

# **Policies**

March 22, 2024

Herein lie the stated policies guiding Venaglia Payee, Inc. These policies are intended to guide decisions and procedures within Venaglia Payee to ensure fair, moral, legal and ethical conduct:

- With our clients, whom may also be referred to as beneficiaries
- Within the provisions set forth by the agencies we conduct business with, including, but not limited to: The Social Security Administration and the Department of Veterans Affairs

These policies are to be reviewed annually by the governing body and updated whenever it is deemed necessary.

### **General Policies**

Strive to do the right thing on behalf of our clients.

Prioritize doing what is right over what is easier or more cost effective.

The officers will meet at least once a year, in the first week of April, with a specific meting date set in March.

Records containing personal, health, or identifying information shall be maintained for at least 3 years.

Records containing financial information shall be maintained for at least 2 years.

Protect the personal, health and financial information we collect and maintain using strong measures, such as locking cabinets, passwords and encryption.

Physical documents must be protected by restricting access to documents, records and files in locked containers when stored, or in containers that prevent accidental loss, damage or exposure while being transported.

Digital documents are to be stored using strong encryption measures, passwords and two-factor authorization when possible, to prevent unauthorized access should a computer asset be compromised.

Clients needs are prioritized seeking to provide for shelter and food, medical and personal hygiene needs, resolving outstanding debts, accumulation of savings for unexpected expenses, and quality of life, in that order.

Comply with agency requests to the best of our ability, in a timely fashion, and always in a professional manner.

#### **Client Policies**

Clients for whom we lose contact – contact phone numbers, known address, and who do not actively reach our to us on a regular basis – and are unable to reestablish contact after four months, will be dropped.

Clients who lose their benefits for 12 consecutive months, will be dropped.

Newly approved clients for whom we are unable to establish contact and a budget for two months after being appointed as a Social Security Representative Payee or VA Fiduciary, will be dropped.

Clients who are repeatedly belligerent, disrespectful, or violently threaten our staff, will be dropped.



# **Policies**

All expenses over \$200, whether for the client or the business, must be accounted for. Receipts and invoices for these expenses must be retained in accordance with our financial records retention policy, above.

## **Computer Assets**

**Definition:** A <u>computer asset</u> is any computational device that is used for storing or accessing personal, health, identifying, or financial information under management by Venaglia Payee. Computer assets may include, but are not limited to, laptop computers, desktop computers, smart phones, or cloud servers.

All computer assets, are subject to the security policies of the company. If a computer asset, including personally owned devices, cannot be subject to these policies, then it must not be used for these purposes.

Computer assets that store or access information must be protected using login passwords, at least 8 characters in length with a mix of upper-case, lower-case, numbers and symbols. An exception is made for smartphone devices which must use at least 6 digits and biometric authentication.

Computer assets that store or access information must be protected using file-system encryption. Even viewing information may cause data to be stored temporarily to the file-system.

Computer assets that store or access information must be configured to permit a remote data wipe in the event of loss or theft, and must be remotely wiped of all data in the event of such loss or theft.

Personally owned computer assets may be used, but are subject to these policies. The owner must sign a statement of consent, and permit the installation or configuration of any software necessary to comply.

Computer assets that had been used in the past to store or access information, that will no longer be used for these purposes, must be wiped before being sold, donated or disposed. Likewise, if a personal computer asset was used, but the owner is no longer affiliated with the company, the asset must be wiped or thoroughly inspected to ensure any and all information related to Venaglia Payee or its clients is permanently removed.

### Review

These policies have been reviewed and endorsed by the governing body of Venaglia Pavee, Inc.