



God's Love We Deliver | Compliance Program Manual

Introduction

Following corporate compliance best practice and guidance is an important part of the work of God's Love We Deliver. We consistently seek to monitor and address risk, comply with state and federal laws, implement quality improvement measures, and implement corrective actions where appropriate.

This document describes the compliance procedures and guidance in place at God's Love We Deliver.

Why do we register our compliance program?

The New York State Office of the Medicaid Inspector General (OMIG) requires that all required providers develop and implement compliance programs that meet the requirements of Social Services Law Section 363-d ("SSL 363-d") and title 18 New York Codes of Rules and Regulations Part 521 ("Part 521").

Under New York State Law, God's Love We Deliver qualifies as a required provider because we receive Medicaid payments—and can be reasonably expected to receive payments—either directly or indirectly, of at least \$500,000 in any consecutive 12-month period.

As defined in the law, indirect Medicaid reimbursement is any payment that you receive for the delivery of Medicaid care, services, or supplies that comes from a source other than the State of New York. Because we provide covered services to a Medicaid beneficiary who is enrolled in a Medicaid Managed Care Plan, the payment we receive from the Managed Care Organization is considered an indirect payment.

Beyond regulations, a compliance program helps us all focus on our code of conduct, including each of our responsibilities to:

- Act fairly, ethically, and honestly at all times.
- Act as a team.
- Treat clients, partners, coworkers, and volunteers with respect at all times.
- Identify ways to improve your department, and talk to your supervisor about these improvements.
- Report any problems, including suspected fraud, to your supervisor immediately.
- Comply with all compliance program policies, and ensure those you work with comply as well.
- Ask questions of the Chief Compliance Officer.

What is included in the God's Love We Deliver compliance plan?

The required elements of a compliance plan include:

1. Written policies and procedures
2. A staff member vested with responsibility for corporate compliance
3. Training and education about the compliance program
4. Lines of communication to the responsible compliance position
5. Disciplinary policies to encourage good faith participation
6. A system for routine identification of compliance risk areas
7. A system for responding to compliance issues
8. A policy of non-intimidation and non-retaliation

We describe our compliance efforts in each of these areas in subsequent sections in this document.

What does our compliance plan cover?

As dictated by OMIG, our compliance efforts cover seven major areas of risk:

- Billings
- Payments
- Medical necessity and quality of care
- Governance
- Mandatory reporting
- Credentialing
- Other risk areas identified by the provider

Additionally, we regularly review the following risk areas:

- Food safety
- Quality assurance
- Client grievance issues

Who does the compliance program apply to?

The God's Love We Deliver compliance program applies to:

- All staff, of any title or position
- Members of the Board of Directors and Board of Trustees
- Contractors
- Vendors
- Consultants
- Volunteers working in relevant departments

Written policies and procedures

This compliance manual is available at all times on our website at <https://www.glwd.org/about/compliance>.

All staff members receive, and have regular access to the staff member handbook, which includes a general code of conduct, as well as policies on:

- Equal employment (Appendix A)
- Discrimination and harassment (Appendix B)
- Sexual harassment (Appendix C)
- Reporting and resolution procedures (Appendix D)
- Non-retaliation (Appendix E)
- Relatives and relationships (Appendix F)
- Gifts and gratuities (Appendix G)
- Political action (Appendix H)
- Confidential information (Appendix I)
- Communications, including email and the internet (Appendix J)
- Social media (Appendix K)
- Safe workplace (Appendix L)
- Workplace violence (Appendix M)
- Professional conduct (Appendix N)
- Whistleblowers (Appendix O)

All clients, their caregivers, and their care coordinators receive, and have regular access to:

- Client agreement, which details the requirements of our program, including certification of illness and code of conduct. (Appendix P)
- Client grievance policy, which describes how to address a grievance or serious complaint. (Appendix Q)
- HIPAA authorization, which enables a client to grant or withhold the release of medical information, including HIV-related information. (Appendix R)

In addition, all board members receive this compliance manual as part of orientation. We also review the policies and procedures at our annual board retreat.

Finally, all vendors are directed to review our corporate compliance manual before beginning work with God's Love We Deliver.

A staff member vested with responsibility for corporate compliance

The Chief Operating Officer (COO), who reports directly to the CEO, is also designated as the Chief Compliance Officer for God's Love We Deliver. In this role, the COO regularly reports on all compliance-related issues to the executive team (CEO, Chief Development Officer, Chief Financial Officer), which meets weekly; and to the Board of Directors, the governing board for God's Love We Deliver, which meets quarterly at a minimum.

In addition, the following people hold responsibility for day-to-day compliance operations:

- The Chief Financial Officer is responsible for day-to-day compliance operations in all billing and payment activities.

- The Director of Client Programs is responsible for day-to-day compliance operations in all activities related to medical necessity and quality of care, relevant credentialing, client complaints or grievances, and mandatory reporting activities.
- The Executive Chef and the Director of Nutrition Services are responsible for day-to-day compliance operations in all food production, food safety, menu creation, and nutrition counseling activities.
- All staff members are responsible for their own conduct and ensuring that such conduct and the conduct of those who they supervise complies with the Code of Conduct.

Training and education about the compliance program

New staff members, Board Members, contractors, vendors, volunteers, and other relevant stakeholders are trained on our compliance program, at orientation, annually and as needed throughout the year when issues arise.

In addition, we deliver or engage training on important information for all staff members (such as anti-discrimination) or department-specific topics (such as information about coding, billing, payments, and procurement for the Finance team) throughout the year.

Lines of communication to the responsible compliance position

Everyone, including, without limitation, staff members, Board Members, contractors, vendors, volunteers, and clients, must report concerns regarding non-compliance, fraud, waste or abuse or potential illegal activity. Concerns may be reported in person or through email with the Chief Compliance Officer, or through anonymous written submissions by mailing a letter to Chief Compliance Officer, God's Love We Deliver, 166 Avenue of the Americas, New York, NY 10013. All reports are kept confidential.

We encourage all stakeholders to raise issues as soon as possible. We take these issues seriously, and may involve different persons in the investigation or the discussion depending on the complaint, while maintaining the confidentiality of the report.

No person who files a report, through any mechanism, of suspected non-compliance, fraud, waste, abuse or other improper activity in good faith will be subject to retaliation in any form.

Disciplinary policies to encourage good faith participation

The effectiveness of our compliance program hinges on the active participation of all our staff members, Board Members, contractors, vendors, volunteers, and clients in preventing, detecting and appropriately responding to fraud, waste and abuse or other misconduct.

If it is found that a member of our staff did not report compliance issues of which he or she was aware, then this individual will be subject to discipline. The imposition of discipline may be based on, among other things, an individual's unlawful or unethical actions; negligent or reckless conduct; deliberate ignorance of the rules that govern his or her job (including the Code, compliance policies and procedures and applicable laws, rules and regulations, where applicable); his or her role in encouraging, directing, facilitating or permitting non-compliant behavior, condoning or not reporting unlawful actions by

others; or retaliation or intimidation against those who report suspected wrongdoing, or other violations.

Discipline may range from oral warnings to suspension, mandatory training, termination, or financial penalties, as appropriate, and may require reporting to federal and/or state oversight bodies.

Disciplinary action will be taken on a fair and equitable basis. Our employee handbook and policies set clear expectations about reporting, as well as tolerating non-compliant behavior, as well as our non-retaliation policy.

A system for routine identification of compliance risk areas

One of the key methods of identifying compliance risk areas is the performance of regular internal monitoring and audits and compliance reviews. The executive team at God's Love We Deliver meets weekly to raise any issues that are a threat to compliance, and at least once annually to review risk areas, including those related to compliance. The Operations team, which includes all program-related areas, from client support to meal delivery, meets weekly to discuss any potential issues.

We work with an external firm to prepare a yearly audit, and make any relevant adjustments as soon as possible. Regular external risk assessments, such as those conducted by food safety consultants, help us focus our activities as those risk areas change.

A system for responding to compliance issues

We are committed to taking prompt corrective action to address non-compliance and any fraud, waste and abuse or other improper activity identified through internal or external reviews, investigations, reports by staff, or other means. As discussed above, the Chief Compliance Officer promptly investigates any compliance issue reported and ensures corrective action is implemented if needed.

In addition, the executive team meets weekly to address a range of issues, including potential compliance issues. We prioritize those of greatest risk, and raise any major issues to the board as soon as possible. Integrity is core to our operations, and reviewing compliance issues helps ensure that integrity.

A policy of non-intimidation and non-retaliation

Our staff member handbook includes clear language about non-retaliation. We work hard to create an open culture where staff members feel comfortable raising and discussing issues, and address any violations of this policy promptly. For example, we would take steps to remove a Board Member in violation of these policies, or terminate a contract with a vendor.

APPENDIX A | Equal Employment Opportunity Policy

God's Love We Deliver provides equal employment opportunities to all staff members and applicants for employment without regard to race, color, religion, sex, national origin, age, disability, genetic information, sexual orientation, gender identity or expression, marital status, citizenship, military or veteran status, or status in any group protected in accordance with applicable federal, state and local laws.

In addition, God's Love complies with applicable state and local laws governing non-discrimination in employment in every location in which we have facilities. This policy applies to all terms and conditions of employment, including but not limited to hiring, placement, promotion, termination, transfer, leaves of absence, compensation and training.

APPENDIX B | Policy Against Discrimination and Harassment

God's Love We Deliver does not tolerate harassment or discrimination, period. God's Love has adopted a policy of "zero-tolerance" with respect to unlawful staff member harassment or discrimination based on race, color, religion, sex, national origin, age, disability, genetic information, sexual orientation, gender identity or expression, marital status, citizenship, military or veteran status, or status in any group protected by federal, state or local law.

God's Love will not tolerate discrimination or harassment by Managers, co-workers or non-staff members in our workplace. This policy against discrimination and harassment includes verbal, physical or visual conduct that may create an intimidating or hostile work environment that unreasonably interferes with job performance. Improper interference with the ability of our staff members to perform their job duties is not tolerated.

If you believe you have been discriminated against, harassed or otherwise treated unfairly in violation of this policy you should promptly utilize the reporting procedures described in the Reporting and Resolution Procedures Policy described in this Handbook.

APPENDIX C | Policy Against Sexual Harassment

To promote a safe, harassment-free environment, God's Love We Deliver **prohibits** the following conduct:

- Unwelcome sexual advances, requests for sexual favors and all other verbal, visual and/or physical conduct of a sexual or otherwise offensive nature, especially where submission to such conduct is made explicitly or implicitly a term or condition of employment, submission to or

rejection is used as the basis for decisions affecting an individual's employment or such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment

- Offensive comments, jokes, innuendos, and other sexually-oriented statements

Examples of conduct that may constitute harassment include, but are not limited to: rubbing or massaging someone's neck or shoulders; brushing against another's body; grabbing, groping, kissing, or fondling; using foul or obscene language; transmitting offensive e-mail, voicemail messages, text messages, or other messages sent via electronic equipment, regardless of whether such equipment was provided by God's Love; discussing or asking questions about one's sex life or experiences; and repeated requests for dates.

What Should I Do If I Believe I Have Been Subjected to Sexual or Other Harassment?

If you believe you have been subjected to any type of discrimination or harassment, please follow the reporting procedures described in the Reporting and Resolution Procedures Policy.

APPENDIX D | Reporting and Resolution Procedures

At God's Love We Deliver, each member of management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. All staff members are responsible for respecting the rights of our coworkers and complying with the Policy Against Discrimination and Harassment and Policy Against Sexual Harassment.

If you experience any job-related harassment based on your race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, citizenship, military or veteran status, or status in any group protected by federal, state or local law, or believe you have been treated in an unlawful, discriminatory manner, you must promptly report the incident to your Manager, Department Head, a member of the Executive Team, or the Human Resources Department. The Executive Team is comprised of the President & CEO, the Chief Operating Officer, the Chief Financial Officer, and the Vice President & Chief Development Officer.

Please be advised that nothing in this policy prohibits staff members from directly communicating with the alleged harasser and asking the person to stop the offending behavior. This policy does not, however, require any staff member to do so.

This policy applies to **all** incidents of alleged harassment or discrimination, including:

- Those which occur off-premises or outside of normal working hours (that means twenty-four hours a day and seven days a week)
- Where the alleged offender is a Manager, coworker, or even a non-staff member with whom the staff member is involved, directly or indirectly, in a business or potential business relationship, or with whom the staff member otherwise comes into contact as part of his or her employment with God's Love

Should the alleged harassment or discrimination occur at a time outside of your normal business hours, your complaint should be initiated as early as practicable on the first business day following the alleged incident.

To Whom Should I Complain?

Although you are not required to do so, you may communicate directly with the alleged harasser or the person discriminating and ask that person to stop the offending behavior.

If you believe you are being harassed or discriminated against, or you learn of conduct prohibited by our policies against harassment and discrimination, you must report this information directly to someone who can do something about it. Specifically, you may complain directly to your Manager or Human Resources or any Executive Team Member. You are not required to speak with your Manager first before speaking with Human Resources or any Executive Team Member.

Any Manager or Executive Team Member who receives a report or complaint of discrimination or harassment, or who learns that conduct violating the organization's Policy Against Discrimination and Harassment or Policy Against Sexual Harassment may be occurring, must report that information immediately to Human Resources.

Will There be an Investigation?

Complaints of harassment or discrimination will be investigated promptly, appropriately and as discreetly as possible by Human Resources. Staff members have an obligation to cooperate if they are contacted to provide information in connection with such an investigation. Human Resources will promptly undertake an investigation of any complaints. If the complaint is about or implicates someone in the Human Resources Department, the President & CEO will determine who outside of Human Resources will investigate and help resolve the complaint.

What Action Will be Taken Following an Investigation?

If God's Love determines that a staff member has engaged in discrimination or harassment in violation of our policies, appropriate disciplinary action will be taken up to and including the termination of employment. In addition, any staff member not complying with their obligations under this Policy, including the reporting obligation of Managers and Executive Team Members, will be subject to disciplinary action, up to and including the termination of employment.

APPENDIX E | Non-Retaliation Policy

Retaliation is Prohibited at God's Love We Deliver

God's Love prohibits any form of retaliation against any staff member for making a good faith complaint about discrimination, harassment, or any other God's Love policy, or for participating or assisting in a complaint investigation or for reporting to appropriate officials as defined in New York State Labor Law Sections 740 and 741. In the event you believe you have been subjected to retaliation, you must immediately report your concern to your Manager or Human

Resources or an Executive Team Member. Any Manager or Executive Team Member who receives a report or complaint of retaliation, or who learns that retaliatory behavior may be occurring, must report that information immediately to Human Resources. Any report or complaint of retaliation will be investigated and resolved in accordance with the above described Reporting and Resolution Procedures Policy.

If, after investigating a complaint of harassment or discrimination, God's Love determines that the complaint was not made in good faith or that a staff member has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information.

APPENDIX F | Relatives and Relationships Policy

God's Love permits the employment of qualified relatives of staff members as long as such employment does not create the possibility of favoritism, or any actual or perceived conflicts of interest.

Related Staff Member

A "Related Staff Member" is any individual who may be related to a staff member via blood, marriage or domestic partnership, including a spouse, domestic partner, child, parent, sibling, grandparent, grandchild, aunt, uncle, niece, nephew, first cousin, or corresponding in-law or "step" relation.

Placement of a Related Staff Member

When deciding whether to hire, transfer or promote a Related Staff Member, God's Love, in our sole discretion, will exercise sound business judgment according to the following:

- Related staff members are permitted to work for the Agency provided no direct reporting or supervisory/management relationship exists. Related staff members may not work in the same department or in any other positions in which God's Love believes the possibility of favoritism or an actual or perceived conflict of interest may exist. Staff members have an obligation to inform our Human Resources Department of the relationship prior to the commencement of employment of a Related Staff Member
- Staff members who marry or enter into a domestic partnership while employed are treated in accordance with this Policy. That is, if, within the sole discretion of God's Love, an actual or perceived conflict arises as a result of the marriage/partnership, one or both of the staff members may be transferred at the earliest practicable time. Such conflict may result in a termination if there is not a suitable position for transfer

God's Love recognizes that at times, staff members maintain close personal relationships with individuals who may not meet the definition of Related Staff Members but whose employment at God's Love might nevertheless create the possibility of favoritism, or an actual or perceived conflict of interest. This includes, but is not limited to, staff members who engage in romantic

relationships with one another. With regard to such individuals, God's Love will, in our sole discretion, exercise sound judgment with respect to the placement of staff members in order to avoid the creation of an actual or perceived conflict of interest, avoid favoritism or the appearance of favoritism, and decrease the likelihood of sexual harassment in the workplace. As such, staff members who enter into a personal relationship that may result in or create an actual or perceived conflict of interest must inform our Human Resources Department of same. In addition, staff members who are in a close personal relationship with another staff member have an obligation to inform Human Resources about the relationship prior to a transfer or promotion that might lead to the possibility of favoritism or an actual or perceived conflict of interest. Once informed, action may be taken as required by the circumstances.

APPENDIX G | Gifts and Gratuities

Staff members at God's Love We Deliver interact with outside agencies, vendors and individuals on a regular basis during the course of their business-related activities. When engaging in activities such as planning an event, ordering supplies or negotiating pricing with these outside entities, you are expected to act in the best interest of God's Love.

To avoid potential conflicts of interest or the appearance of impropriety, you must not solicit or accept any favor, gift or benefit which might influence or appear to influence the actions of others.

You should not accept gifts, gratuities, favors, travel, entertainment or other benefits valued at over \$50 offered by clients, client family members, guests, visitors, customers, vendors or firms doing or seeking to do business with God's Love. You should refuse graciously all offers that are not allowed by this policy. If appropriate to the circumstances, you may suggest instead a contribution to God's Love.

It is recognized that some vendors such as caterers or printers might provide "samples" of their goods to give staff a better idea of their product. Samples may be accepted to assist with the evaluation of the vendor's products.

Donations of other items including furniture, clothing, supplies and food items such as holiday gift baskets are considered to be gifts to the entire staff and not just to one staff member and accordingly should be shared with colleagues. If you have questions regarding a particular donation, contact your Manager.

All gifts, regardless of monetary value, must be timely reported to your Manager, Executive Team member and our President & CEO.

Violations of this policy will result in disciplinary action, up to and including the termination of employment.

APPENDIX H | Political Contributions

No God's Love funds or assets may be contributed, used or loaned, directly or indirectly, to any political party or for the campaign of any person for political office. You are not authorized to make direct or indirect political contributions of any kind on behalf of God's Love. God's Love prohibits staff members from working for a political candidate or party on the Agency's time or using the Agency's resources.

You may not use your position within God's Love to solicit political contributions from other staff members or to make a political contribution in the name of God's Love.

If you speak out on public issues, you must make sure you do so as an individual. Unless specifically authorized, you must not give the appearance that you are speaking or acting on behalf of God's Love. You must also avoid involving God's Love in personal political activities.

If your planned contribution or activity could in any way be looked upon as involving God's Love funds, property or services, or if a staff member seeks specific authorization to speak on behalf of God's Love, you must receive prior approval from the President & CEO before making the contribution or engaging in the activity.

Violations of this policy may result in disciplinary action, up to and including the termination of employment.

APPENDIX I | Protecting Confidential Information

Every staff member at God's Love is responsible for safeguarding confidential information obtained through employment. If, during your employment, you acquire confidential or proprietary information about God's Love, clients, staff, donors and/or volunteers ("Confidential Information"), such information is to be handled in strict confidence and cannot be shared with any external individuals (including, but not limited to, donors or volunteers), or with coworkers who otherwise do not need to know the information.

For the avoidance of doubt, the prohibition on sharing Confidential Information extends to all communications, written or oral, including, but not limited to, posting or disseminating the Confidential Information in a public place, including in online forums, blogs and social media.

Staff members will be asked to sign a statement of confidentiality at the time of hire and periodically throughout their term of employment to acknowledge their awareness of, and reaffirm their commitment to, this policy.

Staff members who violate this policy are subject to disciplinary action, up to and including the termination of employment, and may also be subject to civil and/or criminal penalties.

Personal Information

God's Love respects the confidentiality of staff members' personal information, including, but not limited to, information in their personnel files. This means that access to staff member records will be limited to persons who have appropriate authorization and a clear business need for that information. Staff members who have access to personal information must adhere to the highest standards of confidentiality regarding the use of such personal information.

Staff member records are maintained by our Human Resources Department and are considered confidential and the property of the Agency. Managers other than our Human Resources Department may only have access to personnel file information on a need-to-know basis, and will not be granted access to private medical information. A manager considering the hire of a former staff member or transfer of a current staff member may be granted access to certain information in the file needed to inform the hiring decision.

Representatives of government or law enforcement agencies, in the course of business, may be allowed access to staff member record information. This decision will be made at the discretion of our Human Resources Department in response to the request, a legal subpoena, or court order.

If staff members want to see their personnel file, they can request access from the Human Resources Department. Access to the personnel file made by current staff members will be provided within three business days of the request. Personnel files may not be taken outside of the Human Resources Department or copied.

Note: Nothing in this section restricts staff members from engaging in activities that are protected under the National Labor Relations Act, New York Labor Law or other similar laws and regulations, such as discussing wages or other terms of employment.

APPENDIX J | Email, the Internet and Other Communications Systems

All of the communication systems at God's Love ("Systems"), including but not limited to electronic and telephonic communication systems, and all communications and information transmitted by, received from, or stored in these systems, are the property of Gods' Love. While limited personal use of any software and business equipment is permissible, such use should be limited, and must not interfere with your work.

The Systems include, but are not limited to, voicemail, telephone equipment, copiers, facsimiles, computers, the Agency's e-mail system, internal or external Instant Messaging, access to the Internet, Wi-Fi, smart phones, and Agency provided cellular phones or other personal handheld or wireless devices. The Systems include any hardware or software provided by God's Love to help you do your job.

Do not use a code, access a file or retrieve any stored communication unless (a) such code, file or communication is directly related to your work for the Agency, (b) you are authorized to do so, or (c) you have received prior clearance from an authorized God's Love representative.

All logins, passwords, data, files, messages, communications, software or hardware that allow staff members to utilize the Systems at God's Love from within or outside the office, and information derived from, transmitted by, received from, entered into, or stored in the above-referenced Systems and/or equipment, whether or not they are related to the business of God's Love, are the property of God's Love. All pass codes, passwords and voicemail access codes used by a staff member to access the Systems at God's Love must be made available to the Director of Systems and Production, Director of Human Resources and/or Executive Team member as required.

Staff members are expected to demonstrate good judgment when using the Agency's Systems. Improper use of the Agency's Systems, including use that would violate any other Policy in this Handbook, will not be tolerated and may result in disciplinary action, up to and including the termination of employment.

No Expectation of Privacy

Managers and other authorized representatives may access or monitor the Agency's Systems. Therefore, you should have no expectation of privacy in any message, file, data, document, communication or facsimile, or any other form of information, whether Agency-provided or personal, that is accessed, transmitted to, received from, or stored on any Systems made available by the Agency.

The use, creation, or change of any password, code or any method or encryption or the capacity to delete or purge files or messages, whether authorized by the Agency or not, shall not be interpreted as giving a staff member any expectation of privacy in any message, file, data, document, communication, facsimile, or other form of information transmitted to, received from, or stored on any System made available by the Agency. All inbound and outbound email (Agency-sponsored or otherwise) may be automatically tracked by, among other things, sender name, receiver name, subject line and subject matter. This information is maintained pursuant to the policies and procedures of the Agency, and is considered public information to Agency management. Therefore, any information sent via the Agency's Systems may be utilized as the Agency's needs dictate.

In addition, there should be no expectation of privacy in any conversation conducted through the Agency's communication infrastructure or via our Systems, including but not limited to, all telephone lines. It is unacceptable (and prohibited) for a staff member to engage in any form of harassment via electronic communications, including, but not limited to, e-mail, text, instant message or telephone, whether such harassment takes the form of harassing language, or is harassing merely due to the frequency or size of such messages.

Monitoring

The Agency reserves the right to, and may, on a regular basis, monitor staff members' use of the Internet, including the websites visited; electronic and other communications transmitted using the Agency's systems and networks. This may also include listening to stored voicemail messages. By agreeing to this Staff member Handbook, you hereby consent to such monitoring and have no expectation of privacy in phone calls made on Agency phones. The Agency reserves the right to audit networks and systems on a periodic basis to ensure compliance.

Telephone Communications

From time to time the Agency may tape, record, videotape, or otherwise monitor conversations or other communications between staff members and/or between staff members and non-staff members for legitimate business purposes, such as client service training, to protect the integrity of certain transactions (for example, intakes taken over the telephone). In addition, Agency telephone lines may be monitored and taped consistent with applicable federal and state law. Such monitoring or taping may be done if the Agency is conducting an investigation into allegedly unlawful or unethical activities, in conjunction with regulatory or other enforced authorities, or for any other business reason in the Agency's sole discretion.

The Agency hereby reserves the right to monitor your phone usage. By accepting and agreeing to the Agency's Staff member Handbook, you consent to such taping and monitoring.

Using the Internet

Access to the Internet is a useful tool for the Agency in conducting our business. You may not use the Internet in any way that would violate any applicable local, state or federal laws and regulations or any Agency policies.

Exercise care and responsibility, and use good judgment, common sense, and careful discretion when accessing the Internet, browsing the Web, downloading and uploading files, and using other applications on the God's Love network.

You may not access, view, copy, upload, download, print, save, send, post or otherwise transfer materials that contain sexually explicit, derogatory, abusive, harassing or objectionable material or language, that defames or libels others, that infringes the privacy rights of others, or that is illegal or obscene. Use of the Internet to attempt to gain unauthorized access to remote systems is prohibited. Do not forward, distribute, or incorporate into another work, material retrieved from a web site or other external system without contacting the IT Department to ascertain whether the intended use is permissible.

In Addition, the Following Rules Apply with Respect to Internet Usage:

- No browsing of restricted content web sites

- No downloading of non-business related data
- No downloading of application programs
- No participation in web-based surveys without prior authorization from your Manager
- No use of subscription-based services without prior authorization from your Manager
- No violation of copyright laws which includes the sharing of subscription-only content via password-sharing

God's Love may use Internet monitoring software to track all sites visited by our staff members. Be aware that there is no expectation of privacy with respect to the Internet access. The Agency reserves the right to monitor each staff member's use of the Internet.

Use of Electronic Communications (Email, Text and Instant Messaging)

God's Love provides electronic communications systems to staff members for business purposes. You should exercise good judgment, forethought and common sense when creating and distributing electronic communications. Electronic communications are official Agency documents, and you should treat them as such.

Please note that whenever you send electronic communications, your name and that of God's Love are included in each communication and those messages can be as permanent as (or even more so than) conventionally mailed letters and materials. Most electronic communications you send are archived in the system through which it passes.

You should consider each electronic communication to be a letter and compose it accordingly. Do not write anything in a message that you would not want to be disclosed in a legal or other proceeding. This is true for external as well as internal electronic communications.

If your department requires an Agency disclaimer, you are responsible for making sure that the applicable disclaimer is located on each outgoing email.

Unacceptable Use of Electronic Communications Systems (Email, Text and Instant Messaging):

- Sending "junk mail" or other advertising material to individuals who did not specifically request such material (email spam)
- Sending or receiving harassing, threatening, obscene, racist, sexist, discriminatory, inappropriate, embarrassing or other objectionable messages via electronic communication to anyone (such messages include, but are not limited to, threats, jokes, cartoons, unwelcome propositions, chain letters and love letters), or sending email of which our content or transmission would violate any Agency policy
- Unauthorized use, or forging, of email header information

- Solicitation of email for any other email address, other than that of the poster's account, with the intent to harass or to collect replies
- Actual or attempted forgery via electronic communications
- Attempts to read, copy, modify or delete electronic communication messages of other users
- Proselytizing for commercial ventures or political or religious causes via Agency electronic communications
- Disseminating unauthorized videos by electronic communications
- Sending, without authorization, Agency-wide emails with large logos and/or photos (such emails tend to take up a lot of space on the Agency's server)

Confidentiality

To ensure the security and confidentiality of Agency information, staff members must transmit all business-related emails securely through the Agency's communications systems. Except as approved by management, staff members should not use their personal email accounts to conduct Agency business. Additionally, please refer to the section on confidentiality of our client information as required by HIPAA.

Electronic Communications Monitoring

The Agency reserves the right to, and will, on a regular basis, access and monitor all aspects of staff members' electronic communications. The Agency also reserves the right to archive electronic communications, in our sole discretion, and access archived electronic communications.

Deleting Electronic Communications

Staff members are subject to the Agency's record retention rules. If staff members have any questions about whether it is appropriate to delete a document, they should contact the Agency's Director of Systems and Production.

Email Etiquette

In order to maximize client/customer service, please keep the following in mind:

- Consider whether an email is the best method for your communication. All communication should be respectful and professional at all times
- Choose your recipients carefully. Address emails to essential recipients only – be mindful of mechanisms that automatically identify a recipient when the first few letters are inserted
- Include a clear, direct subject line. Use the subject field to accurately and concisely describe the contents of the email

- Content and formality are important. Review your messages for accuracy in content, spelling, and punctuation. Choose every word with care, and reread every email before sending to be sure only the intended message is conveyed
- Always include a signature line for external communications
- Promptly respond to messages. Do your best to respond to communications from clients and customers as quickly as possible
- Think carefully before you decide to click the “reply all” button
- Don’t use email to discuss confidential information

APPENDIX K | Social Media Policy

God’s Love encourages our staff members to make positive use of the Internet, and welcomes the dissemination and exchange of ideas that this mode of communication makes possible. At the same time, the Agency’s legitimate interests can, in certain circumstances, be compromised by inappropriate uses of blogging, social networking and social media. As stated otherwise in this Staff member Handbook, staff members are expected to use good judgment, both in person and online.

Accordingly, this Social Media policy is intended to respect staff members’ rights to personal expression while limiting the Agency’s legal liability and protecting the Agency’s proprietary information and business interests. Importantly, this policy applies to all Agency staff members, and pertains to blogging/social media/social networking:

- Performed both on and off Agency time
- Performed both on and off the Agency’s premises; and
- Regardless of whether it is performed on Agency equipment (computers, smartphones, tablets, etc.), or on the staff member’s or any third party’s equipment

For purposes of this policy, the term “social media” includes, but is not limited to, the use or viewing of blogging and social networking sites such as Facebook, Twitter, Instagram, Snapchat and LinkedIn.

Blogs/posts may not contain any content that:

- Violates any laws, including laws pertaining to intellectual property
- Infringes any third party rights (including intellectual property rights)
- Is defamatory or libelous or might be construed as harassment or disparagement in violation of Agency policy on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, or any other status protected by applicable law

- Violates any policies, rules, standards or requirements applicable to the Agency, including but not limited to any confidentiality or privacy policy, or the terms of any confidentiality agreement entered into by a staff member
- Discloses any trade secrets, "insider information" or similar confidential or proprietary information of the Agency
- Is adverse to the reputation of the products and/or services provided by the Agency

The following are permitted only with the express prior written permission of a staff member's Manager and either the Communications Manager and/or the Vice President & Chief Development Officer. The only exceptions are when an effort is sponsored by God's Love:

- Blogs or social networking that imply sponsorship or support by the Agency but are not officially sponsored by the Agency;
- Blogs or social networking that use any logos or trademarks of the Agency or our affiliates in any manner that expresses or implies that the communication is from or is endorsed by the Agency
- Blogs or social networking that use the Agency's time, facilities, resources, or supplies

If a blog or social networking post refers to the Agency or our operations, personnel, products or services, and the staff member's name is generally associated by the general public with the Agency (staff members who are unsure of whether this applies to them should consult the Communication Manager and/or the Vice President & Chief Development Officer), the staff member blogger/poster must (a) notify his or her Manager and the Vice President & Chief Development Officer or Communication Manager of the existence of the blog or post, and (b) include a statement in the blog/post that all views expressed are those of the blogger/poster and have not been reviewed or approved by the Agency. Similarly, if a staff member blogs or otherwise posts online an endorsement of the Agency or our products, the staff member must identify him or herself as an Agency staff member.

Unless staff members are blogging or posting as part of their job, blogs or posts may not be crafted so as to appear as if they were being made by the Agency or on our behalf. If any blog or post would appear as if it is being made on behalf of the Agency, the blogger/poster must include a statement in the blog/post that all views expressed are those of the blogger/poster and have not been reviewed or approved by the Agency.

Management reserves the right to require a staff member to stop posting any blog or post which contains content that it deems to violate this policy.

This policy is a statement of legal and ethical principles for individual and business conduct. Failure to comply with this policy may subject a staff member to disciplinary action, up to and including the termination of employment.

If you have any questions regarding this policy, please contact the Vice President & Chief Development Officer.

Nothing in this policy is meant to prevent staff members from discussing the terms and conditions of their employment as permitted by law or engaging in any other activities protected under Section 7 of the National Labor Relations Act or any other applicable federal, state or local law.

Guidelines for Professional Use of Social Media on Behalf of the Agency

If you have been authorized by the Communications Manager or Vice President & Chief Development Officer to post content on behalf of God's Love, the following policies must be followed in addition to the above mentioned policies:

- Follow approval processes for publications and communication
- Monitor your relevant social media channel
- Know and follow our record management practices

APPENDIX L | Safe Workplace

A safe and healthy working environment is important to the welfare of our staff members. God's Love complies with relevant federal and state occupational health and safety laws, and seeks to develop and maintain the best feasible operations, procedures, technologies, and programs in order to ensure safety, health and security for everyone. All God's Love staff members are expected to work diligently to maintain safe and healthful working conditions and to adhere to proper operating practices and procedures designed to prevent injuries and illnesses.

As a staff member of God's Love, You are Responsible for:

- Exercising maximum care and good judgment at all times to prevent accidents and injuries
- Reporting to Managers, and seeking first aid for, all on-the-job injuries regardless of how minor
- Reporting unsafe conditions, equipment, or practices to your Manager or our Facilities Department
- Using safety equipment provided by God's Love at all times
- Observing conscientiously all safety rules and regulations at all times

Smoking Prohibited

To maintain a safe and comfortable working environment, smoking (including electronic cigarettes) in God's Love's offices and facilities is prohibited. You may not smoke inside our premises nor in our outside spaces including within 25 feet of our loading dock and entrances at any time.

Complaints about violations of this policy should be addressed or filed with our Human Resources Department. No staff member will be retaliated against for attempting to enforce this policy.

God's Love is a Drug- Free Workplace

It is the policy of God's Love to create a drug-free workplace. The use of illegal drugs can create serious health and safety risks, is inconsistent with the behavior expected of staff members, and undermines God's Love's ability to operate effectively and efficiently. Therefore, God's Love has implemented a drug-free workplace policy.

You are not permitted to manufacture, distribute, dispense, possess, sell, or use controlled substances in the workplace or while engaged in God's Love business on or off the Agency's premises. Such conduct is also prohibited during nonworking time to the extent that, in the opinion of God's Love, it impairs a staff member's ability to perform on the job or threatens the reputation or integrity of God's Love.

APPENDIX M | Workplace Violence

God's Love is committed to maintaining a working environment free of all violence and safe from threatening behaviors, intimidation and physical harm.

God's Love has Zero Tolerance for Workplace Violence

God's Love expressly prohibits any acts or threats of violence by any staff member or other individual performing work on behalf of God's Love (any "Individual") against any other individual in or about any of God's Love property (including vans) or while engaged in God's Love business at any time, on or off premises.

Where Do Acts or Threats of Violence Come From?

We recognize that, aside from acts or threats of violence by an Individual's co-workers, such acts or threats of violence can also be made by visitors, volunteers, clients, business partners, persons formerly affiliated with God's Love, or persons in someone's personal life (e.g., a current or former spouse, partner, boyfriend, or girlfriend). As a result, it is important to be aware that domestic violence, sexual violence, dating violence, and stalking can result in an instance of actual or threatened workplace violence.

Obligations of Staff Members Subject to this Policy

In keeping with the Agency's commitment to providing a safe and healthful work environment, the following protocol must be followed in the event that any staff member becomes aware of any actual or threat of violence against any Individual by any person:

- Any staff member who becomes aware of any actual or threat of violence against any person has a duty to warn God's Love by contacting our Human Resources Department and/or that staff member's Manager immediately. Reports made pursuant to this policy will be held in confidence to the maximum extent possible and practical under the circumstances.
- Violence and threats of violence can come from multiple sources. If you have been the victim of actual or threatened violence by a person in your personal life, or if you become aware that a colleague has been a victim of actual or threatened violence by someone in their personal life, such as a significant other, you are required under this policy to warn God's Love by contacting our Human Resources Department and/or your Manager immediately.
- Any threats of violence made online or in any electronic format such as by email, text message or via social media, as well as verbal threats made over recorded phone lines are subject to the requirements set forth in this Workplace Violence policy. With respect to such threats, to the extent possible, staff members should take steps to preserve and maintain such threats, and should forward these to our Human Resources Department immediately.
- In addition to contacting our Human Resources Department and/or your Manager, all staff members who believe they are in immediate harm, or that another individual is in immediate harm, may always contact 911 or their local police precinct directly.
- Individuals, visitors, and volunteers are prohibited from carrying unauthorized firearms or other weapons into any of our premises or work locations. Any person found doing so in violation of this Policy and/or applicable laws will be prosecuted to the maximum extent permitted by law.
- Staff members are prohibited from utilizing any workplace resources, such as work time, phones, email, computers, fax machines, copiers or other means, to threaten, harass, intimidate, or otherwise harm another person.

No Retaliation

No staff member will face any reprisal or retaliation for making a good faith complaint to God's Love of actual or threatened violence in violation of this policy. Further, staff members who believe they have been subjected to an adverse action as a result of making a report pursuant to this policy should contact our Human Resources Department.

Additional Information

God's Love will take prompt remedial action, up to and including the immediate termination of employment, with respect to any staff member who engages in any threatening behavior or acts of violence or who uses any obscene, abusive, or threatening language or gestures. Such action may include notifying the police or other law enforcement personnel and prosecuting violators of this policy to the maximum extent permitted by law.

God's Love has established viable security measures to ensure that God's Love premises are safe and secure to the maximum extent possible and to properly restrict access by the public, off-duty Individuals, and former staff members.

If you require further information on our security measures or the procedures described in this policy, or have any questions or concerns, please contact our Facilities Department or our Human Resources Department.

APPENDIX N | Professional Conduct

As a staff member and representative of God's Love, your conduct reflects not only on you but also on the Agency. We expect you to demonstrate good judgment in matters of personal conduct, and to exhibit a high degree of integrity at all times. Any on or off premises behavior that negatively affects the work environment or the reputation of God's Love will not be tolerated.

Conduct that occurs off God's Love premises and outside the normal course of God's Love business ("off duty conduct") may adversely affect workplace safety or security or the reputation of God's Love. Such conduct may include, but is not limited to behavior that can be considered lewd or obscene, convictions for misdemeanors or felonies, or pending arrests for crimes involving violence, dishonesty or theft. If you are arrested for, or convicted of, a crime during the course of your employment, you should report that information to Human Resources.

Any staff member who operates a motorized vehicle as part of their work must immediately report to their supervisor any on-the-job or off-the-job traffic ticket and/or violation including DUI, DWAI, or DWI.

On a case-by-case basis, God's Love will (in our sole discretion and in accordance with applicable law) assess the impact that off duty conduct may have on the Agency's interests and reputation and take disciplinary action up to and including the termination of employment.

Use of Cell Phones and Smartphones

Cell phones and smartphones that are provided to you by God's Love are to be used only by you and for business purposes only. These phones may be used for personal purposes only in emergency situations. Please keep the use of personal cell phones and smartphones during your workday to a minimum, so as not to interfere with your own work and that of others.

Do not use cell phones or smartphones while driving. If you absolutely must (because of an emergency) use a cell phone or smartphone while driving, you must use a hands-free device, and must comply with applicable local, city or state laws. In such circumstances, you are encouraged to pull off the road and safely stop the vehicle before placing or accepting the emergency call.

Under no circumstances may staff members place themselves (or anyone else) at risk in order to fulfill an actual or perceived business need. Further, under no circumstances may any staff member text or email while driving on behalf of the Agency.

You are solely liable for any traffic violations or accidents caused by use of a cell phone or smartphone while driving. Any violation of this policy is subject to disciplinary action, up to and including the termination of employment.

APPENDIX O | Whistleblower Policy

Purpose

The directors, executives, officers, staff members of God's Love We Deliver are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Staff members of the Agency must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. The Whistleblower Policy will serve to safeguard these high standards of business and personal ethics.

The matters which should be reported under this policy include, but are not limited to, any action or suspected action that is illegal or improper such as:

- Fraud
- Theft
- Embezzlement
- Accounting or auditing irregularities
- Bribery
- Kickbacks
- Misuse of our assets
- Gross mismanagement of a government contract or grant
- Gross waste of government funds
- An abuse of authority relating to a government contract or grant
- A substantial and specific danger to public health or safety
- Any other suspected regulatory, compliance, or ethics related issues, concerns or violations (including the competition for or negotiation of a government contract or grant)

Note that any suspected violations of our Agency's applicable human resources policies, problems with co-workers or managers, or issues related to alleged employment discrimination or sexual or any other form of unlawful harassment should be reported in accordance with the Equal Employment Opportunity Policy, Policy against Discrimination and Harassment, and/or Policy against Sexual Harassment found in Section 2 of this Staff member Handbook.

Procedure for Reporting Concerns

It is the responsibility of all directors, executives, officers, and staff members to report violations or suspected violations of high business and ethical standards and/or applicable legal requirements in accordance with this Whistleblower Policy.

Individuals should share their questions, concerns, suggestions or complaints regarding suspected violations with someone who can address them properly. For staff members, in most cases, a staff member's Manager is in the best position to address an area of concern. However, if a staff member is not comfortable speaking with their Manager, or is not satisfied with the Manager's response, the staff member is encouraged to speak with anyone in senior management whom the staff member is comfortable approaching. Senior managers are required to report suspected violations to either the President & CEO or Chair of the Board of Directors. If executive staff are not comfortable reporting suspected violations to the President & CEO or Chair, they must then report suspected violations to the Chair of the Audit Subcommittee of the Finance Committee of the Board.

Protection of Whistleblowers

No Retaliation

No director, executive, officer, or staff member who in good faith reports any action or suspected action taken by or within God's Love We Deliver that is illegal, fraudulent or in violation of any God's Love We Deliver policy shall suffer any intimidation, harassment, discrimination or other retaliation or, for staff members, any adverse employment consequence. An individual who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, up to and including the termination of employment. This Whistleblower Policy is intended to encourage and enable staff members to raise serious concerns within our Agency prior to seeking resolution outside our Agency.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Individuals who bring concerns forward pursuant to this policy may be asked to provide certain additional identifying details in order to conduct a thorough investigation of their allegations. Concerns expressed anonymously will be investigated to the extent possible. Individuals should be aware; however, that anonymity could become an obstacle to full review and resolution of a concern.

Defend Trade Secrets Act of 2016

Finally, please be aware that, pursuant to the Defend Trade Secrets Act of 2016, an individual may not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that: (a) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (b) solely for the purpose of reporting or investigating a suspected violation of law; or (c) is made in a complaint or other

document that is filed under seal in a lawsuit or other proceeding. Further, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the employer's trade secrets to the attorney and use the trade secret information in the court proceeding if the individual: (a) files any document containing the trade secret under seal; and (b) does not disclose the trade secret, except pursuant to court order.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the ethical and legal standards noted above must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of such standards. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense punishable by disciplinary action, up to and including the termination of employment.

Administration of Policy

Responsibilities of the Chair of the Board and/or Chair of the Audit Subcommittee

The President & CEO is responsible for the administration of this policy and must report suspected violations to the Executive Committee of the Board. The responsibilities for investigating the complaint are listed below.

Any Report that is made directly to senior management or to any member of the Board of Directors, whether openly, confidentially or anonymously, will be promptly reported to either the Board Chair or the Chair of the Audit Subcommittee. That person will serve as the “director” of the investigation, and as such will receive, retain, investigate and act on all reported complaints and concerns related to questionable financial practices, compliance with legal and regulatory requirements, other ethics related issues and retaliation against staff members who report suspected violations.

The director of the investigation will notify the person who made the complaint – if their identity is known – and acknowledge receipt of the Report within seven days.

At the discretion of the director of the investigation, responsibilities created by this policy may be delegated to either the Board Chair, to the Chair of the Audit Subcommittee, to the entire Audit Subcommittee or to senior management. The director will have discretion to consult with any member of senior management who is not the subject of the allegation and may have appropriate expertise to assist.

If the director of the investigation determines that senior management should investigate the Report, they will notify the President & CEO of God’s Love We Deliver in writing of that conclusion. Senior management will thereafter promptly investigate the Report and will report the results of our investigation, in writing, to the director of the investigation. Senior

management will be free in their discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.

If the director of the investigation determines that the director or the Audit Subcommittee should investigate the Report, they will promptly determine what assistance, if any, is needed in order to conduct the investigation. Such assistance may include the creation of an ad hoc committee to advise in conducting the investigation. The director of the investigation can utilize their discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.

The director of the investigation will inform the Board of Directors of the receipt of a Report, and the actions taken, when appropriate. The director is not required to inform the Board of Directors of a Report prior to the conclusion of an investigation, if doing so would be likely to jeopardize the integrity of the investigation. The approval of the Board of Directors is not required for the director of the investigation to investigate a Report or to direct senior management to investigate a Report.

Records

God's Love We Deliver will retain for a period of seven years all records relating to any Report and investigation made under this Policy.

APPENDIX P | Client Agreement

CLIENT MEAL AGREEMENT WITH GOD'S LOVE WE DELIVER

GENERAL POLICY

I understand that my eligibility for home-delivered meals is based on a valid medical referral form signed by my doctor confirming my diagnosis and all physical and mental limitations as to why I can't cook and shop for myself. I understand this form is needed for me to receive services.

I understand that GLWD will allow me ten business days to send in a medical referral letter from my medical provider, or I will be taken off the program until GLWD receives a valid letter. I understand that for NON-HIV diagnoses, a new medical referral letter is due every twelve (12) months and for HIV+ diagnoses a new medical referral letter is due every six (6) months.

I understand that as a requirement for continuing on the meal program, I must complete a nutrition assessment with one of GLWD's nutritionists as well as a six-month reassessment or my meal service may be interrupted.

I understand that my deliveries may stop if I do not sign and return this Client Agreement. Upon receipt of these documents, meal deliveries will restart.

I understand that I have the right to contact GLWD regarding a concern, complaint or grievance without fear of risking my services and that the issue will be resolved quickly and respectfully. I have received a copy of the Client Grievance Policy, and understand how to make a complaint.

I will inform GLWD when I am no longer restricted in activities of daily living and therefore do not qualify for home delivered meals.

I understand that I must communicate with respect and courtesy with all GLWD staff and volunteers. I understand that at no time may I cause a GLWD representative to feel or be endangered. This includes physical and/or verbal abuse of any kind at any time.

I understand that verbal and/or physical abuse to a GLWD volunteer or staff member may result in discontinued services based on ineligibility for the meal program.

I understand that GLWD will not deliver meals to any household or building where a GLWD representative may be endangered. This includes physical and verbal abuse and substance use by the client or anyone in the client's household or building. This may include other situations deemed dangerous to GLWD.

DAILY RESPONSIBILITIES

I understand that I must be home to receive my meals between 8:00 a.m. and 4:00 p.m. each day that I am scheduled. If I can't be home, someone must be in my home to receive my meals. If no one will be in my home on my delivery day, I understand that I must cancel my meal delivery 24-48 hours in advance by calling (212) 294-8102 or (800) 747-2023 or emailing clientservices@glwd.org.

I understand that meals can't be left with anyone other than me or someone in my home, on the doorknob, porch, front desk or with a neighbor. Neither can delivery return if a delivery is missed.

I understand that if I miss 3 consecutive deliveries (without calling in advance to cancel), I may be suspended from the meal program for two weeks or more. And if I miss in addition to that period, I may be suspended for a period up to thirty days or more, at the discretion of the Manager of Client Services.

I understand that if I am not home to receive my meals and have not called in advance to cancel, I will not receive any meal deliveries.

APPENDIX Q | Client Grievance Policy

God's Love We Deliver is committed to maintaining partnerships providing quality services to all of our clients. However, on occasion, you may feel that you have a grievance, a serious complaint, that was not addressed adequately or the decision reached was one you did not agree with. The following procedure was developed to address these situations.

Step 1: Notify the Manager of Client Services of the grievance. A written report will be noted in your file and the manager will attempt to immediately resolve the situation. If further follow-up is necessary, the

manager will notify the Sr. Director of Program Services. The Manager of Client Services will notify you within 7 business days of a decision. Notification may be by telephone or in writing. If the grievance is the result of a suspension or termination of services, the suspension or termination of services will continue until the grievance is resolved and a final decision (Step 2) is reached.

Step 2: If the situation remains unsatisfactory, you are encouraged to submit your grievance in writing to the Manager of Client Services. Include a description of the concern and include the steps taken to resolve the situation. You may also request a copy of the initial report submitted. The Manager of Client Services will contact you usually within 7 business days of receipt of your grievance to review the matter. You will receive notification of a final decision within 7 days after contact with the manager. Notification may be by telephone or letter.

Note: You have the right to have a representative of your choice act as an advocate at any time during the grievance process. A representative may be a friend, family member, or someone in your support system. This individual must be reflected on New York State Confidentiality forms-the HIPAA form. Should you request further assistance, you may appeal to the Sr. Director of Program Services.

All concerns, complaints and grievances that are brought to the attention of God’s Love will be resolved quickly and respectfully. We value your opinions and concerns, and your feedback gives us an opportunity to improve our services to you. You can contact us regarding a complaint without fear of risking your services.

The chart below shows examples of concerns, complaints and grievances. It also shows where to call to address and resolve issues.

ISSUE	WHAT TO DO	POTENTIAL RESULT
You missed your delivery (you were asleep, your doorbell was out of order, and so on).	Call Client Services at 212-294-8102 or 800- 747-2023.	We may not be able to return that same day, however, we will return on your next delivery day.
Your meals have stopped because your medical provider said that you are not eligible for services from God’s Love.	Call the Manager of Client Services at 212-294-8131 or 800-747-2023.	We will help you confirm if you are eligible for our program; if not, we will help direct you to other meal programs.
You think your God’s Love driver is not following your delivery instructions and you are missing your deliveries.	Call Client Services at 212-294-8102 or 800- 747-2023.	A client services team member will follow-up with you to resolve your complaint with the delivery department.
You believe you are receiving the wrong food based on your nutritional needs.	Call Nutrition Services (NS) at 212-294-8103 or 800-747-2023.	The nutritionist will work with you and your medical provider to get you the meals that are best for you.
You have a conflict with a GLWD volunteer or staff member and you have been unsuccessful in resolving the conflict.	Call the Manager of Client Services at 212-294-8131 or 800-747-2023.	The Manager of Client Services will investigate.

APPENDIX R | HIPAA Authorization

New York State Department of Health HIPAA Compliant Authorization for Release of Medical Information and Confidential HIV and NON-HIV Related Information

EVERYONE, REGARDLESS OF DIAGNOSIS OR MEDICAL CONDITION, MUST SIGN THIS HIPAA

I consent to disclosure of:

- My HIV Medical Information*
- My NON-HIV Medical Information**

This form authorizes release of medical information including HIV-related information. You may choose to release just your non-HIV medical information, just your HIV-related information, or both. Your information may be protected from disclosure by federal privacy law and state law. Confidential HIV-related information is any information indicating that a person has had an HIV-related test, or has HIV infection, HIV-related illness or AIDS, or any information that could indicate a person has been potentially exposed to HIV.

Under New York State Law HIV-related information can only be given to people you allow to have it by signing a written release. This information may also be released to the following: health providers caring for you or your exposed child; health officials when required by law; insurers to permit payment; persons involved in foster care or adoption; official correctional, probation and parole staff; emergency or health care staff who are accidentally exposed to your blood, or by special court order. Under State law, anyone who illegally discloses HIV-related information may be punished by a fine of up to \$5,000 and a jail term of up to one year. However, some re-disclosures of medical and/or HIV-related information are not protected under federal law. For more information about HIV confidentiality, call the New York State Department of Health HIV Confidentiality Hotline at 1-800-962-5065; for information regarding federal privacy protection, call the Office for Civil Rights at 1-800-368-1019.

By checking the boxes above and signing this form, medical information and/or HIV-related information can be given to the people listed on page two (or additional sheets if necessary) of the form, for the reason(s) listed. Upon your request, the facility or person disclosing your medical information must provide you with a copy of this form. Information in the box below must be completed Name and address of facility/person disclosing HIV-related and/or medical information: Doctor's

Name: _____

Medical Facility/Hospital: _____

Agency: God's Love We Deliver

Name of person whose information will be released: _____

Name and address of person signing this form (if other than above): _____

Relationship to person whose information will be released: _____

Describe information to be released: _____

Reason for release of information: _____

Time period during which release of information is authorized.

From: To: _____

Disclosures cannot be revoked, once made. Additional exceptions to the right to revoke consent, if any:

Description of the consequences, if any, of failing to consent to disclosure upon treatment, payment, enrollment or eligibility for benefits (Note: Federal privacy regulations may restrict some consequences):

All facilities/persons listed on pages 1 and 2 of this form may share information among and between themselves for the purpose of providing medical care and services.

Please sign below to authorize:

Signature: _____

Date: _____

*Human Immunodeficiency Virus that causes AIDS

** If releasing only non-HIV medical information, you may use this form or another HIPAA-compliant general medical release form.

Provide information for each facility/person to be given general medical information and/or HIV-related information. Attach additional sheets as necessary. It is recommended that blank lines be crossed out prior to signing.

Name and address of facility/person to be given general medical and/or HIV-related information: God's Love We Deliver

Reason for release, if other than stated on page 1:

If information to be disclosed to this facility/person is limited, please specify:

Name and address of facility/person to be given general medical and/or HIV-related information:

Reason for release, if other than stated on page 1:

If information to be disclosed to this facility/person is limited, please specify:

The law protects you from HIV related discrimination in housing, employment, health care and other services. For more information call the New York State Division of Human Rights Office of AIDS Discrimination Issues at 1-800-523-2437 or (212) 480-2522 or the New York City Commission on Human Rights at (212) 306-7500. These agencies are responsible for protecting your rights.

My questions about this form have been answered. I know that I do not have to allow release of my medical and/or HIV-related information, and that I can change my mind at any time and revoke my authorization by writing the facility/person obtaining this release. I authorize the facility/person noted on page one to release medical and/or HIV-related information of the person named on page one to the organizations/persons listed.

Signature: (Subject of information or legally authorized representative)

If legal representative, indicate relationship to subject:

Date: _____

Print Name _____

Client/Patient Number: _____