

RICHMOND REDEVELOPMENT AND HOUSING AUTHORITY

PROPOSED RESOLUTION

Meeting Date: November 19, 2025

Agenda Item No.: 3

TITLE: APPROVAL OF THE COMPILATION OF UPDATED RRHA EMPLOYMENT POLICIES INTO AN EMPLOYEE HANDBOOK

RESOLUTION:

WHEREAS, the Richmond Redevelopment and Housing Authority (“RRHA”) desires to provide its employees with an Employee Handbook outlining important policies and procedures that were not previously combined into a single handbook;

WHEREAS, in addition to compiling all policies and procedures into one single handbook, RRHA staff have updated the personnel-related policies to ensure compliance with applicable statutes, laws, and regulations.

NOW, THEREFORE, BE IT RESOLVED that the RRHA Board of Commissioners hereby approves and adopts the Employee Handbook attached hereto as Exhibit A and the policies included therein.

Recommended by: Jessica Clarke  
VP of Human Resources

Date: November 19, 2025

Approved by: Steven B. Nesmith  
Chief Executive Officer

Date: November 19, 2025

---

COMMISSIONERS' ACTION

Approved \_\_\_\_\_ Disapproved \_\_\_\_\_

SIGNED:

---

Eddie L. Jackson, Jr., Chair  
RRHA Board of Commissioners

<b>Votes Recorded</b>				
Commissioner	Aye	Nay	Abstain	Absent
Eddie L. Jackson, Jr.				
Harold Parker, Jr.				
Dyanne Broidy				
Kyle R. Elliott				
Barrett Hardiman				
W.R. "Bill" Johnson, Jr.				
Gregory Lewis				
Marika McCray				
Charlene Pitchford				

## EXHIBIT A

### RRHA'S EMPLOYEE HANDBOOK

**Richmond Redevelopment and  
Housing Authority  
(RRHA)**

**Employee Handbook**

**Adopted by Board Resolution on  
XXXX**

## Table of Contents

### **Introduction and General Provisions**

#### **Section 1: Employment**

<b>Equal Employment Opportunity.....</b>	<b>1.1</b>
<b>Employment of Relatives.....</b>	<b>1.2</b>
<b>Hiring.....</b>	<b>1.3</b>
<b>Work Hours.....</b>	<b>1.4</b>
<b>Probationary Period.....</b>	<b>1.5</b>
<b>Separation and Termination.....</b>	<b>1.6</b>
<b>Emergency Closure.....</b>	<b>1.7</b>
<b>Dress Code.....</b>	<b>1.8</b>

#### **Section 2: Compensation & Benefits**

<b>Leave.....</b>	<b>2.1</b>
<b>Reasonable Accommodation.....</b>	<b>2.2</b>
<b>Holidays.....</b>	<b>2.3</b>

#### **Section 3: Work Conduct**

<b>Standards of Conduct.....</b>	<b>3.1</b>
<b>Grievance.....</b>	<b>3.2</b>
<b>Conflict of Interest.....</b>	<b>3.3</b>
<b>Political Affiliation.....</b>	<b>3.4</b>
<b>Alcohol and Other Drugs.....</b>	<b>3.5</b>
<b>Workplace Harassment.....</b>	<b>3.6</b>
<b>Anti-Fraternization.....</b>	<b>3.7</b>
<b>Investigations.....</b>	<b>3.8</b>
<b>Confidentiality.....</b>	<b>3.9</b>

## Introduction and General Provisions

Welcome to the Richmond Redevelopment and Housing Authority (RRHA) Employee Handbook. This handbook has been developed to serve as a comprehensive resource for all employees, providing an overview of the policies, procedures, benefits, and expectations that guide our work. It reflects RRHA's commitment to fostering a professional, fair, safe, and inclusive work environment where all employees can thrive and contribute to our mission of serving the residents and communities of Richmond, Virginia.

This handbook is intended to:

- Provide clear guidance on the rights, responsibilities, and expectations of RRHA employees;
- Ensure consistency and transparency in the administration of personnel policies;
- Support employees in understanding the standards of conduct, workplace practices, and organizational values that govern our daily operations; and
- Strengthen communication between employees, management, and the Human Resources Department.

While this handbook provides a summary of key employment policies and practices, it is not an employment contract and does not guarantee continued employment. RRHA reserves the right to interpret, revise, suspend, or rescind any policy, as a whole or in part, at its sole discretion, in accordance with applicable laws and operational needs.

## ADMINISTRATION:

The Human Resources Department is responsible for the administration, review, and ongoing maintenance of this employee handbook. Policies are reviewed on an annual basis or as needed to ensure compliance with federal, state, and local laws, as well as to reflect changes in RRHA's organizational structure or business practices. When revisions or new policies are adopted, employees will be notified of updates through official RRHA communication channels, such as agency-wide emails, team meetings, or system announcements within our HR Information System (HRIS), Ultimate Kronos Group (UKG). Employees are expected to review all updates to remain informed of the most current policies.

## ACCESS TO THE EMPLOYEE HANDBOOK:

The most current version of this Employee Handbook will always be accessible to employees via UKG, RRHA's Human Resources Information System, under the Company Documents section.

## ACKNOWLEDGEMENT OF RECEIPT:

Employees will be required to sign an acknowledgment confirming that they have received, read, and understood the contents of the RRHA Employee Handbook. This acknowledgment will be stored in the employee's personnel file within UKG. Refusal to sign the acknowledgement of this employee handbook may result in disciplinary action up to and including termination.

## **Policy 1.1 Equal Employment Opportunity**

### **PURPOSE:**

The Richmond Redevelopment and Housing Authority (RRHA) is an Equal Employment Opportunity employer. RRHA provides equal employment opportunities to all employees and applicants for employment without regard to race, ethnicity, color, religion, sex, sexual identity, gender identity, national origin, citizenship status, age, disability, pregnancy or status as a covered veteran in accordance with all applicable federal, state and local laws. RRHA complies with all applicable state and local laws governing non-discrimination in employment at all work sites. This policy applies to all personnel transactions and conditions of employment, including, but not limited to, recruitment, selection, promotion, demotion, transfer, termination, rates of pay or other forms of compensation, selection for training, the use of all facilities, feedback and evaluations, disciplinary actions and terminations, and participation in all organization-sponsored employee activities and events. This policy ensures compliance with all relevant federal and state laws, including the Virginia Human Rights Act (VHRA), Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the Pregnancy Discrimination Act, the Pregnancy Worker Fairness Act (PWFA), the Age Discrimination in Employment Act (ADEA), the Virginians with Disabilities Act (VDA).

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all RRHA employees.

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 1.2 Employment of Relatives

### **PURPOSE:**

The purpose of this policy is to eliminate the possibility of nepotism in employment related decisions and to ensure that all employment decisions at the Richmond Redevelopment and Housing Authority (RRHA) are made based on merit, qualifications, and business needs, and to avoid any actual or perceived conflicts of interest, favoritism, or bias that may arise from the employment of relatives. Richmond Redevelopment and Housing Authority's employees are prohibited from supervising or being supervised by other employees who are relatives. RRHA may offer employment to an applicant who is related to a current employee except as prohibited as outlined in this policy. Employees are not eligible for promotion, demotion, or transfer that would result in a prohibited supervisory relationship.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all RRHA employees.

### **DEFINITION(S):**

**Nepotism** - Nepotism is favoritism to a job applicant or current employee in hiring, retention, reduction in force, promotion, transfer, or any other conditions associated with employment resulting from a relationship by blood or marriage.

**Supervision** – For the purposes of this policy, supervision is defined as the ability to affect the work assignment, evaluation of job performance, compensation, promotion, demotion, reduction-in-force, retention, transfer or any other decision-making authority which influences the employee's employment status.

**\*\*Relatives of the Board of Commissioners, the Chief Executive Officer, the Executive Team (AVP and above) and the Human Resources staff will not be employed by RRHA under any circumstances. \*\***

#### **Examples of Relatives:**

- Spouse
- Brother/sister, stepbrother/sister or half-brother/sister
- Parent, grandparent, stepparent, foster parent, or legal guardian (where such relationship is officially recognized by state or local government entity)
- Child (son/daughter), stepchild, adopted child, or foster child (where such relationship is officially recognized by a state or local governmental entity)
- In-law (brother, sister, mother, father, grandfather, grandmother, son/step-son, daughter/step-daughter)
- Aunt, uncle, niece or nephew

## Policy 1.2 Employment of Relatives

- Any other individual residing in the employee's household or with whom the employee has a close personal or familial relationship that could create an appearance of favoritism or bias

**Marriage** – marriage between **current** employees is allowed; however, the same restrictions outlined within this policy apply,

### **RESTRICTIONS:**

#### **Supervisory Relationships:**

No employee may directly or indirectly supervise, evaluate, or influence employment decisions affecting a relative. This includes decisions regarding hiring, promotion, compensation, scheduling, performance evaluation, disciplinary action, and termination.

#### **Hiring and Selection:**

Relatives of current employees may be considered for employment if they are the most qualified candidate for the position and the hiring does not create a conflict under this policy. Employees may not participate in or influence the selection, hiring, or advancement of a relative.

#### **Transfers or Reassignments:**

If a situation arises in which employees become related through marriage, domestic partnership, or other circumstances, and a conflict exists under this policy, RRHA will make reasonable efforts to resolve the situation. This may include reassignment, transfer, or modification of reporting relationships. If no alternative arrangement can be made, one of the employees may be required to separate from employment.

#### **Vendor and Contractor Relationships:**

Employees may not influence, manage, or oversee contracts, procurement, or business relationships involving a relative or a business in which a relative has a financial interest.

### **DISCLOSURE:**

All employees are required to promptly disclose to the Human Resources Department any personal relationship that could create a real or perceived conflict of interest under this policy within 10 business days of becoming aware of such relationship. Failure to disclose such a relationship may result in disciplinary action, up to and including termination of employment.

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 1.3 Effective Hiring

### **PURPOSE:**

The purpose of this policy is to provide guidelines for the competitive hiring process and to ensure equal employment opportunities and procedures for filling vacancies within the Richmond Redevelopment and Housing Authority (RRHA). The Richmond Redevelopment and Housing Authority (RRHA) is committed to attracting, selecting, and retaining qualified individuals who share our mission of serving the residents and communities of Richmond. This policy establishes a fair, consistent, and transparent process for filling positions and outlines the responsibilities of all participants in the hiring process.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all RRHA employees.

### **EXECUTIVE STAFF APPOINTMENTS:**

The Chief Executive Officer has the authority to appoint qualified individuals to positions on the executive team. The executive team consists of all Assistant Vice Presidents, Vice Presidents, Senior Vice Presidents, C-Suite Executives and administrative positions that report directly to executive team members. The Chief Executive Officer will determine which recruitment process will best meet the needs of RRHA's executive team selections.

### **POSTING POSITIONS TO BE FILLED:**

Before a position is posted for recruitment, Hiring Managers should:

- Review the vacant position job description and work requirements to determine if any changes have occurred.
- Determine the knowledge, skills, abilities and competencies that are either required or preferred for the position.
- Identify any education qualifications required by law and/or preferred for the position.
- Confirm that the position has been approved for backfilling according to the finalized budget

### **RECRUITMENT OPTIONS:**

Hiring Managers may use one of the following options when conducting recruitment:

- Open Recruitment – All RRHA employees and the public may apply.
- Internal Recruitment – Only current RRHA employees, full-time and hourly, and in good standing in their current position, may apply. If internal recruitment is requested, it must remain internal for a minimum of 5 business days before being converted to open.

## Policy 1.3 Effective Hiring

- Continuous Recruitment (Evergreen) – Positions are posted on a continuous basis with no initial recruitment ending period. This option is used for hard-to-fill positions or positions that may have high turnover.
- Hiring Managers should select the recruitment option that best fits their needs before requesting recruitment for a vacant position.

### **JOB ADVERTISEMENTS:**

Vacant positions must be posted and advertised for a minimum of five (5) business days. If a holiday falls during this period, an additional day will be added to the advertising period. Positions may be advertised in the following recruitment sources:

- Employment Opportunities Notice (posted in RRHA's Employee Newsletter (VIBE))
- RRHA website ([www.rrha.com](http://www.rrha.com))
- UKG Career Page
- Public Housing Specific Job Boards (e.g., PHADA, NAHRO, and CLPHA)
- Job Boards (e.g., Indeed, Zip Recruiter, Glassdoor)

### **JOB ANNOUNCEMENT REQUIREMENTS:**

All job announcements must include an Equal Employment Opportunity statement and should state the basic functions of the position and the qualification requirements. All information in the job announcement must be job related. Job announcements must include the following information:

- Job Title
- A Summary of Duties
- Required Qualifications (include job knowledge, skills, and abilities required)
- Preferred Qualifications (include job knowledge, skills, and abilities preferred)
- Expectations for required training, certifications and/or professional licenses
- Location of the Job
- Hourly or Salary Pay Range
- Notification of Criminal History Check and Drug Testing Requirements

### **APPLICATIONS FOR EMPLOYMENT:**

Applications for employment are required for all individuals desiring consideration for employment with RRHA. Resumes are required for a complete application.

### **SELECTION PROCESS:**

#### **Screening Applications**

## Policy 1.3 Effective Hiring

The Human Resources Department is responsible for screening applications and resumes according to the qualifications established for the position outlined in the job description and must apply these criteria consistently to all applicants.

### A. Interviews

All scheduled interviews must be conducted before a final selection decision and job offer are made. No person may be hired into a position without having been interviewed for the position. Virtual interviews are permitted; however, it is strongly recommended that the candidate meet in-person with the hiring manager before a job offer is made. Hiring managers are not required to reschedule interviews with applicants who are unable to be present at the scheduled interview time. Interviews must be conducted by the hiring manager and a panel of individuals designated by the hiring manager.

### B. Selection Panels

When a selection panel is used, panel members should:

- Become familiar with the basic responsibilities of the position for which they will participate in interview applicants.
- Be in the same or higher pay grade than the position being filled, unless they are participating as a human resource professional or individual with a particular expertise required for the position.
- Hold confidential all information related to the interviewed applicants and the selection process.

### C. Interview Questions

Questions should seek information related to the applicant's knowledge, skill, and ability to perform the job for which they are interviewing. Questions that are not job related or that violate the EEO standards outlined in this policy are not permissible.

### D. Interview Documentation

All interviewers must document each applicant's responses to the questions. Hiring managers are responsible for documenting their decision regarding each applicant. All referred applicants must be sent to Human Resources for review prior to any offer of employment. The responsibility and accountability for the hiring decision rests with the hiring manager. All interview responses, summary forms, and notes should be submitted to the Human Resources Department.

### E. Background Checks

All new employees will be subject to a criminal history check, pre-employment drug testing, and for certain positions a DMV driver's license check. All background checks must be completed prior to the new hires first day. The Human Resources Department will relay the results of the background checks to the hiring manager. Applicants must sign an authorization of release to allow Human Resources to access their personal information. Refusal to sign this release will result in an offer of employment being rescinded. Background checks will be conducted in compliance with the Fair Credit Reporting Act (FCRA) and applicable Virginia laws.

## Policy 1.3 Effective Hiring

Current employees who are promoted or transfer to another position may be required to undergo another background check and/or drug testing.

### **COMPLETING THE HIRING PROCESS:**

#### **Starting Salaries**

Human Resources will consult with the hiring manager and the finance department to determine the starting salary for new hires. Factors such as the applicant's qualifications, the starting and current salary of other active employees in the same classification, and budgetary obligations will be considered when determining the starting salary.

#### **Employment Offers**

Only members of the Human Resources Department may extend and draft employment offer letters. All employment offer letters should:

1. State the salary as a pay period and annual amount.
2. Describe any conditions of employment.
3. State the probationary period, if applicable.

Once a candidate has accepted an employment offer and a start date has been established, the Human Resources Department will provide information related to when, where and to whom to report, parking and building access data, identification cards, and benefits information.

#### **New Hire Orientation**

The Human Resources Department will provide orientation for all new and rehired employees within 30 days of their start date. Orientation should include:

1. A complete explanation of employee benefits.
2. An overview of the employee handbook.
3. Information about RRHA's purpose, mission, vision and values.
4. An introduction to all RRHA departments and executive leadership.
5. Overview of all other relevant details of employment.

#### **Notification and Inquiries**

The Human Resource Department will notify applicants who were interviewed but not selected. All inquiries from external and internal applicants should be referred to the Human Resources Department.

### **RELOCATION:**

## Policy 1.3 Effective Hiring

RRHA will pay relocation expenses, based on the availability of funds, for certain management positions. Requests for relocation assistance must be submitted by the hiring manager to the departments executive and the Vice President of Human Resources for prior approval. Requests must include verification from the budget division that funds are available. Approval must be obtained prior to actual relocation and hiring. RRHA may consider relocation pay for approved expenses incurred for the transfer of household goods, travel and short-term housing accommodation.

## Policy 1.4 Work Hours

### PURPOSE:

The purpose of this policy is to establish Richmond Redevelopment and Housing Authority's standard hours of work for employees. All employees are expected to adhere to their designated work schedules, report to work on time, and remain engaged throughout their workday. RRHA's core business hours are established to meet operational needs and to provide consistent service to the residents and communities we serve.

### WHO THIS POLICY APPLIES TO:

This policy is applicable to all RRHA full-time and part-time employees.

### DEFINITIONS:

- **Standard Work Week** – Thursday 12:01 a.m. through Wednesday 12:00 midnight.
- **Core Business Hours** – Normal core business hours are from 8:30 a.m. – 5:00 p.m.
- **Maintenance Hours** – Maintenance office hours are either from 7:00 a.m. - 3:30 p.m. or from 7:30 a.m. – 4:00 p.m.
- **Hybrid/Telecommuting** – Allows employees to split their time between working in the office and working from home.
- **Comp time** – Salaried employees that work beyond their normal scheduled weekly hours can elect to come in late or leave early another day within the pay period with supervisor approval.
- **Alternate Work Schedules** – Work schedules that differ from the standard work week. Any alternate schedule must include a minimum of 6 hours that overlap with the core business hours.
- **Exempt** – Salary employees that are not subject to overtime pay as outlined in the Fair Labor Standard Act (FLSA)
- **Non-exempt** – Hourly employees that are entitled to overtime pay for hours worked over 40 in a week.

### WORK SCHEDULES:

## Policy 1.4 Work Hours

Department Executives, or their designees, will establish and adjust work schedules based on agency needs. In emergency situations, an employee's work schedule may be adjusted temporarily by their manager or executive leadership. An employee's schedule may not be adjusted continuously to meet an employee's personal needs without a written request for reasonable accommodation.

### HYBRID WORK SCHEDULE:

RRHA's hybrid work option allows employees in eligible positions to work in office for three (3) days per week and remote for the remaining two (2) days of the week. Employees must decide, with their managers' approval, which two (2) days of the week will be remote. Managers and department leaders have the authority to approve or deny hybrid work schedule requests based on the needs of their departments and the agency. The remote days are not required to be the same each week. Remote days do not roll over per week.

The following positions are **not** eligible for hybrid work:

- Maintenance positions (all except for the Maintenance Call Center).
- Positions where the department head has denied approval of hybrid work, either permanently or temporarily.
- Employees that are on any type of disciplinary action or performance improvement plan.
- New hires are eligible for the hybrid work schedule after completing 90 days of employment.

A hybrid workplace is designed to provide employees the flexibility in *how* and *where* they work and offer a better work/life balance. When working remotely, employees are expected to log on to their computers and be available via email, phone, Microsoft Teams (except for lunch hours and breaks) and when called upon. Employees working remotely must respond to emails and phone calls within the same day they are received.

Any employee who must be away from their computer or are otherwise unavailable to handle RRHA tasks while they are working remotely, except for standard breaks and lunch hour, must submit a request for appropriate leave and have that request approved by their supervisor. All employees should refrain from scheduling non-RRHA meetings or appointments during Standard Work Hours unless approved for Leave.

Employees working remotely who are experiencing computer issues that cannot be resolved by the Help Desk within 1 hour should come into the office to work. This includes home internet outages. **When participating in virtual meetings employees should have their cameras "ON" and be dressed professionally in accordance with RRHA's Dress Code Policy.**

### LUNCH PERIODS AND BREAKS:

- Supervisors and managers are responsible for scheduling or ensuring lunch periods and/or breaks with the least amount of disruption possible to the agency's operations.
- Employees who work at least six consecutive hours shall be offered a lunch period of at least 30 minutes and not more than 60 minutes.
- The lunch period is unpaid and not included in the total required hours of work per day.
- Employees who work an eight-hour day shall be afforded a maximum of one 15-minute break before and one 15-minute break after the lunch period. Breaks are included in the required hours of work per

## Policy 1.4 Work Hours

day and are paid. The 15-minute break should fall within the middle of the start of the employee's shift and lunch, and the middle of the return from an employee's lunch and the end of the workday.

- The lunch period and the break(s) must be used separately and may not be used to extend the lunch period and/or breaks without prior supervisor or manager approval.
- Neither the lunch period nor the break(s) may be used to compensate for an employee's late arrival or early departure, or to cover time for other purposes.

### ALTERNATE WORK SCHEDULES:

Departments may implement work schedules that differ from the standard work week (within a five-day, 40 hours per week schedule), if such schedules promote and support efficient agency operations. Supervisors must consult with the Department of Human Resources prior to submitting requests for alternate work schedules to their department executives. All alternate work schedules must be approved by Human Resources and the department leader.

### OVERTIME HOURS:

Non-exempt employees who work more than 40 hours in a pay week are eligible for overtime pay of time and a half. Non-exempt employees may work overtime hours only as authorized by their supervisor or management and are prohibited from working unapproved overtime hours. Employees in exempt positions are ineligible for overtime pay.

The Fair Labor Standards Act (FLSA) requires overtime pay for hours worked by an employee over 40 hours in a work week. Only hours worked are considered for the calculation of overtime pay. Therefore, hours recorded on employee timesheets for holidays, PTO, LWOP, disability, or any other type of non-work hours are not included in the total 40 hours in the work week for overtime calculation.

### EMPLOYEE RESPONSIBILITIES:

- Employees are required to adhere to their work schedules by reporting to work at the specified starting time, departing at the specified ending time, and taking lunch periods and breaks as authorized and outlined within this policy.
- Employees are expected to notify their manager or supervisor as soon as possible if they are unable to adhere to their scheduled hours (i.e. arriving late to work or leaving).
- Employees are expected to work overtime hours as authorized by their supervisor.

## Policy 1.5 Probationary Period

### **PURPOSE:**

The purpose of this policy is to establish a defined probationary period for all new hires and newly promoted employees at the Richmond Redevelopment and Housing Authority (RRHA). The probationary period is intended to provide management with sufficient time to evaluate an employee's performance, conduct, and overall suitability for the position, while allowing the employee to become familiar with the duties and expectations of their role. The probationary period is considered an extension of the selection process, designed to determine whether continued employment with RRHA is appropriate for both the employee and the agency.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all applicable employees.

### **WHO MUST SERVE A PROBATIONARY PERIOD:**

#### **New Hires:**

The probationary period for newly hired employees shall be one year (12 months) from the effective date of employment (hire date). The employee's first year Anniversary Date is the date the probationary period ends.

#### **Re-employment:**

Former Richmond Redevelopment & Housing Authority (RRHA) employees must serve another original probationary period if:

- The separation was over one year ago.
- The employee is re-employed in a different job class or position than the previously held position.
- The employee never completed an original probationary period.

#### **Promotion, Demotion, and Transfer:**

Employees who are promoted, demoted, or transferred to another position must serve a three (3) month probationary period. If an employee is promoted, demoted, or transferred before the completion of the original probationary period, the original probationary period shall not be satisfied until the cumulative time served in all positions equals at one year.

### **EXTENDED PROBATIONARY PERIODS:**

Probationary periods may be extended for the following reasons:

- Completion of a required training course.
- Unsatisfactory Performance or Disciplinary Action
- Re-Organization or Position Restructuring

## Policy 1.5 Probationary Period

Probationary periods must be extended when probationary employees are on leave, with or without pay, for more than ten (10) consecutive workdays. The probationary period will be extended by the number of days the employee was on leave. Any extension of the probationary period must be justified by the employee's immediate supervisor, approved by the department executive, and submitted to Human Resources for review and approval, prior to the completion of the initial probationary period.

### PERFORMANCE DURING PROBATION:

Supervisors will conduct periodic reviews of the employee's performance during the probationary period. Supervisors are required to meet with their probationary employees at least two (2) times and provide written documentation to Human Resources prior to the end of the employees' probationary period. If an employee's performance does not meet RRHA standards, the supervisor may recommend extension of the probationary period (not to exceed an additional 90 days) or termination of employment.

At the conclusion of the probationary period, based on the employees performance, the employee may be retained, demoted, or reassigned to another position within the same pay range during the re-evaluation period if the agency identifies another position that is more suitable for the employee's performance level.

### COMPLETION OF A PROBATIONARY PERIOD:

1. Prior to the end of any probationary period, the employee's immediate supervisor and/or the Department Executive shall determine whether the employee's services should be retained.
2. If the supervisor determines at any time during the probationary period that an employee cannot perform the required duties of the position, the employee should be terminated or allowed to resign.
3. Newly hired employees on probation are not eligible to use the Grievance Procedure.

## Policy 1.6 Separation and Termination

### **PURPOSE:**

To identify the types of separations/terminations and establish termination categories for Richmond Redevelopment & Housing Authority (RRHA) employees.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all full-time employees.

### **DEFINITIONS:**

- **Resignation** – an employee's voluntary separation from RRHA service.
- **Dismissal** – termination or involuntary separation by the Authority for the employee's unsatisfactory work, performance, misconduct, violation of RRHA policy or for any reason deemed sufficient by the RRHA.
- **Reduction in Force** – termination or separation from employment due to reduction of the workforce, elimination of a position or lack of sufficient work.
- **Retirement** – voluntary separation of a regular employee with at least five years of service who is scheduled to begin receiving retirement benefits due to service or disability retirement.

### **TYPES OF SEPARATION OF SERVICE:**

#### **Resignation**

To resign in good standing (eligible for re-hire), an employee shall give his or her immediate supervisor at least two (2) work weeks written notice of their intent to resign. The resignation notice should state the last date and time of day the employee plans to work. Once a resignation has been accepted, it may not be withdrawn unless the Department Executive approves the withdrawal.

- To resign in good standing, members of the Executive Team shall submit a letter to the Chief Executive Officer with a period of notice of not less than four weeks.

#### **Dismissal**

The Vice President of Human Resources, or designee, is to be contacted prior to the dismissal of any employee. RRHA may, at its sole discretion, give some notice of its intent to dismiss an employee, but is not required to give any such notice.

- Proposed dismissal by departments shall be coordinated in conjunction with the Department of Human Resources. The pending dismissal will then be reviewed with the Chief Executive Office and the legal counsel, if deemed necessary.
- A non-exhaustive list of reasons for dismissal can be found in Policy #3.1 Standards of Conduct and throughout this handbook. A non-probationary employee, who is dismissed, may seek redress through

## Policy 1.6 Separation and Termination

the Authority's Employee Grievance Procedure (See Policy #3.2). Probationary employees may be dismissed with or without cause and are not eligible to use RRHA's Employee Grievance Procedure pursuant to state law.

**Disability** – Upon supported and certified medical evidence, an employee may be separated for service or non-service-related disability when he or she cannot perform the essential function of the job because of physical or mental impairment. The employee should contact Human Resources to discuss benefit options. This could include long-term disability and/or disability retirement. The separation needs to be coordinated with workers' compensation benefits if the illness or injury is work related and has been ruled as compensable. Workers' compensation benefits are managed by the Risk Management division.

**Job Abandonment** – Employees who are absent from work for three consecutive workdays without giving proper notice to their supervisors may be considered to have voluntarily separated and may be dismissed for job abandonment.

**Death** – Upon the death of an employee on active pay status, compensation will be paid through the end of the day. The Department of Human Resources should be contacted for survivor benefit information.

**Retirement** – Whenever an employee meets the provisions of the Virginia Retirement System, he or she may elect to retire and receive all benefits earned under the retirement plan. Persons retiring under this policy shall be considered as voluntarily separating from RRHA service.

**Reduction-In-Force/Lay-off** – It is the policy of RRHA to maintain as stable an employment situation as possible. Whenever it has been determined that positions will no longer be required as a result of adverse economic conditions, reorganization within RRHA, lack of sufficient work, completion or termination of grant funds, or by other related incidents directly and solely caused by RRHA, the following will serve as the general procedure for a reduction in workforce or lay-off. The following procedure shall not apply in cases where the reduction in the workforce involves positions not fully funded by RRHA, as employees in such positions do not have a right to or expectation of continued employment (i.e. grant funded positions and/or positions funded by specific project budgets.)

1. In cases where a reduction in the workforce necessitates the actual removal of personnel, upon identifying classification(s) to be affected, the following order of priority will be adhered to:
  - a. Temporary employees
  - b. Part-time employees
  - c. Probationary employees
2. If it is necessary to further reduce personnel, the Department VP or SVP will rank the remaining employees based upon quality of service, along with consideration of seniority. The appropriate number of employees will then be terminated based upon the established ranking. The intent is to retain the most productive and qualified employees.
3. When separation of employment is due to a lay-off or reduction in force, severance pay will be offered based on the availability of funds and approval by the Chief Executive Officer.

## Policy 1.6 Separation and Termination

4. If the quality of service is relatively equal among two or more employees, the Department VP or SVP will determine which employee is most essential to the efficient operation of the department. The Department VP or SVP submits a recommendation to the VP of Human Resources detailing the specific skills, knowledge and abilities possessed by the employee and the reasons why the employee should be retained.
5. Where possible, Transfer or Demotions may apply.
6. Terminated employees may reapply for employment should future openings be advertised.
7. A reduction in the workforce is not a grievance eligible offence.
8. When separation of employment is due to a lay-off or reduction in force, severance pay will be offered based on the availability of funds and approval by the Chief Executive Officer.

### SEPARATION DATE:

When an employee separates from RRHA service, the effective date will be the last day that the employee was in an active status, or the date that the employee was notified.

- If an employee is on approved sick leave, workers' compensation leaves, or leave without pay when separated, the effective date of separation will be the actual date of separation as given by the employee and approved by the VP of Human Resources and not necessarily the last day physically on the job.
- When the effective date immediately precedes a holiday, the employee shall not be paid for the holiday since he or she is no longer an employee.

### NOTICE OF EMPLOYEE SEPARATION:

When an employee's employment is terminated regardless of reason, Human Resources will notify the hiring manager, as well as all other pertinent internal departments, of the employee's separation. It is up to the separated employee's direct manager and department executives to manage the notification of separation for all external stakeholders and internal stakeholders not notified by Human Resources.

**\*\*Whenever feasible, an exit interview will be conducted by Human Resources, and an Exit Interview Survey will be completed by the terminating employee. Relevant information obtained from the Exit Survey may be shared with leadership if department improvements are deemed necessary by Human Resources\*\***

### AUTHORITY AND INTERPRETATION:

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 1.7 Emergency Closure Protocol

### **PURPOSE:**

The purpose of this policy is to establish Richmond Redevelopment and Housing Authority's (RRHA) guidelines for the continuation of operations during emergency closures, ensuring the safety of personnel and clarity in expectations for essential and non-essential employees.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to ALL RRHA employees.

### **EMERGENCY CLOSURE DEFINITION:**

An emergency closure is defined as any situation that necessitates the closure of RRHA facilities. Examples include, but are not limited to:

- Severe weather conditions (e.g., hurricanes, snowstorms, floods).
- Natural disasters.
- Presidentially or State declared Disasters.
- Public safety threats.
- Utility failures or other unforeseen circumstances.

### **REMOTE WORK DURING EMERGENCY CLOSURE:**

- All non-essential personnel who can work remotely are required to do so during emergency office closures. Supervisors/Managers must ensure that employees have the necessary tools and resources to perform their job duties remotely. **ALL STAFF WHO CAN WORK REMOTE MUST BRING THEIR LAPTOPS HOME EVERY DAY.**
- If an employee is unable to work remotely, the following options will be available:
  - Use of accrued Paid Time Off (PTO) for the duration of the closure.
  - Leave without pay (LWOP) for the duration of the closure.
- Employees must notify their supervisor of their status regarding remote work capabilities and any leave requests during the closure period immediately upon notification of the office closure.
- Supervisors/Managers must provide executive leadership with the status of their direct reports on a daily basis, for the duration of the emergency closure.

### **ESSENTIAL PERSONNEL:**

A. **Essential personnel are those employees whose duties are critical to maintaining RRHA's operations and safety during emergencies and will need to report IN-PERSON to their assigned work location.**

## Policy 1.7 Emergency Closure Protocol

**NOTE:** Executive Staff (AVP level and above) and Administrative Assistants are integral to our operations during emergency situations. Therefore, whether in person and/or virtual, Executive Staff and Administrative Assistants must be readily available to oversee, evaluate, advise, and approve actions for employees during emergency closure situations, and are considered essential personnel.

B. Essential personnel are required to report to their designated work location during an emergency closure. Failure to report may result in disciplinary action unless exceptional circumstances are documented and approved.

C. Compensation for essential personnel:

1. Essential personnel will be paid their regular rate for all hours worked under this policy, unless non-exempt and eligible for overtime.
2. If an employee is part of the “Stand By” Maintenance staff, they may be paid at the Standby rate depending on the work performed during the emergency closure and manager approval.
3. If an employee works more than 40 hours during the emergency closure week, they will be compensated at the overtime rate of time and a half for all eligible hours.

**NOTE:** Designation as an essential employee may be based on the type of emergency. Communication will go out to all employees at the start of all emergency closures to outline which employees will be deemed essential. Employees designated as “Stand By” are always considered essential employees and must remain available for immediate deployment during emergency closures. Stand By employees are expected to:

- Remain within contact range unless they are directly impacted by the disaster or emergency.
- Respond promptly to calls from their supervisor or emergency management team.

### GENERAL POLICY PROVISIONS:

A. Employees must keep updated contact information on file within UKG to ensure timely communication during emergencies.

B. Supervisors must provide clear instructions regarding duties, expectations, and reporting requirements during an emergency closure.

C. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary to adapt to operational needs.

### AUTHORITY AND INTERPRETATION:

This policy is issued by the Department of Human Resources. Questions regarding its application and interpretation should be directed to Human Resources.

## Policy 1.8 Dress Code

### PURPOSE:

The purpose of this policy is to provide guidance in defining appropriate dress for Richmond Redevelopment and Housing Authority (RRHA) employees during work hours and on designated casual days. RRHA expects that employees will dress and act in a way that will not reflect adversely on himself/herself or the Authority.

### WHO THIS POLICY APPLIES TO:

This policy is applicable to all employees. Employees who wear uniforms must follow the uniform standards established in this policy and by their department/division.

### RESPONSIBILITY:

Employees are responsible for ensuring that they are appropriately attired to work. The manager/supervisor has the discretion to determine if an employee is inappropriately dressed. When an employee is inappropriately dressed the manager/supervisor can, at their discretion, require that the employee leave the workplace to change their clothing. Time spent away from the workplace for this purpose will be charged to the employees' annual leave.

### BUSINESS CASUAL ATTIRE:

At RRHA, **Business Casual Attire** is expected unless otherwise noted. Business Casual promotes a professional yet comfortable environment and includes attire that is neat, clean, and appropriate for a professional setting.

#### Male Examples:

- Slacks, khakis, or dress pants
- Polo shirts, button-down shirts, or sweaters (with or without ties)
- **Denim jeans (without holes, rips, or tears)**
- Closed-toe shoes, loafers, or dress shoes

#### Female Examples:

- Slacks, khakis, or dress pants
- Blouses, sweaters, or collared shirts
- Skirts or dresses (appropriate length)
- **Denim jeans (without holes, rips, or tears)**
- Flats, closed-toe shoes, or low-heeled shoes

**Note:** \*BLDG 600 Staff\*- It should be noted that business here at RRHA is forward-facing at times. Therefore, it is strongly encouraged to wear **Business Professional Attire** when in an environment that calls for it i.e "Dress for your Day" example – Board meetings. **Flip-flops, Crocs, Slippers or stilettos are not permitted.**

## Policy 1.8 Dress Code

### UNACCEPTABLE ATTIRE:

Includes tank tops, halters, tops that expose midriff, strapless dresses or shirts, denim shorts, capri pants, sweatpants, bib overalls, spandex, leggings worn as pants, or other form fitting or low-cut clothing. Exceptions may be made for special Authority events, as accommodation for medical reasons or due to the nature of the work performed.

### MAINTENANCE UNIFORM ATTIRE:

Employees in the Maintenance Division are required to wear uniforms. Uniforms should be clean, properly maintained, and worn appropriately during all working hours.

### VIOLATIONS:

Employees who fail to comply with the Dress Code Policy will be subject to disciplinary action as stated in Policy# 3.1 Standards of Conduct.

### AUTHORITY AND INTERPRETATION:

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 2.1 Leave

### **PURPOSE:**

The Richmond Redevelopment and Housing Authority (RRHA) recognizes that employees may need time away from work for personal, medical, family, civic, or other reasons. The purpose of this policy is to establish clear guidelines for the various types of leave available to employees, ensuring fair and consistent administration while supporting the health, well-being, and work-life balance of our workforce.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all RRHA employees.

### **PTO LEAVE:**

Paid time-off, or PTO, is used for vacations, illness and personal reasons. Employees are encouraged to use their PTO for rest and relaxation so that they can return to the workplace refreshed and more productive. Requests for the use of PTO must be communicated to the employee's supervisor either verbally or in writing, as well as entered for approval in the HRIS, UKG, a minimum of 5 business days prior to the start date of scheduled leave. Supervisors must consider as a priority the operational needs of the department/agency when reviewing requests for annual leave and determining whether the request(s) will be approved or denied. Supervisors must provide a response to the employee's leave request within 3 business days of receipt of the request.

When PTO is used for illness (employee or family member) or an injury that incapacitates the employee from being able to perform their work, coordination with the Family and Medical Leave Act (FMLA) may be needed. In these situations, employees and supervisors must consult with the Human Resources Department.

Employees who are unable to work due to illness or unexpected personal reasons are responsible for contacting their supervisor prior to the scheduled work start time on the day of the absence and will be expected to report on their status on a regular basis as established by the supervisor.

Employees who use non-FMLA annual leave for illness or an incapacitating injury and are out of work for more than five workdays must provide medical certification of their illness/injury from a physician when they return to work. Any PTO or other leave taken pursuant to FMLA is subject to the requirements that are listed in the Family and Medical Leave Act procedures outlined within this policy.

Prior to returning to work after an extended (more than 3 workdays) illness or disability, an employee must submit a statement from the physician certifying that the employee can perform the essential functions of the job with or without reasonable accommodation.

## Policy 2.1 Leave

Employees will not be offered modified work or light duty assignments, even if authorized by the attending physician or health care provider, without review and approval in writing by the Human Resources department. This pertains to both work-related and non-work-related illnesses and injuries.

PTO hours are accrued each pay period, and the accrual rate is based on years of service (see below for the PTO accrual chart). An employee cannot use PTO leave until it is accrued. The accrual rate for annual leave and the maximum amount of accrued leave that an employee may retain for leave carryover from one calendar year to the next, or for receiving payment for annual leave upon separation from the agency is listed below:

Years of Service	Accrual Rate/ Pay Period	Total Hours/ Days Accrued Annually	Maximum Balance End of the Year	Maximum Payment Upon Separation
0 -12 months	6 hours	182 hours 22.75 days	192 hours 24 days	192 hours 24 days
1 -5 years	7 hours	182 hours 22.75 days	192 hours 24 days	192 hours 24 days
5-9 years	8 hours	208 hours 26 days	240 hours 30 days	240 hours 30 days
10-14 years	8 hours	208 hours 26 days	288 hours 36 days	288 hours 36 days
15 or more years	9 hours	234 hours 29.25 days	336 hours 42 days	288 hours 36 days

When employees separate from the agency (including resignation, retirement, disability retirement, layoff, termination or death) accrued PTO leave up to the maximum pay out amount will be paid either in a lump sum or other payment schedule approved by the agency. RRHA will deduct from the payment(s) the appropriate federal and state taxes and any other amounts required by law, and any deductions for amounts owed by the employee to the agency as permitted under applicable law. Payment upon an employee's death will be made to the Beneficiary. If there is no Beneficiary or Executor on record for the employee, payment will be made to the surviving spouse, or if none, to the next of kin in accordance with section 64.1-123 of the Code of Virginia.

Employees who are absent without approved annual leave will be placed on Leave without Pay (LWOP). LWOP due to unauthorized absences may be grounds for disciplinary action. **An employee who is absent without approved leave for three consecutive workdays may be terminated due to job abandonment.**

### CIVIL LEAVE:

- Employees will be granted civil leave with pay for absences to serve on juries, and to attend court or an administrative hearing as a witness under subpoena provided the employee is not a charged party.
- Employees serving in this capacity are entitled to keep any jury or witness fees awarded by the court in addition to their regular salary. If an employee must appear in court or at an administrative hearing

## Policy 2.1 Leave

either as a witness or a party, due to his/her employment with RRHA, such hours are considered hours of work.

- Employees must notify their supervisor of the request for civil leave and provide a copy of the summons or other court documentation related to the requests.

### BEREAVEMENT LEAVE:

Employees are granted three (3) consecutive workdays of bereavement leave for the death of an immediate family member. If an employee needs to be absent for more than three days, approved PTO may be used. Please see the definition of an immediate family member within this policy below:

- Spouse
- Brother/sister, stepbrother/sister or half-brother/sister
- Parent, grandparent, stepparent, foster parent, or legal guardian (where such relationship is officially recognized by state or local government entity)
- Child (son/daughter), stepchild, adopted child, or foster child (where such relationship is officially recognized by a state or local governmental entity)
- In-law (brother, sister, mother, father, grandfather, grandmother, son/step-son, daughter/step-daughter)
- Aunt, uncle, niece or nephew

### ADMINISTRATIVE/INVESTIGATIVE LEAVE:

The Chief Executive Officer may approve administrative leave with pay for a maximum of 15 working days. Administrative leave may be approved for non-disciplinary purposes and for leave that is not covered by any other leave provision. This type of leave is required for conducting workplace investigations. Any employee involved in a complaint that requires an investigation will be placed on administrative/investigative leave while the investigation is being completed. **Administrative leave may be with or without pay.**

**Investigative leave is paid leave; however, the result of the investigation may result in an unpaid suspension. The pay status of the administrative leave will be determined and communicated to the employee prior to the initiation of the leave.**

### LEAVE WITHOUT PAY (LWOP):

The Chief Executive Officer and Department Executives (in consultation with Human Resources) are authorized to grant or administer LWOP as appropriate under the following circumstances:

- Disciplinary action.
- Military purposes that require a longer period of absence than what is permitted under military leave with pay.
- Health related purpose for the employee or for the employee to care for an immediate family member who is ill.

## Policy 2.1 Leave

- Administrative leave (only with approval from the Chief Executive Officer and/or Human Resources).
- Worker's Compensation (requires consultation with the Risk Manager).
- To supplement PTO leave for emergency situations.

LWOP is limited to a maximum period of 12 consecutive months. Employees on LWOP in any pay period will not be paid for holidays during the LWOP period.

Employees who have excessive absences (more than 5 unexcused absences in a month) and only have LWOP available may be subject to disciplinary action. Employees on LWOP must communicate with their supervisors at established periods of time to provide a status update and an anticipated return to work date. An employee's position or an equivalent position will be held open for employees on leave under the Family Medical Leave Act (FMLA). For other types of LWOP, the Department Executive, in consultation with Human Resources, will determine whether the position or an equivalent position will be held for the employee. This decision will be based on the anticipated date of return to work and agency needs. The LWOP status will be reviewed periodically throughout the absence. If the agency cannot hold the position open or provide an equivalent position, the employee will be advised in writing. If there is no position available when the employee returns to work, the employee will be terminated and may be employed again only after going through the normal hiring process.

### **MILITARY LEAVE:**

It is RRHA's objective to grant a military leave of absence to employees who are absent from work because they are serving in the United States uniformed service in accordance with the Uniformed Services Employment and Re-employment Rights Act ("USERRA"). RRHA will also grant a military leave of absence to any employee who is absent from work because of their membership in the Virginia National Guard, Virginia State Defense Force or naval militia called to state active duty by the Governor.

An eligible employee must give their immediate supervisor advance notice of upcoming military service unless military necessity prevents advance notice, or it is otherwise impossible or unreasonable. Employees who are required by their military orders to report for training duty or for a tour of active duty will be granted up to 15 workdays (120 hours) of military leave with pay in a fiscal year (October 1-September 30). Employees may retain any additional military stipend received.

Employees on military leave will stay on an "active" status for benefit administration purposes for the 15-day period. Continuation of health insurance benefits is available as required by USERRA based on the length of the leave and subject to the terms, conditions and limitations of the applicable plans for which the employee is otherwise eligible. Military leave with pay will be taken without loss of seniority or PTO balances. Employees' benefits will not be affected by periods of military leave with pay. When released from duty the employee will be restored to the same or equal position to the one that was previously held.

Employees may be paid for up to eight hours annually for pre-induction and other physical examinations required for military service in addition to the 15 days of military leave with pay. Employees may

## Policy 2.1 Leave

choose to use annual leave to cover absences over 15 days for military leave purposes to retain their rights to certain benefits. RRHA does not require an eligible employee to use PTO leave for military service.

Employees will be granted leave without pay for the duty indicated in their military orders for all days on which the employee is required to engage in either active duty lasting longer than 15 working days or any federally funded inactive duty training. Such leave will be granted without affecting seniority, accrued annual leave or performance rating.

Employees on military leave without pay will not earn PTO. However, time spent in military service will count toward agency service when determining the employee's rate of PTO and seniority. To qualify for reemployment rights under USERRA, employees on military leave must meet the following requirements:

- Total military duty must be no more than five years.
- All employees returning from military leave must have an Honorable Discharge to retain reemployment rights.
- Employees returning from military leave of 30 days or less must report to work by the beginning of the first regularly scheduled workday that falls eight (8) hours after returning home from military service (or as soon as possible after the eight-hour period if reporting by that time is impossible or unreasonable through no fault of the individual).
- Employees returning from military leave of 31- 180 days must apply for reemployment no later than 14 days after their last day of service. If meeting this deadline is impossible or unreasonable through no fault of the individual, the application must be submitted on the next calendar day when submission becomes possible.
- Employees returning from military leave of more than 180 days must apply for reemployment no later than 90 days after completing service (discharge date).
- The reporting or application deadlines are extended for up to two years for people who are hospitalized or convalescing because of a disability incurred or aggravated during the period of service.

Upon honorable release from state active duty, an employee must make written application for reemployment within five days of release from duty or from hospitalization following release.

Upon their return from military leave, an employee will be placed either in the position attained if employment has been continuous or in a comparable position.

Provided that the employee has met all the requirements of USERRA and/or applicable state law, the employee may qualify for continuation or reinstatement of certain benefits. Employees on military leave will not be considered for promotion.

## FAMILY AND MEDICAL LEAVE ACT (FMLA):

## Policy 2.1 Leave

Under the Family and Medical Leave Act (FMLA) of 1993, employees may be entitled to up to 12 weeks (60 days or 480 hours) of unpaid leave in any rolling 12-month period, measured backwards from the date the leave begins. To qualify for FMLA leave, the employee must have been employed by RRHA for at least 12 months and must have worked 1,250 or more hours in the previous 12 months.

FMLA leave may be taken:

- To care for your child after birth, adoption or state placement of a child for foster care.
- To care for your spouse, child or parent who has a serious health condition.
- For a serious health condition that makes the employee unable to perform the essential functions of their job.
- For a qualifying exigency arising out of the fact that your spouse, child or parent is on covered active duty or call to active-duty status in support of a contingency operation as a member of the National Guard or Reserves.
- To care for a covered service member with a serious injury or illness for which you are needed to provide care.

For the purposes of the FMLA leave policy, “child” means a biological child, adopted child, foster child, stepchild, legal ward or a child of a person standing “*in loco parentis*”, who is either under age 18 or incapable of self-care because of a disability. FMLA leave for birth, placement for adoption or foster care must be completed within one year of the birth or placement. If a husband and wife both work for RRHA, they are entitled only to a total of 12 weeks’ leave combined (not 12 weeks each) for a birth, adoption or foster care placement.

- Employees have the option of using paid leave for absences covered under FMLA. If an employee uses accrued leave for family/medical leave, the agency is required to provide only the number of unpaid workdays which, when combined with the number of days of other leave taken, equals a total of 60 workdays or 480 work hours (12 weeks). Example: An employee uses 18 days of accrued leave to care for a parent who has a serious health condition. The agency must allow the employee to take 42 days of unpaid leave if requested. Each of these leaves will count towards the total 60-day FMLA balance allotted under FMLA.
- Employees are required to provide advance notice of leave. If the leave is foreseeable, you must provide 30 days’ advance notice. If the leave is not reasonably foreseeable, you must provide notice as soon as practicable. Failure to provide such notice for leave may be grounds for delay of leave.
- To request family/medical leave, employees must complete and sign a Family and Medical Leave Request Form (“Request Form”) and submit it to Human Resources. **Supervisors should not accept FMLA forms as they do not have the authority to approve or deny this type of leave request, only Human Resources can do so.**

Should RRHA disagree with the opinion given by the employee’s healthcare provider, RRHA reserves its right to require opinions from second or third health care providers at RRHA’s expense.

## Policy 2.1 Leave

If the two health care providers disagree about the employee's condition, a third health care provider, agreed upon by the employee and RRHA, will make a binding decision.

Upon receipt of the completed forms, RRHA will designate the leave as either FMLA or non-FMLA and provide the employee with a Notice of FMLA Rights and Responsibilities ("FMLA Notice") reflecting that designation. If leave is taken for a FMLA reason and has not been designated by RRHA, but the employee wants the leave to be counted as FMLA leave, the employee may not subsequently assert FMLA protections for the absence.

Employees are required to provide status reports to RRHA on their intent to return and recertification of the serious health condition every 30 days.

**Time taken as paid leave that also qualifies as family/medical leave will count against both the paid leave and against the annual 12-week allowance of family/medical leave.**

During family/medical leave, RRHA will continue your health insurance coverage at the same levels as when your leave began. If the leave is paid, the agency will deduct the employee's portion of the group health premium as a regular payroll deduction. If the leave is unpaid, you must pay your portion of the premium, or discuss with Human Resources a plan for payment, within 15 days of your return-to-work date.

Family and medical leave may be taken intermittently, if medically necessary. Intermittent leave counts on a "pro rata" basis toward the annual 12-week limit. Intermittent leave is not permitted for the birth or adoption of a child without RRHA's express agreement. Where intermittent family/medical leave is taken, the employee's pay may be reduced to reflect unpaid leave time, except that a salaried employee's pay will not be reduced for a partial-day absence unless the leave for such absence is actually mandated by the FMLA. Employees who take intermittent leave may be temporarily transferred to an available alternate position that better accommodates intermittent leave if one is available. The position must have equivalent pay and benefits. If leave is unpaid, the employee's salary will be reduced based on the amount of time actually worked.

Employees do not accrue annual leave when they are in leave without pay status during family/medical leave.

When an employee returns from family/medical leave, they will be entitled to reinstatement to their current position or to an equivalent position with the same pay and benefits.

Family/medical leave taken because of the employee's illness or injury requires the provision of a fitness for duty certification from a health care provider before the employee returns. Failure to provide this certification may cause a delay in the employee's reinstatement with or without restrictions. When family/medical leave expires, the employee's failure to return to work will be grounds for immediate termination unless a written extension is obtained from your supervisor.

**If an employee is not returning to work, the employee will need to submit a letter of resignation or application for retirement or disability retirement.**

## Policy 2.1 Leave

If an employee's position is determined to be a key position, they will not be denied family and medical leave if they qualify. However, they may forfeit their right to reinstatement under certain conditions. The employee will be informed of this possibility when notice is given or as soon thereafter as practical under the circumstances.

An employee who fraudulently obtains FMLA leave from RRHA is not protected by the Act's restoration or maintenance of health benefits provisions and will be subject to disciplinary action including termination.

### **PREGNANT WORKERS FAIRNESS ACT (PWFA):**

Richmond Redevelopment and Housing Authority (RRHA) is committed to providing a workplace that supports the health, safety, and well-being of all employees, including those affected by pregnancy, childbirth, or related medical conditions. This policy is established in accordance with the federal Pregnant Workers Fairness Act (PWFA) and the Virginia Human Rights Act, which require employers to provide reasonable accommodation to qualified employees with known limitations related to pregnancy, childbirth, or related medical conditions, unless doing so would impose an undue hardship on the operation of the business. RRHA will engage in an interactive process with any employee who requests a workplace adjustment or accommodation due to pregnancy, childbirth, or a related medical condition. The goal of this process is to identify reasonable accommodation that enables the employee to perform the essential functions of their position or to temporarily relieve them of those functions if appropriate.

Employees seeking reasonable accommodation should contact the Human Resources Department as soon as the need arises. HR may provide the employee with a medical certification form to be completed by a healthcare provider if the request involves medical limitations.

Once the request is received, HR will engage in an interactive dialogue with the employee and their supervisor to determine appropriate and effective accommodation, if available. RRHA will make every effort to respond promptly and fairly to all requests.

Employees will **not** be discriminated against, harassed, or retaliated against for:

- Requesting or using reasonable accommodation;
- Being pregnant, having given birth, or having a related medical condition; or
- Participating in any process related to this policy or the PWFA.

Employment decisions—including hiring, promotion, training, pay, and termination—will not be affected by an employee's pregnancy or related condition.

### **Leave Sharing**

## Policy 2.1 Leave

Leave sharing permits eligible employees in a Leave without Pay status to receive income by using PTO leave hours donated to them by other employees. Employees covered by this policy may request donated leave as described in this policy if the employee:

- experiences leave without pay due to a personal illness or injury for which the employee is using Family and Medical Leave, or
- experiences leave without pay due to a family member's illness or injury for which the employee is using Family and Medical Leave, or
- experiences leave without pay due to a covered servicemember's serious injury or illness for which the employee is using Family and Medical Leave.

A qualified employee may request donated leave by contacting the Human Resources Department and completing the Leave Share Recipient Application. If an employee is physically or mentally unable to initiate a request, a family member or the Authority may do so. **Employees may not accept leave share donations more than once per year.**

For employee and family illnesses or injuries, normal documentation under Family and Medical Leave is required. Employees may receive leave share donations only for periods of absence that are covered by personal or family FMLA medical certifications. A certification by a second physician of the Authority's choice may be required. The Authority will bear the cost of a second opinion.

Before being eligible to receive continued pay through the Leave Sharing program, an employee must have exhausted all personal leave balances (annual, leave history and any short-term disability (if applicable) that may be used for FMLA reasons) and be designated in leave without pay (LWOP) status.

Recipients of leave share donations are not eligible to receive pay for holidays. Additionally, they may not receive any salary increases until they return to pay status. While an employee is receiving leave share donations for personal illness or injury or FMLA family reasons, the Authority will continue to pay its portion of the health care premium for the period covered by FMLA.

Periods of leave share are not considered creditable compensation for retirement calculations by the Virginia Retirement System (VRS). Therefore, contributions to VRS will be discontinued when an employee is receiving leave share donations.

Certain payroll deductions may continue while an employee is receiving leave share donations if the employee receives income replacement sufficient to cover the deductions. Among these are health care premiums and other voluntary deductions. If the income replacement received through leave share donations is insufficient to cover such deductions, the deductions will be cancelled unless the employee makes arrangements with the Human Resources to continue them.

## Policy 2.1 Leave

**Employees are ineligible to use donated leave during the period of any disciplinary action or investigation.**

A donor may authorize donations of accrued PTO in minimum increments of 8 hours by completing a Donor Form and submitting it to the Human Resources Office. Donors do not have to retain any minimum leave balances, nor is there a limit on the number of PTO hours they may donate.

Leave given by a donor may not be reclaimed, except if an employee receives donated leave in excess of the amount needed to cover their absence. The excess leave will be returned to the donors in reverse order of the receipt of donations.

Medical conditions of the employee will be excluded from eligibility for leave sharing benefits if they result from:

1. Any occupational-related accident or illness for the period for which Worker's Compensation (WC) benefits have been awarded or could have been awarded, if the employee had cooperated with the WC Program requirements.
2. Intentionally inflicted injuries, except as a result of conditions that qualify under ADA; or
3. Injuries occurring in the course of violating a law.
4. Incomplete or non-existent medical supporting documentation on file.

Medical conditions of the family member will be excluded from eligibility for leave sharing benefits if they result from:

1. intentionally self-inflicted injuries, except as a result go conditions that qualify under ADA; or
2. injuries occurring in the course of violating a law.

Recipients shall be required to reimburse the Authority for pay received for donated annual leave hours when either of the following situations occurs:

1. when an employee receives compensation through the leave sharing program and, subsequently, receives retroactive worker's compensation benefits for that same period of time; or
2. when the employee's agency determines that abuse has occurred. If recipients reimburse the authority in situations described above, leave hours will be returned to the original donor(s).

If abuse is verified, the recipient will be required to repay the cost of all donated leave at the salary rate in effect at the time the employee was placed on leave without pay. Additionally, the employee may be disciplined, including termination, in accordance with the provisions of Policy 3.1, Standards of Conduct.

### **AUTHORITY INTERPRETATION:**

This policy is issued by the Department of Human Resources. Human Resources management is responsible for the official interpretation of this policy. Questions regarding the application of this policy should be directed to the Department of Human Resources. The Department of Human Resources with the approval of the Chief Executive Officer, reserves the right to revise or eliminate this policy at any time.

## Policy 2.2 Reasonable Accommodation

### **PURPOSE:**

The Richmond Redevelopment and Housing Authority (RRHA) is committed to supporting a diverse and inclusive work environment. Consistent with federal and state laws, RRHA provides reasonable accommodations to qualified employees and applicants with disabilities, including pregnancy-related conditions, to ensure equal access to employment, programs, and services. RRHA will provide reasonable accommodations to all qualified individuals with disabilities as defined by the Americans with Disabilities Act (ADA), Pregnant workers and those with pregnancy-, childbirth-, or postpartum-related medical conditions under the Pregnant Workers Fairness Act (PWFA), and employees with sincerely held religious practices, unless doing so would cause undue hardship to the organization.

Employee reasonable accommodation is determined on an individualized basis through an interactive dialogue process involving the employee, HR, management, and appropriate medical providers. Retaliation against any employee who requests an accommodation, participates in the interactive dialogue process, or assists others in obtaining accommodations is strictly prohibited.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all RRHA employees.

### **Definitions:**

#### **Reasonable Accommodation:**

A modification or adjustment to a job, the work environment, or how work is performed that enables a qualified employee with a disability or medical condition to perform essential job duties.

#### **Undue Hardship:**

A significant difficulty or expense for RRHA based on business size, resources, needs, and operational impact.

#### **Qualified Individual:**

An employee who can perform the essential functions of their job with or without reasonable accommodation.

#### **Interactive Dialogue:**

A collaborative conversation between HR, the employee, and management to understand limitations and identify possible accommodations.

### **Examples of Reasonable Accommodations:**

Possible accommodations may include, but are not limited to:

- Modified work schedules or hybrid/remote work arrangements
- Adjusted break schedules
- Leave for medical treatments, recovery, or pregnancy-related needs
- Temporary job restructuring or reassignment of non-essential duties
- Physical modifications (ergonomic equipment, seating, lighting adjustments)

## Policy 2.2 Reasonable Accommodation

- Assistive technology or communication aids
- Modified workplace policies (e.g., uniform or dress requirements)
- Alternative workspace arrangements

Accommodations will be evaluated on a case-by-case basis.

### Requesting a Reasonable Accommodation:

Employees requesting an accommodation should:

1. Submit their request verbally and in writing to HR and/or their supervisor.
2. Complete RRHA's **Reasonable Accommodation Request Form** (if applicable).
3. Provide supporting medical documentation when needed to clarify functional limitations.

Supervisors who receive a request must notify HR immediately. Requests may be made at any time during employment.

### Interactive Dialogue Process:

After receiving a request, HR will:

1. Review the request and any supporting documentation.
2. Meet with the employee to discuss the limitations and job functions impacted.
3. Identify possible accommodations and assess feasibility.
4. Confer with management to determine operational impact.
5. Approve, modify, or deny the accommodation request.

If an accommodation is denied due to undue hardship, HR will communicate the reason and explore alternative options when possible.

### Confidentiality:

All medical information and accommodation documentation will be:

- Maintained in a secure, confidential HR file separate from personnel records
- Shared only with individuals who need to know for implementation or compliance

RRHA complies with all HIPAA-related privacy protections.

### Ongoing Monitoring and Follow-Up:

RRHA may conduct periodic follow-ups to ensure:

- The accommodation remains effective
- No new issues have arisen
- Adjustments are made if needed

Employees are encouraged to contact HR at any time if their needs change or if the accommodation becomes ineffective.

### Protection Against Retaliation:

RRHA strictly prohibits retaliation or adverse treatment against employees who:

- Request an accommodation
- Participate in the interactive dialogue process

## Policy 2.2 Reasonable Accommodation

- Support another employee's request
- Raise concerns related to accommodations or disability rights

Any retaliation concerns should be immediately reported to HR.

### **AUTHORITY INTERPRETATION:**

This policy is issued by the Department of Human Resources. Human Resources management is responsible for the official interpretation of this policy. Questions regarding the application of this policy should be directed to the Department of Human Resources. The Department of Human Resources with the approval of the Chief Executive Officer, reserves the right to revise or eliminate this policy at any time.

## Policy 2.3 Holiday

### PURPOSE:

The purpose of this policy is to establish Richmond Redevelopment and Housing Authority's (RRHA) holiday schedule.

### PERSONS TO WHOM POLICY APPLIES:

This policy applies to all full-time, part-time, and consulting employees.

### HOLIDAYS:

- New Year's Day – January 1st
- Martin Luther King Day – 3rd Monday in January
- President's Day – 3rd Monday in February
- Easter Friday
- Memorial Day – Last Monday in May
- Juneteenth – June 19th
- Independence Day – July 4th
- Labor Day – 1st Monday in September
- Indigenous People's Day – 2nd Tuesday in October
- Veteran's Day – November 11th
- Thanksgiving Day – 4th Thursday in November
- Thanksgiving Friday – 4th Friday in November
- Christmas Eve – December 24th
- Christmas Day – December 25<sup>th</sup>
- New Years Eve – December 31<sup>st</sup>

If a holiday falls on a Saturday, it will be observed on the preceding Friday. If a holiday falls on a Sunday, it will be observed on the following Monday. When Christmas Eve falls on a Sunday, the Christmas Holidays will be observed on December 25th & 26<sup>th</sup>. When Christmas Day falls on a Saturday, the Christmas Holidays will be observed on December 24th & 27th. Additional paid holidays may be granted at the discretion of the Chief Executive Officer.

### FLOATING HOLIDAYS:

Employees will be credited annually with one floating holiday (eight (8) total hours). New employees will not receive credit for the floating holiday until they have completed their probationary period. The floating holiday may be used for any regular scheduled workday during the calendar year. Requests for using the floating

## Policy 2.2 Holiday

holiday must be approved by the supervisor following the protocol outlined within this handbook. Floating holidays that are not used by the end of the calendar year will be forfeited.

### **HOLIDAY PAY REQUIREMENTS:**

Employees must be in a pay status the day before and the workday following the holiday to receive holiday pay. For computing total hours worked, holiday hours are not counted as hours worked.

Non-exempt employees who would normally be off, but are required to work on a holiday, will receive regular pay for the holiday and pay for the actual hours worked at their regular rate of pay. Non-exempt employees who work more than eight hours on the holiday will count the hours worked over eight in the total hours for the work period to determine if the overtime rate is applicable.

Non-exempt employees will only be compensated for hours worked over 40 in the work week at the overtime rate, regardless of how many hours are worked during the holiday.

Exempt employees who are required to work on a holiday will not receive additional pay. The employee may be permitted, if approved by the supervisor, to take another day off via comp-time.

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.1 Standards of Conduct

### **PURPOSE:**

The purpose of this policy is to establish the standards of conduct for Richmond Redevelopment and Housing Authority (RRHA) employees and to prescribe procedures for progressive discipline. This policy establishes rules of professional conduct, unacceptable workplace conduct, and corrective action procedures that may be imposed to address behavior and employment problems.

### **WHO THIS POLICY APPLIES TO:**

This policy applies to all RRHA employees.

### **DEFINITION(S):**

**Conduct** – The manner in which a person behaves or acts; including the omission or failure to act.

**Corrective Action** – Any action taken by management to address workplace problems or behavior. Corrective action may range from informal counseling to formal disciplinary action including demotion or termination.

**Counseling** – An informal discussion between an employee and their supervisor concerning the employee's work performance or behavior.

**Demotion** – An employee's reassignment to a position in a lower pay range.

**Dismissal** – Termination by management for an employee's unsatisfactory work performance or behavior.

**Disciplinary action** – An action taken by management in response to an employee work performance or behavior. Disciplinary action may range from counseling to termination.

**Acceptable conduct** – Positive expectations for work performance and workplace behavior.

**Suspension** – The removal of an employee from work, with or without pay. Suspensions are imposed as part of a disciplinary action or to remove the employee from the workplace pending an investigation or a court action.

**Unacceptable conduct** – Unacceptable employee behavior for which specific disciplinary action is warranted.

### **CORRECTIVE ACTION:**

Corrective action should be used as soon as a supervisor becomes aware of an employee's unsatisfactory work performance or behavior, or if an employee violates an established work rule or policy. Depending on the situation, various corrective action approaches may be appropriate. Supervisors should

## Policy 3.1 Standards of Conduct

consult with the Human Resources Manager, or designee regarding the appropriate corrective action. All documentation to support corrective action must be maintained in the employee's personnel file.

### **TYPES OF CORRECTIVE ACTIONS:**

#### **Counseling**

Counseling discussions are intended to place an employee on notice of unacceptable work performance or behavior that is not consistent with the standards of acceptable workplace conduct at the RRHA. While it is hoped that most performance and behavior problems can be resolved through informal counseling, counseling is not a prerequisite to formal disciplinary action.

Counseling should consist of a private discussion between the employee and their supervisor regarding the desired course of action to improve the employees' performance or behavior and the supervisors' expectations for employees. It is strongly recommended that all counseling conversations are followed up with an email to document what occurred and what was discussed and agreed upon.

#### **Probation**

Probation is intended to allow an employee for a period of time to improve performance. The probation should last for a predetermined amount of time not to exceed ninety (90) days, unless approved by the Chief Executive Officer. During the probation the employee will be placed on a corrective action plan, with specific expectations for improvement. The employee must demonstrate a willingness to meet and maintain the conduct or work requirements as specified by the supervisor.

At the end of the probation, the employee will either be returned to regular employee status, or if established goals are not met, be subject to further disciplinary action, up to and including termination. In certain situations, the RRHA may extend the probationary period.

#### **Suspension**

Supervisors may suspend an employee with or without pay for a period not to exceed five (5) working days. Suspensions for a period of six consecutive working days or more should have prior approval by the Department Executive and Vice President of Human Resources. A letter of suspension should be mailed, emailed, and/or hand-delivered to the employee. The letter should include the reasons for the suspension, the pay status during probation, the effective date, and a warning of further disciplinary action which could result if the performance or behavior is not corrected upon their return.

#### **Demotion or Transfer**

The RRHA may demote an employee who fails to meet performance expectations. A letter of demotion should be mailed, emailed, hand-delivered, or sent via HRIS notification to the employee. The letter should include the reasons for the demotion or transfer, the effective date, and a warning of further disciplinary action which could result if the performance or behavior is not corrected.

## Policy 3.1 Standards of Conduct

Employees will be subject to a reduction in salary. A demotion should not be used as a disciplinary action if the employee involved cannot qualify for the lower-level position or if the demotion would require the displacement of another employee.

### Employee Assistance Program

As part of the corrective action process, supervisors may refer employees to the Employee Assistance Program (EAP). Referral to the EAP may be exercised before the need for corrective action or in addition to the corrective action process. Referral should not be considered a substitute for any disciplinary action imposed.

## ACCEPTABLE RULES OF CONDUCT:

The following rules of conduct are intended as standards for the minimum expectations of acceptable work performance and workplace behavior. These rules are not all-inclusive but are intended to be illustrative of the minimum expectations.

**Attendance** - Employees should report to work as scheduled. If employees cannot report as scheduled, they should arrange planned absences, including reporting to work late or leaving work early, in advance with supervisors. Employees should report unexpected absences, including reporting to work late or having to leave early, to supervisors as promptly as possible. Employees should also observe the time limits established for breaks and lunch periods. Employees should observe the proper use of PTO and other offered leave options.

**Satisfactory Work Performance** - Employees are expected to meet established performance standards as outlined within their job descriptions, by their Managers/Supervisors or Department Executive, or outlined by the Chief Executive Officer. Supervisors should review performance expectations with employees annually or as needed more frequently throughout the year. Employees should report any conditions or circumstances that prevent satisfactory work performance or inform supervisors of unclear instructions or procedures that may affect satisfactory work performance.

**Compliance with Work Rules and Policies** - Employees are expected to comply with all RRHA work rules and policies. If there are any questions regarding any RRHA policy or procedure, the employee should reach out to their supervisor or Human Resources.

## UNACCEPTABLE CONDUCT (OFFENSES):

The following offenses are not all-inclusive but are intended as examples of unacceptable behavior for which specific disciplinary actions may be warranted. Any offense, in the judgment of the Chief Executive Officer or the Vice President of Human Resources, which undermines the effectiveness of RRHA's operations or workplace culture may be considered unacceptable and treated in a manner that is consistent with this policy. The list of offenses includes but are not limited to:

## Policy 3.1 Standards of Conduct

- Failure to report to work
- Unauthorized absences, repeated tardiness, or extended breaks
- Abuse of leave
- Unauthorized time away from work area
- Sleeping at the job
- Excessive use of RRHA telephones for personal use
- Excessive use of personal cellphones or devices at work
- Smoking in unauthorized areas
- Unsanitary personal hygiene or appearance
- Speeding or careless driving of RRHA owned, leased or rented vehicles
- Failure to report work-related injury, illness, or accident
- Unauthorized soliciting or distribution
- Disruptive behavior
- Spreading false or malicious gossip
- Obscene or abusive language
- Violation of any RRHA policies outlined within this handbook
- Failure to perform assigned work
- Failure to follow a supervisor's instructions (insubordination)
- Leaving the work site during work hours without permission
- Refusal to work overtime hours as required, or working unapproved overtime hours
- Absence more than three consecutive workdays without proper authorization or a satisfactory reason
- Falsifying records, including, but not limited to, timesheets, vouchers/resident documents, or leave records
- Improper, illegal, or unauthorized use of RRHA vehicles, supplies, or equipment
- Improper, illegal, or unauthorized use of RRHA cell phones, computers, e-mail or the Internet
- Gambling on or with RRHA property
- Fighting and/or other acts of physical violence
- Violating safety rules and regulations
- Participating in any kind of work slowdown
- Unauthorized possession or use of firearms, dangerous weapons, or explosives
- Threatening or coercing supervisors, employees, or residents
- Criminal convictions occurring on or off the job
- Theft, neglect or damage of RRHA property
- Theft, misappropriation, or mishandling of RRHA financial assets or those of our residents

## PROCEDURES FOR IMPLEMENTING DISCIPLINARY ACTIONS:

## Policy 3.1 Standards of Conduct

Disciplinary actions should be taken in response to an employee committing an offense and may include probation, suspension, transfer, demotion, or termination. Supervisors should issue and initiate a corrective action plan or disciplinary notice immediately after an employee's commission of an offense. All disciplinary actions should be documented on Form# HR310 Corrective Action/Disciplinary Notice Form.

Before any action is taken, the Vice President of Human Resource or designee are responsible for reviewing all disciplinary actions to determine whether mitigating circumstances exist that warrant a modified disciplinary action and/or referral to the Employee Assistance Program. They are also responsible for making recommendations to the Department Executive and Chief Executive Officer regarding the appropriate disciplinary action.

### **PROCEDURES RELATED TO SUSPENSION:**

A suspension may be imposed pending an investigation of an employee's behavior by RRHA or an investigation involving the employee's behavior by the State Police and/or other federal, state or local law enforcement agencies. Employees will remain on related suspensions for a maximum period of two (2) weeks.

If additional time is required to complete the investigation, the Department Executive may extend the period of suspension with approval of the Chief Executive Officer. If RRHA does not decide regarding the disciplinary action within three (3) weeks, then the employee shall be permitted to return to work pending completion of the investigation. If RRHA's investigation clears the employee of any misconduct, the agency shall reinstate the employee with back pay and benefits for the period of suspension.

Written notification of a suspension pending an investigation or other action should be completed by memorandum or letter. During the suspension employees will receive their regular compensation. Employees may, upon approval of their supervisor, use their accrued PTO leave. Employees placed on suspension will not be allowed on RRHA premises, unless to file and process a grievance.

### **USE OF THE GRIEVANCE PROCEDURE:**

Employees may challenge disciplinary actions through the Employee Grievance Procedure and may direct questions regarding this procedure to the Human Resource Director or designee. All full-time employees who have completed the initial probationary period may file a grievance. Employees must file a grievance within 30 days of the qualifying event. Copies of the forms and the procedure are available in the Human Resource Office.

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.2 Grievance Policy

### PURPOSE:

It is the policy of the Richmond Redevelopment and Housing Authority (RRHA) to provide an immediate and fair method for the resolution of certain complaints which may arise between RRHA and its employees.

### WHO THIS POLICY APPLIES TO:

All full-time, non-probationary RRHA employees except the Chief Executive Officer, Department Executives and employees who voluntarily resign from their positions are excluded from this policy.

### DEFINITION(S):

**Arbitrary or Capricious** – In disregard of the facts or without a reasoned basis.

**Back pay** – Retroactive payment of wages, bonuses, leave, overtime or other benefits, as directed by the hearing officer.

**Expedited Process** – A shortened process available for terminations, demotions with a loss of pay or suspensions without pay, or loss of wages.

**First-Step Respondent** – The immediate supervisor of the employee; the individual responsible for completing the performance evaluation or giving daily work instructions.

**Grievance** – Written complaint on the grievance form stating the nature of the claim, the facts in support of the claim, and the relief requested.

**Noncompliance** – Failure to follow a grievance procedure rule.

**Party** – Either the employee who initiates grievance or RRHA.

**Retaliation** – Any form of discrimination involving action(s) against an individual because they filed a grievance, testified, or participated in an investigation or hearing involving a grievance.

**Second-step Respondent** – An individual designated by RRHA who is in a senior management position and has the authority to provide the employee with the appropriate relief.

**Third-step Respondent** – The Chief Executive Officer or an individual designated by the Chief Executive Officer who has the last opportunity to resolve the grievance in the resolution steps.

## Policy 3.2 Grievance Policy

**Workday**- The normal work schedule, excluding authorized leave time for the individual responsible for taking the required grievance action.

### QUALIFICATION OF GRIEVANCE:

Only issues that are qualified by the Chief Executive Officer may proceed through the grievance procedure. Actions which automatically qualify for hearing include:

- Disciplinary actions taken under Policy # 3.1 Standards of Conduct include terminations, suspensions, demotions, transfers or re-assignments issued in conjunction with such actions.
- Dismissal for unsatisfactory work performance.

A grievance may qualify for hearing if the facts and circumstances raise a sufficient question as to whether one or more of the following has occurred:

- Unfair application or misapplication of personnel policies, procedures, rules, and regulations.
- Discrimination is based on race, color, religion, political affiliation, age, disability, national origin, pregnancy, gender, or gender identity.
- Arbitrary or capricious performance evaluation.
- Retaliation for participating in the grievance process or participating in the grievance of another employee.
- Retaliation as the result of complying with state or federal law, reporting a violation of any such law to a governmental authority, or seeking to change a law before Congress or the General Assembly.

RRHA retains the sole right to manage its business affairs and services and to direct its workforce. Complaints or disputes that relate solely to the following issues do not qualify for a hearing:

- Contents of statutes, ordinances, personnel policies, procedures, rules, and regulations.
- Establishment, abolishment or revision of wages, salaries, position classifications, or general benefits.
- Work activity accepted by the employee as a condition of employment or which may be reasonably expected to be part of the content of the job;
- The methods, means, and personnel by which work activities are to be carried out;

## Policy 3.2 Grievance Policy

- Termination, layoffs, demotion, or suspension from duties because of lack of work, reduction in workforce, or job abolishment.
- The hiring, promotion, transfer, assignment, and retention of employees;
- The relief of employees from duties in emergencies.
- Informal supervisory instructions, i.e., interim evaluations, counseling memorandum, and oral reprimands
- Extending an employee's probationary period

### INITIATING A GRIEVANCE

An employee must initiate a grievance on a fully completed HR 320 Employment Grievance Form. The form must state the claim, the facts in support of the claim, and the requested relief. If there is not enough space on the form for a complete statement, attachments may be used. Once grievance is initiated additional claims may not be added. An employee's grievance must:

- Be presented to management within 30 calendar days of the date the employee knew or should have known of the event that forms the basis of the grievance.
- Pertain directly and personally to the employee's own employment in a position with access to the grievance procedure.
- Not to be used to harass or otherwise impede the efficient operations of RRHA.
- Not duplicating another grievance challenging the same action or arising out of the same facts.

If any of these requirements are not met, management may notify the employee that the grievance will be administratively closed due to noncompliance. RRHA may raise noncompliance at any point through the Chief Executive Officer's qualification decision.

### GRIEVANCE STEPS

#### Step 1 Informal Discussion / Supervisor Review

- The employee must raise the concern **verbally or in writing** to their **immediate supervisor** within **30 calendar days** of the event giving rise to the grievance (or the date the employee became aware of it).
- The supervisor should meet with the employee within **5 business days** to discuss the concern and attempt resolution.
- The supervisor must provide a **written response** within **5 business days** following the meeting.
- **Examples of issues appropriate for Step 1:**

## Policy 3.2 Grievance Policy

- Interpersonal conflicts or communication issues
- Scheduling or workload concerns
- Policy clarification requests

The goal of this step is to encourage open communication and resolution without formal escalation.

### Step 2 Department Head Review

- If the employee disagrees with the Step 1 response, they may file a written grievance with their Department Head or Division Director within 5 business days of receiving the Step 1 decision.
- The Department Head (or designee) should conduct a meeting or fact-finding discussion with the employee and supervisor within 10 business days.
- The Department Head will issue a written decision within 5 business days after the meeting, summarizing findings and next steps.

The goal of this step is to provide an impartial review of the issue with a broader departmental perspective.

### Step 3 Chief Executive Officer and Human Resources Review

- If the employee remains dissatisfied after Step 2, they may submit the grievance to Human Resources within 5 business days of receiving the Step 2 decision.
- HR will conduct a review of documentation, prior responses, and relevant policy to ensure fairness and compliance.
- HR will forward the grievance to the Chief Executive Officer (CEO) or designated executive leader, who may choose to meet with the employee directly.
- A final written decision will be provided within 10 business days of HR's receipt of the Step 3 grievance.

### Step 4 Formal Hearing (For qualified grievances only)

If the grievance concerns termination, demotion, suspension, retaliation, discrimination, or other qualifying adverse employment action, the employee may request a formal grievance hearing under Virginia's grievance statutes. This step typically involves a neutral hearing officer through the Virginia Department of Human Resource Management (DHRM) Office of Employment Dispute Resolution (EDR). The employee can elect to forego this step and file a claim directly with the Virginia Office of Human Rights or the Equal Employment Opportunity Commission (EEOC).

### The Appeal Process

- If the Chief Executive Officer determines that an issue does not qualify for a hearing, the employee may appeal the decision to the Circuit Court of the City of Richmond. The employee must submit the grievance form to RRHA's Human Resource Office within 5 workdays of receiving the Chief Executive Officer's qualification decision. Within 5 workdays after receiving the request for an

## Policy 3.2 Grievance Policy

appeal, the Chief Executive Officer must forward the grievance record to the Clerk of the Circuit Court for the City of Richmond.

- If RRHA does not forward the record, the employee may request the Circuit Court to issue an order requiring transmittal of the record. The court may affirm the decision of the Chief Executive Officer or may reverse or modify the decision. The court's decision shall be final and not subject to appeal.

### THE HEARING PROCEDURE:

#### Pre-Hearing

- The hearing officer should conduct a pre-hearing conference. This conference, which can be conducted in person or virtually—will provide the hearing officer with an opportunity to address procedural and evidentiary issues. At the pre-hearing conference the hearing officer will set the date, the time and place for the hearing. The hearing is usually conducted at the location where the grievant is employed, unless another location is agreed to by the parties and the hearing officer.
- RRHA will provide the hearing officer with copies of the employee's grievance, and this procedure prior to the hearing so that he may review the documents. RRHA and the Grievant may also submit pre-hearing position statements, summarizing their respective positions. Additionally, the hearing officer may require the parties to provide him/her with copies of exhibits and other information prior to the hearing.

#### The Hearing

- At the hearing, the parties may be represented by legal counsel or other representative(s) of their choice. Such representative(s) may examine and cross-examine witnesses or present other evidence on behalf of the party. Opening statements may be made at the beginning of the hearing and the hearing officer may ask for such statements to clarify the issue(s) involved in the grievance.
- RRHA and the employee, or their representatives, will present their claims, proof, evidence, and witnesses will respond to questions or other examinations. The hearing officer may, at his discretion, vary this procedure but will afford equal opportunity to all parties for presentation of any relevant evidence. Both parties will have the right to cross-examination.
- Evidence is to be taken in the presence of the hearing officer and both parties. Witnesses other than the parties should remain in the hearing only while giving their testimony. The hearing officer may question anyone giving testimony to clarify points being made. Hearings are not meant to be conducted as full court proceedings and hearing officers are not bound by the technical rules of evidence. Hearing officers, however, should consider all reliable and substantial evidence produced at the hearing. Exhibits offered by the parties may be received in evidence by the hearing officer and, when so received, will be marked and made part of the record.

## Policy 3.2 Grievance Policy

- The parties will produce additional evidence as the hearing officer may deem necessary so that they have a better understanding of the dispute. The hearing officer will judge the relevance of all evidence offered.

### THE AUTHORITY OF THE HEARING OFFICER:

#### Hearing officers have the authority to:

- Hold a pre-hearing conference.
- Require the parties to exchange a list of witnesses and documents.
- Issue orders for the appearance of witnesses at hearing and the production of documents
- Decide whether non-parties may attend the hearing.
- Administer oaths.
- Admit evidence, exclude evidence, and accept offers of proof of excluded evidence;
- Rule on procedural requests.
- Render written decisions on qualified grievances and provide appropriate relief.
- Take other actions as necessary or specified in the grievance procedure.

#### The Hearing Officer's Decision

- The hearing officer will render a decision within 30 calendar days of the conclusion of the hearing. The decision must be in writing. After rendering a decision, the hearing officer must send his decision to each party. Hearing officers are to decide cases on merits, not on compliance matters occurring prior to or during hearings. Compliance issues should be referred to the Chief Executive Officer. The hearing officer may uphold or reverse the action of RRHA. Depending on certain circumstances he may choose a modified remedy.
- The hearing officer's responsibility is to ensure the proper application of personnel policies and procedures. They do not have the authority to formulate or change policies or procedures or to consider matters which have not been qualified for the panel's hearing. Hearing officers may order appropriate remedies but may not grant relief that is inconsistent with law or policy. The Chief Executive Officer is responsible for assuring that hearing officer's decisions are implemented. In granting relief, the hearing officer should consider the relief requested in the written grievance.

#### Relief which may be available from a Hearing Officer's Decision:

- Reinstatement to the employee's former position or, if occupied, to a similar position;
- Upholding, reducing, or rescinding disciplinary actions.
- An award of full, partial or no back pay for the period of separation. An award of back pay must be offset by interim earnings the employee received during the period of separation;
- The restoration of full benefits and seniority.

## Policy 3.2 Grievance Policy

### Relief which is not available from a Hearing Officer's Decision:

- Damages or attorneys' fees.
- Hiring, promotion, transfer, assignment, or retention of any employee.
- Establishing or revising compensation, classification, or benefits.
- Establishing or revising policies, procedures, rules, or regulations;
- Directing the methods, means, or personnel by which work activities are to be carried out.
- Any other relief that is inconsistent with the grievance statute or procedure.

### Challenges to the Hearing Officer's Decision

- All requests to reconsider a decision or reopen a hearing is made to the hearing officer within 10 calendar days of the date of the original hearing decision. This request must state the basis for the request, such as newly discovered evidence. Either party may also appeal the decision to the Circuit Court of the City of Richmond.
- The Circuit Court will affirm the decision unless (1) it is arbitrary or capricious; (2) the hearing officer exceeded his or her authority; or (3) the decision is contrary to or inconsistent with RRHA policy or procedure.

### Non-compliance

- All parties must comply with the grievance procedure. All claims of noncompliance should be raised immediately. If either party proceeds with grievance after learning of a procedural violation, both parties may forfeit the right to challenge the noncompliance at a later time.
- Likewise, the hearing officer must comply with the grievance procedure, especially regarding the time limits for issuing a decision.

### Confidentiality

- Information concerning employee grievance is to be held in confidence. Supervisors, Department Executives, and other members of management who investigate grievance are to discuss it only with those individuals involved in the grievance, or those needed to supply necessary background information or advice.

## FORM(S) THAT APPLY:

Form: Employment Grievance Form

## AUTHORITY AND INTERPRETATION:

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.3 Conflict of Interest

### **PURPOSE:**

All employees of Richmond Redevelopment and Housing Authority (RRHA) are expected to observe the highest standards of ethical conduct in the performance of their jobs when dealing with people inside and outside of the authority. Not only should wrongdoing itself be avoided, but also the appearance of wrongdoing. No employee should put themselves in a position where someone could question the propriety of his or her actions.

Virginia Code § 2.2-3100 *et seq.* imposes specific obligations on all employees of the Authority by virtue of the Authority operating as a political subdivision of the Commonwealth of Virginia. Employees must not engage in any activities, transactions, or relationships that are incompatible with the impartial, objective, ethical and effective performance of their duties.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all employees.

### **RESPONSIBILITY:**

The Chief Executive Officer is responsible for the interpretation of this policy and its application in any set of circumstances. Employees must disclose actual or potential conflicts as soon as they become aware of them and no later than 10 workdays after. Employees who receive compensation from or work for organizations who do business with RRHA must complete a disclosure form.

### **TYPES OF ACTIVITIES AND RELATIONSHIPS TO AVOID:**

Generally, the types of activities and relationships employees must avoid include, but are not limited to:

- Accepting or soliciting a gift, favor, or service;
- Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefits in exchange for the employee's favorable decisions or actions in the performance of his or her job;
- Accepting employment or compensation or engaging in any business or professional activity requires disclosure of the Authority's confidential information or impairs the individual's judgment in the performance of their official duties.
- Accepting employment or compensation or engaging in any business or professional activity with companies that do business with RRHA if the employee has access to information that will benefit the company or if the employee has decision-making responsibility that may benefit the company.

## Policy 3.3 Conflict of Interest

- Making personal investments that are contrary to the Authority's interest or that may create an actual or perceived conflict of interest with the business of the Authority.
- Making any investments in the same line of business as the Authority, which could cause divided loyalty, or the appearance of divided loyalty.
- Purchasing any property the value of which may reasonably be expected to be affected by actions taken by the Authority. This does not necessarily prohibit an employee from participating in the Authority's homeownership programs or other programs, but an employee should first fill out the Conflict-of-Interest Disclosure form and receive the Authority's approval ensuring there are no conflicts of interest before doing so.
- Using knowledge of Authority operations, plans or investments for their personal gain. In general, the use by an employee, any member of his or her family, or any of his or her friends or acquaintances of any business opportunity or information reasonably related to the Authority's business of which the employee becomes aware through his or her employment with the Authority is prohibited.
- Employees are prohibited from entering into any personal, financial, or business relationships with RRHA residents that could create a real or perceived conflict of interest.
- Employees shall not accept gifts, favors, or compensation from residents or applicants in exchange for preferential treatment or services.
- Employees must not rent, lease, or otherwise engage in housing-related business transactions with any current RRHA resident or housing applicant.
- Employees may not access, modify, or discuss resident files or information for any individual with whom they have a personal relationship (family, friendship, romantic, or otherwise).
- If an employee discovers a potential conflict (e.g., a friend or relative applies for housing), they must immediately disclose it to Human Resources or the Ethics Officer for reassignment or review.
- Employees are prohibited from engaging in personal or financial relationships with RRHA Board Members that could compromise objectivity, influence decisions, or create an appearance of favoritism.
- Employees shall not seek special treatment, employment advantages, or other benefits from Board Members.
- Any interaction with Board Members should be professional and conducted only in the course of official agency business.
- Employees must disclose to HR any pre-existing relationships with Board Members prior to or upon hire.

## Policy 3.3 Conflict of Interest

- Employees shall not solicit or accept gifts, services, or favors from any vendor, contractor, or business entity doing or seeking to do business with RRHA.
- Employees must not participate in contract selection, award, or administration where a real or apparent conflict of interest exists.
- Employees must disclose to HR and/or the Procurement Department any personal or financial interest in a vendor or contractor associated with RRHA.
- Employees shall not use their position to influence or benefit any external stakeholder with whom they have a personal or financial relationship.
- All employees must recuse themselves from decisions, meetings, or reviews that may impact a person or entity with whom they have a known relationship.

Employees must avoid activities that are intended to or might appear to influence the employees' decision making or professional conduct.

### **PROCEDURES:**

All disclosures must be made in writing to the employee's department executive. The department executive will promptly review the disclosure and determine which interests are in conflict and which, if any, can be resolved. Department executives will submit all disclosures to the Human Resources department. The Vice President of Human Resources will review all disclosures to ensure compliance with policy and guidelines. This information will be retained in the employees' personnel file.

To ensure improper conflicts are avoided, any employee considering accepting employment other than with the Authority or starting his or her own business while continuing his or her employment with the Authority ("outside employment") must fill out a Conflict-of-Interest Disclosure Form detailing the proposed outside employment and receive the department executive's approval before starting such employment. If an employee already has outside employment at the time this revised policy is implemented, he or she must fill out the Conflict-of-Interest Disclosure for his or her current outside employment and obtain the Department Executive's approval for his or her continued outside employment. Any questions regarding the interpretation or meaning of this policy or its application in any set of circumstances should be presented in writing to the Chief Executive Officer.

### **FORM(S) THAT APPLY:**

Form: Disclosure Form Conflict of Interest

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.4 Political Affiliation

### **PURPOSE:**

Richmond Redevelopment and Housing Authority (RRHA) employees are affected by the provisions of the federal Hatch Act. The Hatch Act covers all employees during their employment including while working, on vacation leave, disability leave, leave without pay, or any other type of leave, on-site or working remote, and otherwise. All employees of the Authority are prohibited from engaging in prohibited political activities.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all employees.

### **PROHIBITED ACTIVITIES:**

The following activities are prohibited as described in this policy:

- Using RRHA space, supplies or facilities to influence elections or nominations or for other political activities.
- Directly or indirectly coercing, attempting to coerce, commanding or advising an employee to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes.
- Being a candidate for public elective office.
- Using their official authority or influence as an employee of RRHA for the purpose of interfering with or affecting the result of an election or nomination for office.

### **PERMITTED ACTIVITIES:**

The following activities are permitted as described in this policy:

- Employees are free to engage in political activity that does not violate the Hatch Act or this Policy, including participating in political campaigns, and serving as officers of a political party, delegating to political party conventions or members of a national, state or local committee of a political party.

### **APPROVAL:**

An employee's political activity must not conflict with their occupation with the Richmond Redevelopment and Housing Authority. All potential conflicts should be reviewed and approved in advance by the Chief Executive Officer.

## Policy 3.4 Political Affiliation

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.5 Alcohol and other Drugs

### **PURPOSE:**

The purpose of this policy is to define Richmond Redevelopment and Housing Authority's (RRHA) policy and procedures regarding the use of alcohol and other drugs. RRHA is firmly committed to the quality of programs and services it provides, the efficient operation of the organization, and to the health and safety of RRHA employees and the public. RRHA considers the use of drugs and alcohol in the workplace to be detrimental to these goals and the continued growth and success of RRHA. The use of drugs and alcohol reduces productivity and endangers people and property. Therefore, it is the policy of RRHA to promote and maintain a drug and alcohol-free work environment. Pursuant to this policy, drug and alcohol use and/or possession in the workplace including, under the influence of such substances, will not be tolerated.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all RRHA employees.

### **DEFINITION(S):**

**Drugs** - "Illegally" used controlled substances: (encompasses narcotic and non-narcotic drugs, including prescription drugs used abusively) and "non-controlled substances" (over-the-counter medicines if they render one unfit for duty). Alcohol also is a drug for purposes of this policy. Additionally, the use of any substance for the purpose of achieving a drug-like effect will fall under this prohibition against drugs.

**Under the Influence** - The presence of any drug or alcohol in the body as verified by laboratory tests. Alcohol testing may also be performed by the RRHA Police Department or other law enforcement utilizing a breathalyzer machine. Under the influence also shall mean the presence of alcohol or drugs as indicated by behavior that is reasonably construed to indicate the presence of alcohol or drugs.

**Possession** - Includes the presence of alcohol or drugs in the possession or control of the employee and in lockers, bags, parcels, lunch boxes, other personal articles or personal automobiles while located on RRHA property. Possession also includes the presence of alcohol or drugs located in a vehicle owned by RRHA or that is being used in connection with work by an RRHA employee.

### **EMPLOYEE ASSISTANCE PROGRAM:**

Early identification and treatment of a drug or alcohol problem is the best method for protecting the interests of employees and the public. Accordingly, RRHA encourages employees who need help dealing with an alcohol or drug problem to contact the EAP. An employee who voluntarily contacts the EAP is assured that such contact will be confidential. The EAP will not apprise RRHA of the identity of employees who voluntarily seek assistance. While RRHA encourages voluntary participation in the EAP, such participation will not prevent or lessen the extent of disciplinary action taken for violation of the rules set forth in this policy.

## Policy 3.5 Alcohol and other Drugs

Existing leave policies will apply to EAP assistance, and employees will be responsible for costs associated with treatment and the continuation of benefits. Employees certified as able to return to work must continue in an after-care program designated by the counselor and are subject to all provisions of this policy.

### **EMPLOYEE RESPONSIBILITIES:**

As a condition of employment or as a condition of continued employment, all employees are expected to adhere to RRHA's policy on Alcohol and Other Drugs. Failure to adhere to this policy shall be the basis for disciplinary action up to and including termination.

- No employee shall have their ability to perform their job duties impaired due to the use of alcohol or drugs while on RRHA time, business, and property or in any RRHA vehicle at any time during the workday including break and lunch periods.
- Employees must notify RRHA of any criminal drug statute convictions based on conduct occurring in or outside of the workplace, and charges or convictions that occur in the workplace no later than two calendar days after such charge or conviction.
- No employee shall possess, use, sell, transfer, transport, conceal, manufacture, distribute, consume or be under the influence of illegal drugs or alcohol while on RRHA time, business, property or in any RRHA vehicle at any time during the workday including breaks and lunch periods.
- No employee shall report or return to work under the influence of alcohol or drugs.

### **OTHER DRUGS OR ALCOHOL USE:**

1. This policy is not intended to address all circumstances where involvement with drugs or alcohol warrants disciplinary action. Accordingly, nothing in this policy shall be considered as limiting RRHA's right to take disciplinary action, up to and including termination, for an employee's involvement with drugs or alcohol not specifically addressed in this policy.
2. This policy shall not include drugs taken according to a verifiable prescription and direction of a licensed physician. However, an employee who, under a physician's guidance, is taking prescription drugs or other medication, which may affect his/her ability to work safely, is responsible for notifying their supervisor before beginning work. This applies to an employee who is taking a prescription drug or a non-prescription drug. An employee who reports to work or who is observed at work and is determined incapable of safely performing his/her job may be subject to disciplinary action which may include termination of employment.

### **DRUG AND ALCOHOL TESTING:**

## Policy 3.5 Alcohol and other Drugs

**Pre-employment** - All applicants selected for employment shall be subject to testing for drugs as a pre-qualification to employment. Any applicant who tests positive for drugs or refuses to submit to a drug test will be denied employment.

**Reasonable Cause** - Employees shall submit to drug or alcohol testing when, in the opinion of management, there is reasonable cause to believe that an employee has used alcohol or drugs or violated any other provisions in this policy. Alcohol testing includes, but is not limited to, use of a breathalyzer to measure blood alcohol content levels. Alcohol testing may also be conducted in a laboratory.

Reasonable cause is based on objective and clearly stated facts sufficient to lead a reasonably prudent supervisor to suspect that an employee is under the influence of alcohol or drugs. By way of example, and without limitation, any of the following conditions alone or in combination, may comprise reasonable cause:

- Unexplained inability to perform normal job functions.
- Slurred speech.
- Smell of drugs or alcohol on breath/body.
- Any unusual lack of physical coordination or loss of equilibrium.
- Possession of alcohol or drugs, or the presence of alcohol or drugs or alcohol or drug container in an area subject to the employee's control.
- Involvement in an avoidable accident that caused, or had the potential to cause, personal injury or property damage.

The supervisor who suggests a reasonable cause for a drug or alcohol test will document in writing the conduct leading to the request for testing. This documentation is submitted to the department executive or their designee, and Human Resources, for approval.

RRHA shall provide transportation to the collection facility, which includes the RRHA Police Department or other law enforcement office, if it is believed that the employee's ability to arrive at the facility may be in doubt due to their suspected impairment.

The Board of Commissioners or the Administration Committee of the Board, if so, designated by the Board, shall order the testing of the Chief Executive Officer.

### RELEASE OF LIABILITY FORM:

When the decision to test has been made the employee will be required to sign a "Release of Liability for Drug and Alcohol Testing" form authorizing the laboratory or law enforcement agency to perform the tests and release the results to RRHA. An Employee who refuses to sign this form will be subject to termination.

### POSITIVE TEST:

Applicants who test positive for drugs on a pre-employment drug test will not be hired.

## **Policy 3.5 Alcohol and other Drugs**

An employee who tests positive for illegal drugs will be terminated. An employee who is determined to be under the influence of alcohol may, in RRHA's sole discretion, be referred to the EAP or subject to discipline, up to and including termination.

An employee referred to the EAP must comply with any and all directions of the EAP counselor. As part of the EAP program, an employee may be required to submit to random or periodic testing to ensure compliance with the program. Before returning to duty, such an employee will be required to pass a drug or alcohol test. Failure to enter the program or refusal to comply with the EAP counselor's recommendations or directions will be grounds for immediate termination.

### **PRESCRIPTION DRUGS:**

Employees who test positive for drugs and state that they have a prescription for the drug, must prove through clear and convincing evidence that the positive test was the result of their use of a drug prescribed by a licensed medical practitioner. In addition, the employee must prove that use of the drug is consistent with legal drug use and does not prevent the safe performance of their duties. An employee who tests positive for drugs bears the burden of proving that the use was prescribed, lawful, and safe.

- While an employee may avoid discipline for the prescribed and lawful use of a controlled substance, the employee may be medically unable to perform their duties. The MRO will make this determination. The MRO may at his sole discretion request the opinion of another physician to determine if an employee's positive drug test is consistent with the lawful use of prescribed drugs and if the employee can safely perform his/her duties.
- Employees shall inform their supervisors prior to using prescription drugs which would or could render the employee medically unqualified to perform his/her duties.

### **ACCESS TO TEST RESULTS:**

An applicant may obtain his or her pre-employment drug screening results by written request within sixty (60) days from the date they receive notification from RRHA of the disposition of their employment application.

### **REFUSAL TO TEST:**

A refusal to take a drug or alcohol test or refusal to be transported to the collection facility to take a drug or alcohol test will have the same effect as a positive test for all purposes under this policy including disciplinary action.

### **SEARCHES:**

## Policy 3.5 Alcohol and other Drugs

To enforce the goals of this policy, RRHA reserves the right to search any employee, their personal vehicle on RRHA property, baggage, clothing, toolbox, lunch box, locker, desk, office and RRHA facilities or vehicles. Searches will only be conducted when RRHA has reasonable cause to believe that an employee has drugs or alcohol use as set forth by this policy. Only the Chief Executive Officer or a member of the executive staff can order a search.

RRHA will conduct searches with the appropriate regard for the personal privacy of the employee. An employee's refusal to submit to a search may result in disciplinary action, up to and including discharge.

### **VIOLATIONS:**

Employees who violate RRHA's drug and alcohol policy will be subject to disciplinary action up to and including termination.

### **EDUCATION AND TRAINING:**

All employees shall receive, on an on-going basis, information regarding the dangers of alcohol and/or other drug use or abuse in the workplace; availability of counseling for alcohol and drug use; and the penalties that may be imposed for policy violations. All supervisors shall be required to attend training on the specific behavioral performance indicators and symptoms of probable alcohol and drug use.

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.6 Workplace Harassment

### **PURPOSE:**

The purpose of this policy is to define Richmond Redevelopment and Housing Authority's (RRHA) policy and procedures regarding the prohibition of harassment, to educate employees in recognizing and preventing illegal workplace harassment and provide effective means of eliminating such harassment from the workplace. It is the policy of the Richmond Redevelopment and Housing Authority (RRHA) that harassment and discrimination are unacceptable and will not be condoned or tolerated on the part of any employee. RRHA will take preventive, corrective, and disciplinary action for any behavior that violates this policy or the rights and privileges of employees it is designed to protect.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all employees.

### **DEFINITION(S):**

**Workplace Harassment** - Any unwelcome or unsolicited verbal, written or physical conduct that is derogatory, intimidating, threatening or offensive towards a person based on race, color, national origin, ancestry, citizenship status, age, sex, gender, gender identity, religion, disability, pregnancy, or any other classification protected by applicable law that:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment.
- Has the purpose or effect of unreasonably interfering with an employee's work performance.
- Affects an employee's employment opportunities or compensation.

**Sexual Harassment** - Unwelcome sexual advances, requests for sexual favors, and any other verbal or physical conduct of a sexual nature when submission to or rejection of this conduct explicitly or implicitly affects an individual's employment unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. Sexual harassment can occur between a manager, supervisor, co-workers, vendors, contractors, residents and voucher holders. This list is not all-inclusive.

**Retaliation** - Any form of discrimination involving action(s) against an individual because they have filed a formal or informal complaint, testified, assisted or participated in an investigation or hearing involving Harassment or discrimination. It is against RRHA policy and the law to retaliate against any employee because they complained of discrimination or harassment.

**Complainant** - Any individual against whom the alleged harassment has taken place, or the individual who has filed a formal complaint related to the harassment situation.

**Respondent** – Any employee against whom a complaint has been filed.

### **EXAMPLES OF HARASSMENT:**

## Policy 3.6 Workplace Harassment

**Verbal Harassment** - Derogatory or offensive comments and slurs based on race, gender, sex, sexual orientation, gender identity, religion, color, creed, national origin, ancestry, disability, pregnancy, age, or any other classification protected by applicable law.

Verbal harassment may also include sexual remarks or well-intentioned compliments about a person's appearance, clothing, body, hobbies, personality characteristics, behaviors or sexual activities.

**Physical Harassment** - Assault, unwelcome touching, impeding or blocking movement, or any physical interference with normal work or movement when directed at an individual on the basis of race, gender, gender identity, sex, sexual orientation, religion, color, national origin, citizenship status, disability, pregnancy, age or any other classification protected by applicable law.

**Visual Forms of Harassment** - Derogatory posters, notices, bulletins, cartoons, drawings, or other announcements, visual media, graphic or inappropriate clothing, based on the outlines protected classes listed under examples of verbal and physical harassment.

### COMPLAINT PROCEDURE:

An employee who believes that she/he has been subjected to harassment should complain immediately to the offending employee and tell him/her to stop it. An employee who is uncomfortable talking to the offending employee, does not want to approach the offending employee or who has been unsuccessful in talking to the offending employee, the complainant should complain to his/her Supervisor, Director or to Human Resources. An employee who is uncomfortable approaching either of these individuals should complain directly to the Chief Executive Officer or assigned designee. **Complaints must be submitted in writing for the receiving party to begin the investigation.**

The Vice President of Human Resource and the Department Executive will investigate each complaint, interview the complainant, respondent and any other witnesses, and propose the resolution of each complaint. The investigation should include a thorough review of the alleged conduct, the nature of the conduct, actions, or physical evidence. The context in which the alleged incident occurred and all circumstances surrounding the alleged incident will also be considered. The investigation and response to the complainant should be completed within 30 days. Both the complainant and the respondent should be notified of the outcome of the investigation and the response to the complaint.

- If the complaint is substantiated, appropriate corrective or disciplinary action will be taken up to and including termination in accordance with Policy #3.1 Standards of Conduct.
- If the complaint is not substantiated, the Vice President of Human Resource will conduct a meeting with the complainant and the respondent individually. The meeting should address issues of sensitivity, confidentiality, and the seriousness of harassment. Additionally, the complainants and respondent will be reminded of RRHA's policy concerning retaliation. Specifically, the complainant will be informed that she/he will not be retaliated against, and the respondent will be told that retaliation is illegal and will not be tolerated.

## Policy 3.6 Workplace Harassment

### **VIOLATIONS:**

If a Department Executive, manager, or supervisor fails to respond to allegations of workplace harassment or who knowingly allow harassment to continue may be considered a party to the offense, even though they may not have engaged in the behavior. Failure to take appropriate action should result in disciplinary action under Policy #3.1 Standards of Conduct, including demotion or termination.

### **RESPONSIBILITIES:**

RRHA must communicate this policy to all employees and ensure all guidelines are adhered to appropriately, including:

- Taking all steps necessary to set a positive example and to support and encourage actions and attitudes in the organization that prevent harassment and discrimination from occurring;
- Ensure that all complaints of harassment and discrimination are investigated thoroughly and are responded to within 48 hours of notification;
- Provide periodic training to educate all employees, including supervisors and managers, about the types of behavior that can be considered workplace harassment;
- Consult with employees, supervisors, and Department Executive regarding the harassment policy, complaint procedures, and incidents.

Department Executives, managers, and supervisors are responsible for:

- Informing all employees of the Authority's policy on workplace harassment;
- Stopping any harassment of which they may be aware of whether a complaint has been made;
- Consulting with employees and Human Resources regarding incidents, workplace harassment policy and complaint procedure inquiries;
- Assisting in the investigation of complaints involving employees in their departments;
- Participating in periodic training and ensuring that all staff attend required training;

## Policy 3.6 Workplace Harassment

- Preventing retaliation towards the complainant and the respondent;
- Posting copies of the policy on bulletin boards, break rooms, and designated work areas.

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.7 Anti-Fraternization

### **PURPOSE:**

Richmond Redevelopment and Housing Authority (RRHA) understands that person-to-person relationships can be complex, dynamic and at times complicated. However, the Authority and its employees have a duty to not engage in relationships which could jeopardize the functions of the agency and question the motives of the employee in question. If such relations exist, it is the duty of the employee to properly disclose any real or potential conflict so RRHA can take steps to ensure that the impacted parties or the public do not question the fairness of any administrative and/or maintenance actions. Above all else, disclosure of potential conflicts, and avoiding making decisions that impact those with whom the employee has had a relationship (as defined in this policy) are paramount to avoiding accusations of unfairness, favoritism and/or harassment and discrimination.

The purpose of this Anti-Fraternization Policy is to maintain a comfortable and safe work and residential environment, and to protect residents, employees, and the Authority from potential issues and lawsuits concerning harassment and including sexual harassment, conflicts of interest, appearance of favoritism, and to maintain the highest possible employee and resident morale.

### **WHO THIS POLICY APPLIES TO:**

This policy is applicable to all RRHA employees.

### **DEFINITIONS:**

- Fraternization in this policy refers to (a) dating, romantic involvement, intimate, sexual/physical relationship, (b) a close personal relationship (undue familiarity) between two people but not one based merely upon physical intimacy or (c) current or prior business relationships.
- A conflict of interest can arise when an employee of the agency interacts in their official capacity with a contractor, resident or fellow employee and such RRHA employee has a prior or current personal or business relationship with such person(s) and their official actions could be perceived as favoritism to such person(s) or they have taken official actions (or acts of omission) in violation of RRHA's policies and procedures.

### **Applicant, Tenant and Contractor Relations Standards & Procedures:**

Fraternization between employees, contractors and residents is discouraged and employees must avoid conflicts of interest or the perception of any conflicts of interest. Any violations of this policy, including a failure to disclose, may result in disciplinary action including employment termination if such relationship violates the following three areas:

- RRHA's policies or mandated HUD standards regarding applicant processing, transfers, and/or rent determinations.

## Policy 3.7 Anti-Fraternization

- RRHA policies and procedures regarding work performance, confidentiality, responding to work orders and responding to lease violations including lease or voucher terminations.
- Virginia's statutory and regulatory ethical and conflict of interest standards.

The list above is not exhaustive. There could be issues and actions outside of those listed above. When an employee believes there could be an issue with fraternization or an appearance of a conflict of interest they are strongly encouraged to speak with their supervisor and/or Human Resources.

Supervisors and employees are prohibited from managing, directing or undertaking the processing of: housing (public and voucher) applications, customer complaints, rent calculations, lease compliance issues, transfer requests and other related matters for those persons in which they have, or had, a relationship as defined under this policy. If such employees have had prior relationships which meet the definitions outlined in this policy and/or they have a close personal relationship with such persons, they should immediately notify their supervisor and Human Resources for approval to proceed or to transfer the file.

Employees that conduct hearings concerning applicant status, disability status, transfer requests or grievances involving tenancy (including those under the RRHA's voucher programs) must disclose any fraternization and/or conflicts of interest they may have with such persons. Such impacted employees are strictly prohibited from directing such hearings if they have a former or current relationship which meets the definitions outlined under this policy, unless disclosed and written permission is granted by the Office of the Chief Executive Officer and Human Resources. Participation in such hearings will be decided by the Office of the Chief Executive Officer.

Maintenance employees and/or those employees that oversee maintenance operations are strongly discouraged from conducting non-emergency work orders and inspections in the units of apartments of tenants which they have had prior or current relationships which meet the definitions contained in this policy. If such prior or current relationships exist, they must inform their immediate supervisor and Human Resources immediately. In such situations another employee should conduct such work and inspections. If disclosed relationships significantly impact their work productivity as defined by management, then the employee in question could be reassigned or terminated if such relationships negatively impact work productivity standards. Maintenance employees are encouraged to refrain from performing work orders in units where the resident is undressed, inappropriately dressed, or engaging in behaviors that violate the residents lease.

### Employee-Tenant or Voucher Participant Relationships:

It is the policy of RRHA to reach out to its tenants and voucher holders when employment opportunities arise. RRHA does not prohibit the hiring of such persons.

RRHA employees who are also tenants or voucher holders from one of the offered housing programs shall have their applications, rent determinations, and other administrative procedures impacting their participation in the applicable housing program overseen by an RRHA employee outside of that housing program. If this cannot be done in a manner that is efficient or productive then the Department Executive shall

## Policy 3.7 Anti-Fraternization

review such administrative procedures to determine if RRHA and program guidelines and procedures were followed.

### Employee-Employee Relationships:

Fraternization as defined under this policy between employees is strongly discouraged. Any such relationship must only occur during non-work hours and off Authority premises. The Authority prohibits employees from engaging in public displays of affection or romantic relations at any time while on premises or during working hours on or off premises.

Employees who become personally involved with co-workers should be aware that serious risks and consequences can develop as a result of the relationship's effect on business matters. Any relationships involving employees that appear to compromise the integrity of supervisory authority or that may be perceived as generating partiality, unfairness, or disruption are considered against this policy and may result in disciplinary action up to and including termination. Keep in mind that unwanted sexual advances and requests for sexual favors are already prohibited under the Authority's Sexual Harassment and other related policies.

Supervisors, including those that manage and/or direct other employees are prohibited from having relationships with their subordinates that meet the definition of fraternization.

### Quid Pro Quo Transactions Strictly Prohibited:

If an employee, while conducting official RRHA business, engages in a quid pro quo transaction with an applicant, tenant, voucher holder or vendor he/she will face immediate disciplinary action which could include suspension or termination. Such employees found to have engaged in a quid pro quo transaction could also be found to have violated State or Federal law standards, including both civil and criminal.

Quid Pro Quo - for purposes of this policy - is defined as the exchange of promises for official RRHA action. The promise could include financial, sexual, or any other kind of support for the expectation of receiving a benefit from the agency that would either normally not occur or would occur.

### Complying with Policy:

If an employee believes that they have a relationship that meets the definitions contained in this policy, they shall report this to their Supervisor and the Human Resources Department, which shall make a written determination if such relationship poses a conflict. Such information shall remain confidential and will be reported in a separate file outside of the employee's personnel file.

If it is determined that an employee has a relationship that meets the definition of fraternization and/or one that creates a conflict or an appearance of a conflict of interest, then management will provide written guidance to ensure that RRHA policies and procedures are adhered to and followed. If this cannot be done, then the employee will be notified in writing that such relationship must be terminated.

## **Policy 3.7 Anti-Fraternization**

### **Violations of Policy:**

It is the duty of each employee to disclose potential conflicts as outlined in this policy. Failure to disclose a relationship which could impact an employee's duties could be cause for disciplinary action up to and including termination.

If RRHA determines that a relationship interferes with the work environment or otherwise is not in the best interests of the Authority, appropriate action, including remedial measures such as counseling and reassignment of duties and/or workstations could result.

If an employee engages in actions which are prohibited in this policy, they could face disciplinary action up to and including termination in order to minimize problems relating to harassment, discrimination, conflicts of interest, safety, security, or morale.

### **AUTHORITY AND INTERPRETATION:**

This policy is issued by the Department of Human Resources. Questions regarding the application and interpretation of this policy should be directed to the Department of Human Resources. The Department of Human Resources reserves the right to revise or eliminate this policy as necessary.

## Policy 3.8 Investigations

### **PURPOSE:**

The Richmond Redevelopment and Housing Authority (RRHA) is committed to maintaining a workplace that is professional, ethical, and free from harassment, discrimination, retaliation, and other forms of misconduct. This policy establishes clear procedures for responding to complaints or allegations of inappropriate workplace behavior or misconduct involving RRHA employees, whether reported by staff, residents, vendors, or other stakeholders.

RRHA takes all complaints seriously and is dedicated to conducting prompt, fair, and thorough investigations in compliance with federal, state, and local employment laws, including Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the Age Discrimination in Employment Act (ADEA), the Fair Labor Standards Act (FLSA), and applicable provisions of the Virginia Human Rights Act and Virginia Whistleblower Protection Law.

### **WHO THIS POLICY APPLIES TO:**

This policy applies to all RRHA employees, contractors, and temporary workers. It covers any complaint or allegation of:

- Harassment, sexual harassment, discrimination, or retaliation;
- Violation of RRHA policies, procedures, or ethical standards;
- Misconduct toward residents, coworkers, or stakeholders;
- Breaches of confidentiality or misuse of authority;
- Conflicts of interest or unethical behavior;
- Other employee relations concerns that may impact RRHA's operations, reputation, or community trust.

### **Policy Statement:**

RRHA's goal is to ensure that all concerns or complaints are handled with:

- Promptness — investigations begin as soon as reasonably possible after a complaint is received.
- Fairness — all parties will be treated with respect and given an opportunity to share their perspective.
- Confidentiality — to the extent possible, information will be shared only with individuals directly involved in the investigation process.
- Non-retaliation — employees who report concerns in good faith or participate in investigations are protected from retaliation under both RRHA policy and Virginia law.

### **Investigation Procedure:**

#### **1. Receipt of Complaint:**

Complaints must be submitted verbally and in writing to:

- The Human Resources Department;
- An employee's supervisor or department leader; or
- Through RRHA's confidential reporting process in UKG or HR email inbox.

## Policy 3.8 Investigations

Upon receipt, HR will document the complaint, assign a case number, and acknowledge receipt to the reporting party.

### 2. Initial Review:

HR leadership will review the nature of the complaint to determine:

- Whether the allegation violates RRHA policy or law;
- Whether immediate action (such as administrative leave) is necessary;
- Whether an internal or external investigator is appropriate based on the nature and sensitivity of the complaint.

If the complaint involves potential legal violations, HR may consult with RRHA's legal counsel.

### 3. Administrative Leave:

Employees who are the subject of an investigation may be placed on paid administrative leave during the investigation period.

Administrative leave:

- Is not disciplinary in nature;
- Allows the investigation to proceed without disruption;
- Ensures fairness and protection for all parties involved.

The employee will be notified in writing of their administrative leave status, expected availability for interviews, and confidentiality requirements during this period.

### 4. Investigation Process:

The investigator (HR or designated party) will:

- Gather all relevant information, including personnel files, written communications, and supporting documentation.
- Interview all parties involved, including the complainant, respondent, and any witnesses.
- Collect written statements from each party to ensure accuracy of information.
- Maintain detailed investigation notes and evidence in a secure, confidential file.

All participants are expected to cooperate fully and provide truthful information. Failure to cooperate may result in disciplinary action.

### 5. Findings and Determination:

Once the investigation is complete:

- HR will review the findings and determine whether the allegations are substantiated, unsubstantiated, or inconclusive.
- Findings will be reviewed with HR leadership and, when appropriate, RRHA's legal counsel and the CEO.

## Policy 3.8 Investigations

- A final decision will be made regarding appropriate corrective or disciplinary action, which may include counseling, retraining, written warnings, suspension, demotion or termination.

### 6. Communication of Results:

The employee under investigation will be informed in writing of the outcome once the review is complete.

- Specific disciplinary action details will not be shared with complainants, but RRHA will confirm that the matter was reviewed and addressed appropriately.
- All investigation records will be maintained confidentially by HR for a minimum of five (5) years in compliance with EEOC and state recordkeeping requirements.

### 7. Protection Against Retaliation:

RRHA strictly prohibits retaliation against anyone who reports a concern, participates in an investigation, or provides information in good faith. Any employee who believes they are being retaliated against should immediately report it to HR or the CEO for review and resolution.

## Ongoing Monitoring:

After the investigation concludes, HR may conduct follow-up interviews or meetings with relevant departments and/or individuals to ensure that corrective actions have been implemented are effective, and that no further issues have arisen.

# Policy 3.9 Confidentiality

## PURPOSE:

The purpose of this policy is to ensure that all employees of the Richmond Redevelopment and Housing Authority understand and comply with the agency's confidentiality and privacy requirements. Every employee, regardless of position or department, is responsible for protecting the confidentiality of sensitive information obtained during the course of their employment. This policy is intended to safeguard the privacy of our residents, employees, and business partners, and to ensure compliance with all applicable federal, state, and local laws related to data protection and confidentiality.

## DEFINITIONS:

For purposes of this policy, *Confidential Information* includes but is not limited to:

- **Personally Identifiable Information (PII)** of residents, applicants, or employees, including names, addresses, phone numbers, social security numbers, dates of birth, financial records, or other identifying data.
- **Resident and Tenant Files**, including applications, leases, case notes, inspection records, and any other related documentation.
- **Employee Information**, including personnel records, medical or benefits information, and payroll data.
- **Agency Business Records**, including contracts, vendor information, financial statements, legal documents, and any non-public reports or communications.
- **Electronic Data and Communications**, including emails, system files, or other digital records containing sensitive or confidential information.

## Employee Obligations:

### 1. Non-Disclosure

Employees must not disclose, share, discuss or use for personal gain any confidential information with anyone outside of RRHA unless specifically authorized to do so or required by law.

### 2. Authorized Access Only

Employees may access confidential information only to the extent necessary to perform their assigned job duties. Unauthorized access, viewing, or retrieval of confidential information is strictly prohibited.

### 3. Conflict of Interest and Resident Privacy

Employees must not access, review, or handle the records of residents, applicants, or participants with whom they have a personal or family relationship, or any individual with whom there may be a potential conflict of interest.

### 4. Data Security

Employees are responsible for maintaining the security of all physical and electronic confidential information. This includes:

- Locking files and securing workstations when unattended.
- Using strong, unique passwords and never sharing login credentials.
- Following RRHA's technology and data protection policies.
- Reporting any lost or stolen devices containing RRHA information immediately.

## Policy 3.9 Confidentiality

### 5. Return or Destruction of Information

Upon separation from RRHA or at management's request, employees must return all confidential information, documents, and equipment. Employees must not retain copies of confidential materials in any form.

### Reporting Obligations:

Employees must immediately report any known or suspected breach of confidentiality, data loss, or unauthorized access to their supervisor or directly to the Human Resources Department. Prompt reporting allows RRHA to take corrective action and mitigate potential harm.

### Consequences of Breach:

Violations of this policy—including unauthorized disclosure, misuse, or negligent handling of confidential information—may result in disciplinary action, up to and including termination of employment. Depending on the severity of the breach, legal action may also be pursued.

### Acknowledgment:

All RRHA employees are required to review this policy upon hire and as part of the annual policy acknowledgment process through the HR Information System (UKG). By acknowledging receipt, employees confirm that they understand and agree to comply with the terms of this policy.