

VEEMAH Integrated Wellness And Consulting Services, LLC

August 13, 2025



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1.Introduction

1.1 Handbook Disclaimer

The contents of this handbook serve only as guidelines and supersede any prior handbook. Neither this handbook, nor any other policy or practice, creates an employment contract, or an implied or express promise of continued employment with the Organization. Employment with VEEMAH Integrated Wellness And Consulting Services, LLC is "AT-WILL". This means employees or VEEMAH Integrated Wellness And Consulting Services, LLC may terminate the employment relationship at any time, for any reason, with or without cause or advance notice. As an at-will employee, it is not guaranteed, in any manner, that you will be employed with VEEMAH Integrated Wellness And Consulting Services, LLC for any set period of time.

This handbook may provide a summary of employee health benefits, however actual coverage will be determined by the express terms of the benefit plan documents. If there are any conflicts between the handbook or summaries provided and the plan documents, the plan documents will control. The Organization reserves the right to amend, interpret, modify or terminate any of its employee benefits programs without prior notice to the extent allowed by law.

The Organization also has the right, with or without notice, in an individual case or generally, to change any of the policies in this handbook, or any of its guidelines, policies, practices, working conditions or benefits at any time. No one is authorized to provide any employee with an employment contract or special arrangement concerning terms or conditions of employment unless the contract or arrangement is in writing and signed by the president and the employee.

1.2 Welcome Message

Dear Valued Employee,

Welcome to VEEMAH Integrated Wellness And Consulting Services, LLC! We are pleased with your decision to join our team.

VEEMAH Integrated Wellness And Consulting Services, LLC is committed to providing superior quality and unparalleled customer service in all aspects of our business. We believe each employee contributes to the success and growth of our Organization.

This employee handbook contains general information on our policies, practices, and benefits. Please read it carefully. If you have questions regarding the handbook, please discuss them with your supervisor or the Program Manager/CFO.

Welcome aboard. We look forward to working with you!

Sincerely,

The Program Manager/CFO

1.3 Changes in Policy

Change at VEEMAH Integrated Wellness And Consulting Services, LLC is inevitable. Therefore, we expressly reserve the right to interpret, modify, suspend, cancel, or dispute, with or without notice, all or any part of our policies, procedures, and benefits at any time with or without prior notice. Changes will be effective on the dates determined by VEEMAH Integrated Wellness And Consulting Services, LLC, and after those dates all superseded policies will be null and void.

No individual supervisor or manager has the authority to alter the foregoing. Any employee who is unclear on any policy or

procedure should consult a supervisor or the Program Manager/CFO.

1.4 Program Overview

VEEMAH Integrated Wellness And Consulting Services, LLC offers mental health treatment services in the clinic for children, adolescents, and adults.

VEEMAH Integrated Wellness And Consulting Services, LLC also offers CIBHS, a community-based treatment option that provides intensive intervention to children with significant mental health conditions. VEEMAH Integrated Wellness And Consulting Services, LLC's interventions incorporate evidence-based treatment, including trauma-informed care and other treatment modalities, specifically addressing the client's needs.

Program Goals & Objectives

To Our Clients: VEEMAH Integrated Wellness And Consulting Services, LLC strives to improve the lives of people with mental health needs. We work to develop programs that foster personal growth, accentuate positive potential, and teach healthy coping skills.

To Our Communities: Our goal is to provide programs that enhance the strengths of each person, family, and community we work with. We strive to have each community see our program as an asset.

Name: This organization's name is VEEMAH Integrated Wellness And Consulting Services, LLC Integrated Wellness and Consulting Services, LLC. It is a Limited Liability Company registered in Minnesota and in good standing.

OBJECTIVES

To provide culturally specific services to individuals in the Twin Cities and surrounding areas.

To help the residents of these areas enhance a system of care that ensures primary mental health needs are met through VEEMAH Integrated Wellness And Consulting Services, LLC.

To unite people of all social groups and ages to understand mental health problems to enhance the development of a sound community.

To provide high-quality mental health treatment services.

PHILOSOPHY

We strive to provide comprehensive and individualized intervention that is geared toward the client's needs. We strive to empower our clients by helping them understand their condition and identify coping strategies that could help them in their daily lives.

VISION

"To be a source of empowerment, support, and hope for our community."

MISSION STATEMENT

To provide the highest quality of integrity-based care using evidence-based interventions and techniques so that our clients can

Attain: A healthier quality of life

Improve: Their self-worth and values

Resolve: Core issues that are barriers in the way of their progress

Embrace: The will to live and enjoy the subtleties of life

Support: Clients of all identities with respect to age, gender, culture, race, mental and physical abilities, ethnicity, sexual orientation, language, religion, spirituality, socio-economic status, political affiliation, and worldview.

2. General Employment

2.1 At-Will Employment

Employment with VEEMAH Integrated Wellness and Consulting Services, LLC is “at-will.” This means employees are free to resign at any time, with or without cause, and VEEMAH Integrated Wellness And Consulting Services, LLC may terminate the employment relationship at any time, with or without cause or advance notice. As an at-will employee, it is not guaranteed, in any manner, that you will be employed with VEEMAH Integrated Wellness And Consulting Services, LLC for any set period of time.

The policies set forth in this employee handbook are the policies that are in effect at the time of publication. They may be amended, modified, or terminated at any time by VEEMAH Integrated Wellness And Consulting Services, LLC, except for the policy on at-will employment, which may be modified only by a signed, written agreement between the President and the employee at issue. Nothing in this handbook may be construed as creating a promise of future benefits or a binding contract between VEEMAH Integrated Wellness And Consulting Services, LLC and any of its employees.

2.2 Immigration Law Compliance

VEEMAH Integrated Wellness And Consulting Services, LLC is committed to employing only United States citizens and aliens who are authorized to work in the United States.

In compliance with the Immigration Reform and Control Act of 1986, as amended, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with VEEMAH Integrated Wellness And Consulting Services, LLC within the past three years, or if their previous I-9 is no longer retained or valid.

VEEMAH Integrated Wellness And Consulting Services, LLC may participate in the federal government's electronic employment verification system, known as “E-Verify.” Pursuant to E-Verify, VEEMAH Integrated Wellness And Consulting Services, LLC provides the Social Security Administration, and if necessary, the Department of Homeland Security with information from each new employee's Form I-9 to confirm work authorization.

2.3 Equal Employment Opportunity

VEEMAH Integrated Wellness And Consulting Services, LLC is an Equal Opportunity Employer. Employment opportunities at VEEMAH Integrated Wellness And Consulting Services, LLC are based upon one's qualifications and capabilities to perform the essential functions of a particular job. All employment opportunities are provided without regard to race, religion, sex (including sexual orientation and transgender status), pregnancy, childbirth or related medical conditions, national origin, age, veteran status, disability, genetic information, or any other characteristic protected by law.

This Equal Employment Opportunity policy governs all aspects of employment, including, but not limited to, recruitment, hiring, selection, job assignment, promotions, transfers, compensation, discipline, termination, layoff, access to benefits and training, and all other conditions and privileges of employment.

The Organization will provide reasonable accommodations as necessary and where required by law so long as the accommodation does not pose an undue hardship on the business. The Organization will also accommodate sincerely held religious beliefs of its employees to the extent the accommodation does not pose an undue hardship on the business. If you would like to request an accommodation, or have any questions about your rights and responsibilities, contact your Program Manager/CFO. This policy is not intended to afford employees with any greater protections than those which exist under federal, state or local law.

VEEMAH Integrated Wellness And Consulting Services, LLC strongly urges the reporting of all instances of discrimination and harassment, and prohibits retaliation against any individual who reports discrimination, harassment, or participates in an investigation of such report. VEEMAH Integrated Wellness And Consulting Services, LLC will take appropriate disciplinary action, up to and including immediate termination, against any employee who violates this policy.

2.4 Equal Employment Opportunity (Minnesota Employees)

VEEMAH Integrated Wellness And Consulting Services, LLC is an Equal Opportunity Employer. Employment opportunities at VEEMAH Integrated Wellness And Consulting Services, LLC are based upon one's qualifications and capabilities to perform the essential functions of a particular job. All employment opportunities are provided without regard to:

- Race
- Religion
- Color
- Creed
- Sex (including pregnancy, childbirth, and disabilities related to pregnancy or childbirth)
- National origin
- Age
- Veteran status
- Disability
- Genetic information
- Marital status
- Familial status
- Sexual orientation
- Gender identity
- Status with regard to public assistance
- Lawful activity outside the workplace during non-work hours, such as the use of tobacco products
- Any other characteristic protected by law

This Equal Employment Opportunity policy governs all aspects of employment, including, but not limited to, recruitment, hiring, selection, job assignment, promotions, transfers, compensation, discipline, termination, layoff, access to benefits and training, and all other conditions and privileges of employment.

VEEMAH Integrated Wellness And Consulting Services, LLC strongly urges the reporting of all instances of discrimination and harassment, and prohibits retaliation against any individual who reports discrimination, harassment or participates in an investigation of such report. Appropriate disciplinary action, up to and including immediate termination, will be taken against any employee who violates this policy.

2.5 Employee Grievances

It is the policy of VEEMAH Integrated Wellness And Consulting Services, LLC to maintain a harmonious workplace environment. VEEMAH Integrated Wellness And Consulting Services, LLC encourages its employees to express concerns about work-related issues, including workplace communication, interpersonal conflict, and other working conditions.

Employees are encouraged to raise concerns with their supervisors. If not resolved at this level, an employee may submit, in writing, a signed grievance to the Program Manager/CFO.

After receiving a written grievance, VEEMAH Integrated Wellness And Consulting Services, LLC may hold a meeting with the employee, the immediate supervisor, and any other individuals who may assist in the investigation or resolution of the issue. All discussions related to the grievance will be limited to those involved with, and who can assist with, resolving the issue.

Complaints involving alleged discriminatory practices shall be processed in accordance with VEEMAH Integrated Wellness And Consulting Services, LLC's Sexual and other Unlawful Harassment Policy.

VEEMAH Integrated Wellness And Consulting Services, LLC assures that all employees filing a grievance or complaint can do so without fear of retaliation or reprisal.

2.6 Internal Communication

Effective and ongoing communication within VEEMAH Integrated Wellness And Consulting Services, LLC is essential. As such, the Organization maintains systems through which important information can be shared among employees and management.

Bulletin boards are posted in designated areas of the workplace to display important information and announcements. In addition, VEEMAH Integrated Wellness And Consulting Services, LLC uses the Intranet and email to facilitate communication and share access to documents. For information on appropriate email and Internet usage, employees may refer to the Computer, Email, and Internet Usage policy. To avoid confusion, employees should not post or remove any material from the bulletin boards.

All employees are responsible for checking internal communications on a frequent and regular basis. Employees should consult their supervisor with any questions or concerns on information disseminated.

2.7 Outside Employment

Employees may hold outside jobs as long as the employee meets the performance standards of their position with VEEMAH Integrated Wellness And Consulting Services, LLC.

Unless an alternative work schedule has been approved by VEEMAH Integrated Wellness And Consulting Services, LLC, employees will be subject to the Organization's scheduling demands, regardless of any existing outside work assignments; this includes availability for overtime when necessary.

VEEMAH Integrated Wellness And Consulting Services, LLC's property, office space, equipment, materials, trade secrets, and any other confidential information may not be used for any purposes relating to outside employment.

2.8 Anti-Retaliation and Whistleblower Policy

This policy is designed to protect employees and address VEEMAH Integrated Wellness And Consulting Services, LLC's commitment to integrity and ethical behavior. In accordance with anti-retaliation and whistleblower protection regulations, VEEMAH Integrated Wellness And Consulting Services, LLC will not tolerate any retaliation against an employee who:

- Makes a good faith complaint, or threatens to make a good faith complaint, regarding the suspected Organization or employee violations of the law, including discriminatory or other unfair employment practices;
- Makes a good faith complaint, or threatens to make a good faith complaint, regarding accounting, internal accounting controls, or auditing matters that may lead to incorrect, or misrepresentations in, financial accounting;
- Makes a good faith report, or threatens to make a good faith report, of a violation that endangers the health or safety of an employee, patient, client or customer, environment or general public;
- Objects to, or refuses to participate in, any activity, policy or practice, which the employee reasonably believes is a violation of the law;
- Provides information to assist in an investigation regarding violations of the law; or
- Files, testifies, participates or assists in a proceeding, action or hearing in relation to alleged violations of the law.

Retaliation is defined as any adverse employment action against an employee, including, but not limited to, refusal to hire, failure to promote, demotion, suspension, harassment, denial of training opportunities, termination, or discrimination in any manner in the terms and conditions of employment.

Anyone found to have engaged in retaliation or in violation of law, policy or practice will be subject to discipline, up to and including termination of employment. Employees who knowingly make a false report of a violation will be subject to disciplinary action, up to and including termination.

Employees who wish to report a violation should contact their supervisor or Vivian Ballah-Swaray directly. Employees should also review their state and local requirements for any additional reporting guidelines.

VEEMAH Integrated Wellness And Consulting Services, LLC will promptly and thoroughly investigate and, if necessary, address any reported violation.

Employees who have any questions or concerns regarding this policy and related reporting requirements should contact their supervisor, the Program Manager/CFO or any state or local agency responsible for investigating alleged violations.

3. Employment Status & Recordkeeping

3.1 Employment Classifications

For purposes of salary administration and eligibility for overtime payments and employee benefits, VEEMAH Integrated Wellness And Consulting Services, LLC classifies employees as either exempt or non-exempt. Non-exempt employees are entitled to overtime pay in accordance with federal and state overtime provisions. Exempt employees are exempt from federal and state overtime laws and, but for a few narrow exceptions, are generally paid a fixed amount of pay for each workweek in which work is performed.

If you change positions during your employment with VEEMAH Integrated Wellness And Consulting Services, LLC or if your job responsibilities change, you will be informed by the Program Manager/CFO of any change in your exempt status.

In addition to your designation of either exempt or non-exempt, you also belong to one of the following employment categories:

Full-Time:

Full-time employees are regularly scheduled to work greater or equal to 40 hours per week. Generally, regular full-time employees are eligible for VEEMAH Integrated Wellness And Consulting Services, LLC's benefits, subject to the terms, conditions, and limitations of each benefit program.

Part-Time:

Part-time employees are regularly scheduled to work less than 40 hours per week. Regular part-time employees may be eligible for some VEEMAH Integrated Wellness And Consulting Services, LLC benefit programs, subject to the terms, conditions, and limitations of each benefit program.

Temporary:

Temporary employees include those hired for a limited time to assist in a specific function or in the completion of a specific project. Temporary employees generally are not entitled to VEEMAH Integrated Wellness And Consulting Services, LLC benefits, but are eligible for statutory benefits to the extent required by law. Employment beyond any initially stated period does not in any way imply a change in employment status or classification. Temporary employees retain temporary status unless and until they are notified, by VEEMAH Integrated Wellness And Consulting Services, LLC Management, of a change.

3.2 Personnel Data Changes

It is the responsibility of each employee to promptly notify their supervisor or the Program Manager/CFO of any changes in personnel data. Such changes may affect your eligibility for benefits, the amount you pay for benefit premiums, and your receipt of important company information.

If any of the following have changed or will change in the coming future, contact your supervisor or the Program Manager/CFO as soon as possible:

- Legal name
- Mailing address
- Telephone number(s)
- Change of beneficiary
- Exemptions on your tax forms
- Emergency contact(s)
- Training certificates
- Professional licenses

3.3 Access to Personnel Records (Minnesota Employees)

Following a good faith written request, current VEEMAH Integrated Wellness And Consulting Services, LLC employees, as well as separated employees, may review their personnel records. Current employees may review their records once every six months. Separated employees may review their records once per year for as long as the record is maintained.

"Personnel record" means: any application for employment; wage or salary history; notices of commendation; discipline notices or warnings; pay deduction authorizations; fringe benefit information; leave records; and employment history, including job titles, dates of promotions, transfers, and other changes, attendance records, performance evaluations, and retirement records.

If the personnel record is physically located within the state of Minnesota, VEEMAH Integrated Wellness And Consulting Services, LLC will provide the employee with an opportunity to review their record within seven days of a written request. If the personnel record is located outside of Minnesota, VEEMAH Integrated Wellness And Consulting Services, LLC will provide the employee with access to their personnel record within fourteen days of a written request.

Personnel records must be reviewed in the presence of the Program Manager/CFO. Following review of the records and upon written request, VEEMAH Integrated Wellness And Consulting Services, LLC will provide the employee with a copy of the record at no charge.

If an employee disputes information contained in their personnel record, they may request that it be removed or revised. If VEEMAH Integrated Wellness And Consulting Services, LLC does not agree that the information should be removed or revised, the employee may submit up to a five page written statement explaining their position. This statement will be retained along with the disputed information for as long as the information is maintained in the employee's personnel record.

VEEMAH Integrated Wellness And Consulting Services, LLC will not take any action against an employee for appropriately asserting their rights to review their personnel record.

3.4 Expense Reimbursement

VEEMAH Integrated Wellness And Consulting Services, LLC reimburses employees for necessary expenditures and reasonable costs incurred in the course of doing their jobs. Expenses incurred by an employee must be approved in advance by the Program Manager/CFO.

Some expenses that may warrant reimbursement include, but are not limited, to the following: mileage costs, air or ground transportation costs, lodging, meals for the purpose of carrying out company business, and any other reimbursable expenses as required by law. Employees are expected to make a reasonable effort to limit business expenses to economical options.

To be reimbursed, employees must submit expense reports to the Program Manager/CFO for approval. The report must be accompanied by receipts or other documentation substantiating the expenses. Questions regarding this policy should be directed to your supervisor.

3.5 Termination of Employment

Termination of employment is an inevitable part of personnel activity within any organization.

Notice of Voluntary Separation

Employees who intend to terminate employment with VEEMAH Integrated Wellness And Consulting Services, LLC shall provide VEEMAH Integrated Wellness And Consulting Services, LLC with at least two weeks written notice. Such notice is intended to allow the Organization time to adjust to the employee's departure without placing undue burden on those employees who may be required to fill in before a replacement can be found.

Return of Company Property

Any employee who terminates employment with VEEMAH Integrated Wellness And Consulting Services, LLC shall return all files, records, keys, and any other materials that are the property of VEEMAH Integrated Wellness And Consulting Services, LLC prior to their last date of employment.

Final Pay

VEEMAH Integrated Wellness And Consulting Services, LLC will provide employees with their final pay in accordance with applicable federal, state and local laws.

Benefits Upon Termination

All accrued and/or vested benefits that are due and payable at termination will be paid in accordance with applicable federal, state and local laws.

Certain benefits, such as healthcare coverage, may continue at the employee's expense, if the employee elects to do so. VEEMAH Integrated Wellness And Consulting Services, LLC will notify employees of the benefits that may be continued and of the terms, conditions, and limitations of such continuation.

If you have any questions or concerns regarding this policy, contact VEEMAH Integrated Wellness And Consulting Services, LLC's Program Manager/CFO.

4. Working Conditions & Hours

4.1 Company Hours

VEEMAH Integrated Wellness And Consulting Services, LLC is open for business from

- Monday - Friday 08:30 AM to 06:00 PM
- Saturday 10:00 AM to 02:00 PM

. This excludes holidays recognized by VEEMAH Integrated Wellness And Consulting Services, LLC. The standard workweek is 40 hours.

Supervisors will advise employees of their scheduled shift, including starting and ending times. Business needs may necessitate a variation in your starting and ending times as well as in the total hours you may be scheduled to work each day and each week.

4.2 Emergency Closing

At times, emergencies such as severe weather, fires, or power failures can disrupt company operations. In extreme cases, these circumstances may require the closing of a work facility. The decision to close or delay regular operations will be made by VEEMAH Integrated Wellness And Consulting Services, LLC management.

When a decision is made to close, employees will receive official notification from VEEMAH Integrated Wellness And Consulting Services, LLC.

Note: In a declared state of emergency that prohibits travel, employees shouldn't report to work.

Pay:

Exempt Employees:

If VEEMAH Integrated Wellness And Consulting Services, LLC closes due to an emergency, employees who are classified as exempt from overtime will receive their full salary, provided they have worked any part of the workweek.

Non-Exempt Employees:

If VEEMAH Integrated Wellness And Consulting Services, LLC closes due to an emergency, employees who are classified as non-exempt from overtime won't be paid, unless state or local law requires such pay or they have paid leave available and elect to use it for the missed work hours.

Note: If a non-exempt employee is already working when the decision to close is made, the employee will be paid for all hours actually worked and any additional hours that may be required under state and local laws, if applicable. If a non-exempt employee arrives at work and is asked to wait while a decision to close is made, they will receive pay for the time they spent waiting.

If you have questions about emergency closing or pay, please contact the Program Manager/CFO.

4.3 Workplace Safety

VEEMAH Integrated Wellness And Consulting Services, LLC is committed to providing a clean, safe, and healthful work environment for its employees. Maintaining a safe work environment, however, requires the continuous cooperation of all employees. VEEMAH Integrated Wellness And Consulting Services, LLC and all employees must comply with all

occupational safety and health standards and regulations established by the Occupational Safety and Health Act and state and local regulations. In addition, all employees are expected to obey safety rules and exercise caution and common sense in all work activities.

Complaint and Reporting Procedure:

Employees should immediately report any unsafe conditions to their supervisor without fear of reprisal. In the case of an accident that results in injury, regardless of how seemingly insignificant the injury may appear, employees must notify their supervisor. If you believe it would be inappropriate to report the matter to your supervisor, you can report it directly to:

Vivian Ballah-Swaray

vivianbs@veemahconsulting.com

(763) 228-8086

Employees who violate safety standards, cause hazardous or dangerous situations, or fail to report or, where appropriate, remedy such situations may be subject to disciplinary action, up to and including termination of employment.

Retaliation Prohibited:

VEEMAH Integrated Wellness And Consulting Services, LLC expressly prohibits retaliation against anyone who reports unsafe working conditions or work-related accidents, injuries or illnesses. Any form of retaliation will be subject to disciplinary action, up to and including termination of employment.

Questions or concerns regarding this policy should be directed to your supervisor or the Program Manager/CFO.

4.4 Security

The purpose of VEEMAH Integrated Wellness And Consulting Services, LLC's security policy is to protect Organization assets and to maintain a safe working environment for all employees.

Facility Access:

All regular VEEMAH Integrated Wellness And Consulting Services, LLC employees will be issued a key to gain access to VEEMAH Integrated Wellness And Consulting Services, LLC facilities. Employees who are issued keys are responsible for their safekeeping. All lost or stolen keys must be reported to your supervisor as soon as possible.

Upon separation from VEEMAH Integrated Wellness And Consulting Services, LLC, and at any other time upon VEEMAH Integrated Wellness And Consulting Services, LLC's request, all keys must be returned to your supervisor.

Closing Procedures:

The last employee, or a designated employee, who leaves the office at the end of the business day assumes the responsibility to ensure that: all doors are securely locked; the alarm system is armed; thermostats are set on appropriate evening and/or weekend setting; and all appliances and lights are turned off with the exception of the lights normally left on for security purposes.

Employees are not permitted on company property after hours without prior written authorization from the Program Manager/CFO.

4.5 Meal & Break Periods

VEEMAH Integrated Wellness And Consulting Services, LLC will schedule meal and break periods in order to accommodate Organization operating requirements.

4.6 Meal & Break Periods (Minnesota Employees)

Employees are entitled to a reasonable meal period if scheduled to work 8 or more consecutive hours. For non-exempt employees, the meal period is unpaid. Non-exempt employees must record the beginning and ending of the meal period

using VEEMAH Integrated Wellness And Consulting Services, LLC's timekeeping system.

Non-exempt employees must be fully relieved of their job responsibilities and are not permitted to work during unpaid meal periods. If for any reason a non-exempt employee does not take the meal period that they are provided, the employee must notify his or her supervisor immediately.

Non-exempt employees are also entitled to a reasonable break period at least every 4 hours. Break periods of 20 minutes or less will be paid.

Supervisors will schedule meal and break periods in order to accommodate the Organization's operating requirements.

4.7 Break Time for Nursing Mothers

VEEMAH Integrated Wellness And Consulting Services, LLC accommodates employees who wish to express breast milk during the workday by providing reasonable break times to do so. The Organization will provide a designated room, other than a bathroom, that is shielded from view, free from intrusion from coworkers and the public and is in compliance with all other applicable laws for this purpose.

Employees who use regularly scheduled rest breaks to express breast milk will be paid for the break time. If the lactation break does not run concurrently with the employee's regularly scheduled compensated break, the lactation break time will be unpaid.

For questions related to this policy, please contact the Program Manager/CFO.

4.8 Break Time for Nursing Mothers (Minnesota Employees)

VEEMAH Integrated Wellness And Consulting Services, LLC accommodates employees who wish to express breast milk during the workday at the worksite by providing reasonable rest periods to do so. These breaks will be paid.

VEEMAH Integrated Wellness And Consulting Services, LLC will make reasonable efforts to provide a clean, private, and secure room or other location, other than a bathroom or toilet stall, with access to an electrical outlet and in close proximity to the worksite for this purpose.

For questions related to this policy, please contact the Program Manager/CFO.

5. Employee Benefits

5.1 Military Leave

VEEMAH Integrated Wellness And Consulting Services, LLC grants employees unpaid time off for service, training and other obligations in the uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and any other applicable state law.

All employees requesting time off for military service must provide advance notice to their immediate supervisor, unless military necessity prevents such notice or it is otherwise impracticable. Continuation of health insurance benefits is available during military leave subject to the terms and conditions of the group health plan and applicable law.

Employees are eligible for reemployment for up to five years from the date their military leave began. The period an individual has to apply for reemployment or report back to work after military service is based on time spent on military duty and on applicable law. For reinstatement guidelines, contact the Program Manager/CFO.

Employees who qualify for reemployment will return to work at a pay level and status equal to that which they would have attained had they not taken military leave. They will be treated as though they were continuously employed for purposes of determining benefits based on length of service.

VEEMAH Integrated Wellness And Consulting Services, LLC complies with all rights and protections under all applicable state laws granting time off for service, training and other obligations in the uniformed services. This includes, but is not limited to, benefits entitlement and continuation, notice and recertification requirements, and reemployment application requirements.

Questions regarding this policy should be directed to the Program Manager/CFO.

5.2 Family Military Leave (Minnesota Employees)

Employees with an immediate family member in the U.S. armed forces, who has been ordered into active service, may be granted up to one day of leave per calendar year to attend a send-off or homecoming ceremony.

Employees may be eligible to take up to 10 days of leave in the unfortunate event his or her immediate family member is injured or killed while engaged in active service.

For purposes of this policy, immediate family member means parent, child, grandparent, sibling, or spouse.

Family military leave is unpaid; however, employees may use accrued paid time off for this purpose.

Employees must provide as much notice as possible of their intent to take such leave. When possible, employees should consult with their supervisor to schedule the leave so that it does not unduly disrupt VEEMAH Integrated Wellness And Consulting Services, LLC's operations.

Employees must be prepared to provide VEEMAH Integrated Wellness And Consulting Services, LLC with certification from the proper military authority to verify the employee's eligibility for family military leave.

Upon expiration of the leave, an employee will generally be reinstated to his or her position with equivalent seniority, benefits, pay and other terms and conditions of employment.

5.3 Jury Duty

VEEMAH Integrated Wellness And Consulting Services, LLC encourages employees to fulfill their civic responsibilities when

called upon to serve as a juror. Employees must provide their immediate supervisor with a copy of their jury summons as soon as possible so that the supervisor may make arrangements to accommodate their absence.

Employees on jury duty must report to work on workdays, or parts of workdays, when they are not required to serve. Either VEEMAH Integrated Wellness And Consulting Services, LLC or the employee may request an excuse from jury duty if it is determined that the employee's absence would create serious operational difficulties.

Jury duty will be paid if required by applicable state law. If paid, jury duty pay will be calculated on the employee's base pay rate times the number of hours the employee would otherwise have worked on the day of absence. . If exempt employees miss work because of jury duty, they will receive their full salary, unless they miss the entire workweek. However, VEEMAH Integrated Wellness And Consulting Services, LLC may offset any jury-duty fees received by an exempt employee against the salary due for that workweek.

5.4 Workers' Compensation

Employees who are injured on the job at VEEMAH Integrated Wellness And Consulting Services, LLC are eligible for Workers' Compensation benefits. Such benefits are provided at no cost to employees and cover any injury or illness sustained in the course of employment that requires medical treatment.

Lost time or medical expenses incurred as a result of an accident or injury which occurred while an employee was on the job will be compensated for in accordance with workers' compensation laws. This protection is paid for in full by VEEMAH Integrated Wellness And Consulting Services, LLC. No premium is charged for this coverage and no individual enrollment is required. VEEMAH Integrated Wellness And Consulting Services, LLC will provide medical care and a portion of lost wages through our insurance carrier.

All job-related accidents or illnesses must be reported to an employee's supervisor immediately upon occurrence. Supervisors will then immediately contact the Program Manager/CFO to obtain the required claim forms and instructions.

5.5 Crime Victims Leave (Minnesota Employees)

An employee may be entitled to leave if the employee, or his or her spouse or immediate family member, is a victim of a violent crime. Such leave may be taken to attend legal and court proceedings related to the crime.

Except in cases of imminent danger to the health or safety of the employee or his or her family member, or unless impracticable, an employee requesting crime victims leave must inform his or her supervisor at least 48 hours prior to the need for leave.

Employees must be prepared to provide VEEMAH Integrated Wellness And Consulting Services, LLC with certification to verify the employee's eligibility for the leave requested, such as a police report; a court order or evidence that they appeared in court; or documentation of treatment from a medical professional.

Crime victims leave is unpaid; however, employees may use accrued paid time off for this purpose.

5.6 Domestic Abuse Leave (Minnesota Employees)

An employee may be entitled to up to a reasonable amount of leave if the employee, or a family member or member of his or her household, is a victim of domestic abuse. This leave may be used for domestic violence or sexual assault matters pursuant to the Minnesota Domestic Abuse Act.

Except in cases of imminent danger to the health or safety of the employee or his or her family member, or unless impractical, an employee requesting domestic abuse leave must inform his or her supervisor at least 48 hours prior to the need for leave.

Employees must be prepared to provide VEEMAH Integrated Wellness And Consulting Services, LLC with certification to verify the employee's eligibility for the leave requested, such as copies of restraining orders, police reports, or orders to appear in court.

Domestic abuse leave is unpaid; however, employees may use accrued paid time off for this purpose.

5.7 Election Judge Leave (Minnesota Employees)

An employee who is selected to serve as an election judge will be granted paid leave in order to perform the duties of the position to which they have been appointed. Pay for such leave will be reduced by any compensation the employee receives from the appointing authority during the time the employee was absent.

An employee must provide his or her supervisor with at least 20 days advance written notice of their need for leave under this policy. Requests must be accompanied by a certification from the appointing authority stating the hourly compensation to be paid to the employee for service as an election judge along with the hours during which the employee will serve.

5.8 Party Officer or Delegate Leave (Minnesota Employees)

Employees may be eligible to take a reasonable amount of leave to attend any meeting of the state central committee or executive committee of a major political party if the employee is a member of the committee. Such leave may also be taken to attend any convention of major political party delegates, including meetings of official convention committees, if the employee is a delegate or alternate delegate to that convention.

To the extent possible, employees must provide 10 days advance written notice of their need for leave under this policy. Requests must be submitted to the employee's supervisor.

Employees must be prepared to provide VEEMAH Integrated Wellness And Consulting Services, LLC with certification to verify the employee's eligibility for the leave requested.

The leave is unpaid; however, employees may opt to use accrued paid time off for this purpose.

5.9 Voting Leave (Minnesota Employees)

VEEMAH Integrated Wellness And Consulting Services, LLC requests that, whenever possible, employees vote before or after work hours to avoid interference with business operations. However, if an employee does not have sufficient time outside of work hours to cast his or her ballot, the employee may be eligible for paid time off to vote.

VEEMAH Integrated Wellness And Consulting Services, LLC may specify the hours during which the employee may take leave to vote. Such time will generally be limited to the beginning or end of a working shift unless otherwise mutually agreed.

To the extent possible, employees must provide reasonable notice of their need for leave under this policy.

Employees must be prepared to provide VEEMAH Integrated Wellness And Consulting Services, LLC with certification, such as a voter's receipt, to prove that he or she voted.

5.10 School Visitation Leave (Minnesota Employees)

Employees may be eligible to take up to 16 hours of leave per year to attend their child's school conference or school-related activity, provided the conference or activity cannot be scheduled during non-work hours.

To the extent possible, employees must provide reasonable advance notice of their need for leave under this policy. When possible, employees should consult with their supervisor to schedule the leave so that it does not unduly disrupt VEEMAH Integrated Wellness And Consulting Services, LLC's operations.

Leave is unpaid; however, employees may use accrued paid time off for this purpose.

5.11 Pregnancy Accommodations (Minnesota Employees)

VEEMAH Integrated Wellness And Consulting Services, LLC will provide employees who are limited in their abilities to perform their jobs because of pregnancy, childbirth, and related medical conditions with necessary reasonable

accommodations, as long as the accommodation does not impose an undue hardship on the Organization.

Reasonable accommodations include, but are not limited to:

- Temporary transfer to a less strenuous or hazardous position;
- Temporary leave;
- Modification in work schedule or job assignments;
- Seating;
- More frequent or longer break periods; and
- Limits to heavy lifting.

Employees should be prepared to discuss the need and probable duration for the accommodation requested. The Organization will not retaliate against an employee who requests or uses a reasonable accommodation under this policy.

Employees should speak with the Program Manager/CFO to discuss their need for reasonable accommodation, or for questions regarding this policy.

5.12 Nursing Mothers, Lactating Employees, and Pregnancy Accommodations Employee Notice (Minnesota Employees)

Employees should review the Nursing Mothers, Lactating Employees, and Pregnancy Accommodations Employee Notice, which includes important information regarding their rights under state law.

If this handbook is provided in print form, a copy of the notice will accompany the handbook. If this handbook is provided in electronic form, the notice is available for online access by clicking [here](#).

5.13 Pregnancy and Parental Leave (Minnesota Employees)

Employees may be eligible to take up to 12 weeks of leave for the birth or adoption of a child, prenatal care or incapacity due to pregnancy, childbirth or related health conditions.

Eligibility:

Leave provided for the birth or adoption of a child must begin within 12 months after the birth or adoption. If the child must remain in the hospital longer than the mother, leave must begin within 12 months after the child leaves the hospital.

Notice:

To the extent possible, employees must provide reasonable notice of their need for leave, as well as the estimated duration of the leave requested.

Benefits Continuation:

An employee on leave will maintain the same level of benefits as when leave commenced, however the employee may be responsible for the cost of any insurance or health care while the employee is on leave.

Compensation:

Leave is unpaid; however, employees may opt to use accrued paid time off for this purpose.

Return to Work:

An employee returning from leave is generally entitled to the same rate of pay and position, or a comparable position, with the Organization as when the leave began.

Relationship with Other Leave Policies:

To the extent the Organization offers the employee leave through another plan or policy, the plan or policy with the greatest protection will apply. To the extent allowed by law, pregnancy disability leave must be taken concurrently with leave taken under other relevant laws.

Employees should speak with the Program Manager/CFO for questions regarding this policy.

5.14 Paid Sick Leave (Minnesota Employees)

Employees who work in Minnesota may be entitled to paid sick leave under state law.

Employee Coverage

This policy generally applies all employees (including temporary and part-time employees) who perform work for at least 80 hours in a year for VEEMAH Integrated Wellness And Consulting Services, LLC in Minnesota.

Accrual and Frontloading

Accrual

Employees are entitled to begin accruing paid sick leave on January 1, 2024 or their date of hire, whichever is later. Employees will accrue a minimum of one hour of paid sick leave for every 30 hours worked, up to a maximum of 48 hours in a year.

Employees are generally permitted to carry over accrued but unused paid sick leave into the following year. However, the cap on total accrual is set at 80 hours.

Frontloading

In lieu of allowing carryover into the following year, VEEMAH Integrated Wellness And Consulting Services, LLC may provide an employee with paid sick leave for the year that meets or exceeds the requirements of the law that is available for the employee's immediate use at the beginning of the subsequent year as follows:

- 48 hours, if VEEMAH Integrated Wellness And Consulting Services, LLC pays an employee for accrued but unused paid sick leave at the end of a year at the same hourly rate as an employee earns from employment; or
- 80 hours, if VEEMAH Integrated Wellness And Consulting Services, LLC doesn't pay an employee for accrued but unused paid sick leave at the end of a year at the same or greater hourly rate as an employee earns from employment.

Use of Leave

An employee may use the paid sick leave for:

- The employee's mental or physical illness, treatment, or preventive care;
- A family member's mental or physical illness, treatment, or preventive care;
- Absence due to domestic abuse, sexual assault, or stalking of the employee or a family member;
- Closure of the employee's workplace due to weather or public emergency or closure of a family member's school or care facility due to weather or public emergency; and
- When determined by a health authority or healthcare professional that the employee or family member is at risk of infecting others with a communicable disease.
- When they need to make arrangements for or attend funeral services or a memorial, or address financial or legal matters that arise after the death of a family member.

A family member is defined as a:

- Child, including foster child, adult child, legal ward, child for whom the employee is legal guardian or child to whom the employee stands or stood in loco parentis (in place of a parent);
- Spouse or registered domestic partner;
- Sibling, stepsibling, or foster sibling;
- Biological, adoptive or foster parent, stepparent, or a person who stood in loco parentis (in place of a parent) when the employee was a minor child;
- Grandchild, foster grandchild or step-grandchild;
- Grandparent or step-grandparent;
- A child of a sibling of the employee;
- A sibling of the parents of the employee;
- A child-in-law or sibling-in-law;
- Any of the family members listed above of an employee's spouse or registered domestic partner;
- Any other individual related by blood or whose close association with the employee is the equivalent of a family relationship; and
- Up to one individual annually designated by the employee.

Pay During Leave

Employees who use sick leave will be paid at the same base rate they earn when they are working.

Documentation

If the absence is more than three consecutive scheduled days, VEEMAH Integrated Wellness And Consulting Services, LLC may require reasonable documentation that the absence is covered by the law. However, if documentation cannot be obtained in a reasonable time or without added expense, then reasonable documentation may include a written statement from the employee indicating that the employee is using or used paid sick leave for a qualifying purpose.

Local Paid Sick Leave Ordinances

Paid sick leave ordinances may already exist in certain cities in Minnesota. VEEMAH Integrated Wellness And Consulting Services, LLC will follow the most protective law that applies to the employee.

Unused Leave

Employees won't be paid for unused paid sick leave upon the employee's termination, resignation, retirement, or other separation from employment.

Retaliation Prohibited

VEEMAH Integrated Wellness And Consulting Services, LLC will not take adverse action against an employee for exercising their rights under the law.

If you have questions about this policy, contact your supervisor or the Program Manager/CFO.

5.15 Paid Sick Leave Notice (Minnesota Employees)

Employees should review the state's paid sick leave notice, which includes important information regarding their rights under state law.

If this handbook is provided in print form, a copy of the notice will accompany the handbook. If this handbook is provided in electronic form, the notice is available for online access by clicking [here](#).

The Program Manager/CFO will provide an acknowledgment form for employees to sign to indicate they have received the notice.

5.16 Jury Duty Leave (Minnesota Employees)

VEEMAH Integrated Wellness And Consulting Services, LLC encourages employees to fulfill their civic responsibilities when called upon to serve as a juror. Employees should provide their immediate supervisor with a copy of their jury summons as soon as possible so that the supervisor may make arrangements to accommodate their the employee's absence.

If you report for jury duty and/or serve on a jury, you will be granted unpaid time off; however, employees may opt to use accrued paid time off for this purpose .

If you have questions about this policy, contact your supervisor or the Program Manager/CFO.

6. Employee Conduct

6.1 Standards of Conduct

VEEMAH Integrated Wellness And Consulting Services, LLC's rules and standards of conduct are essential to a productive work environment. As such, employees must familiarize themselves with, and be prepared to follow, the Organization's rules and standards.

While not intended to be an all-inclusive list, the examples below represent behavior that is considered unacceptable in the workplace. Behaviors such as these, as well as other forms of misconduct, may result in disciplinary action, up to and including termination of employment:

- Theft or inappropriate removal/possession of property
- Falsification of timekeeping records
- Possession, distribution, sale, transfer, manufacture or use of alcohol or illegal drugs in the workplace
- Fighting or threatening violence in the workplace
- Making maliciously false statements about co-workers
- Threatening, intimidating, coercing, or otherwise interfering with the job performance of fellow employees or visitors
- Negligence or improper conduct leading to damage of company-owned or customer-owned property
- Violation of safety or health rules
- Smoking in the workplace
- Sexual or other unlawful or unwelcome harassment
- Excessive absenteeism
- Unauthorized use of telephones, computers, or other company-owned equipment on working time. Working time does not include break periods, meal times, or other specified periods during the workday when employees are not engaged in performing their work tasks.
- Unauthorized disclosure of any "business secrets" or other confidential or non-public proprietary information relating to the Organization's products, services, customers or processes. Wages and other conditions of employment are not considered to be confidential information.

This policy is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Other forms of misconduct not listed above may also result in disciplinary action, up to and including termination of employment. If you have questions regarding VEEMAH Integrated Wellness And Consulting Services, LLC's standards of conduct, please direct them to your supervisor or the Program Manager/CFO.

6.2 Disciplinary Action

Disciplinary action at VEEMAH Integrated Wellness And Consulting Services, LLC is intended to fairly and impartially correct behavior and performance problems early on and to prevent reoccurrence.

Disciplinary action may involve any of the following: verbal warning, written warning, suspension with or without pay, and termination of employment, depending on the severity of the problem and the frequency of occurrence. VEEMAH Integrated Wellness And Consulting Services, LLC reserves the right to administer disciplinary action at its discretion and based upon the circumstances.

VEEMAH Integrated Wellness And Consulting Services, LLC recognizes that certain types of employee behavior are serious enough to justify termination of employment, without observing other disciplinary action first.

These violations include but are not limited to:

- Workplace violence
- Harassment
- Theft of any kind

- Insubordinate behavior
- Vandalism or destruction of company property
- Presence on company property during non-business hours
- Use of company equipment and/or company vehicles without prior authorization
- Indiscretion regarding personal work history, skills, or training
- Divulging VEEMAH Integrated Wellness And Consulting Services, LLC business practices or any other confidential information
- Any misrepresentation of VEEMAH Integrated Wellness And Consulting Services, LLC to a customer, a prospective customer, the general public, or an employee

6.3 Confidentiality

VEEMAH Integrated Wellness And Consulting Services, LLC takes the protection of Confidential Information very seriously. "Confidential Information" includes, but is not limited to, computer processes, computer programs and codes, customer lists, customer preferences, customers' personal information, company financial data, marketing strategies, proprietary production processes, research and development strategies, pricing information, business and marketing plans, vendor information, software, databases, and information concerning the creation, acquisition or disposition of products and services.

Confidential Information also includes the Organization's intellectual property and information that is not otherwise public. Intellectual property includes, but is not limited to, trade secrets, ideas, discoveries, writings, trademarks, and inventions developed through the course of your employment with VEEMAH Integrated Wellness And Consulting Services, LLC and as a direct result of your job responsibilities with VEEMAH Integrated Wellness And Consulting Services, LLC. Wages and other conditions of employment are not considered to be Confidential Information.

To protect such information, employees may not disclose any confidential or non-public proprietary information about the Organization to any unauthorized individual. If you receive a request for Confidential Information, you should immediately refer the request to your supervisor.

The unauthorized disclosure of Confidential Information belonging to the Organization, and not otherwise available to persons or companies outside of VEEMAH Integrated Wellness And Consulting Services, LLC, may result in disciplinary action, up to and including termination of employment. If you leave the Organization, you may not disclose or misuse any Confidential Information.

This policy is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Questions regarding this policy should be directed to the Program Manager/CFO.

6.4 Workplace Violence

VEEMAH Integrated Wellness And Consulting Services, LLC strictly prohibits workplace violence, including any act of intimidation, threat, harassment, physical violence, verbal abuse, aggression or coercion against a coworker, vendor, customer, or visitor.

Prohibited actions, include, but are not limited to the following examples:

- Physically injuring another person
- Threatening to injure another person
- Engaging in behavior that subjects another person to emotional distress
- Using obscene, abusive or threatening language or gestures
- Bringing an unauthorized firearm or other weapon onto company property
- Threatening to use or using a weapon while on company premises, on company-related business, or during job-related functions
- Intentionally damaging property

All threats or acts of violence should be reported immediately to your supervisor or security personnel. Employees should warn their supervisors or security personnel of any suspicious workplace activity that they observe or that appears problematic. Employee reports made pursuant to this policy will be investigated promptly and will be kept confidential to the maximum extent possible. VEEMAH Integrated Wellness And Consulting Services, LLC will not tolerate any form of retaliation against any employee for making a report under this policy.

VEEMAH Integrated Wellness And Consulting Services, LLC will take prompt remedial action, up to and including immediate termination, against any employee found to have engaged in threatening behavior or acts of violence.

6.5 Drug & Alcohol Use

VEEMAH Integrated Wellness And Consulting Services, LLC is committed to maintaining a workplace free of substance abuse. No employee or individual who performs work for VEEMAH Integrated Wellness And Consulting Services, LLC is allowed to consume, possess, sell, purchase, or be impaired by alcohol or illegal drugs, as defined under federal and/or state law, on any property owned by or leased on behalf of VEEMAH Integrated Wellness And Consulting Services, LLC, or in any vehicle owned or leased on behalf of VEEMAH Integrated Wellness And Consulting Services, LLC or while on Organization business.

The use of over-the-counter drugs and legally prescribed drugs is permitted as long as they are used in the manner for which they were prescribed and provided that such use does not hinder an employee's ability to safely perform their job. Employees should inform their supervisor if they believe their medication will impair their job performance, safety or the safety of others, or if they believe they need a reasonable accommodation when using such medication.

VEEMAH Integrated Wellness And Consulting Services, LLC will not tolerate employees who report for duty while impaired by the use of alcohol or drugs. All employees should report evidence of alcohol or drug abuse to their supervisor or the Program Manager/CFO immediately. In cases in which the use of alcohol or drugs creates an imminent threat to the safety of persons or property, employees are required to report the violation. Failure to do so may result in disciplinary action, up to and including termination of employment.

As a part of our effort to maintain a workplace free of substance abuse, VEEMAH Integrated Wellness And Consulting Services, LLC employees may be asked to submit to a medical examination and/or clinical testing for the presence of alcohol and/or drugs. Within the limits of federal, state, and local laws, VEEMAH Integrated Wellness And Consulting Services, LLC reserves the right to examine and test for drugs and alcohol at our discretion.

As a condition of your employment with VEEMAH Integrated Wellness And Consulting Services, LLC, employees must comply with this Drug & Alcohol Use Policy. Be advised that no part of the Drug & Alcohol Use Policy shall be construed to alter or amend the at-will employment relationship between VEEMAH Integrated Wellness And Consulting Services, LLC and its employees.

Employees found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.

6.6 Sexual & Other Unlawful Harassment

VEEMAH Integrated Wellness And Consulting Services, LLC is committed to a work environment in which all individuals are treated with respect. VEEMAH Integrated Wellness And Consulting Services, LLC expressly prohibits discrimination and all forms of employee harassment based on race, color, religion, sex, pregnancy, national origin, age, disability, military or veteran status, or status in any group protected by state or local law.

Sexual harassment is a form of discrimination and is prohibited by law. For purposes of this policy sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Unwelcome sexual advances (either verbal or physical), requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission or rejection of the conduct is used as a basis for making employment decisions; or, (3) the conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive work environment.

Sexual and unlawful harassment may include a range of behaviors and may involve individuals of the same or different gender. These behaviors include, but are not limited to:

- Unwanted sexual advances or requests for sexual favors.
- Sexual or derogatory jokes, comments, or innuendo
- Unwelcomed physical interaction
- Insulting or obscene comments or gestures
- Offensive email, voicemail, or text messages
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, or cartoons
- Making or threatening reprisals after a negative response to sexual advances

- Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters
- Verbal sexual advances or propositions
- Physical conduct that includes touching, assaulting, or impeding or blocking movements
- Abusive or malicious conduct that a reasonable person would find hostile, offensive, and unrelated to the Organization's legitimate business interests
- Any other visual, verbal, or physical conduct or behavior deemed inappropriate by the Organization

Harassment on the basis of any other protected characteristic is also strictly prohibited.

Complaint Procedure:

VEEMAH Integrated Wellness And Consulting Services, LLC strongly encourages the reporting of all instances of discrimination, harassment, or retaliation. If you believe you have experienced or witnessed harassment or discrimination based on sex, race, national origin, disability, or another factor, promptly report the incident to your supervisor. If you believe it would be inappropriate to discuss the matter with your supervisor, you may bypass your supervisor and report it directly to:

Vivian Ballah-Swaray

vivianbs@veemahconsulting.com

(763) 228-8086

Any reported allegations of harassment or discrimination will be investigated promptly, thoroughly, and impartially.

Any employee found to be engaged in any form of sexual or other unlawful harassment may be subject to disciplinary action, up to and including termination of employment.

Retaliation Prohibited:

VEEMAH Integrated Wellness And Consulting Services, LLC expressly prohibits retaliation against any individual who reports discrimination or harassment, or assists in investigating such charges. Any form of retaliation is considered a direct violation of this policy and, like discrimination or harassment itself, will be subject to disciplinary action, up to and including termination of employment.

6.7 Telephone Usage

VEEMAH Integrated Wellness And Consulting Services, LLC telephones are intended for the sole use of conducting company business. Personal use of the Organization's telephones and individually owned cell phones during business hours should be kept to a minimum or for emergency purposes only. We ask that personal calls only be made or received outside of working hours, including during lunch or break time. Long distance phone calls which are not strictly business-related are expressly prohibited.

Any employee found in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

6.8 Personal Property

Employees should use their discretion when bringing personal property into the workplace. VEEMAH Integrated Wellness And Consulting Services, LLC assumes no risk for any loss or damage to personal property.

Additionally, employees may not possess or display any property that may be viewed as inappropriate or offensive on VEEMAH Integrated Wellness And Consulting Services, LLC premises.

6.9 Use of Company Property

Company property refers to anything owned by the company: physical, electronic, intellectual, or otherwise. The use of company property is for business necessity only.

When materials or equipment are assigned to an employee for business, it is the employee's responsibility to see that the equipment is used properly and cared for properly. However, at all times, equipment assigned to the employee remains the property of the Organization, and is subject to reassignment and/or use by the Organization without prior notice or approval of the employee. This includes, but is not limited to, computer equipment and data stored thereon, voicemail, records, and employee files.

VEEMAH Integrated Wellness And Consulting Services, LLC has created specific guidelines regarding the use of company equipment. Below is a list of employee responsibilities and limitations with regards to company property.

Personal use of company property:

Company property is not permitted to be taken from the premises without proper written authority from company management.

Company Tools:

All necessary tools are furnished to employees in order to assist them in their required duties. Each employee is, in turn, responsible for these tools. Tools damaged or stolen as a result of an employee's negligence will, to the extent permitted by federal, state and local law, be charged to the employee.

Care of Company Property:

Office areas should be kept neat and orderly and all equipment should be well-maintained. The theft, misappropriation, or unauthorized removal, possession, or use of company property or equipment is expressly prohibited.

Any action in contradiction to the guidelines set herein may result in disciplinary action, up to and including termination of employment.

6.10 Smoking

VEEMAH Integrated Wellness And Consulting Services, LLC provides a smoke-free environment for its employees, customers, and visitors. Smoking, including the use of e-cigarettes and vaporizers, is prohibited throughout the workplace. We have adopted this policy because we have a sincere interest in the health of our employees and in maintaining pleasant working conditions.

6.11 Visitors in the Workplace

To ensure the safety and security of VEEMAH Integrated Wellness And Consulting Services, LLC and its employees, only authorized visitors are permitted on Organization premises and in Organization facilities.

All visitors must enter through the main reception area and sign in and out at the front desk. All visitors are also required to wear a "visitor" badge while on VEEMAH Integrated Wellness And Consulting Services, LLC premises. Authorized visitors will be escorted to their destination and must be accompanied by a representative of the Organization at all times.

6.12 Computer, Email & Internet Usage

Computers, email, and the Internet allow VEEMAH Integrated Wellness And Consulting Services, LLC employees to be more productive. However, it is important that all employees use good business judgment when using VEEMAH Integrated Wellness And Consulting Services, LLC's electronic communications systems (ECS).

Standards of Conduct and ECS

VEEMAH Integrated Wellness And Consulting Services, LLC strives to maintain a workplace free of discrimination and harassment. Therefore, VEEMAH Integrated Wellness And Consulting Services, LLC prohibits the use of the Organization's ECS for bullying, harassing, discriminating, or engaging in other unlawful misconduct, in violation of the Organization's policy against discrimination and harassment.

Copyright and other Intellectual Property

Respect all copyright and other intellectual property laws. For the Organization's protection as well as your own, it is critical

that you show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including the Organization's own copyrights, trademarks and brands. Employees are also responsible for ensuring that, when sending any material over the Internet, they have the appropriate distribution rights.

VEEMAH Integrated Wellness And Consulting Services, LLC purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, VEEMAH Integrated Wellness And Consulting Services, LLC does not have the right to reproduce such software for use on more than one computer. Employees may only use software according to the software license agreement. VEEMAH Integrated Wellness And Consulting Services, LLC prohibits the illegal duplication of software and its related documentation.

ECS Guidelines

The following behaviors are examples of previously stated or additional actions and activities under this policy that are prohibited:

- Sending or posting discriminatory, harassing, or threatening messages or images about coworkers, supervisors or the Organization that violate the Organization's policy against discrimination and harassment.
- Stealing, using, or disclosing someone else's code or password without authorization.
- Pirating or downloading Organization-owned software without permission.
- Sending or posting the Organization's confidential material, trade secrets, or non-public proprietary information outside of the Organization. Wages and other conditions of employment are not considered confidential material.
- Violating copyright laws and failing to observe licensing agreements.
- Participating in the viewing or exchange of pornography or obscene materials.
- Sending or posting messages that threaten, intimidate, coerce, or otherwise interfere with the job performance of fellow employees.
- Attempting to break into the computer system of another organization or person.
- Refusing to cooperate with a security investigation.
- Using the Internet for gambling or any illegal activities.
- Sending or posting messages that disparage another organization's products or services.
- Passing off personal views as representing those of VEEMAH Integrated Wellness And Consulting Services, LLC.

Privacy and Monitoring

Computer hardware, software, email, Internet connections, and all other computer, data storage or ECS provided by VEEMAH Integrated Wellness And Consulting Services, LLC are the property of VEEMAH Integrated Wellness And Consulting Services, LLC. Employees have no right of personal privacy when using VEEMAH Integrated Wellness And Consulting Services, LLC's ECS. To ensure productivity of employees, compliance with this policy and with all applicable laws, including harassment and anti-discrimination laws, computer, email and Internet usage may be monitored.

This policy is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Violations of this policy may result in disciplinary action, up to and including termination of employment. Questions or concerns related this policy should be directed to your supervisor or the Program Manager/CFO.

6.13 Company Supplies

Only authorized persons may purchase supplies in the name of VEEMAH Integrated Wellness And Consulting Services, LLC. No employee whose regular duties do not include purchasing shall incur any expense on behalf of VEEMAH Integrated Wellness And Consulting Services, LLC or bind VEEMAH Integrated Wellness And Consulting Services, LLC by any promise or representation without express written approval.

6.14 Training and Professional Development

VEEMAH Integrated Wellness And Consulting Services, LLC is committed to the personal and developmental growth of all its employees. To this end, VEEMAH Integrated Wellness And Consulting Services, LLC not only prepares their new hires to succeed with the Organization, VEEMAH Integrated Wellness And Consulting Services, LLC also continually teaches, develops, and improves current employees' skills in order to constructively respond to today's on-going business challenges.

Employee training and development is essential in responding to the rapid business changes that occur due to continual

economic fluctuations, global economy, enhanced technology, and cultural and demographic factors. VEEMAH Integrated Wellness And Consulting Services, LLC strongly encourages the training and development of employees to aid them in improving their ability to succeed at the current position, and also to prepare them for career advancement.

Some training programs are required for all employees, such as anti-harassment training and anti-discrimination training, training on VEEMAH Integrated Wellness And Consulting Services, LLC policies and procedures as well as occupational safety training. Employees required to attend these training sessions will be compensated pursuant to applicable federal and state laws.

In addition, VEEMAH Integrated Wellness And Consulting Services, LLC encourages employees interested in job-specific training and continuing educational opportunities to research such programs and consult the Program Manager/CFO. Management approval must be obtained, in writing, prior to registering for the seminars or courses.

VEEMAH Integrated Wellness And Consulting Services, LLC firmly believes in developing employees by drawing on the knowledge and experience of its own talented workforce. To this end, VEEMAH Integrated Wellness And Consulting Services, LLC offers programs such as coaching and mentoring. To obtain more information on these types of programs, employees may consult with the Program Manager/CFO.

7. Timekeeping & Payroll

7.1 Attendance & Punctuality

Absenteeism and tardiness place an undue burden on other employees and on the Organization. VEEMAH Integrated Wellness And Consulting Services, LLC expects regular attendance and punctuality from all employees. This means being in the workplace, ready to work, at your scheduled start time each day and completing your entire shift. Employees are also expected to return from scheduled meal and break periods on time.

All time off must be requested in writing, in advance, as outlined in the Organization's time-off policy. If an employee is unexpectedly unable to report for work for any reason, they must directly notify their supervisor as early as possible, and preferably prior to their scheduled starting time. It is not acceptable to leave a voicemail, text, or email message with a supervisor, except in extreme emergencies. In cases that warrant leaving a voicemail, text, or email message or when an employee's direct supervisor is unavailable, a follow-up call must be made later that day.

If an illness or emergency occurs during work hours, employees should notify their supervisor as soon as possible.

Employees, who are going to be absent for more than one day, should contact their supervisor on each day of their absence. VEEMAH Integrated Wellness And Consulting Services, LLC reserves the right to ask for a physician's statement in the event of a long-term illness (three consecutive days), or multiple illnesses or injuries.

If an employee fails to notify their supervisor after three consecutive days of absence, VEEMAH Integrated Wellness And Consulting Services, LLC will presume that the employee has voluntarily resigned. VEEMAH Integrated Wellness And Consulting Services, LLC will review any extenuating circumstances that may have prevented the employee from calling in before they are removed from payroll.

Should undue or recurrent absence and tardiness become apparent, the employee will be subject to disciplinary action, up to and including termination of employment.

This policy is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Certain absences may be protected by federal, state, and/or local law. If you have questions about this policy or your entitlement to time off, contact the Program Manager/CFO.

7.2 Timekeeping

It is the Organization's policy to comply with applicable laws that require records to be maintained of the hours worked by our employees. Every employee is responsible for accurately recording time worked.

In addition to recording arrival and departure time, non-exempt employees are required to accurately record the start and end of each meal period as well as any departure for non-work related reasons. Any errors in time records, must be immediately reported to your supervisor.

Absent prior authorization, non-exempt employees are not permitted to start work until their scheduled starting time or work past their scheduled ending time.

VEEMAH Integrated Wellness And Consulting Services, LLC strictly prohibits non-exempt employees from working off the clock for any reason. All time spent working must be logged and accounted for; this includes time spent using electronic devices for work-related purposes.

Vacation days, sick days, holidays, and absences for jury duty, funeral leave or military training must be specifically recorded by all employees.

It is the responsibility of all employees to submit and approve their time records each week.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action up to and including termination of employment.

7.3 Paydays

VEEMAH Integrated Wellness And Consulting Services, LLC employees are paid on a Semi-monthly basis. In the event that a regularly scheduled payday falls on a holiday, employees will be paid on the day preceding the holiday, unless otherwise required by state law.

Paychecks will not, under any circumstances, be given to any person other than the employee without written authorization. Paychecks may also be mailed to the employee's listed address or, upon advance written authorization, deposited directly into an employee's bank account. Employees who elect payment through direct deposit will receive an itemized statement of wages when the Organization makes direct deposits.

In the event of employee termination, the employee will receive their accrued pay in accordance with applicable federal, state and local laws.

7.4 Payroll Deductions

VEEMAH Integrated Wellness And Consulting Services, LLC makes deductions from employee pay only in circumstances permitted by applicable law. This includes, but is not limited to, mandatory deductions for income tax withholding and Social Security and Medicare contributions as well as voluntary deductions for health insurance premiums and other related contributions.

If you believe that an improper deduction has been made from your pay, raise the issue with the Program Manager/CFO immediately. VEEMAH Integrated Wellness And Consulting Services, LLC will promptly investigate. If the investigation reveals that you were subjected to an improper deduction from pay, you will be reimbursed promptly.

7.5 Disclosure of Pay Information (Minnesota Employees)

VEEMAH Integrated Wellness And Consulting Services, LLC recognizes each employee's right to discuss and disclose their own pay and pay-related information.

In accordance with this policy, VEEMAH Integrated Wellness And Consulting Services, LLC will not require that an employee:

- Waive any right to disclose their wages,
- Refrain from disclosing their wages as a condition of employment.

The Organization will not tolerate any adverse action taken against an employee, or prospective employee, for disclosing the employee's own wages or discussing another employee's wages which have been disclosed voluntarily.

VEEMAH Integrated Wellness And Consulting Services, LLC, however, does not allow any employee without written consent to disclose proprietary, trade secret or other information protected by law. Employees are also prohibited from disclosing another employee's wage information to a competitor of VEEMAH Integrated Wellness And Consulting Services, LLC.

VEEMAH Integrated Wellness And Consulting Services, LLC will not retaliate against any employee for enforcing the terms of this policy. Should VEEMAH Integrated Wellness And Consulting Services, LLC become aware that any adverse action has been taken against an employee as a result of discussing his or her wages, the Organization will promptly investigate and take immediate steps to address and remedy the situation.

Nothing in this policy should be construed to diminish an employee's rights under the National Labor Relations Act.

An employee has the right to bring a civil action against VEEMAH Integrated Wellness And Consulting Services, LLC if they believe their rights under this policy have been violated. Questions regarding this policy should be directed to the Program Manager/CFO.

8. Clinical Information

8.1 Providers Qualification and Scope of Practice

Mental Health Professional Qualification (Per DHS policy and procedures)

The following individuals may provide services to a client as mental health professionals:

1. A registered nurse who is licensed and is certified as a treatment nurse specialist in child or adolescent, family, or adult psychiatric and mental health nursing by a national certification organization
2. A licensed independent treatment social worker
3. A licensed social worker may engage in social work practice, except that a licensed social worker must not engage in treatment practice.
4. A licensed graduate social worker may engage in social work practice, except that a licensed graduate social worker must not engage in treatment practice except under the supervision of a licensed independent social worker or an alternate supervisor.
5. A licensed independent social worker may engage in social work practice, except that a licensed independent social worker must not engage in treatment practice except under the supervision of a licensed independent treatment social worker or an alternate supervisor
6. A licensed independent treatment social worker may engage in social work practice, including treatment practice.
7. Psychologist licensed by the Board of Psychology
8. A physician licensed and is certified by the American Board of Psychiatry and Neurology certified by the American Osteopathic Board of Neurology and Psychiatry eligible for board certification in psychiatry
9. A marriage and family therapist licensed
10. A licensed professional treatment counselor
11. Has completed a master's or doctoral degree program in counseling or a related field, as determined by the board
12. Has demonstrated competence in professional counseling by passing the National Treatment Mental Health Counseling Examination (NCMHCE), administered by the National Board for Certified Counselors, Inc. (NBCC), and ethical, oral, and situational examinations as prescribed by the board
13. Has demonstrated successful completion of 4,000 hours of supervised, post-masters degree, professional practice in the delivery of treatment services in the diagnosis and treatment of child and adult mental illnesses and disorders

Mental health professional scope of practice

1. A mental health professional must maintain a valid license with the mental health professional's governing health-related licensing board and must only provide services to a client within the scope of practice determined by the applicable health-related licensing board.
2. **Treatment Supervisor:** To qualify as an LPCC, an applicant must have completed 4,000 hours of post-masters degree supervised professional practice in delivering treatment services in diagnosing and treating mental illnesses and disorders in children and adult
3. The supervision must have been received under a contract and supervision from a mental health professional who is qualified or by a board-approved supervisor who has at least two years of post-licensure experience in the delivery of treatment services in the diagnosis and treatment of mental illnesses and disorders. All supervisors must meet the supervisor requirements in Minnesota Rules, part 2150.5010
4. Supervision must be obtained at the rate of two hours per 40 hours of professional practice.
5. Supervision must be evenly distributed throughout the supervised professional practice. At least 75 percent of the required supervision hours must be received in person. The remaining 25 percent may be received by telephone, audio, or audiovisual electronic devices.
6. At least 50 percent of the required hours of supervision must be received individually. The remaining 50 percent may be obtained in a group setting.
7. The supervised practice must include at least 1,800 hours of treatment client contact.
8. Supervision includes the supervisor's observation of the successful application of professional counseling knowledge, skills, and values in the differential diagnosis and treatment of psychosocial function, disability, or impairment, including addictions and emotional, mental, and behavioral disorders.
9. Mental health professional responsible for each case and the beginning and end date of that responsibility

When providing treatment supervision, a supervisor must follow a staff person's written treatment supervision plan considering the following.

- Treatment supervision will focus on each client's treatment needs and the ability of the staff person under treatment supervision to provide services to each client, including the following topics related to the staff person's current caseload:
- A review and evaluation of the interventions that the staff person delivers to each client
- Instruction on alternative strategies if a client is not achieving treatment goals
- A review and evaluation of each client's assessments, treatment plans, and progress notes for accuracy and appropriateness
- Instruction on the cultural norms or values of the clients and communities that VEEMAH Integrated Wellness And Consulting Services, LLC serves and the impact that a client's culture has on providing treatment.
- Evaluation of and feedback regarding direct service staff person's areas of competence
- Coaching, teaching, and practicing skills with a staff person.
- Treatment supervisor will provide treatment supervision to a staff person using methods that allow for immediate feedback, including in-person, telephone, and interactive video supervision.
- A treatment supervisor's responsibility for a staff person receiving treatment supervision is limited to the services provided at VEEMAH Integrated Wellness And Consulting Services, LLC . If a staff person receiving treatment supervision is employed by multiple agencies, each agency is responsible for providing treatment supervision related to the treatment of the agency's clients. VEEMAH Integrated Wellness And Consulting Services, LLC supervisors are not responsible to provide supervision for clients seen at other agencies

- A treatment supervisor and the staff person supervised by the treatment supervisor will develop a written treatment supervision plan. VEEMAH Integrated Wellness And Consulting Services, LLC ensures that a new staff person's treatment supervision plan is completed and implemented by a treatment supervisor and the new staff person within 30 days of the new staff person's first day of employment.
- Will review and update each staff person's treatment supervision plan annually.
- Each staff person's treatment supervision plan must include:
 - The name and qualifications of the staff person receiving treatment supervision
 - The names and licensures of the treatment supervisors who are supervising the staff person
 - How frequently the treatment supervisors must provide treatment supervision to the staff person; and the staff person's authorized scope of practice, including a description of the client population that the staff person serves, and a description of the treatment methods and modalities that the staff person may use to provide services to clients.
- Clinical trainee qualifications
 - A clinical trainee is a staff person who is enrolled in an accredited graduate program of study including, social work, psychology, and marriage and family therapy to prepare the staff person for independent licensure as a mental health professional and who is participating in a practicum or internship with the license holder through the individual's graduate program
 - A clinical trainee is an individual who has completed an accredited graduate program of study to prepare the staff person for independent licensure as a mental health professional and who follows the requirements of the applicable health-related licensing board, including requirements for supervised practice.
 - A clinical trainee is responsible for notifying and applying to a health-related licensing board to ensure that the trainee meets the requirements of the health-related licensing board.
 - As permitted by a health-related licensing board, treatment supervision under this chapter may be integrated into a plan to meet the supervisory requirements of the health-related licensing board but does not supersede those requirements.
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Clinical trainee scope of practice

- Clinical trainees under the treatment supervision of a mental health professional may provide a client with psychotherapy, client education, rehabilitative mental health services, diagnostic assessments, functional assessments, level of care assessments, and treatment plans.
- A clinical trainee must not provide treatment supervision to other staff persons.
- A treatment trainee may provide direction to mental health behavioral aides and mental health rehabilitation workers.
- A psychological treatment trainee under the treatment supervision of a psychologist may perform psychological testing of clients.
- A clinical trainee must not provide services to clients that violate any practice act of a health-related licensing board, including failure to obtain licensure if licensure is required.
- *Veemah Integrated Wellness And Consulting Services, LLC and clinical trainee must have a written plan documenting:*
 - The name of the individual, educational institution, and degree program
 - Description of the status of the individual with respect to degree completion
 - Description of the specific job status of the individual with respect to VEEMAH Integrated Wellness And Consulting Services, LLC and client population
 - Specific plan for supervision of the clinical trainee, including name and title of the direct supervisor
 - The clinical trainee must provide liability insurance from their institution
 - The clinical trainee must be under the close supervision of the treatment director of the organization or an assigned treatment supervisor.
 - The person providing the supervision must be qualified to provide the services they are supervising.
 - The clinical trainee may be assigned a limited caseload based on background and prior experience.
 - The clinical trainee must be background screened, oriented, and trained as consistent with VEEMAH Integrated Wellness And Consulting Services, LLC's policies and procedures.
 - Service delivery by the treatment trainee must be documented according to DHS and the clinical trainee's professional ethics boards
 - All documentation of billable services must be reviewed and countersigned by a treatment supervisor.
 - Services shall be billed using appropriate existing codes and reimbursed at the established contract rate for the anticipated degree unless a distinct student rate has been established for the service.
- Clinical trainee screening process
 - Treatment director/Supervisors/program coordinator shall screen written application forms and invite qualified candidates for an interview.
 - Treatment trainees shall be selected based on their application, qualifications, experience, references, and interviews.
 - Personnel files shall be maintained on every treatment trainee.
 - Personnel policies and procedures apply to all treatment trainees.
- Training of clinical trainee
 - Trainees shall receive training on program orientation as needed and assessed by their designated treatment supervisor including duties, responsibilities, client confidentiality and supervision.
 - Clinical trainees may receive training as needed and assessed by their designated supervisor.
 - Supervision of clinical trainee
 - Each clinical trainee shall have one immediate treatment supervisor as appointed by the treatment director.
 - An annual review of performance shall be conducted by each clinical trainee's immediate treatment supervisor and shall be documented by the evaluation process and maintained in the personnel file.
- Cause for Dismissal.
 - Clinical trainee may be terminated in accordance with the policies and procedure of Staff Termination.
 - Clinical trainees may be terminated when they have fulfilled a specific need for services during a "Time-Limited" period.

8.2 Data Policy

Staff will be provided with training on the Minnesota Data Practices Act. As providers of mental health services, VEEMAH Integrated Wellness And Consulting Services, LLC is also subject to the Federal Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the privacy provisions of the Minnesota Comprehensive Children's Mental Health Act.

Staff is expected to follow the policies and procedures in the Staff manual regarding the confidentiality, privacy, and security of our clients' personal and medical information.

VEEMAH Integrated Wellness And Consulting Services, LLC maintains an electronic database of information regarding clients and the services provided. Client and service data is collected, summarized, and analyzed to report to funders, monitor and evaluate Veemah Integrated Wellness And Consulting Services, LLC work, understand whom Veemah

Integrated Wellness And Consulting Services, LLC is serving and the nature of the services being provided, and advocate for funding.

VEEMAH Integrated Wellness And Consulting Services, LLC staff involved in providing direct service or supporting direct service are responsible for ensuring that client and service data is complete, accurate, and up to date

Scope

This policy applies to staff and clinical trainees who provide direct service or support the provision of direct service.

Procedures

- Staff responsible for providing direct service to clients will enter complete, accurate, and up-to-date information about the client and/or service provided into the electronic database as soon as possible after the service event/information is collected and no later than one working day after the service event/information is collected. This includes client demographics, assessments, activity progress notes, and other pertinent information, including no-shows, cancellations, etc.
- Staff must ensure that client appointments are entered into the client and service database before clients are seen to ensure accurate client service records.
- Staff supporting direct service will ensure that information that they are responsible for collecting is complete and timely and documented within one day of seeing the client
- The supervisor will monitor the information in the electronic database about clients and services to ensure that it is complete and timely.
- Veemah Integrated Wellness And Consulting Services, LLC uses electronic record-keeping and signatures to ensure no client documentation is altered.
- Any changes to a client's record must be noted and signed on the date the change was made.
- All documents are locked and can only be opened by the treatment supervisor, the billing specialist, and the clinic administrator.
- Staff is required to promptly document a client's revocation of consent to disclose the client's health record. Staff must always verify consent before any client's record is released.
- The client must be informed about the request for the release of records before any record is released.
- At the beginning of service initiation, the client is informed about their choice to rescind their consent for any reason.
- Staff must verify that they have permission to disclose a client's health record before releasing any client data.

Policy for investigating and reporting breach of confidentiality

- VEEMAH Integrated Wellness And Consulting Services, LLC staff must immediately report suspected violations of data privacy standards to their immediate supervisor. If the immediate supervisor fails to respond to violations or the supervisor is the report's subject, the staff should report the matter to the treatment director.
- The written report must be completed immediately and include a specific description of the details of the alleged violation. VEEMAH Integrated Wellness And Consulting Services, LLC will conduct an internal interview of suspected violations of data privacy policies within ten working days of receiving the report.
- The investigation will be conducted by the immediate supervisor of the staff who is suspected of the violation and/or by someone appointed by the administrative manager.
- The assigned individual will conduct a thorough investigation that includes interviews with complainants, witnesses, and the subject of the investigation.
- The investigation will also include reviewing relevant documents, including policies, rules, applicable statutes, and any other tangible evidence identified by the complainants, witnesses, other staff, and the subject of the investigation.
- A written report documenting the investigative procedure and summarizing the facts learned in the investigation will be completed and submitted to the administrative manager within ten working days of the start of the investigation.
- The staff will be notified in writing of the investigation's outcome. The administrative manager is responsible for the final resolution of the violation and will act on the report within five working days of receiving it.
- VEEMAH Integrated Wellness And Consulting Services, LLC will report any violations that could constitute a crime to the appropriate authorities and will also report willful violations of ethical standards to the appropriate licensing or regulatory authority.
- Staff who willfully violate the data privacy policies will be subject to disciplinary action, including written reprimand or termination of employment, based on the gravity of the offense, as outlined in the Staff Handbook and HIPAA Privacy Policies and Procedures.
- When staff become aware of a data privacy violation, VEEMAH Integrated Wellness And Consulting Services, LLC requires such individuals to report the violation to their supervisor.
- The supervisor discusses the allegation with the administrative manager per policies. For example, for an individual licensed by the Social Work Board, a report will be made to the Board of Social Work within 24 hours of knowledge of the report. An internal investigation will be conducted in addition to reporting to a licensed board. VEEMAH Integrated Wellness And Consulting Services, LLC may uphold the decisions taken by the boards.
- The administrative manager and/or a designee will investigate staff who are unlicensed and are accused of violating data privacy. The investigation will begin within 48 hours after the report is made and will conclude within

14 working days. The staff will be notified in writing of the investigation's outcome when a data privacy violation has been found; the organization will act against the staff depending on the severity of the infraction. The organization's actions will range from a written reprimand to termination of employment/contract as outlined in the staff's handbook and data privacy policies

The purpose of honoring the individual's privacy and Health Insurance Portability Accountability (HIPAA)

- This policy establishes guidelines concerning the Health Insurance Portability Accountability Act, the right to privacy of persons served, and the confidentiality of their records.
- As mandated by state and federal laws, all health care providers must establish guidelines on HIPAA.
- Veemah Integrated Wellness And Consulting Services, LLC has implemented training and policies to ensure that the organization follows HIPAA and other data practices.
- This organization believes that all individuals have the right to be treated with full recognition of their dignity, which includes privacy for personal care and treatment and the right to have their records treated confidentially. The organization's chief executive officer will exercise the responsibility and duties of the "responsible authority" for all program data, as defined in the Minnesota Government Data Practices Act, Minnesota Statutes, and Chapter 13.
- Everyone will be afforded privacy for personal care and treatment. Individual clients will be allowed privacy while engaging in personal activities unless staff assistance is required by the risk management plan or for other reasons of safety and assistance.
- Everyone will be treated with full recognition of dignity and will be given a reasonable amount of privacy, including keeping all information confidential.
- Access to individual files is limited to authorized persons. Staff working directly with clients, including treatment supervisors, support staff, and designated administrators, may have immediate access to current or archival individual program information on a need-to-know basis.
- The following staff of entities or agencies who are authorized by Minnesota Statutes, Chapter 13, or Federal law: Minnesota Department of Human Services, County of Financial Responsibility or County of Residence Social Service office, the Ombudsman for mental health or mental retardation, US Department of Health and Human Services, Social Security Administration, County, State, or Federal auditors, and Child or Adult Protection teams may have access to client's record.
- All staff, sub-contractors, treatment team members, or company consultants will consider information about individuals or their families as private, so it may not be released except as authorized or justified by law. All support services or finance staff will have access to private data only to the extent necessary to carry out their duties.
- Entities or individuals who have obtained written permission from the individual or the legal representative, through the completion of either a "standard release of information during continued use of services" or a "Specific release of information," have access to written and oral information as detailed in the release. Information will be released to law enforcement or judiciary agencies only after completing a "Specific authorization to release information" or through a valid court order. Information will be disclosed without prior consent only when necessary, in a medical or psychiatric emergency requiring immediate treatment or action and the consumer or legal representative is unable to provide consent, or when disclosure is necessary to protect against a clear and substantial risk of imminent harm.
- The nature of the emergency, the type of information disclosed, and to whom the information was disclosed must be documented in the daily log notes by the designated coordinator or designee. How the information was used to respond to the emergency and when and how the individual or the legal representative was informed of the disclosed information must also be documented in the daily log notes.
- The Designated Coordinators will ensure that all program information, including that stored by a computer, is locked up or consistently under someone's direct control.
- Files will not leave their site except for valid reasons, and then their security will be maintained. Staff will not print the names of other individuals who receive services from any organization on documents to be placed in a person's record. Any "Vulnerable adult and maltreatment report" must be filed separately.
- State and federal laws govern the oral transmission of information. All staff who receive telephone calls from someone claiming to know the individual or to have consent to obtain information cannot acknowledge whether someone is a consumer or release information without a signed consent form.
- All staff will limit the oral transmission of information about individual services to those persons authorized to receive such information.
- The service initiation or termination process will comply with the right to privacy of records. The executive director and/or the designee will ensure that all referral information for new individuals is authorized by completing a "Release of information at referral" if the referring organization has not provided a release.

8.3 Maintaining Client's Records/Documentation Standard

VEEMAH Integrated Wellness And Consulting Services, LLC policy and procedure guidelines for storage, access, transportation, and staff documentation procedures of individual files and records, as well as other program-related

administrative documentation, to ensure that vital required records are secure.

Staff will be provided with training on the Minnesota Data Practices Act.

As providers of mental health services, VEEMAH Integrated Wellness And Consulting Services, LLC is also subject to the Federal Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the privacy provisions of the Minnesota Comprehensive Children's Mental Health Act.

1. Staff is expected to follow the policies and procedures in the Staff manual regarding the confidentiality, privacy, and security of our clients' personal and medical information.
2. VEEMAH Integrated Wellness And Consulting Services, LLC maintains an electronic database of information regarding clients and the services provided.
3. Client and service data is collected, summarized, and analyzed to report to funders, monitor and evaluate VEEMAH Integrated Wellness And Consulting Services, LLC work, understand whom VEEMAH Integrated Wellness And Consulting Services, LLC is serving and the nature of the services being provided, and advocate for funding.
4. VEEMAH Integrated Wellness And Consulting Services, LLC staff involved in providing direct service or supporting direct service are responsible for ensuring that client and service data is complete, accurate, and up to date.

Scope

1. This policy applies to staff and clinical trainees who provide direct service or support the provision of direct service.

Procedures

1. Staff responsible for providing direct service to clients will enter complete, accurate, and up-to-date information about the client and/or service provided into the electronic database as soon as possible after the service event/information is collected and no later than one working day after the service event/information is collected.
2. This includes client demographics, assessments, activity progress notes, and other pertinent information, including no-shows, cancellations, etc.
3. Staff must ensure that client appointments are entered into the client and service database before clients are seen to ensure accurate client service records.
4. Staff supporting direct service will ensure that information that they are responsible for collecting is complete and timely and documented within one day of seeing the client
5. The supervisor will monitor the information in the electronic database about clients and services to ensure that it is complete and timely.
6. VEEMAH Integrated Wellness And Consulting Services, LLC uses electronic record-keeping and signatures to ensure no client documentation is altered.
7. Any changes to a client's record must be noted and signed on the date the change was made.
8. All documents are locked and can only be opened by the treatment supervisor, the billing specialist, and the clinic administrator.
9. Staff is required to promptly document a client's revocation of consent to disclose the client's health record. Staff must always verify consent before any client's record is released.
10. The client must be informed about the request for the release of records before any record is released.
11. At the beginning of service initiation, the client is informed about their choice to rescind their consent for any reason.
12. Staff must verify that they have permission to disclose a client's health record before releasing any client data

Policy for investigating and reporting breach of confidentiality

1. VEEMAH Integrated Wellness And Consulting Services, LLC staff must immediately report suspected violations of data privacy standards to their immediate supervisor. If the immediate supervisor fails to respond to violations or the supervisor is the report's subject, the staff should report the matter to the treatment director.
2. The written report must be completed immediately and include a specific description of the details of the alleged violation.
3. VEEMAH Integrated Wellness And Consulting Services, LLC will conduct an internal interview of suspected violations of data privacy policies within ten working days of receiving the report.
4. The investigation will be conducted by the immediate supervisor of the staff who is suspected of the violation and/or by someone appointed by the administrative manager.
5. The assigned individual will conduct a thorough investigation that includes interviews with complainants, witnesses, and the subject of the investigation.
6. The investigation will also include reviewing relevant documents, including policies, rules, applicable statutes, and any other tangible evidence identified by the complainants, witnesses, other staff, and the subject of the investigation.
7. A written report documenting the investigative procedure and summarizing the facts learned in the investigation will be completed and submitted to the administrative manager within ten working days of the start of the investigation.

- The staff will be notified in writing of the investigation's outcome.
8. The administrative manager is responsible for the final resolution of the violation and will act on the report within five working days of receiving it.
 9. VEEMAH Integrated Wellness And Consulting Services, LLC will report any violations that could constitute a crime to the appropriate authorities and will also report willful violations of ethical standards to the appropriate licensing or regulatory authority.
 10. Staff who willfully violate the data privacy policies will be subject to disciplinary action, including written reprimand or termination of employment, based on the gravity of the offense, as outlined in the Staff Handbook and HIPAA Privacy Policies and Procedures.
 11. When staff become aware of a data privacy violation, VEEMAH Integrated Wellness And Consulting Services, LLC requires such individuals to report the violation to their supervisor. The supervisor discusses the allegation with the administrative manager per policies. For example, for an individual licensed by the Social Work Board, a report will be made to the Board of Social Work within 24 hours of knowledge of the report. An internal investigation will be conducted in addition to reporting to a licensed board. Veemah Integrated Wellness And Consulting Services, LLC may uphold the decisions taken by the boards.
 12. The administrative manager and/or a designee will investigate staff who are unlicensed and are accused of violating data privacy. The investigation will begin within 48 hours after the report is made and will conclude within 14 working days. The staff will be notified in writing of the investigation's outcome when a data privacy violation has been found; the organization will act against the staff depending on the severity of the infraction. The organization's actions will range from a written reprimand to termination of employment/contract as outlined in the staff's handbook and data privacy policies

The purpose of honoring the individual's privacy and Health Insurance Portability Accountability (HIPAA)

1. This policy establishes guidelines concerning the Health Insurance Portability Accountability Act, the right to privacy of persons served, and the confidentiality of their records. As mandated by state and federal laws, all health care providers must establish guidelines on HIPAA.
2. VEEMAH Integrated Wellness And Consulting Services, LLC has implemented training and policies to ensure that the organization follows HIPAA and other data practices.
3. This organization believes that all individuals have the right to be treated with full recognition of their dignity, which includes privacy for personal care and treatment and the right to have their records treated confidentially. The organization's chief executive officer will exercise the responsibility and duties of the "responsible authority" for all program data, as defined in the Minnesota Government Data Practices Act, Minnesota Statutes, and Chapter 13.
4. Everyone will be afforded privacy for personal care and treatment. Individual clients will be allowed privacy while engaging in personal activities unless staff assistance is required by the risk management plan or for other reasons of safety and assistance.
5. Everyone will be treated with full recognition of dignity and will be given a reasonable amount of privacy, including keeping all information confidential. Access to individual files is limited to authorized persons. Staff working directly with clients, including treatment supervisors, support staff, and designated administrators, may have immediate access to current or archival individual program information on a need-to-know basis.
6. The following staff of entities or agencies who are authorized by Minnesota Statutes, Chapter 13, or Federal law: Minnesota Department of Human Services, County of Financial Responsibility or County of Residence Social Service office, the Ombudsman for mental health or mental retardation, US Department of Health and Human Services, Social Security Administration, County, State, or Federal auditors, and Child or Adult Protection teams may have access to client's records
7. All staff, sub-contractors, treatment team members, or company consultants will consider information about individuals or their families as private, so it may not be released except as authorized or justified by law. All support services or finance staff will have access to private data only to the extent necessary to carry out their duties.
8. Entities or individuals who have obtained written permission from the individual or the legal representative, through the completion of either a "standard release of information during continued use of services" or a "Specific release of information," have access to written and oral information as detailed in the release. Information will be released to law enforcement or judiciary agencies only after completing a "Specific authorization to release information" or through a valid court order. Information will be disclosed without prior consent only when necessary, in a medical or psychiatric emergency requiring immediate treatment or action and the consumer or legal representative is unable to provide consent, or when disclosure is necessary to protect against a clear and substantial risk of imminent harm.
9. The nature of the emergency, the type of information disclosed, and to whom the information was disclosed must be documented in the daily log notes by the designated coordinator or designee. How the information was used to respond to the emergency and when and how the individual or the legal representative was informed of the disclosed information must also be documented in the daily log notes.
10. The Designated Coordinators will ensure that all program information, including that stored by a computer, is locked up or consistently under someone's direct control. Files will not leave their site except for valid reasons, and then their security will be maintained. Staff will not print the names of other individuals who receive services from any organization on documents to be placed in a person's record. Any "Vulnerable adult and maltreatment report" must be filed separately.
11. State and federal laws govern the oral transmission of information.

12. All staff who receive telephone calls from someone claiming to know the individual or to have consent to obtain information cannot acknowledge whether someone is a consumer or release information without a signed consent form.
13. All staff will limit the oral transmission of information about individual services to those persons authorized to receive such information.
14. The service initiation or termination process will comply with the right to privacy of records. The executive director and/or the designee will ensure that all referral information for new individuals is authorized by completing a "Release of information at referral" if the referring organization has not provided a release.
15. VEEMAH Integrated Wellness And Consulting Services, LLC further ensures that records are stored safely in case of a natural disaster or fire and protected from unauthorized access. Staff must maintain client records that are eligible for reading and update as necessary.
16. **Forms and Storage Policy**
 1. Clients' files will be locked in a secured cabinet in compliance with licensing standards using an electronically encrypted/or through a certified or safe electronic record company. VEEMAH Integrated Wellness And Consulting Services, LLC uses Procentive EHR. All other files are stored in a locked cabinet in a locked file room. This room is restricted to staff only, and a sign on the door indicates that it can only be accessed by staff. Access to health record.
 2. Overall, VEEMAH Integrated Wellness And Consulting Services, LLC ensures that all staff members limit access to protected health information to those who need access to the records based on individual roles in the organization and must have written authorization that grants such access. Violators will be disciplined following the disciplinary action policy and procedures.

8.4 Chart Access and Requirement

Access to Records

1. Overall, VEEMAH Integrated Wellness And Consulting Services, LLC ensures that all staff members limit access to protected health information to those who need access to the records based on individual roles in the organization and must have written authorization that grants such access. Violators will be disciplined following the disciplinary action policy and procedures.

Record Keeping

1. Recordkeeping involves considering legal requirements, ethical standards, other internal and external constraints, and the demands of the services delivered.
2. VEEMAH Integrated Wellness And Consulting Services, LLC will ensure that client records are maintained for various reasons.
3. The most important of which is for the client's benefit.
4. Conscious recording of current client needs, support, and interventions is part of the staff's duty of care to the client.
5. Appropriate record keeping can provide history and updated status if clients seek services from another health professional and/or programs.
6. Maintaining appropriate records may also be relevant to a variety of other institutional, financial, and legal purposes.
7. Will maintain client records, which include any information (including information stored electronically) used to document the nature, delivery, progress, and/or outcome of services delivered.
8. The clients' files will be located at 5701 Kentucky Avenue North, Suite 100, Crystal, MN 55428, where services and coordination of services are located.

Establishment and maintenance of records

1. VEEMAH Integrated Wellness And Consulting Services, LLC will arrange stored records of clients under public guardianship without a written variance
2. VEEMAH Integrated Wellness And Consulting Services, LLC will retain clients' records from past years for at least 5 years as part of the electronic record, beginning the day the client is discharged from services.
3. If the client is a minor, the record retention period is extended until the minor reaches the age of 25.
4. Records disposal will be done appropriately to ensure the preservation of confidentiality and unnecessary disclosure of records.
5. Records will be stored electronically
6. Documentation MUST be timely and appropriate to state the services and/or not provided.

Documentation standards

All documentation at Veemah Integrated Wellness And Consulting Services, LLC must be

1. Legible
2. Identifies the applicable client and staff person on each page
3. Is signed and dated by the staff persons who provided services to the client or completed the documentation, including the staff persons' credentials.

Documentation approval

1. All diagnostic assessments, functional assessments, level of care assessments, and treatment plans completed by a treatment trainee or mental health practitioner contain documentation of approval by a treatment supervisor within five business days of initial completion by the staff person under treatment supervision.
2. All diagnostic assessments must be completed within five days of services. However, a provider has up to 2 sessions with the client to complete a DA.
3. For CIBHS, all treatment plans must be completed and signed by the clinician, supervisor, and client before mental health therapy and CIBHS services can commence.

All treatment plans must be completed on the first day following the DA.

1. The client must sign a treatment plan consent form before services begin.
2. All screening results and functional assessments must be entered electronically into the client's EHR as part of their chart.

Determination of medically necessary services

- VEEMAH Integrated Wellness And Consulting Services, LLC will use a client's diagnostic assessment and crisis assessment to determine a client's medical necessity eligibility for mental health services
- A client's diagnostic assessment must:
 - At least one mental health diagnosis for which the client meets the diagnostic criteria and recommend mental health services to develop the client's mental health services and treatment plan
 - Include a finding that the client does not meet the criteria for a mental health disorder.
 - For an existing client, Veemah Integrated Wellness And Consulting Services, LLC will ensure that a new standard diagnostic assessment includes a written update containing all significant new or changed information about the client and an update regarding what information has not significantly changed, including a discussion with the client about changes in the client's life situation, functioning, presenting problems, and progress with achieving treatment goals since the client's last diagnostic assessment was completed.

8.5 Clients and Staff Rights

Client Rights and Procedure

Individuals receiving service at VEEMAH Integrated Wellness And Consulting Services, LLC have both rights and responsibilities.

Clients and participants will be educated about their rights and obligations in various ways (e.g., posters in service locations, in written form, by staff through the intake and assessment process). The client will be given the notice of rights and acknowledge receipt and understanding of rights and responsibilities by signing the form at intake. All staff reviewing the client's rights and obligations must state so by documenting the client's response in the client's chart. If a client's rights are restricted, staff must document a mental health professional's approval of the restriction in the client's file and the reasons for the limitation.

Scope

1. This policy applies to VEEMAH Integrated Wellness And Consulting Services, LLC staff who serve clients in the office, community, and schools.

Limitations

1. Clients have the right to ask for a change of staff; however, the request will only be granted when it is reasonable and an alternative exists. Requests that are discriminatory will not be granted.

Procedure

1. Staff will regularly explain clients' rights and responsibilities as part of the intake and assessment process.
2. Program Coordinators will ensure the client rights and responsibilities statement (below) is available in written form to clients and participants and the client's preferred language.
3. Staff will ensure they are familiar with VEEMAH Integrated Wellness And Consulting Services, LLC's privacy

policies and procedures to answer clients' questions and assist clients in exercising their rights regarding their records

4. Following the grievance procedures, you may report violations to the Program Director or the Privacy Officer at VEEMAH Integrated Wellness And Consulting Services, LLC.

You will not be discriminated against if you present a complaint. You may also report directly to the state or federal agencies listed here:

If your provider is a psychologist

Minnesota Board of Psychology

335 Randolph Avenue, Suite 270

St. Paul, MN 55102

Phone: 612-617-2230; Fax: 651-797-1372; Hearing/Speech Relay: 1-800-627-3529

Email: psychology.board@state.mn.us

If your provider is a Licensed Professional Clinical Counselors

Minnesota Board of Behavioral Health and Therapy (BBHT)

335 Randolph Ave Suite 290 St Paul, MN 55102

Phone: (651) 201-2756; Fax: (651)797-1374

Email: bbht.board@state.mn.us

If your provider is a Marriage and Family Therapists

Minnesota Board of Marriage and Family Therapists

335 Randolph Avenue, Suite 260

St. Paul, MN 55102

Phone: 612-617-2220; Hearing/Speech Relay: 1-800-627-3529

Email: mft.board@state.mn.us Website: mn.gov/boards/marriage-and-family

If your provider is a Social Worker Minnesota Board of Social Work

335 Randolph Ave Suite 245

St Paul, MN 55102

Phone: (612) 617-2100; Fax: 651.215.0956; Website: Social.work@state.mn.us

Ombudsman for Mental Health/Develop. Disab.

121 7th Place East Suite

420 Metro Square Building

St. Paul, Minnesota 55101-2117

Phone: 651-757-1800 or 1-800-657-3506; TTY/TDD – 711 Email: ombudsman.mhdd@state.mn.us

Privacy Officer The Privacy Officer for VEEMAH Integrated Wellness And Consulting Services, LLC is Dr. Vivian Ballah-Swaray, PsyD, LP, who can be contacted at vivianbs@Veemahconsulting.com or (763) 228-8086.

Staff Rights and Responsibilities

1. VEEMAH Integrated Wellness And Consulting Services, LLC is committed to providing safe, just learning environments for all its staff.
2. No person may cause or allow conditions to be created that are unfair, without dignity, or violate the human rights of any other staff members of the organization.

Scope

This policy applies to all VEEMAH Integrated Wellness And Consulting Services, LLC staff and clinical trainee

Limitations

1. VEEMAH Integrated Wellness And Consulting Services, LLC personnel may not Hire people without a position description and means of systematic evaluation.
2. Violate the terms of the staff contract.
3. Promise a position that cannot be terminated with reasonable notice.
4. Deploy staff who regularly fail to demonstrate the attitude, knowledge, and skills required for their position.
5. Allow personnel to work in an unsafe work environment.
6. Fail to take appropriate, timely action in response to formal or informal allegations of racism, homophobia, sexual harassment, any other form of discrimination, or other contract violations.

Rights

1. All staff members have the right to know about any risks or dangers in the workplace
2. Participate in making the workplace safe
3. Refuse unsafe work environment
4. Feedback about their volunteer work
5. Be screened using processes that are equitable, fair, and free from discrimination
6. The opportunity to provide feedback and input
7. Recognition for their contributions
8. Work in a healthy and safe working environment
9. Have their confidential personal information dealt with by VEEMAH Integrated Wellness And Consulting Services, LLC privacy and confidentiality policies
10. An orientation to the organization, their position
11. Respect and recognition as a valued team member
12. A written position description

Responsibilities

1. VEEMAH Integrated Wellness And Consulting Services, LLC staff have the responsibility to adhere to relevant VEEMAH Integrated Wellness And Consulting Services, LLC policies and procedures.
2. Maintain confidentiality and privacy with regard to organizational, client, and other information of a confidential nature
3. Work within the limits of their qualifications, education, and skills
4. Value, support, and respect the rights of others
5. Maintain an accurate record of documentation
6. Be on time to provide services and notify their supervisor of absences as much in advance as possible
7. Carry out assigned tasks specified in the position description responsibly.

Crisis Situation

"Emergency services" means an immediate response service available on a 24-hour, seven-day-a-week basis for each child having a psychiatric crisis, a mental health crisis, or a mental health emergency.

VEEMAH Integrated Wellness And Consulting Services, LLC strives to provide immediate service to clients experiencing acute emotional distress during office hours. Recognizing that VEEMAH Integrated Wellness And Consulting Services, LLC has limited capacity to respond to such emergencies, staff will involve community resources (e.g., 911, 988, COPE, and other counties' mental health outreach teams) as required and will communicate the limitations of resources.

In a crisis situation

1. Assess the urgency of the situation
 - o When a client is upset and requests immediate consultation with a therapist, the staff involved will evaluate whether the situation is of an immediate serious nature based on the client's voice, appearance, or the content of the communication.
 - o If it is apparent that a client is at risk of harming themselves or others, please refer to the Duty to Warn policy for guidance on how to proceed.
 - o If the severity of the situation is doubtful, the staff supervisor will be contacted for assistance.
 - o If the situation does not appear urgent, the staff may ask the client if the situation can wait until a therapist is free or if they would like an alternative resource.
 - o If the client insists on talking to a therapist and staff is convinced by the client's voice, appearance, or the content of the communication that the situation is of an immediate serious nature, a therapist must be involved as soon as possible, or the client is given alternative crisis resources if the therapist is not available.

8.6 Fire and Safety Drill

Fire Safety Policy and Procedure

In the event of a fire

1. Before opening any door, feel the knob for heat. If it is not hot, brace yourself against the door slightly and open it. If you feel air pressure or a hot draft, close the door quickly.
2. If you encounter smoke, consider taking an alternate exit.
3. Crawl low under the smoke.
4. Activate the fire alarm and call 9-1-1 regardless of the size of the fire.
5. Never assume that this has already been done.
6. Give the correct name and address of the building, the location of the fire, and your name.
7. If parents are meeting in a separate room from their children, the staff who are with the children are responsible for evacuating them.
8. If you cannot leave your room or have returned to it because of fire or heavy smoke
9. Close your door.
10. Be sure the door is unlocked so that firefighters can reach you.
11. If you require assistance and can call 9-1-1, do so and let the Fire Department know where you are in the building.
12. If smoke comes into the room, seal the base of the door with a wet towel or blanket and crouch down low to the floor.
13. Move to the most protected area you can, and partially open a window if possible. (Keep the window closed if smoke comes in).
14. Wait to be rescued.
15. Listen for any instructions from emergency personnel.

8.7 Duty To Warn/Policy related to Suicidal Client

According to the Minnesota Statute 148F.13 Subd. 2.

Duty to warn, limitation on liability.

The statute states, *"Private information may be disclosed without the consent of the client when a duty to warn arises, or as otherwise provided by law or court order. The duty to warn of, or take reasonable precautions to provide protection from, violent behavior arises only when a client or other person has communicated to the provider a specific, serious threat of physical violence to self or a specific, clearly identified, or identifiable potential victim. If a duty to warn arises, the duty is discharged by the provider if reasonable efforts are made to communicate the threat to law enforcement agencies, the potential victim, the family of the client, or appropriate third parties who are in a position to prevent or avert the harm. No monetary liability and no cause of action or disciplinary action by the board may arise against a provider for disclosure of confidences to third parties, for failure to disclose confidences to third parties, or for erroneous disclosure of confidences to third parties in a good faith effort to warn against or take precautions against a client's violent behavior or threat of suicide."*

Policy

1. VEEMAH Integratged Wellness And Consulting Services, LLC protects the confidentiality of information related to clients within limits.
2. These limits are discussed with all clients prior to beginning service and clients are asked to sign a document acknowledging that they have had the limits explained to them.
3. This document also outlines the types of situations in which VEEMAH Integratged Wellness And Consulting Services, LLC may breach confidentiality
4. VEEMAH Integratged Wellness And Consulting Services, LLC reserves the right to breach confidentiality to notify authorities, persons who know the client and/or persons at risk of harm in situations where the individual presents a significant and imminent risk of harm to himself/herself or others. This right is known as the "duty to warn."
5. Staff and students are not under a duty to voluntarily inform authorities regarding a client's past or intended criminal act, except where there is a risk of imminent physical harm. Involving authorities may lead to the determination that the client needs to be detained for an involuntary assessment.

Scope

This policy covers all staff, and students.

Procedure

1. The criteria for determining whether a disclosure of information is warranted should be based on the following guidelines
2. There is a clear risk to an identifiable person or group of persons
3. There is a risk of serious bodily harm or death and
4. The danger is imminent

Suicidal Clients

1. Wherever possible, staff will obtain the client's voluntary agreement to seek medical assistance.
2. When a client is not willing to seek assistance, staff have a duty to disclose a client's active suicidal ideation and/or plan to commit suicide.
3. The staff's disclosure may include, without being limited to
 1. Immediately reporting the suicidal intent to aVEEMAH Integratged Wellness And Consulting Services, LLC supervisor and/or director
 2. Notifying a family member, a physician, or other appropriate person who can ensure the safety of the client
 3. Contacting the police or a mental health crisis team with a request to escort the person to a hospital for a psychiatric examination (i.e., a voluntary or involuntary assessment)

Staff, contractors, and students should proceed according to Veemah Integratged Wellness And Consulting Services, LLC policy on Suicidal Behavior.

- For clients who present a risk of violence or harm to others
- Staff have a duty to warn the intended potential victims of threatened violence.
- Staff should immediately report the threat to a manager or director.
- The threat should be reported to the police when the intended victim cannot be reached or is in immediate danger.
- The police will determine the most appropriate next steps, including whether there are grounds to detain the client for an involuntary assessment.
- Clients who threaten or present a risk of violence to VEEMAH Integratged Wellness And Consulting Services, LLC staff or property
- Staff should proceed according to the VEEMAH Integratged Wellness And Consulting Services, LLC policy on Dealing with Aggressive or Threatening Behavior if they encounter a client who threatens or presents a risk of violence to them, other staff, or Veemah Integratged Wellness And Consulting Services, LLC property
- All forms of suicidal ideation or suicide threats will be taken seriously. Action must be taken in the case of every person contemplating suicide – whether it is a chronic or an acute ideation. When in doubt about whether a situation is high or low risk, the response must be in line with the high-risk possibility.
- The supervisor will be immediately informed (regardless of the hour or time of day) and will provide advice in all cases of suicide threats, attempts, or actual client suicide.

Suicide Risk Factors

1. Individuals may be more likely to contemplate suicide at certain points in their lives or if certain conditions exist. The following factors should be considered in assessing suicide risk:
 - o **Means** is what the client intends to use to commit suicide. The more lethal the means, the more serious the risk (e.g., a gun is a more serious threat than pills). Moreover, the more available the method, the more serious the risk (e.g., loaded gun).
 - o The **plan** is how the client will carry out his/her suicide. A more detailed and specific suicide plan indicates a greater risk.
 - o Intent or motivation reflects whether the client has a reason to live or not. The greater the motivation to die, the greater the risk.
 - o **History**: An individual who has attempted suicide in the past may be at higher risk of achieving their goal than someone who has no history of suicide attempts.
 - o **Age**: There is an increased rate of suicide in persons under 20 years of age and elderly persons also present a serious risk.
 - o **Gender**: Men have a higher rate of suicide than women. Men tend to seek help only when problems have reached serious proportions.
 - o **Stress**: Someone with a lot of stress in their life is at greater risk for suicide.
 - o **Resources**: A person with fewer resources and supports is at greater risk than a person with considerable resources. The more socially isolated the individual, the greater the risk.

Procedure

1. Assess suicide riskent's suicide risk will be assessed at intake If there are any concerns with respect to this, the supervisor or treatment director will be contacted immediately.
2. Staff working with clients will continue this assessment during service and respond accordingly.

To determine the seriousness of the suicide risk, assess the client against the suicide risk factors (see definition above).

1. Serving clients with suicidal ideation (on the phone or in the office)
2. Staff will establish a relationship with clients presenting a suicide risk and will continually assess for means (what they will use), plan, and motivation/intention (reasons to live or die) to commit suicide.
3. When in doubt about whether a situation is a high or low risk, pursue a response that assumes a high-risk possibility (that the client has means, plan, and motivation).
4. In high-risk situations of a client with active suicidal ideation (i.e., the client has the means, plan, and motivation), the client must be continuously engaged while the staff person tries to get help (whether the client is on the phone or in your office).
5. Clients who are in VEEMAH Integratged Wellness And Consulting Services, LLC office must be continuously engaged and not left alone.
6. Communicate clearly that you do not want the person to take his/her life.
7. Help the person identify the problem and reframe it. Do not offer unrealistic outcomes.
8. Establish a suicide prevention plan with the client (e.g., direct the person to the hospital, to a supportive friend or family member, call an ambulance)
9. Call 911 for assistance (e.g., if available, ask a colleague to make this call).
10. Immediately consult the supervisor or treatment director (or the first available supervisor) about the situation and the prevention plan.
11. Document all actions and responses in the client record.

Reporting a client's suicide

1. Upon learning that a current VEEMAHIntegratged Wellness And Consulting Services, LLC client has committed suicide, a staff person should immediately notify his/her supervisor.
2. The supervisor or treatment director reviews the case with the service provider. Together, they review the client record and service history (e.g., identification of risk factors, suicide prevention planning, precipitating factors to the suicide, circumstances of the death, police or other legal involvement). Ensure that the client record is as complete as possible, given the available information.
3. The treatment director is immediately notified of all preliminary information and updated throughout the follow-up process.
4. Arranging for case debriefing and support to staff involved¹.
5. The supervisor will organize a follow-up session with the involved staff to discuss the client's case and possible changes in policy or procedure.
6. The treatment director and supervisor will ensure that post-traumatic support is provided to staff and clients affected by a suicidal death or injury.
7. How this debriefing support is provided will be decided on a case-by-case basis.