilities from other grantors. NVCOG will inform employees convicted of any criminal drug statute violation of its notification responsibilities after the convicted employee has submitted their notification of conviction.

CODE OF ETHICS

[Inset approved Code of Ethics as an addendum]