Personnel Policies Overview and Policy Specifics
Table of Contents

- Introduction to Personnel Policies
- Recommended Personnel Policies
- Policy Development Specifics
- Personnel Recordkeeping
- Staff Responsibilities
- Closing
Introduction to Personnel Policies

Learning Objectives:

- Understand the elements of successful policy development
- Identify which personnel policies your organization needs to develop
- Understand personnel recordkeeping requirements
- Identify staff and team member responsibilities and best practices for effective grants administration
Introduction to Personnel Policies

Personnel Policy Development Key Items

Personnel policies define the treatment, rights, and guidelines for developing the way an organization runs. Effective personnel policies can serve as the blueprint to protect grant recipients and their employees from harm.

• Your organization should have a **purpose statement** that clearly states your organization's intentions, objectives, and goals.

• Your organization should have **written procedures** that are clear and easy to follow.

• The format of your organization's policies should be standardized to ensure similar information is provided across policy areas.

• In general, effective policies will include:
  1. Statement of Purpose
  2. Policy statement
  3. Key definitions and explanations
  4. Clear policy guidelines

Note:
Personnel policies and procedures should be reviewed and updated on a frequent basis.
The below checklist details personnel policies that your organization should research, develop, and implement.

<table>
<thead>
<tr>
<th>Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>HIPAA Policy</td>
</tr>
<tr>
<td>Sexual Harassment Policy</td>
</tr>
<tr>
<td>Equal Opportunity Policy</td>
</tr>
<tr>
<td>Non-Discrimination Policy</td>
</tr>
<tr>
<td>Americans with Disabilities Act (ADA) Policy</td>
</tr>
<tr>
<td>Drug-Free Workplace Policy</td>
</tr>
<tr>
<td>Employee Evaluation Policy</td>
</tr>
<tr>
<td>Conflict of Interest Policy</td>
</tr>
<tr>
<td>Use of Equipment Policy</td>
</tr>
<tr>
<td>Confidentiality Policy</td>
</tr>
<tr>
<td>Fraud, Waste and Abuse Whistleblower Policy</td>
</tr>
<tr>
<td>Records Retention Policy</td>
</tr>
</tbody>
</table>

**Note:**
Please refer to your grant agreement and stay up to date on State and Federal requirements.
Health Insurance Portability and Accountability Act (HIPAA)

HIPAA requires any organization that handles protected health information to ensure the information is not disclosed without consent and that the information is properly safeguarded.

If your organization handles information that could be covered under HIPAA, consider implementing policies that at least cover the below information and detail procedures to properly safeguard the information:

- Sensitive health information cannot be disclosed without a participant's knowledge and consent.
- Health care plans provided to employees must be individual, portable, and renewable.
- Systems for handling protected health information must abide by set security standards and requirements.
Sexual Harassment Policy

An effective sexual harassment policy prohibiting sexual harassment in the workplace establishes boundaries for employees and gives parties clear procedures and reporting mechanisms.

- Your organization is required to develop a written sexual harassment policy that at least covers the below information:
  - Illegality of sexual harassment
  - Definition of sexual harassment under state law
  - Description of sexual harassment with examples
  - How to file an internal complaint, and repercussions for perpetrators
  - Legal recourse and how to file an external complaint with the state
  - Contact information for the state entities where a complaint can be filed
  - Protection against retaliation for complaints filed
Equal Employment Opportunity Policy

An equal employment opportunity policy prohibits discrimination based on race, sex, or disability. Equal opportunities must be provided to individuals in protected classes.

Your organization is required to have an equal employment opportunity policy. The policy must consider and contain the following items:

- Promote equal opportunities for all employees.
- Protected race and national origin categories are American Indian, Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian, and Pacific Islander.
- Protections based on sex and disability status.
- A detailed report must be generated to include statistics broken out by protected class identifying potential disparities and setting goals for improvement. More details on the exact metrics are available in the text of the Illinois legislation.
- Avoid policies that create unequal impacts across protected classes.
Non-Discrimination Policy

Your organization must establish a non-discrimination policy detailing efforts to ensure you do not participate in unlawful discrimination or discrimination based on citizenship status.

Your organization must consider and develop a non-discrimination policy in line with the guidance provided in (775 ILCS 5/) Illinois Human Rights Act:

- Do not engage in “unlawful discrimination”, or discrimination based on citizenship status.
- Adopt affirmative action to ensure that protected groups have equal access to employment.
- Work to address the effects of past discrimination.
American Disabilities Act Policy (ADA)

Your organization must establish an ADA policy that ensures no discrimination against disabled people occurs and that employees or applicants have access to reasonable accommodations.

A person is covered as having a disability if:

1. The disability is a physical or mental impairment that substantially limits at least one major “life activity”.
2. There is documentation of the disability, or others perceive that they have a disability.

Reminders:

1. An organization may not discriminate against disabled people in recruitment, hiring, promotion, pay, assignments, leave of absence, benefits or any privilege of employment.
2. Employers must provide reasonable accommodations for employees that do not place an undue burden on the employer.
Drug-Free Workplace Policy

Your organization must have a policy prohibiting involvement with drugs in the workplace.

30 ILCS 580/ Drug Free Workplace Act details policy guidance and requirements for a Drug-Free Workplace:

1. Definitions of what controlled substances are under the Illinois Controlled Substances Act
2. The organization must have a drug awareness program that advertises the policy, dangers associated with drugs and rehabilitation options
3. The organization must publish a statement notifying employees:
   - Employees are prohibited from manufacturing, distributing, dispensing, possessing or using controlled substances in the workplace
   - Specification of repercussions and consequences
Employee Evaluation Policy

Your organization must establish and follow an employee evaluation policy. The policy sets standards for how your organization’s leadership will provide employee feedback, define evaluation intervals, and the format of the evaluation.

**Why:** Your organization is required to maintain records on employee evaluations. Having a policy ensures the evaluations are provided in a consistent, comparable, and useful format.

- Memorialize evaluation protocol, cadence, and methods in the Employee Manual or equivalent.
- Identify types of documentation that will be maintained to support the process.
- Train organization’s staff on conducting evaluations and keeping proper documentation.
- List escalation protocols for poor performance.
Conflict of Interest Policy

Your organization must establish conflict of interest policies and procedures. Any relationship with a relevant entity or individual that has even the appearance of impropriety should be reported. Maintaining independence, and tracking potential conflicts of interest, helps prevent corruption and builds confidence in your organization.

An effective conflict of interest policy will:

1. Address conditions under which outside activities, relationships, or financial interests are proper or improper.
2. Include a process for notification and review by your organization’s responsible official.
3. Specify the nature of penalties that will be imposed for violations.

Reminder: you must disclose in writing any potential or existing conflicts of interest with IDHS including familial relationships between employees and board members.
Use of Equipment Policy

An effective equipment policy ensures equipment purchased with grant funds is used for its intended purpose. Review your specific funding notice and 2 CFR 200.313 for specific requirements.

**Equipment purchased under a grant has strings attached.**

- Unless otherwise specified, property acquired using grant money belongs to the granting agency.
- The equipment must be used for the authorized purpose only.
- The property may be disposed only by following grant requirements.
- Disposition policy may need to specify obtaining IDHS approval prior to disposing grant funded property.
Confidentiality Policy

Your organization must develop policies and procedures to ensure information is controlled and maintained to protect the organization, its employees, and grant participants.

Your organization must:

- Provide reasonable measures to protect and safeguard personally identifiable information and other information the awarding agency designates as sensitive (2 CFR 200.303(d).

Remember: Unauthorized release of confidential information can expose your organization to legal risks and violate the trusts of the awarding agency and the participants of your programs.
Fraud, Waste & Abuse/Whistleblower Protection Policy

Your organization is required to have a policy to protect whistleblowers that report on potential fraud, waste or abuse. Federal law prohibits an organization (through a manager, supervisor, administrator, etc.) from retaliating against employees.

An effective whistleblower policy encourages staff and volunteers to come forward with credible information on illegal practices or violations within an organization. In addition to including the reporting contact information, the policy should contain elements of the below information:

- Documented protections from retaliation.
- Identifies staff, board member, or other parties to whom the information can be reported and details reporting instructions.
- Contains document retention, destruction, and storage of your organization's documents and records.
Policy Development Specifics

Record Retention Policy

Your organization must develop a records retention policy in line with federal regulations. Financial records and grant specific records must be maintained for a minimum of three years after the close of the program. **Check your specific Notice of Funding Opportunity (NOFO) and grant award for specific requirements related to records retention.**

Why does my organization need a records retention policy?

- A grantee may be asked to produce grant specific records for oversight purposes. Failure to maintain records could lead to non-compliance and the inability to receive additional grant funding.
- An effective records retention policy outlines procedures to maintain records including backup procedures and is clearly communicated to all employees within your organization.

UNIFORM GUIDANCE: RECORDS PUBLIC ACCESS

UNIFORM GUIDANCE: RECORDS RETENTION
What Should be Included in a Personnel File?

Your organization is responsible for collecting and maintaining a personnel file. Below is a sample listing of items that should be included in a personnel file.

1. Job Application and Resume
   Why: If there are questions about hiring procedures, it is important that information related to the application process is maintained.

2. Job descriptions and departmental organization chart
   Why: An organization needs to be able to identify what roles are performed by each employee.

3. Documentation of annual evaluations
   Why: Documentation that employees are being given performance feedback at regular intervals ensures that lower performing employees are given an opportunity to improve performance.

4. Documentation of Conflict-of-Interest Statements
   Why: Documentation of reported conflicts of interest to ensure employees are aware of the policy and have no conflict with board members or vendors.

5. Training logs and onboarding information
   Why: Documentation that employees have received onboarding instructions and completed required annual trainings. Provides documentation that employees are aware of organization policies and requirements.
What Should Employees do Before and During the Grant Program?

1. **Read the employee manual**
   The employee manual should contain information on the organization’s policies, requirements and procedures.
   **Why:** Employees must be aware of the policies and procedures in place.

2. **Sign Conflict of Interest forms**
   Transparency is key!
   **Why:** Monitor your conflicts of interest and potential appearances of conflicts of interest throughout your employment to avoid violations.

3. **Follow policies and procedures**
   Ensure you are aware of your organizations policies.
   **Why:** Understanding the policies in place can protect you and your organization.

4. **Complete required trainings**
   **Why:** Trainings are designed to inform on organizational specifics and for the employee to fully understand the policies, procedures, and punishment associated with non-compliance.
Grantee Reminders

- Ensure that your personnel policies are in writing and are accessible to all employees
- Policies should be clear and easy to follow
- Maintain detailed personnel files
- Periodically review and refresh policies to ensure compliance with all relevant requirements
- Train staff assigned to administer grant awards on policies
- Monitor Federal requirements and applicable laws to incorporate in policies
Resources

- Uniform Grant Agreement: [STATE OF ILLINOIS UGA](#)
- Sample IDHS Grant Agreement: [Sample IDHS Grant Agreement](#)
- Illinois Administrative Code: [44 Ill. Admin Code 7000.430](#)
Questions?