

IOTA Community Schools

2024-2025



IOTA
COMMUNITY SCHOOLS

**EMPLOYEE HANDBOOK OF POLICIES
AND PROCEDURES**

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I. INTRODUCTION

I.A. Welcome

It is my privilege to welcome you to IOTA Community Schools, which has an unwavering belief in the potential of all students.

IOTA is committed to being a great place to work. Our team members are IOTA's greatest asset and students excel when we are able to do our best for them. To that end, this Employee Handbook is intended to help create a positive work environment and form a clear foundation for the expectations between IOTA and you.

Please read this Employee Handbook carefully and keep it handy for future reference. Also, please do not hesitate to ask questions to, or share suggestions and concerns with, your immediate supervisor or IOTA's People Team Department.

Once again, welcome to IOTA Community Schools!

Jacquell Rodgers

Executive Director
IOTA Community Schools

I.B. Purpose of Handbook

This Employee Handbook (also referred to herein as the “Handbook”) is provided to all IOTA Community Schools (“IOTA”) employees as a guide for the employer/employee relationship. It is an important source of information and employees should read the Handbook carefully and use it as a reference.

There are several things that are important to keep in mind about this Handbook:

- The Handbook is designed to give a brief description of the policies and benefits for employees of IOTA. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or practice to you, you should address your specific questions to your immediate supervisor or IOTA’s People Team Department. This Handbook supersedes and replaces all previous personnel policies, practices, guidelines, and handbooks whether written or spoken.
- The procedures, practices, policies, and benefits described herein may be modified or discontinued from time to time as GDPS deems necessary. IOTA will inform employees of any significant changes as they occur and at least on an annual basis.
- The benefits described in this Handbook (including, but not limited to, insurance benefits and retirement plans) are intended for general information purposes only. Many of the benefits are the subject of detailed written plans and policies which are available on request from IOTA’s People Team Department and online. If a question arises about the nature or extent of plan benefits, or if there is conflicting language in the benefit plan documents and the Handbook, the formal language of the benefit plan documents govern.
- The Handbook is not an employment contract or a contract for continued employment. Employment with IOTA is on an at-will basis. No policy set forth herein guarantees any continuity of benefits or rights or forms any contract with an employee.

I.C. Summary of IOTA Community Schools’ Diversity Equity & Inclusion (DEI) Commitment Statement

As we’ve evolved, we’ve learned that we need to be intentional in creating systems that value the unique contributions of our students, families, and staff to transform public education. As a result, we commit to explicitly embedding a diversity, equity, and inclusion lens in our organizational culture, our educational practices, and our talent practices.

Embedding a DEI lens is a catalyst to fulfilling IOTA Community Schools’ work, continually learning and expanding our perspectives and creating an environment where all individuals are valued and supported.

Mission fulfillment

Diversity, equity and inclusion are critical lenses that help us understand the complexity of our students’ experiences, celebrate the potential of each individual and strengthen our ability to fulfill our mission so all students can succeed.

An important part of our mission is that all means all. To accomplish this,

- We commit to setting high expectations, delivering rigorous instruction, and providing tailored support to ensure each and every student, regardless of background or ability, graduates prepared for success in college, leadership, and life.

- Given our belief that education is a vehicle to disrupt historical oppression, we commit to collaborating with a broad group of partners to find opportunities to help transform public education in the communities we serve.

Continually learning and expanding our perspectives

A diverse, equitable, and inclusive culture will enable all voices to be heard and strengthen decision-making in the best interest of our students.

We commit to closing the opportunity gap by explicitly embedding a DEI lens in our organizational culture, our educational practices, and our talent practices.

For DEI in our culture

- We commit to creating the space for ongoing and open discourse about DEI, perpetuating a welcoming culture to create a richer context for community building, and being genuinely willing to consider new perspectives, while appreciating individual similarities and differences.
 - Our mission drives our culture. Our organizational culture grows out of the contributions of every individual who believes in our mission.
 - We each take responsibility to help create an environment in which all students, staff, families, and community partners have a sense of safety and belonging and can be their authentic selves. We respect the communities in which we work and the people who live in them. We commit to further celebrating the assets within the communities we serve and continuing to find opportunities to incorporate student and family voices in our work.
 - We commit to our beliefs in DEI being present in our decision-making and our actions. We commit to innovating, adapting, and reflecting on current systems, structures and practices to help us fulfill our mission. We commit to transparency even as we tackle new and complex work.

For DEI in our educational practices

- We commit to being culturally-responsive in our curricular choices, pedagogical practices, student policies, academic pathways, and programming so that our students feel valued in our classrooms.
 - In our schools, we commit to providing differentiated support and building authentic connections to meet the needs of each student.
 - We commit to reflecting on our identities and beliefs and addressing our own biases in the context of the communities we serve.
 - We commit to better understanding students' experiences and making learning personally meaningful. We will do this by connecting the content to the context of their life, of their families and communities, and of a global society.

For DEI in our talent practices

Hiring Practices

- We commit to recruiting a talented and diverse team.
 - Acknowledging the broader social and historical context of the communities we serve, we commit to taking a purposeful approach to continuing to connect students to educators of similar backgrounds (race, gender, socioeconomic status, English learner status, etc.). In addition, we commit to "growing our own" educators from the communities we serve.
 - At the same time, we commit to helping students connect with staff representing a diverse set of backgrounds and perspectives in preparation for their life beyond IOTA.

Growing and Retaining Talent

- We commit to providing support that makes all staff feel empowered, appreciated and successful in doing the critical work needed to fulfill our mission.
- We are cognizant that there's a gap between our commitments and our current state. We are working to bridge that gap. We approach this work from a place of humility; as we make progress, we

will also likely make mistakes and need to step outside of our comfort zone. Given our passion, this statement of our commitment will continually evolve as we learn and grow.

I.D. Professional Development

The heart and soul of IOTA is our commitment to the professional development of all of our employees. Regardless of your role in the organization, each and every member of the IOTA family is provided the opportunity to participate in ongoing professional development throughout the year.

Each member of the IOTA family will meet regularly with their supervisor to discuss job performance, goals, and expectations. The purpose of the performance evaluation process is to review, document, and acknowledge achievements, cultivate professional development goals, and address performance concerns.

School Site Classified Employee

IOTA provides targeted professional development based on the needs of each job classification. School Site Classified Employees are provided professional development on "IOTA Days" throughout the year. Furthermore, depending on the employee's job function, additional small group trainings and/or one-on-one coaching are scheduled with IOTA's Central Office content experts. As with all IOTA professional development, we ensure that data in the way of surveys, exit slips, and observations of a classified employee's expertise drives the professional development needs of our employees.

Classroom Teachers and Counselors

IOTA provides all new and returning teachers and counselors with professional development days before the school year targeting classroom instruction and climate. Additionally, IOTA provides ongoing professional development with on-site coaching and modeling, weekly staff professional development, day-to-day instructional leadership, and access to external workshops. Thus, whether a teacher or counselor is new or returning to our organization, IOTA ensures all are well-prepared to start the school year and beyond.

School Administrators

IOTA provides all new school administrators to the organization with professional development days that primarily focus on IOTA's teacher evaluation system and the coaching model. As required, all new and returning school administrators must be certified on an annual basis in order to evaluate teachers. Throughout the year, all school administrators are provided professional development that continues to focus on instructional leadership, strategic planning, and school culture.

IOTA's Central Office Employees

IOTA provides all of its Central Office employees with ongoing professional development aligned to the needs of their department.

II. EMPLOYMENT CATEGORIES, CLASSIFICATIONS, AND REQUIREMENTS

II.A. Categories of Employment

IOTA Community Schools maintains employee classifications to ensure all legal requirements are adhered to so that benefit plan eligibility and payment of compensation is in accordance with federal, state and local laws. Managers are responsible for informing the People Team of any changes in status as well as extensions in employment when specified periods are applicable.

Fair Labor Standards Act Job Classifications

All employees are designated as either nonexempt or exempt under state and federal wage and hour laws:

Exempt: Per applicable law, an employee is classified as exempt if the majority of their job duties are exempt from the overtime provisions of applicable law and he/she earns a minimum salary set forth in applicable law. An exempt employee is not eligible for overtime pay and is typically salaried.

Non-Exempt: Per applicable law, a non-exempt employee is classified as non-exempt if he/she does not meet the criteria to be classified as an exempt employee. A non-exempt employee is eligible to receive overtime pay and is paid for actual hours worked (i.e., typically hourly).

Job Classifications

IOTA has established the following categories for both nonexempt and exempt employees:

Regular, Full-Time: Employees who are regularly scheduled to work a minimum of thirty (30) hours weekly and maintain continuous employment status. Generally, these employees are eligible for the full-time benefits package and are subject to the terms, conditions, and limitations of each benefits program.

Regular, Part-Time: Employees who are regularly scheduled to work fewer than thirty (30) hours weekly, and who maintain continuous employment status. Part-time employees may be eligible for some benefits offered by IOTA and are subject to the terms, conditions, and limitations of each benefits program.

Temporary, Full-Time: Employees who do not work on a continuing basis, but rather cover an absent employee or temporary vacancies, and who are regularly scheduled to work a minimum of thirty (30) hours weekly, for a period not to exceed one year. A temporary employee receives all legally mandated benefits (e.g., Social Security, workers' compensation insurance), and is generally eligible for the full-time benefits package and are subject to the terms, conditions, and limitations of each benefits program. A temporary full-time employee may be continued in this classification for one additional year extension upon request of the manager with the approval of the People Team department. After the extension, the employee will either be converted to regular status or released. Employment beyond any initially stated period does not in any way imply a change in employment status.

Temporary, Part-Time: Employees who do not work on a continuing basis, but rather cover an absent employee or temporary vacancies, and who are regularly scheduled to work less than thirty (30) hours weekly, for a period not to exceed 360 days. A temporary employee receives all legally mandated benefits (e.g., Social Security, workers' compensation insurance), and are eligible for some benefits offered by IOTA and are subject to the terms, conditions, and limitations of each benefits program. A temporary part-time employee may be continued in this classification for one additional 360-day extension period upon request of the manager with the approval of the People Team department. After the extension, the employee will either be converted to regular status or released. Employment beyond any initially stated period does not in any way imply a change in employment status.

Seasonal, Full-Time or Part-Time: Employees who do not work on a continuing basis, but rather for a particular predefined duration of time, typically starting and ending at approximately the same time each year, to meet the needs of a IOTA department, not to exceed six months. A seasonal employee receives all legally mandated benefits (e.g., Social Security, workers' compensation insurance), but is ineligible for any of IOTA's benefits (e.g., non-statutory leaves of absence, health or welfare benefits). Seasonal employees will not be granted an extension beyond six months and will either be converted to regular or temporary status or released. Employment beyond any initially stated period does not in any way imply a change in employment status.

Other Classifications

Independent Contractor: An individual who is not an IOTA employee (e.g., consultants) performs labor or services shall generally be considered an "independent contractor," as determined by the People Team, if the following standards are met:

1. The Contractor is free from direction and control over the means and manner of providing the labor or services, subject only to the specifications of the desired results.
2. The Contractor is responsible for obtaining all assumed business registrations or professional occupation licenses required by state law or local ordinances.
3. The Contractor furnishes the tools or equipment necessary for the contracted labor or services.
4. The Contractor has the authority to hire employees to perform the labor or services; or fire said employees if necessary.
5. Payment to the Contractor is made on completion of the performance or is made based on a periodic retainer.

Temporary Staffing Firms: IOTA may work with temporary staffing firms to have individuals placed to fill temporary vacancies or work on short-term projects. Depending on the nature of the job (i.e., frequency and contact with students or IOTA employees), staffing firm employees may be required to perform a IOTA live scan clearance and TB clearance prior to beginning an assignment.

Volunteer: A person who donates their time and energy to IOTA and is not an employee. They contribute to the public service mission of the organization, do not receive compensation for services, and do not displace any employees.

Paid Interns: A paid intern is typically a student or trainee that performs work for the benefit of gaining work experience. Depending on the nature and timeline of the internship, paid interns may be categorized as temporary or seasonal full-time or part-time employees.

Unpaid Interns: IOTA may utilize an unpaid internship program on an as needed basis. Unpaid interns are volunteers and are not IOTA employees. To qualify for a IOTA unpaid internship program, the intern must meet the qualifications under the Fair Labor Standards Act to ensure the intern is the primary beneficiary of the program, including, but not limited to: (1) no expectation of compensation communicated to any prospective intern; (2) the internship will provide training that would be similar to that which would be given in an educational environment (e.g., hands-on training); (3) the internship is tied reasonably to the intern's formal education program; (4) the internship accommodates the intern's academic commitments by corresponding to the academic calendar; (5) the internship's duration is limited to the period in which the internship provides the intern with beneficial learning; (6) the intern's work complements, rather than displaces, the work of paid IOTA employees while providing significant educational benefits to the intern; and (7) the internship is conducted without entitlement to a paid job at the conclusion of the internship.

Americorp (or like) Interns: IOTA may enter into agreements with non-profit organizations that participate in the federal Americorp program, or similar programs, in which the individual is considered a IOTA volunteer, however IOTA may be required to pay a living stipend taxed through payroll.

Substitute Teachers: Substitute teachers either employed by Kelly Services for IOTA, or by IOTA directly, shall comply with T.C.A. §49-5-413 in regard to background investigation and criminal history records check.

Substitute Teachers:

- A. A substitute teacher substituting for a regular teacher on leave authorized for a period not exceeding twenty (20) consecutive teaching days is not required to possess a teacher's certificate or permit. (TCA 49-3-312(a)).
- B. A substitute teacher who is a retired teacher is not required to continue to renew such teacher's certification in order to work as a substitute teacher. (TCA 49-3-312(b)). NOTE under the statute this only applies to retired teachers who retire after 7/1/2011 through 7/1/2016.
- C. No person shall be employed as a substitute teacher whose records with the State Department of Education indicates a license or certificate currently in revoked status. (TCA 49-2-203(a)(15)).
- D. Retired teachers may substitute one-hundred twenty (120) days per year without loss of retirement benefits, and may substitute for an additional ninety (90) days if the Executive Director certifies in writing to the State Board of Education that no other qualified personnel are available to substitute teach. (TCA 8-36-805)

II.B. Contractual Relationships

At-Will Employment

Employment at IOTA is on an at-will basis unless otherwise stated in a written individual offer letter signed by the Executive Director of the organization. This means that either the employee or IOTA may terminate the employment relationship at any time, for any reason, with or without notice.

Nothing in this Handbook is intended to or creates an employment agreement, express or implied. Nothing contained in this, or any other document provided to the employee is intended to be, nor should it be, construed as a contract that employment or any benefit will be continued for any period of time.

Any salary figures provided to an employee in annual or monthly terms are stated for the sake of convenience or to facilitate comparisons and are not intended and do not create an employment contract for any specific period of time.

Nothing in this statement is intended to interfere with, restrain, or prevent concerted activity as protected by applicable law. Such activity includes employee communications regarding wages, hours, or other terms or conditions of employment. IOTA employees have the right to engage in or refrain from such activities.

IOTA may impose any discipline to the extent allowable by law, within its sole discretion, that it determines to be appropriate. Any discipline is in no way intended to alter the at-will nature of an employee's employment relationship with IOTA.

II.C. Immigration Compliance

IOTA complies with applicable immigration law, including the Immigration Reform and Control Act of 1986 and the Immigration Act of 1990. As a condition of employment, every individual must provide satisfactory evidence of their identity and legal authority to work in the United States. However, IOTA will not check the employment authorization status of current employees or applicants who were not offered positions with the organization unless required to do so by law. Failure to provide the appropriate

documentation will be grounds for termination, consistent with federal law. IOTA is committed to employing only United States citizens and aliens who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin.

IOTA will not discharge an employee or in any manner discriminate, retaliate, or take any adverse action (e.g., threatening to report the suspected citizenship or immigration status of an employee or a member of the employee's family) against any employee or applicant for employment because the employee or applicant exercised a right protected under applicable law.

II.D. Criminal Background Checks

All offers of employment and continued employment at IOTA are contingent upon clearance of a criminal background check in alignment with applicable law. The cost of the criminal background check will be borne by the prospective employee. An offer of employment is not considered final until a criminal background clearance is received and communicated to the candidate and hiring manager from the People Team.

No condition or activity will be permitted that may compromise IOTA's commitment to the safety and well-being of its students and employees. IOTA employees are subject to a criminal background check completed through and provided by the appropriate state agency(ies) and/or the Federal Bureau of Investigation, as deemed appropriate by IOTA, required by law, and/or in accordance with state requirements. All background information is stored privately and securely with access restricted to IOTA's People Team or authorized personnel. Conditions that preclude working at IOTA include, but are not limited to, conviction of any controlled substance offense, sex offense, or serious or violent felony, as defined in any applicable law.

If an employee is found at a IOTA work location without a criminal background clearance, or a background check in progress if allowable under applicable state law, they will be sent home and prohibited from continuing employment with IOTA until such clearance is obtained.

Additionally, should an employee be arrested or convicted of a controlled substance offense, sex offense, or serious or violent felony as defined in any applicable law during their employment with IOTA, the employee must immediately report (within 5 business days or as soon as practically possible) such an arrest or conviction to their immediate supervisor and the People Team – failure to report such an offense may result in disciplinary action, up to and including termination of employment.

Volunteers, consultants, independent contractors and other individuals that will perform work on behalf of IOTA involving close proximity to IOTA students will be subject to the criminal background check process described above. The costs for the procedure is borne by the individual.

II.E. Tuberculosis Testing

All IOTA employees must submit written proof from a physician of an examination for tuberculosis ("TB") prior to an employee's first day of paid service, showing that they are free of active TB. This TB examination must have occurred within a sixty-day time period prior to an employee's offer of employment. The examination for TB consists of an approved TB test, which, if positive, will be followed by an x-ray of the lungs or in the absence of skin testing, an x-ray of the lungs. Volunteers are required to undergo a TB examination if the volunteer's functions require or include frequent or prolonged contact with students. A TB examination is a condition of initial employment with IOTA and the cost of the exam will be borne by the prospective

employee. If an employee, or volunteer whose functions require or include frequent or prolonged contact with students, is found at a IOTA location without a TB clearance, she/he will be sent home and prohibited from continuing employment with IOTA until such clearance is obtained.

IOTA food handlers are required to have annual TB exams. This requirement also includes contract food handlers, substitute teachers, and student teachers serving under the supervision of an educator. Documentation of IOTA employee and volunteer compliance with TB exams will be kept on file in IOTA's People Team Department or other appropriate designated office/department. Any entity providing student services (i.e., services that require or include frequent or prolonged contact with students) will be contractually required to ensure that all contract workers have had TB testing that shows them to be free of active TB prior to conducting work in contact with IOTA students.

IOTA bus drivers must meet all applicable background check requirements as well as maintain up-to-date physical assessments of health as prescribed by federal transportation laws including but not limited to annual certification and random screening requirements. IOTA bus drivers are not required to submit a TB examination.

II.F. Credentialing and Other Employment Requirements

Employees holding positions which require a credential must obtain and/or maintain the proper educator credential(s) required by the state to provide the applicable services. Employees are responsible for keeping required credentials (including, but not limited to licenses, certificates, and/or registrations) current and in good standing, and paying the costs associated with renewal or otherwise. Any employee whose credential expires, or is unable to provide evidence of meeting renewal requirements in a timely fashion, may be removed from paid status and/or result in disciplinary action up to and including termination of employment.

As a condition of employment with IOTA, employees requiring certification or licensure must meet the State of Tennessee's requirements to obtain and/or maintain the appropriate educator certificate or license. The State of Tennessee does not permit individuals to teach or provide particular educational services without a valid educator license. If a license expires, or if an employee does not provide the Tennessee Department of Education's Office of Educator Licensing with evidence of meeting renewal requirements in a timely fashion, IOTA will be forced to remove that individual from paid status and/or release the individual from employment. The responsibility for being properly licensed by the State of Tennessee rests solely with the individual. Pursuant to the ESSA, all secondary teachers are required to pass content certification tests and maintain a license in the subject matter that they teach.

Verification of Experience

For teacher and counselor roles, teaching credit will be given for teaching experience under a valid teaching credential/license in public and private schools, grades K-12. Credit for international teaching experience will be granted if international credential/license is proven to be equivalent to domestic credential/license. To be considered, teaching credit documentation (verification of experience) must be submitted within 60 days of employment offer.

III. POLICIES AND PROCEDURES RELATED TO THE FAIR TREATMENT OF EMPLOYEES AND STUDENTS

III.A. Equal Employment Opportunity

IOTA is committed to providing equal employment opportunities to all employees and applicants without regard to their actual or perceived race, religious creed (including religious dress or grooming practices), color,

national origin or ancestry (including native language spoken), physical or mental disability (including HIV or AIDS), medical condition (including cancer or genetic characteristics), genetic information, marital status (including registered domestic partnership status), sex (including pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), parental status, age (forty (40) and over), sexual orientation, Civil Air Patrol status, military and veteran status, citizenship, immigration status or any other consideration protected by federal, state or local law. For purposes of this policy, discrimination on the basis of "national origin" also includes harassment against an individual because that person holds or presents a state-issued driver's license issued per vehicle code.

Similarly, IOTA is committed to complying with all laws protecting qualified individuals with disabilities, as well as employees' religious beliefs and observances. This policy extends to all aspects of IOTA's employment practices, including recruiting, hiring, discipline, termination, promotions, transfers, compensation, benefits, training, leaves of absence, and other terms and conditions of employment.

IOTA will provide a reasonable accommodation for any known physical or mental disability of a qualified individual or for employees' religious beliefs, practices and observances, provided the requested accommodation is required by and can be provided in accordance with applicable law (for example, it does not create an undue hardship for the organization and does not pose a direct threat to the health or safety of others in the workplace or to the individual). Employees with a disability who believe they may need a reasonable accommodation to perform the essential functions of their job should contact IOTA People Team department peopleteam@iotaschools.org to begin the interactive process.

Subsequently, IOTA will inform the employee of its decision on the accommodation request and, if applicable, how to make the accommodation and the duration of the accommodation. IOTA will not retaliate or discriminate against a person for requesting an accommodation regardless of whether the accommodation was granted. An employee or job applicant who has questions regarding this policy or believes that they have been discriminated against on the basis of a disability or religion, as outlined above, should notify IOTA's People Team Department as soon as possible. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

HIV/AIDS Policy for Employees

Employment: IOTA does not discriminate against an employee or applicant on the basis of HIV/AIDS status. Consideration for job application, employment, advancement, discharge, compensations, training, or other terms, conditions, or privileges of employment cannot be denied to individuals on the basis of HIV/AIDS status. No employee shall be required to have a blood test or medical consultation to determine HIV/AIDS status.

In accordance with the Americans with Disabilities Act of 1990, an employee living with HIV/AIDS is welcome to continue working as long as they are able to perform the essential functions of the position. Every employee is entitled to the rights, privileges, and services accorded to employees generally, including benefits provided to employees with long-term diseases or disabling conditions. School authorities shall make reasonable accommodations to allow an employee living with HIV/AIDS to continue their assigned duties unless doing so would cause an undue hardship to IOTA or the employee poses a direct threat to the health or safety of themselves or others.

An employee who refuses or objects to working with or providing services to a person who has or is perceived to have HIV/AIDS shall be counseled and educated in the nature of HIV/AIDS, the transmission of HIV, and the State Board of Education's policy on HIV/AIDS. Should the employee continue to refuse to work with or

provide services to such an individual, the employee may be subject to appropriate discipline.

Privacy: Due to the gravity of the HIV/AIDS epidemic and the potential for discriminatory abuse, maintenance of an individual's right to privacy is of utmost importance. Employees are not required to disclose HIV infection to anyone in the education system. Every employee has a duty to treat as highly confidential any knowledge or speculation concerning the HIV/AIDS status of a student or other staff member.

In accordance with Americans with Disabilities Act, Health Insurance Portability and Accountability Act and Family Educational Rights and Privacy Act ("FERPA") guidelines, no information regarding an employee's HIV/AIDS status shall ever be disclosed to any individual or organization without a court order or the informed, written, signed, and dated consent of the person with HIV infection (or the parent or guardian of a legal minor). The written consent must specify the recipient of the information and the purpose of the disclosure. Information pertaining to a person's HIV/AIDS status shall not be faxed.

Legal Liability: HIV/AIDS-related information is confidential regardless of the source, including whether the information is obtained intentionally or unintentionally from the person with HIV/AIDS or through oral, written, or electronic communication from another source. Disclosure of HIV/AIDS-related information could result in a loss of privacy, harassment, and discrimination. Unauthorized disclosure by employees is cause for disciplinary action, up to and including dismissal, and could lead to individual liability in addition to criminal or civil penalties against local education agencies and their personnel.

Disclosure: An applicant/employee may choose to report their HIV/AIDS status to school personnel. Upon an employee's disclosure of HIV/AIDS status, IOTA's People Team Department shall initiate procedures which will ensure privacy and maintenance of all medically-related documents. All health records and other documents which reference a person's HIV/AIDS status shall be secured by appropriate safeguards intended to limit access to these confidential records. Information regarding HIV/AIDS status shall not be added to an employee's personnel record without written consent.

III.B. Policy Prohibiting Unlawful Harassment, Discrimination, and Retaliation

IOTA maintains a strict policy prohibiting unlawful harassment, discrimination, and retaliation against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns or volunteers based on any legally-recognized basis, including, but not limited to, their actual or perceived race, religious creed (including religious dress or grooming practices), color, national origin or ancestry (including native language spoken), physical or mental disability (including HIV or AIDS), medical condition (including cancer or genetic characteristics), genetic information, marital status (including registered domestic partnership status), sex (including pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), parental status, age (forty (40) and over), sexual orientation, Civil Air Patrol status, military and veteran status, citizenship, immigration status or any other consideration protected by federal, state or local law. All such unlawful discrimination, harassment, and retaliation is prohibited.

This policy applies to all persons involved in our operations, including employees/co-workers, supervisors, managers, temporary or seasonal workers, unpaid interns, individuals in apprenticeship programs, agents, clients, vendors/independent contractors, volunteers, students, parents, or any other third party interacting with the IOTA ("third parties") and prohibits harassing, discriminatory, and retaliatory conduct by any employee or third party of IOTA, including nonsupervisory employees, supervisors and managers. If such unlawful discrimination, harassment, and/or retaliation occurs on the IOTA's premises or is directed toward

an employee or a third party interacting with IOTA, the procedures in this policy should be followed.

Sexual Harassment, Harassment and Discrimination

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment also includes various forms of offensive behavior based on sex and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering; making sexual gestures; displaying sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature; graphic verbal commentary about an individual's body; sexually degrading words to describe an individual; suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for reporting harassment or threatening to report sexual harassment.

An employee may be liable for harassment based on sex even if the alleged harassing conduct was not motivated by sexual desire. An employee who engages in unlawful harassment may be personally liable for harassment if IOTA had no knowledge of such conduct.

All employees will receive employment discrimination training, which includes sexual harassment, within 30 days of the start of employment. Refresher training will be provided annually.

Such training will address all legally required topics, including information about the negative effects that abusive conduct has on both the victim of the conduct and others in the workplace, as well as methods to prevent abusive conduct undertaken with malice a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests. Supervisors shall also be trained on how to appropriately respond when the supervisor becomes aware that an employee is the target of unlawful harassment.

Other Types of Unlawful Harassment

Unlawful harassment on the basis of any legally protected characteristic is prohibited. This includes conduct such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's

- protected classification;
- Visual conduct, including derogatory posters, photographs, cartoons, drawings or gestures based on protected classification;
- Physical conduct, including assault, unwanted touching or blocking normal movement because of an individual's protected status;
- Retaliation for reporting or threatening to report harassment; and
- Disparate treatment based upon any of the protected classes outlined in this policy.

Abusive Conduct Prevention

It is expected that persons in the workplace perform their jobs productively as assigned, and in a manner that meets management's expectations, during working times, and that they refrain from any malicious, patently offensive or abusive conduct including but not limited to conduct that a reasonable person would find offensive based on any of the protected characteristics described above. Examples of abusive conduct include repeated infliction of verbal abuse, such as the use of malicious, derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the intentional sabotage or undermining of a person's work performance.

Workplace Bullying Prevention Policy

Statement of Commitment, Values, and Purpose: IOTA is firmly committed to a workplace free from abusive conduct as defined in this Policy. IOTA strives to do business in a respectful, collaborative, open, and safe atmosphere. All of IOTA's employees deserve to be treated with dignity and respect. Therefore, all complaints of negative and inappropriate workplace behaviors will be taken seriously and followed through to resolution. As discussed further below, employees who file complaints should do so without fear of reprisal.

This Policy applies to all full-time and part-time employees of IOTA, including interns. It does not apply to independent contractors. This Policy applies not only to the performance by officers and employees of their employment related duties, but also to any IOTA-sponsored program, event, or activity, including, but not limited to, sponsored recreation programs and activities. This Policy also covers electronic communications, whether via email, text, or any social media messaging (i.e. X, Facebook Messenger, Instagram Direct Messages, Snapchats) by any employee.

Definition of Abusive Conduct: Abusive conduct includes acts or omissions that could cause a reasonable person, based on the severity, nature, and frequency of the conduct, to believe that an employee was subject to an abusive work environment, which can include, but is not limited to:

- repeated verbal abuse in the workplace, including derogatory remarks, insults, and epithets;
- verbal, nonverbal, or physical conduct of a threatening, intimidating, or humiliating nature in the workplace; or
- the sabotage or undermining of an employee's work performance in the workplace.

A single act generally will not constitute abusive conduct, unless such conduct is determined to be severe and egregious.

Abusive conduct does not include:

- disciplinary procedures pursuant to IOTA's Employee Handbook;
- routine coaching and counseling, including feedback about and correction of work performance;
- reasonable work assignments, including shift, post, and overtime assignments;
- individual differences in styles of personal expression;
- passionate, loud expression with no intent to harm others;
- differences of opinion on work-related concerns;

- the non-abusive exercise of managerial prerogative.

Employer Responsibility: Supervisors and others in positions of authority have a particular responsibility to ensure that healthy and appropriate behaviors are exhibited at all times and that complaints to the contrary are addressed in a timely manner. Pursuant to this Policy, supervisors will:

- provide a working environment as safe as possible by having preventive measures in place and by dealing immediately with threatening or potentially violent situations;
- provide good examples by treating all with courtesy and respect;
- ensure that all employees have access to and are aware of the abusive conduct prevention policy and explain the procedures to be followed if a complaint of inappropriate behavior at work is made;
- be vigilant for signs of inappropriate behaviors at work through observation and information seeking, and take action to resolve the behavior before it escalates;
- respond promptly, sensitively, and confidentially to all situations when abusive behavior is observed or alleged to have occurred.

Employee Responsibility (Including Witnesses): Employees shall treat all other employees with dignity and respect. No employee shall engage in threatening, violent, intimidating or other abusive conduct or behaviors. Employees are expected to assume personal responsibility to promote fairness and equity in the workplace and report any incidents of abusive conduct per this Policy.

Employees should cooperate with preventive measures introduced by supervisors and recognize that a finding of any violations of this Policy may lead to disciplinary action, up to and including, termination.

Retaliation is Not Permitted: As alluded to above, any employee who reports violations of this Policy in good faith will not be subject to retaliation. Retaliation is any act of reprisal, interference, restraint, penalty, discrimination, intimidation, or harassment against an individual or individuals exercising rights under this Policy.

Training for Supervisors and Employees: Because IOTA is committed to providing a workplace free from the abusive behaviors as discussed in this Policy, IOTA is requiring all employees and supervisors to undergo training on abusive conduct prevention. This training will identify factors that contribute to a respectful workplace, familiarize participants with responsibilities under this Policy, and provide steps to address abusive conduct.

Complaint Process

Reporting:

Employees: Any employee who feels he or she has been subjected to abusive conduct is encouraged to report the matter orally or in writing to a supervisor including their direct supervisor, manager, or to the People Team (peopleteam@iotaschools.org). Employees should not feel obligated to report their complaints to their immediate supervisor first before bringing the matter to the attention of one of the representatives identified above.

Any employee seeking to file a complaint in good faith should ensure the complaint consists of precise details of each incident of abusive conduct including dates, times, locations, and any witnesses. Formal complaints should be documented in writing, but are not required to be in writing.

Witnesses: An employee who witnesses or is made aware of behavior that could meet the definition of

abusive conduct as defined by this Policy should report any and all incidents as set forth here.

Supervisors: Supervisors must timely report known incidents involving workplace abuse, intimidation, or violence to the [People Team](#). Supervisors are required to take reasonable steps to protect the complaining employee, including, but not limited to, separation of employees involved.

The person accused of violating this Policy will be notified that an allegation has been made against him or her and informed of the investigative procedure.

Investigation: Investigations of abusive conduct shall be conducted as soon as practicable and in accordance with the policies and practices of IOTA. The objective of the investigation is to ascertain whether the behaviors complained of occurred, and therefore will include interviewing the complaining employee, accused, and witnesses with direct knowledge of the alleged behaviors. All interviews will be appropriately documented. The investigation will be conducted thoroughly, objectively, with sensitivity, and with due respect for all parties. All affected parties will be informed of the investigation's outcome.

Corrective Action: In the event of a finding of abusive conduct, IOTA will take immediate and appropriate corrective action. Remedies may be determined by weighing the severity and frequency of the incidences of abusive conduct in accordance with the IOTA's existing disciplinary policies.

Any employee who engages in conduct that violates this Policy or who encourages such conduct by others will be subject to corrective action. Such corrective action may include but is not limited to participation in counseling, training, and disciplinary action, up to and including termination, or changes in job duties or location.

Supervisors or managers who allow abusive conduct to continue or fail to take appropriate action upon learning of such conduct will be subject to corrective action. Such corrective action may include but is not limited to participation in counseling, training, or disciplinary action up to and including termination, or changes in job duties or location.

While IOTA encourages all employees to raise any concern(s) under this Policy and procedure, IOTA recognizes that intentional or malicious false allegations can have a serious effect on innocent people. Individuals falsely accusing another of violations of this Policy may lead to disciplinary action, up to and including, termination.

Any employees exhibiting continuing emotional or physical effects from the incident in question should be informed of established employee assistance programs or other available resources.

When abusive conduct has been confirmed, IOTA will continue to keep the situation under review, and may take additional corrective actions if necessary. Preventive measures may also be taken to reduce the reoccurrence of similar behavior or action.

Confidentiality: To the extent permitted by law, IOTA will maintain the confidentiality of each party involved in an abusive conduct investigation, complaint, or charge, provided it does not interfere with the ability to investigate the allegations or to take corrective action. Therefore, IOTA cannot guarantee absolute confidentiality.

Reporting Harassment, Discrimination, and/or Retaliation

Any employee who believes that they have been harassed, discriminated against, or subjected to retaliation or abusive conduct by a co-worker, supervisor, agent, client, vendor, customer, or any other third party interacting with IOTA in violation of the foregoing policies, or who is aware of such behavior against others, should immediately provide a written or verbal report to their supervisor, any other member of management, or IOTA People Team department at peopleteam@iotaschools.org.

Employees are not required to make a complaint directly to their immediate supervisor. Supervisors and managers who receive complaints of misconduct must immediately report such complaints to the People Team. When a report is received, IOTA will conduct a fair, timely, complete and objective investigation where corrective action will be taken if any misconduct is found. IOTA expects all employees to fully cooperate with any investigation conducted into a complaint of proscribed harassment, discrimination or retaliation, or regarding the alleged violation of any other IOTA policies. IOTA will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable law. Complaints will be investigated by impartial, qualified internal personnel unless external involvement is warranted. The process will be documented and tracked for reasonable progress and closure of the investigation.

Upon completion of the investigation, IOTA will communicate its conclusion as soon as practical. If IOTA determines that this policy has been violated, remedial action will be taken, commensurate with the severity of the offense, up to and including termination of employment. Appropriate action will also be taken to deter any such conduct in the future.

The Federal Equal Employment Opportunity Commission (EEOC) will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party. Information may be located by visiting the agency's website at www.eeoc.gov.

Protection Against Retaliation

Employees' notification to IOTA is essential to enforcing this policy. Retaliation is prohibited against any person by another employee or by IOTA for using IOTA's complaint procedure, reporting proscribed discrimination or harassment or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Any employee determined to be responsible for violating this policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.

III.C. Whistleblower Policy

IOTA requires its Board of Directors, Board designees, employees, and volunteers to observe high standards of ethics in the conduct of their duties and responsibilities. As IOTA representatives, such individuals must comply with all applicable laws, regulations, and IOTA policies and procedures. The purpose of this policy is to maintain an ethical and open work environment, and to encourage and enable directors, officers, employees, and volunteers to raise serious concerns about the occurrence of illegal or unethical actions before turning to outside parties for resolution.

All IOTA Board of Directors members, Board designees, employees, and volunteers are responsible for

reporting any action or suspected action taken within IOTA that is illegal, unethical, or violates any adopted IOTA policy or procedure. Anyone reporting a violation must act in good faith, without malice to IOTA or any individual, and have reasonable grounds for believing that the information shared in the report indicates that a violation has occurred. A person who makes a report does not have to prove that a violation has occurred. However, any report which the reporter has made maliciously or any report which the reporter has good reason to believe is false will be viewed as a serious disciplinary offense. No one who, in good faith, reports a violation, or who, in good faith, cooperates in the investigation of a violation shall suffer harassment, retaliation, or an adverse employment action.

All IOTA Board of Directors members, Board designees, employees, or volunteers who desire to make a report should provide a clear and concise statement of the alleged improper act and what evidence exists to confirm the claimant's statement. The report should be made to IOTA's People Team Department or other appropriate manager. The report and identity of the claimant shall remain confidential to the extent possible. Whistleblowers should be cautioned that their identity may become known for reasons outside the control of IOTA.

Upon receiving a report, and prior to any such potential investigation, IOTA will evaluate the report to determine whether it has enough potential merit to warrant an investigation. Depending upon IOTA's initial findings, IOTA may conduct an investigation into the facts alleged in the complaint to determine whether an act occurred that violates applicable laws, regulations, and/or IOTA policies and procedures.

III.D. Internal Complaint Policy

IOTA believes that if an employee has a question, suggestion, or complaint, the employee should first discuss this with their immediate supervisor. If the issue is not resolved, or if the employee is uncomfortable discussing the issue with their immediate supervisor, the employee may present the problem to the IOTA People Team at peopleteam@iotaschools.org. Information obtained from complainants will remain as confidential as possible and appropriate, but absolute confidentiality cannot be assured. In conjunction with IOTA's Whistleblower Policy, complainants are protected against retaliation as a result of the filing of any complaints or participation in any complaint process. Ultimately, it's IOTA's goal to identify a reasonable solution in accordance with the policy and the context of the situation.

The following procedure does not guarantee that every issue will be resolved to each employee's satisfaction. However, IOTA values its employees' observations and encourages its employees to raise issues of concern, in good faith, without the fear of retaliation (in conjunction with IOTA's Whistleblower Policy).

Notification

This policy is intended to address complaints filed by employees with the employee's supervisor or IOTA's People Team Department.

Procedures

Depending on the nature of the complaint, the complainant will be provided information concerning the applicable policy and procedures to be followed. If there is no applicable policy or procedures, IOTA shall encourage, and shall assist, the complainant to seek an informal resolution of the issues. If this is not possible due to the nature of the complaint or if informal resolution has been unsuccessfully attempted, IOTA shall undertake a responsible inquiry into the complaint to ensure it is reasonably and swiftly addressed. When appropriate, IOTA will obtain a written statement from the complainant.

If the complainant files a written complaint and no other policy or procedure is applicable, the Principal (or

designee) or People Team Department, and Executive Director (or designee), shall abide by the following process:

- After receipt of the complaint, IOTA shall use its best efforts to investigate the matter by speaking with the parties identified in the complaint and to ascertain the facts relating to the issue/dispute and the positions of all parties.
- In the event that IOTA finds that a complaint is valid, appropriate disciplinary action may be taken. As appropriate, IOTA may also simply instruct employees regarding their conduct without initiating disciplinary measures.
- In the event that IOTA finds that the complaint would best be resolved through a meeting of all parties, such a meeting shall be called, and the Executive Director (or designee) shall attempt to mediate the dispute among the parties. In the event that mediation is not appropriate, or the mediation is unsuccessful, the Executive Director (or designee) shall respond to the complaint and provide all parties with a written statement indicating IOTA's findings and resolution of the complaint.

IOTA's decision relating to the complaint shall be final unless it is appealed to the Board of Directors of the IOTA entity by which the complainant is employed. In the event a party wishes to appeal the decision, they shall submit a written request for the Board of Directors to hear the appeal to the Chair of the Board of Directors within five (5) business days of IOTA's decision. The Chair of the Board of Directors shall schedule a hearing before an ad hoc committee, or otherwise appropriate committee, of the Board of Directors, which may review and modify the decision as it deems appropriate. Such proceedings shall typically be conducted in closed session due to the potential for disciplinary action to be taken against an employee, unless the employee requests otherwise, or there is no potential for disciplinary action to be taken. The decision of the Board of Directors shall be final.

III.E. Child Abuse Reporting (Mandated Reporting)

IOTA is committed to the well-being and safety of its students. IOTA recognizes that child abuse and neglect has severe consequences and that it has a responsibility, in alignment with applicable law, to protect students by facilitating the prompt reporting of known and suspected incidents of child abuse and neglect. This policy applies to all IOTA employees, including part-time, temporary, and seasonal employees whose employment exceeds six weeks from the first date of paid service. Volunteers, unless required by law, are not required to adhere to this policy, but IOTA may make available training regarding the reporting duties of mandated reporters to volunteers whose duties require continued direct contact or supervision of children.

All employees are obligated to report all known or suspected incidents of child abuse and neglect. Such employees shall not investigate any suspected incidents but rather shall cooperate with agencies responsible for investigating and prosecuting cases of child abuse and neglect.

All IOTA employees are required to participate in training within the first six (6) weeks of employment and on an annual basis for the length of their employment thereafter. However, a lack of training does not excuse any mandated reporter from any applicable duty under law to report suspected child abuse and neglect. Failure to complete the training by the due date may result in disciplinary action, up to and including termination.

Child Abuse Reporting Procedures

An employee suspecting child abuse/neglect must immediately, or as soon as practically possible, report such suspicions to an appropriate child protective agency or the local law enforcement department serving the school per applicable state law. The employee will also inform their supervisor.

Prohibited Actions

- Never contact the child's or the alleged perpetrator's parent/guardian if indicators point to possible abuse or if abuse is suspected prior to making a report.
- Never conduct an investigation of any kind once abuse or neglect is suspected or prior to making a report.
- No removal or arranging of any clothing is permitted to provide a visual inspection of the underclothing, breast, buttocks, or genitalia of a pupil.

Consequences for False Reporting/Failure to Report

- A violation of IOTA policies may result in disciplinary action, up to and including termination.
- Generally, school employees are immune from civil and criminal liability when reporting suspected child abuse as required by law.
- A violation of the law (e.g., making a false report) and/or failure to report suspected child abuse varies from state to state but may include a misdemeanor, imprisonment, and/or a monetary fine.

Tennessee Child Abuse Reporting Procedures and Agencies

If an employee knows or reasonably suspects that a IOTA student has been abused, the employee shall immediately report the suspicion to the student's principal and:

- A judge having jurisdiction over the child;
- The Department of Children's Services ("DCS") local staff, or utilization of DCS Centralized Intake Process (877) 237-0004 or visit their website at <https://apps.tn.gov/carat/>;
- A Sheriff in the county where the child resides; or
- A chief law enforcement officer in the municipality where the child resides.

Within 24 hours of a report of abuse being made, the principal or the principal's designee shall contact the parent or legal guardian in coordination with DCS, pursuant to state law (T.C.A. 37-1-403; 37-1-605). The parent or legal guardian should not be notified if there is reasonable cause to believe that the individual is responsible for the abuse. Additional information can be found at <http://www.tn.gov/youth/childsafety.htm>.

Possible Indicators of Abuse and Neglect

- The child has repeated injuries that are not properly treated or adequately explained.
- The child begins acting in unusual ways ranging from disruptive and aggressive to passive and withdrawn.
- The child acts as a parent toward their brothers and sisters or even toward their own parents.
- The child may have disturbed sleep (nightmares, bed wetting, fear of sleeping alone, and needing nightlight).
- The child loses their appetite, overeats or may report being hungry.
- There is a sudden drop in school grades or participation in activities.
- The child may act in ways that are developmentally inappropriate, such as sexual behavior that is not normal for their age group.
- The child may report abusive or neglectful acts.

Note: The above signs can indicate something is wrong but do not necessarily indicate abuse or neglect.

IV. BUSINESS ETHICS AND STANDARDS OF CONDUCT

IV.A. Code of Conduct

The following conduct is prohibited and will not be tolerated by IOTA. This list of prohibited conduct is illustrative and non-exhaustive and applies to all employees of IOTA; other types of conduct that threaten security, personal safety, student and employee welfare and IOTA operations are also prohibited. Further, the specification of this list of conduct in no way alters the at-will employment relationship as to at-will employees.

- Poor or unsatisfactory performance.
- Failing to respond in a timely manner to communications received in the ordinary course of business.
- Discourteous or disrespectful treatment of others, including IOTA employees, parents, students or stakeholders (ex. bullying, harassment, intimidation).
- Insubordination - refusing to perform a task or duty assigned or act in accordance with instructions provided by an employee's manager or proper authority.
- Inefficiency - including deliberate restriction of output, carelessness or unnecessary wastes of time or material, neglect of job, duties or responsibilities.
- Unauthorized soliciting, collecting of contributions, distribution of literature, written or printed matter is strictly prohibited on IOTA property by non-employees and by employees. This rule does not cover periods of time when employees are off their jobs, such as lunch periods and break times. However, employees properly off their jobs are prohibited from such activity with other employees who are performing their work tasks.
- Damaging, defacing, unauthorized removal, destruction or theft of another employee's property or of IOTA property.
- Fighting or instigating a fight on IOTA premises.
- Violations of the drug and alcohol policy.
- Using or possessing firearms, weapons or explosives of any kind on IOTA premises, unless otherwise allowed by applicable law.
- Gambling on IOTA premises.
- Tampering with or falsifying any report or record including, but not limited to, personnel, absentee, sickness or production reports or records, specifically including applications for employment and timecards.
- Recording or falsifying time recordkeeping of another employee. Permitting or arranging for another employee to falsify your own time record.
- Use of profane, abusive or threatening language in conversations with other employees, parents, students, or stakeholders and/or intimidating or interfering with other employees.
- Conducting personal business during business hours and/or unauthorized use of telephone lines for personal calls, or emails for personal emails.
- Unauthorized use of IOTA equipment, time, materials, or facilities.
- Unprofessional conduct.
- Violating any safety, health, security, or School policy, rule, or procedure, or engaging in any conduct which risks injury to the employee or others.
- Engaging in conduct which constitutes a material conflict of interest.
- Excessive absenteeism or tardiness excused or unexcused.
- Posting any notices on IOTA premises without prior written approval of management, unless posting is on an IOTA bulletin board designated for employee postings.
- Immoral or indecent conduct.
- Conviction of a criminal act.
- Engaging in sabotage or espionage (industrial or otherwise).

- Violations of the unlawful harassment, discrimination, or retaliation policy.
- Failure to report a job-related accident to the employee's manager or failure to take or follow prescribed tests, procedures or treatment.
- Sleeping during work hours.
- Release of confidential information without authorization.
- Any other conduct, whether during work hours or not during work hours, that is detrimental to other employees or IOTA's interests or its efficient operations.
- Refusal to speak to supervisors or other employees.
- Dishonesty.
- Failure to maintain appropriate credential(s) required for the position.
- Abandonment of position.

IV.B. Alcohol, Smoking and Drug Use Policy

Smoke-Free Workplace

In compliance with applicable law, IOTA prohibits smoking, which includes vaping, in the workplace. Additional requirements dictate that IOTA school grounds remain entirely smoke-free environments. For the purposes of this policy, "school grounds" means and includes land, portions of land, structures, buildings, and vehicles when used for the provision of academic or extracurricular programs, and structures that support these buildings, including, but not limited to administrative buildings, kitchens, maintenance shops, and garages. "Land" includes parking lots, sports fields, playgrounds and quads. Any violation or disputes arising under this policy should be reported to IOTA's People Team Department.

Alcohol and Drug-Free Workplace

IOTA desires to maintain a working environment that is free of the problems associated with the abuse and/or inappropriate use of controlled substances listed in Schedules I through V of § 202 of the Federal Controlled Substances Act, 21 U.S.C. § 812 ("Controlled Substances"), intoxicants, or alcohol. The abuse and/or inappropriate use of controlled substances, intoxicants, or alcohol is inconsistent with the behavior expected of employees or others on IOTA property and subjects the organization and employees to unacceptable risks of workplace accidents and other events that undermine IOTA's ability to operate effectively and safely.

Therefore, no employee may use, possess, distribute, sell, transport, solicit, or be under the influence of alcohol, or Controlled Substances during work hours, while on IOTA premises, and/or while conducting business-related activities anywhere. Consumption of alcohol during working hours is prohibited.

If management reasonably suspects that any employee is under the influence of alcohol or a Controlled Substance while at work (e.g., exhibiting bleary eyes, staggering, slurred speech, smell of alcohol), or that an employee is otherwise violating this policy, the employee may be required to undergo and pass a drug or alcohol screening before being allowed to return to work, subject to applicable law.

Any employee who is taking a prescribed medication that may adversely affect the ability to perform assigned duties safely must inform IOTA's People Team Department. Employees will not be required to disclose the name of the medication or the medical reasons for taking the medication. If there is any question concerning the ability to perform assigned duties safely, the employee will be assigned other work, if, in the sole discretion of management, such duties are appropriate and available, or you will be sent home. IOTA will comply with all reasonable accommodation requirements.

Employee Assistance Program

When it is determined that an employee is suffering from an alcohol or drug abuse problem, efforts will be

made to assist the employee using available resources. Any IOTA efforts to assist employees do not, however, otherwise preclude IOTA from administering discipline to employees who are found to be in violation of this Alcohol and Drug-Free Workplace Policy, up to and including termination from employment. In addition to overall support for personal and professional matters, IOTA's Employee Assistance Program ("EAP") offers assistance with drug/alcohol related problems in finding effective treatment. Employees with such problems are encouraged to voluntarily seek assistance under the EAP or other available programs. In certain circumstances, IOTA may make a referral to its EAP, or similar mental health or addiction counseling provider, as a condition of their continued employment.

Should an employee wish to utilize EAP's services, they should call 800-342-8111 or visit www.resourcesforliving.com.

Notification of Conviction for Drug-Related Offense

Employees who are convicted of drug-related violations under either state or federal law which occurred on IOTA property or during working hours, or who have plead guilty to any such violation must, in writing, notify IOTA's People Team Department within five (5) days of such conviction or guilty plea. Any employee who fails to give such written notice within the five (5) day period may be terminated.

Protection for Disabled Persons

Employees with past substance abuse may be deemed to be a disabled individual under the Americans with Disabilities Act ("ADA") and/or applicable state laws. In addition, where an employee successfully completes a rehabilitation program as required by this Alcohol and Drug-Free Workplace Policy, the employee may also be considered a disabled person for purposes of these same federal and state laws. Under these circumstances, the applicant/employee will be afforded all rights and protections of the ADA and pertinent state law. Whether an individual is disabled within the meaning of controlling federal or state laws and, if so, the protections to which they are entitled are technical questions which must be answered on the basis of the facts in each individual instance. An individual who has a past history of drug use and/or alcohol abuse cannot be denied a job on that basis alone.

Firearm Free Workspace

Employee, student and visitor possession of firearms or other weapons on institution property is prohibited. This includes but is not limited to: in or on any school building, bus, school campus, grounds, parking lot, recreation area, athletic field or any other property owned, operated, or in use by IOTA.

IV.C. Professional Boundaries: Staff/Student Interaction Policy

IOTA recognizes its responsibility to make and enforce all rules and regulations governing student and employee behavior to bring about the safest learning environment possible.

Professional Boundaries

This policy is intended to guide all IOTA employees in conducting themselves in a way that reflects the high standards of behavior and professionalism required of employees who interact with students and to specify the boundaries between students and staff. Trespassing the boundaries of a student/staff relationship is deemed an abuse of power and a betrayal of public trust.

Although this policy gives specific, clear direction, it is each employee's obligation to avoid situations that could raise concerns with parents, students, colleagues, or school leaders. One viable standard that can be quickly applied is for the individual to ask themselves, "Would I be engaged in this conduct if my family or colleagues were standing next to me?" Some activities may seem innocent from an employee's perspective but can be

perceived as inappropriate from a student or parent point of view. The objective of providing the examples of acceptable and unacceptable behaviors listed below is not to restrain innocent, positive relationships between employees and students, but to prevent relationships that could lead to, or may be perceived as, a breach of the professional boundaries that IOTA employees are obligated to maintain. Employees must understand their own responsibility for ensuring that they do not cross the boundaries as written in this policy. Disagreeing with the wording or intent of the established boundaries will be considered irrelevant for disciplinary purposes.

Examples

Examples of Unacceptable Behaviors (Violations of This Policy) Absent Extraordinary Circumstances (e.g., a familial relationship)

- Giving gifts to an individual student that are of a personal and intimate nature.
- Kissing of any kind.
- Any type of unnecessary physical contact with a student in a private situation, including hugging a student.
- Intentionally being alone with a student away from the school.
- Cursing or making or participating in inappropriate comments related to sex, sexual orientation, race, or other characteristics protected by law.
- Failing to intervene when students curse or make inappropriate comments related to sex, sexual orientation, race, or other characteristics protected by law.
- Seeking emotional involvement with a student for your benefit, including involving students in adult issues.
- Listening to or telling stories that are sexually oriented.
- Discussing inappropriate personal troubles or intimate issues with a student in an attempt to gain their support and understanding.
- Becoming involved with a student so that a reasonable person may suspect inappropriate behavior.
- Allowing students in your home.
- Sending emails, text messages, posts, or letters to students if the content is not about school activities.
- Giving students a ride to/from school or school activities.
- Being alone in a room with a student at school with the door closed.
- Remarks about the physical attributes or development of anyone.
- Excessive attention toward a particular student.

Examples of Acceptable and Recommended Behaviors

- Getting school and parental written consent for any after-school activity.
- Obtaining formal approval (using the IOTA Transportation Policy and Guidelines) to take students off school property for activities such as field trips or competitions.
- E-mails, text, phone and instant messages to students must be very professional and pertaining to school activities or classes (Communication should be limited to school technology).
- Keeping the door open when alone with a student.
- Keeping reasonable space between you and your students.
- Stopping and correcting students if they cross your own personal boundaries.
- Keeping parents informed when a significant issue develops about a student.
- Keeping after-class discussions with a student professional and brief.
- Asking for advice from fellow staff or administrators if you find yourself in a difficult situation related to boundaries.
- Involving your supervisor if conflict arises with the student.
- Informing your principal about situations that have the potential to become more severe.
- Making detailed notes about an incident that could evolve into a more serious situation later.
- Recognizing the responsibility to stop unacceptable behavior of students or coworkers.

- Asking another staff member to be present when you must be alone with a student.
- Giving students praise and recognition without touching them.
- Pats on the back, high fives and handshakes are acceptable, if the student shows indications it is acceptable to them.
- Keeping your professional conduct a high priority.

Duty to Report Suspected Misconduct

When any employee reasonably suspects or believes that another staff member may have crossed the boundaries specified in this policy, he or she must immediately report the matter to their immediate supervisor. All reports shall be as confidential as possible under the circumstances. It is the duty of the administrator to investigate and report the situation thoroughly. Employees must also report to the administration any awareness or concern of student behavior that crosses boundaries or where a student appears to be at risk for sexual or other abuse.

Use of Electronic Media by Staff to Communicate with Students

Although IOTA employees enjoy free speech rights guaranteed by the First Amendment to the United States Constitution, certain types of communication, typically by virtue of their subject-matter connection to campus, may relate enough to school to have ramifications for the author or subject at IOTA. Knowing participation by IOTA employees with students in social media (e.g., Facebook, Snapchat, X, Instagram, video games) or other similar means can lead to violations of the following that may result in disciplinary action, up to and including termination from employment from IOTA:

- Use of personal technology for non-IOTA business should be limited to off-duty time and designated breaks.
- Any participation by any IOTA employee with students, including through the use of electronic media or technology, should always be limited to school business.
- IOTA employees must maintain a clear distinction between their personal social media use and any IOTA-related social media sites.
- IOTA employees' social networking profiles, personal blogs, or other personal online platforms should not be linked to IOTA students' online profiles.
- IOTA employees wishing to communicate with students or share student videos or work product (for example: coaches or enrichment facilitators) should first work with their principal and/or IT department to ensure media releases are on file and to create IOTA-related accounts
- IOTA employees shall not invite students to join social networks unless authorized by IOTA.
- When in doubt about contacting a IOTA student during off-duty hours using either IOTA- owned communication devices, network services, and Internet access route or those of the employee, employees must begin by contacting the student's parent(s) or legal guardian(s) through their phone number registered with IOTA.

IOTA employees must be mindful that any Internet information is ultimately accessible to the world. To avoid jeopardizing their professional effectiveness, employees are encouraged to familiarize themselves with the privacy policies, settings, and protections on any social networking websites to which they choose to subscribe and be aware that information posted online, despite privacy protections, is easily and often reported to administrators or exposed to IOTA students. Before employees create or join an online social network, they should ask themselves whether they would be comfortable if a 'friend' decided to send the information to their students, the students' parents, or their supervisor.

IV.D. Dress Code

A large part of the image that IOTA's schools project to the public, clients, visitors, and vendors is through its employees. IOTA does not have an explicit dress code; however, it asks all employees to dress appropriately.

Employees must use good judgment in determining what types of clothing are considered appropriate attire. Clothing should be professional, clean and neat in appearance, and shoes should be close-toed. Make-up, grooming, and personal hygiene should be reasonable and in accordance with customary business practices. An employee's personal grooming, hygiene, and clothing should not distract from the learning or working environment, nor should it offend reasonable sensibilities of students, parents, or other staff members. IOTA will take appropriate and reasonable measures to accommodate all employee requests relating to dress code issues, including requests for religious, gender identity, disability and medical reasons. Any request for accommodation relating to the dress code should be directed in advance to the People Team. If an employee believes these guidelines are implemented in a discriminatory manner, the employee may immediately report the matter to the People Team.

Each school's administration may specify particular dress code requirements, including, but not limited to, business casual attire, and school specific items. Please see your school staff handbook or administrator for more information.

IV.E. Public Relations Policy

If you receive a request from the media, employees are asked to refer the matter to IOTA's Chief of Staff, Executive Director, or School Principal for guidance. IOTA requires its employees to not make statements or representations on behalf of IOTA or any of its schools without IOTA's advance written consent. Furthermore, employees are expected to use their best judgment if authorized to speak with the media and are to be aware that their statements may be construed as not just representing themselves, but the entire IOTA organization.

IV.F. Proprietary and Confidential Information

IOTA protects the private information of its students, its staff, and their families. This includes, but is not limited to, information found in student lists, student cumulative files, student health files, student individualized education programs, personnel files, and computer records. In addition, federal law prohibits student information from being disseminated except under certain limited conditions. (FERPA, 20 U.S.C. §1232g, 34 CFR Part 99).

Employee personal information is also confidential and may not be discussed with anyone other than the employee's supervisor or IOTA's People Team Departments.

Other records not subject to public disclosure pursuant to any applicable law shall not be shared. If an employee is unsure of the proprietary nature of information, he/she is encouraged to consult their supervisor or a member of IOTA's People Team Department. IOTA employees may be subject to disciplinary action, up to and including termination, for violating this section.

With the exception of the above, IOTA feels that sharing knowledge with other charter organizations, school districts, and other parties interested in the greater good is central to its goal of widespread educational reform and to its responsibilities as a not-for-profit organization that receives charitable and public funds. IOTA has often shared its documents, policies, processes, and best practices with other organizations.

IV.G. Telecommuting

Purpose

The purpose of this Telecommuting Policy is to further IOTA's commitment to a collaborative and positive work environment by allowing a Central Office employee to telecommute, on occasion or on an ongoing basis, when authorized, in writing, by their immediate supervisor for the best interests of IOTA and the employee. IOTA highly values in-person communication and interaction, but also supports approved telecommuting to improve productivity and workplace flexibility, and to attract and retain a diverse and talented workforce.

IOTA provides a generous amount of paid time off ("PTO") and paid holidays as part of its benefits package. IOTA strongly encourages its Central Office employees to use PTO as a means to attend to personal matters or vacation.

Application

IOTA employees generally are required to work in IOTA offices. However, an employee's immediate supervisor may allow the employee to telecommute, on occasion or on an ongoing basis, for the best interests of IOTA and the employee. Consistent with IOTA's equal-employment and nondiscrimination policies, any immediate supervisor determining whether to authorize a telecommuting request shall consider the following criteria on an objective basis to the greatest extent possible:

- the reason(s) for the request to telecommute;
- the nature of the employee's job duties and/or work to be performed while telecommuting;
- the employee's historical and recent job performance;
- the potential impact on other team members and IOTA's collaborative culture;
- the potential impact on productivity; and
- the frequency/length of the request.

To authorize an employee to telecommute on an ongoing basis, the employee's supervisor, in collaboration with the department head (Director or above), shall also take into account the following to determine whether the telecommuting request is approved:

- the requesting employee must be considered to be a hard-to-replace employee given the nature of the role, employee's experience/knowledge, timing of the transition, and other relevant factors;
- how often the remote employee must report to work at the Central Office; and
- the ability of the remote employee to be on-site for mandatory meetings or other required activities, at their own cost.

Any employee who is authorized to telecommute (on occasion or ongoing) must adhere to the following:

- Prior written authorization must be provided by the employee's immediate supervisor.
- A telecommuting employee must be available and able to perform their regular job duties in a timely manner and be accessible to their colleagues by means of communication regularly suited for their position, unless specific arrangements are made in advance with the employee's immediate supervisor.
- A telecommuting employee must work in an environment suitable to conduct ordinary job duties, including, but not limited to, participating in meetings without interruption or audible disturbances.

Those employees who are approved to voluntarily telecommute are responsible for providing secure internet connection for work-related business. They may connect their work issued computer and phone to a personal home internet connection. Telecommuting employees are expected to use their work-issued computer for remote work to protect against cybersecurity threats and to maintain confidentiality of IOTA data. Personal computer use for work related purposes should be reserved only in an emergency in which work issued computers are not functioning. Telecommuting employees must report any work-issued computer problems to the IT department within 24 hours of discovering the issue, or as soon as practicably possible.

Telecommuting employees who are not exempt from the overtime requirements of applicable law must record all hours worked in a manner consistent with regular IOTA practices or as designated in advance by the employee's immediate supervisor. All overtime policies and procedures described in this Employee Handbook shall apply to this Telecommuting Policy, including, but not limited to, receiving advance approval by the employee's immediate supervisor for hours worked in excess of those specified per day and per work week, in accordance with applicable law.

Telecommuting employees are subject to the same IOTA policies described in this Employee Handbook regarding the use of IOTA property/equipment and services while working from a IOTA location. Telecommuting employees must maintain appropriate care and security of any and all IOTA property/equipment used while telecommuting.

Telecommuting employees will be covered by workers' compensation for all job-related injuries occurring while telecommuting during their defined work period. IOTA is not responsible for maintaining a safe and ergonomic working environment, including the work area, bathroom, and other areas that may be necessary for working while telecommuting. Workers' compensation will not apply to non-job-related injuries that occur while telecommuting. Telecommuting employees also remain responsible for injuries to third parties and/or members of the employee's family on the employee's premises or otherwise. IOTA will not be responsible for injuries to third parties or members of a telecommuting employee's family that occur on the employee's premises or otherwise. In the event of a job-related incident, accident, or injury during telecommuting hours, the employee shall report the incident to the People Team as soon as practicable, and follow established procedures to report and investigate workplace incidents, accidents, or injuries. The employee must allow inspections of the telecommuting workplace conducted by IOTA or its agent if a job-related incident, accident, or injury has occurred.

Outside Employment:

Employees are permitted to work a second job as long as it does not interfere with their job performance or work hours with IOTA. Employees with a second job are expected to work their assigned schedules at IOTA. A second job will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or different hours.

If outside work activity causes or contributes to job-related problems, it must be discontinued, or the employee may be subject to disciplinary action, up to and including termination.

IV.H. Student Transportation Policy and Guidelines

IOTA is committed to transporting students safely and recognizes that, in addition to general busing of students by IOTA approved licensed bus drivers, situations arise that require student transportation by the authorized staff of IOTA. Such situations include transportation of students for:

- IOTA or school-sponsored field trips, excursions, or other extracurricular activities (e.g., athletic competitions); and
- Compelling circumstances (e.g., an emergency situation reasonably requiring action to help ensure student safety and/or health). Should compelling circumstances exist, an employee of IOTA and/or its schools shall: (1) attempt to contact the student's parent or guardian for permission to transport a IOTA student in their personal vehicle; and (2) receive permission from the school principal or designee to transport a IOTA student in their personal vehicle.

Without preventative measures, the foregoing situations may expose IOTA to potential legal liability. Unconventional transportation arrangements (e.g., staff driving students home after an extracurricular activity), or students being left on or near campus without transportation, elevate the risk of liability to IOTA.

To help avoid such liability, employees of IOTA shall not transport students in their personal vehicles unless, prior to driving students, the:

- Student's parent has completed the *Transportation Permission and Release of Liability Form* and returned it to the student's school of attendance; and
- The driver has been cleared by the Director of Operational Excellence. Approval is conditional upon IOTA insurance coverage and employee eligibility. Please confirm prior to driving.

IV.I. Violence Prevention Policy

IOTA is committed to providing a safe environment for its employees and students. Violent behavior, threats of violence, or physical intimidation will not be tolerated in IOTA's workplace. IOTA has numerous safety procedures in place, including sign-in procedures requiring visitors to sign in and out at the schools.

IOTA recognizes that workplace violence is a growing concern at schools and offices across the country. Therefore, IOTA is committed to providing a safe, violence-free workplace and school environment. In this regard, IOTA strictly prohibits employees, students, volunteers, parents, consultants, customers, visitors, stakeholders, or anyone else on IOTA premises or engaging in a IOTA-related activity from behaving in a violent or threatening manner. Moreover, as part of this violence prevention policy, IOTA seeks to prevent workplace violence before it begins and reserves the right to address behavior that suggests a propensity towards violence even prior to any violent behavior occurring.

Any employee who witnesses or is the recipient of violent behavior must promptly inform their supervisor, manager, or dial 911 in the event of an emergency. All threats will be promptly investigated and appropriate remedial action will be taken. No employee will be subject to retaliation, intimidation, or discipline as a result making a good-faith report pursuant to this Violence Prevention Policy. Depending on the circumstances, IOTA may be obligated to report incidents to external agencies (e.g., law enforcement). IOTA's policy is to comply fully with its reporting obligations in all cases.

Any individual engaging in violence against IOTA's employees or its property may be prosecuted to the full extent of the law. Any such act or threatening behavior may result in disciplinary action, up to and including termination.

V. FINANCE AND ACCOUNTING POLICIES

V.A. Payroll

IOTA's pay periods run from the 1st to the 15th of each month and the 16th to the end of each month. Paychecks are issued semi-monthly on the 10th and 25th of each month unless those days fall on a weekend or holiday, in which case checks will be distributed on the preceding business day. All employee payroll amounts are calculated based upon approved rates included in the employee's personnel file. Any changes to pay rates or benefits must be properly initiated and authorized using the designated process in IOTA's Human Resources Information System ("HRIS", e.g., ADP Workforce Now).

If for any reason, an employee receives the incorrect amount of pay, IOTA will handle each situation as follows:

- If an employee is materially underpaid (i.e., gross adjustment due is in the amount of \$100 or more) due to erroneous processing by Payroll or due to submission of incorrect information by managers/administrators, then a manual check will be issued as soon as possible.
- If an employee is overpaid due to erroneous processing by Payroll or due to submission of incorrect information by the employee/managers/administrators, then a repayment arrangement will be negotiated with that employee to repay the overpayment to IOTA. The employee will agree, in writing (e-mail is acceptable), that deductions from future pay checks meet with their approval. Repayments to IOTA should be completed by the end of the fiscal year. An employee's refusal to comply with this policy may result in disciplinary action, up to and including termination. Any employee who believes that they have been paid incorrectly must notify the People Team immediately.

Direct Deposit

All IOTA employees should sign up for direct deposit and can do so on their own throughout their employment via IOTA's HRIS, ADP Workforce Now.

Payroll Deductions

In compliance with applicable law, IOTA will make only required or authorized deductions from employees' wages. The following deductions, if applicable, will be made from employees' gross wage payments:

- Deductions to pay the employee portion of local, state and federal taxes.
- Deductions required pursuant to a withholding order for support, an earnings assignment order, an earnings withholding order or other similar court order.
- Deductions required pursuant to a wage garnishment order.
- Other deductions authorized in writing by the employee, including, but not limited to deductions to cover insurance premiums or payments for other employee benefits. Examples of acceptable forms of written employee authorizations are emails, employee approved authorizations through Workday, paper and fax, as well as other forms and methods.

All deductions will be itemized on employees' paycheck stubs. Employees with questions regarding any deductions taken from their paychecks should immediately contact IOTA's People Team.

Deduction rates and amounts are based on the most recent calendar year information from the United States Internal Revenue Service and the employee's state of employment.

Additional payroll deductions (e.g., retirement, benefits) may be withheld and deposited in a timely manner, if applicable.

Arrears: In the event an employee has a scheduled deduction but does not receive a paycheck in an amount

sufficient to cover the deduction, the deduction will accumulate. Such an accumulated balance, which shall be made available to review by the employee in IOTA's HRIS, will be deducted from the employee's immediately following paycheck(s), in full, until the accumulated balance equals zero (\$0.00). All normal deductions will also occur in addition to the deductions of the accumulated balance. Upon an employee's termination from employment with IOTA, the full balance of the arrears will be deducted from their final paycheck and any shortfall will be paid by the employee to IOTA. Additionally, deductions for health benefits that result in the employee earning less than minimum wage are allowable, as long as the employee has voluntarily elected such benefits.

First Paycheck Process

For hourly employees, all hours worked in the pay period are paid in their first paycheck. Salaried employees will receive a full pay period salary if work begins at the start of the pay period. Employees will receive a prorated pay period salary (based on work days in the period) if work begins after the start of the pay period.

Final Paycheck – Regular Pay Proration Process

Salaried employees receive their final paycheck prorated based on the number of work days in the terminating pay period. For example: The pay period of 3/1-3/15 consists of eleven (11) work days. If an employee terminates on the 9th work day of the period, the employee will receive 9/11th regular pay.

Hourly employees will receive total hours worked through their final work day within the pay period.

When a salaried or hourly employee terminates after the end of one period but before the scheduled pay date, that employee receives full pay from the previous period and the prorated pay from the current period (using the process described above) through the last day worked.

First Paycheck – Employee Medical Deductions

All full-time regular IOTA employees are eligible to receive medical benefits as of the 1st of the month following their hire date. Employees who elect to participate in the IOTA Benefit Plan with employee benefit deductions will receive the medical, dental or vision coverage deductions in their paycheck based on the first pay period where benefit coverage begins.

If hired on the first of the month, the first paycheck covering the 1st through the 15th of the month will include employee benefit deductions. If hired after the 1st of the month, deductions will begin as of the following month 1st through 15th pay period.

Final Paycheck – Employee Medical Deductions

Employees who participate in the IOTA Benefit Plan with employee benefit deductions and terminate their employment:

- On or before the 15th of the month, will receive a medical, dental or vision coverage deduction to cover the current period (1st through 15th), as well as medical, dental or vision deductions to cover the following period (16th through last day of the month), on their final paycheck.
- After the 15th of the month, will have their regular medical, dental and vision coverage deductions reflected on their final paycheck.

First Paycheck – Employee Waive Benefit Process

Employees who enrolled in the medical waive benefit will also receive the medical waive benefit in their paycheck based on the schedule below:

- If hired on the 1st of the month and are enrolled in the medical waive benefit employees will receive full medical waive benefits in their first paycheck.
- If hired after the 1st of the month, employees will receive their first medical waive benefit with their 1st through 15th period paycheck in the following month.

Final Paycheck – Employee Waive Benefit Proration Process

Employees who enrolled in the medical waive benefit will also receive one pay period of medical waive benefit in their final paycheck.

Final Paycheck – PTO Accrual Process

Employees who terminate their employment prior to the end of a pay period will receive a prorated PTO accrual on their final paycheck. PTO accrual will be prorated based on the number of work days in the terminating pay period. For example:

The employee accrues PTO at a rate of five hours per pay period, and terminates employment on the 9th day of an 11-day pay period. Thus, 4.09 hours ($9 \div 11 * 5 = 4.09$) of PTO will be accrued for the final pay period.

Payout of Paid Time Off Balances

PTO will be paid as used or upon termination. PTO balances may be paid in special hardship circumstances if approved by the ED. "Special circumstances" include financial hardship or an unforeseen emergency such as medical expenses, funeral expenses, imminent foreclosure of or eviction from the employee's primary residence, or other similar extraordinary and unforeseeable circumstances arising as a result of events beyond the control of the employee. Payment of PTO hours will not be allowed in excess of hours accrued.

Time Entry for Hourly Employees

Hourly employees will log their worked time, including meal periods taken, by using the check in and check out feature in ADP. Hourly employees will attest that the hours logged through the check in/check out process are accurate and complete by using the submission process in ADP.

Hourly employees should clock in each day based on when they actually start working and clock out for meals or at the end of the day when they actually stop working. Hourly employees should have clearly defined start, end, and meal times defined with their supervisor. Should an hourly employee arrive early but is not actually performing work, or stays late but is not actually performing work, they should not be clocked in.

Submission of time is due on the 15th and the last day of each month. If the 15th or the last day of the month is not a business day, time will be submitted the last day worked in the pay period. Supervisors will approve submitted time by the 1st and the 16th of each month. If the 1st or the 16th is not a business day, the approval is due the next business day. An hourly employee should inform their manager immediately if they missed a clock in or clock out time that needs to be updated in ADP so that hours worked are accurately reflected in ADP at all times and ready for submission at the end of the pay period. Repeated errors in time entry may result in disciplinary action, including and up to termination.

Request Time Off

Each employee is responsible for requesting their time off through ADP. Submitted time off is approved by the employee's supervisor. Supervisors are responsible for ensuring that all time off is entered in ADP. If an employee does not enter their time off in ADP, the supervisor (or their designee for this process) may enter the employee's time off in ADP. Time off will be submitted and approved by the 1st and 16th of each month. Please refer to the "Sick Leave and Paid Time Off" policy in this handbook for more details. Failure to report absences in ADP may result in disciplinary action, up to and including termination.

Stipends and Bonuses

From time to time, a stipend may be offered to an employee for specific services rendered that fall outside their normal role and responsibilities. In addition, bonuses may be offered to recognize exemplary performance and/or provide incentives that are beneficial to the organization. Stipends and bonuses are

subject to all state and federally required taxes and other deductions. Stipends and bonuses will be distributed on the 25th check and according to agreed upon payment schedules and distribution methods. Internal sports stipends are listed below:

December 25th Distribution		
Sport/Title	Amount	Location
Athletic Director	\$750	High School
Band Director	\$1,250	High School
Asst Band Director	\$500	High School
Cheer	\$750	High School
Cross Country	\$700	High School
Football HC	\$2,200	High School
Football Asst.	\$1,250	High School
Football Asst.	\$1,250	High School
Soccer	\$1,250	High School
Volleyball	\$1,250	High School
Volleyball Asst.	\$700	High School
Athletic Director	\$500	Middle School
Band Director	\$750	Middle School
Cheer	\$375	Middle School
Football HC	\$1,250	Middle School
Football Asst.	\$700	Middle School
Football Asst.	\$700	Middle School
Soccer	\$700	Middle School
Volleyball	\$700	Middle School
Volleyball Asst.	\$350	Middle School

March 25th Distribution

Sport/Title	Amount	Location
M Basketball Head Coach	\$2,500	High School
M Basketball Asst.	\$1,250	High School
W Basketball Head Coach	\$2,500	High School
W Basketball Asst	\$1,250	High School
Cheer	\$750	High School
M Basketball Head Coach	\$1,250	Middle School
M Basketball Asst.	\$500	Middle School
W Basketball Head Coach	\$1,250	Middle School
W Basketball Asst	\$500	Middle School
Cheer	\$375	Middle School

May 25th Distribution

Sport/Title	Amount	Location
Athletic Director	\$750	High School
Band Director	\$1,250	High School
Asst Band Director	\$500	High School
Baseball	\$1,250	High School
Baseball Asst.	\$700	High School
Soccer	\$1,250	High School
Softball	\$1,250	High School
Softball Asst.	\$700	High School

M. Track	\$1,250	High School
W. Track	\$1,250	High School
Track Asst.	\$700	High School
Athletic Director	\$500	Middle School
Band Director	\$750	Middle School
Baseball	\$700	Middle School
Baseball Asst.	\$350	Middle School
Soccer	\$700	Middle School
Softball	\$700	Middle School
Softball Asst.	\$350	Middle School
M. Track	\$700	Middle School
W. Track	\$700	Middle School

Period Coverage

In the event a teacher is asked to cover a class during their planning period for any reason, the time code ‘period coverage’ can be entered in ADP Workforce Now. Entry cannot exceed one class period daily. Individuals in advisory leadership roles should reasonably expect to cover or model teach advisory classes as part of the leadership duties. Individuals providing advisory coverage beyond two days in each week (Monday-Friday) are eligible for period coverage compensation for any days in excess.

Period coverage is available only for individuals in full-time regular teacher positions. Coverage time should be entered and submitted by pay period deadlines. Retroactive entry will not be applied.

Stipends for Volunteers: Stipends may also be offered to eligible volunteers. To determine eligibility, please contact the People Team to guarantee all appropriate processes are followed prior to any volunteer activities. To ensure volunteers receive their stipend, the required paperwork must be submitted to the People Team. Subsequently, Accounts Payable will process the stipend and provide it to the volunteer.

Overtime

Generally, teachers and administrators are exempt. Exempt employees may have to work hours beyond their normal schedules as work demands require. No overtime compensation will be paid to these exempt employees.

Non-exempt employees may be required to work beyond the regularly scheduled workday or work week as necessary. Only actual hours worked in a given workday or workweek can apply in calculating overtime for non-exempt employees. IOTA provides compensation for all overtime hours worked by non-exempt employees in accordance with state and federal laws. All overtime work must be pre-approved by the employee’s supervisor. If an employee works overtime without pre-approval, they will be compensated for that time in accordance with applicable law. However, they may be subject to discipline, up to and including termination.

For purposes of calculating hours worked and overtime pay, the IOTA work week begins each Monday at 12:01 a.m. and ends on Sunday at midnight. The IOTA workday begins at 12:01 a.m. and ends at midnight twenty-four (24) hours later.

For employees who qualify for overtime, all hours worked in excess forty (40) hours in one work week (Monday- Sunday) shall be treated as overtime and shall be paid at a rate of one and one-half times the employee's regular rate of pay. For overtime purposes, holiday pay and paid time off are not considered hours worked during the work week.

On a monthly basis, Payroll data encompassing regular time and overtime incurred in the period is provided to the appropriate Director/Manager or Central Office department head. The data is reviewed for reasonableness and discussed with appropriate administrators and department heads as necessary.

Meal and Rest Periods

It is important to IOTA that all employees take daily rest time away from their work areas. IOTA offers fully functional break rooms at each work site to allow a place for employees to rest and eat during their breaks. If an hourly employee is required to attend professional development or other work-related function during a mealtime, that does not allow freedom to their own time, the employee should remain clocked in. If this is the case, supervisors should ensure they are still following the appropriate meal laws to provide the employee with any required meal breaks.

Any hourly employee will be provided an uninterrupted unpaid meal period of at least 30 minutes if they are scheduled to work six hours consecutively. They must clock out for the meal period. They will be permitted a reasonable opportunity to take this meal period, and they will be relieved of all duty. During their meal period, they are free to come and go and are free to leave the premises. They are expected to return to work promptly at the end of any meal period.

Recording Meal and Rest Periods

All non-exempt employees must clock out for any meal period and record the start and end of the meal period. Employees are not allowed to work "off the clock." Such employees must report all work time accurately on their time record. If, for any reason, an employee is not provided a meal period in accordance with this "Meal and Rest Periods" policy, or if any such employee is in any way discouraged or impeded from taking their meal or rest periods or from taking the full amount of time allotted, the employee must immediately notify their supervisor, manager or IOTA's People Team Department. Anytime that a meal period was missed that should have been provided (or any portion of a provided meal or rest period is worked), the employee must report to their immediate supervisor and document the reason for the missed meal or rest period or time worked. Refusal of an employee to take a meal period can result in disciplinary action, up to and including termination.

Lactation Accommodation

IOTA accommodates lactating employees by providing a reasonable amount of break time to any employee who desires to express breast milk for an infant child. The break time shall, if possible, run concurrently with any break time already provided to the employee. Any break time provided to express breast milk that does not run concurrently with break time already provided to the non-exempt employee shall be unpaid and must be documented by the employee for time-tracking/payroll purposes.

IOTA will make reasonable efforts to provide employees who need a lactation accommodation with the use of a room or other private location that is located close to the employee's work area. Employees with private offices will be required to use their offices to express breast milk. Employees who desire lactation

accommodations should contact their supervisor to request accommodations.

Summer Savings –Transferring to a Non-Teaching Position

“Summer Savings” is a method by which teachers and counselors can receive 24 paychecks during a fiscal year by allowing IOTA to withhold a portion of each paycheck during the 23 pay periods per fiscal year; the balance of which is paid to the teacher/counselor, in full, in July after the conclusion of the fiscal year in which the funds were withheld. Teachers who transfer to a non-teaching position (e.g., from a school to Central Office) will receive a payout of any Summer Savings balance in their final paycheck before transferring to the new position.

V.B. Consultants and Independent Contractors

Independent contractors (as defined above in Section II. EMPLOYMENT CATEGORIES, CLASSIFICATIONS, AND REQUIREMENTS) and consultants are not entitled to any of the benefits that IOTA provides its employees, including, but not limited to, medical and dental insurance, workers’ compensation, disability insurance, leaves of absence, vacation, or sick leave. Consultants and independent contractors are responsible for providing disability, workers’ compensation, or other insurance as well as licenses, credentials, and permits usual or necessary for performing the applicable services.

Under no circumstances shall IOTA be considered or interpreted to be a consultant’s or an independent contractor’s employer, partner, agent, or principal for any purpose.

Prior to services being rendered, IOTA’s People Team Department must be contacted to develop a written engagement agreement. The use of consultants and independent contractors are closely monitored so as not to vary from the rules of applicable law. The drafting of all contracts for consultants and independent contractors should be based on the standard contract template jointly developed by IOTA’s People Team and Legal. Any significant changes to the standard template should be reviewed by IOTA’s appropriate administrators and Legal before the execution of the contract to limit IOTA’s exposure to liability or legal action.

Additionally, independent contractors may be required to follow the criminal background checks and tuberculosis testing requirements as outlined in this Handbook prior to completing the contracting process. Once cleared to begin work, independent contractors are required to submit written, detailed invoices for payments which are processed through the IOTA’s Accounts Payable Department.

Conflicts of Interest – Employee-Vendor Relationships

IOTA adheres to its Conflict-of-Interest Code and Policy. IOTA attempts to avoid preferential treatment in purchasing goods and services by separating employees’ personal interests from the interests of IOTA. Current IOTA employees cannot sell goods or services as independent contractors to IOTA. An employee-vendor relationship is any relationship between a IOTA employee and a proposed vendor that might create a conflict of interest. An employee-vendor relationship exists when a family relationship exists between the person involved in the selection of the vendor and the proposed vendor. Examples of employee-vendor relationships include:

- An IOTA employee acts as a vendor to sell goods or services to IOTA.
- An IOTA employee buys goods or services for IOTA from a vendor who is a member of the employee’s family.
- An IOTA employee or member of their family owns or controls at least 10% of the business from which IOTA purchases goods or services.

V.C. Acceptable Use of Public Funds

The term “public funds” is not limited to money, but includes anything of value belonging to an agency that accepts public funds such as equipment, supplies, compensated staff time, and use of telephones, computers, and fax machines and other equipment and resources.

Due to the receipt of public funds from various public sources, there is increased scrutiny over IOTA’s use of public funds. IOTA adheres to applicable law regarding the use of public funds. Private funds commingled with public funds are considered public funds and must be spent in accordance with applicable law regarding allowable use of public funds.

Gifts of Public Funds

Using public funds for gifts of a personal nature is not allowed because they confer a tangible benefit to an individual. Except as explained below, gift certificates, flowers, and candy are most often viewed as personal as opposed to public in character and, therefore, should not be purchased with IOTA funds. Gift certificates and gift cards are characterized as gifts of public funds and, therefore, are not allowed, except when purchasing gas cards for students designated as homeless under the McKinney-Vento Homeless Assistance Act (refer to “McKinney-Vento Program” below). However, gift certificates and gift cards originating directly from a donation from external vendors or individual contributors can be transferred by IOTA administrators to employees for various organizational purposes. The employee is responsible for ensuring that the gift or benefit received is in accordance with the “Acceptance of Personal Gifts” section of the Finance and Accounting Policy Manual.

Staff appreciation meals are also considered a gift of public funds and, therefore, not allowed due to the fact that staff appreciation meals do not serve a direct and/or substantial public purpose. Note that meals served at professional development trainings are allowable. Employees must provide appropriate support or proof that a professional development session took place. Appropriate support includes, but is not limited to, an agenda, a brief description of the session and how the subject matter will help advance the Organization’s mission, and list of participants. Flowers may be used for awards ceremonies or as decorations for public events.

Additionally, IOTA’s funds shall not be used for donations to nonprofit organizations or students/families in need because they are considered a gift of public funds, no matter how worthy the cause. IOTA’s tax identification numbers allow donations to the schools to be tax deductible, but once the funds are received they are commingled with other monies received for a variety of purposes. Sending a portion of the funds to another nonprofit agency constitutes a gift of public funds.

In general, fundraising should be for the exclusive benefit of IOTA schools or the Organization and not for other organizations. However, a group of students or employees may organize a fundraiser to support a charity as long as the event is clearly identified as raising funds for that charity. All donations not going to IOTA should be in the form of checks made payable to the charity and should be picked up by, or delivered to, the charity so that funds are not deposited into the IOTA account (note – such donations are also not eligible for a tax exemption letter provided by IOTA as IOTA is not the recipient). IOTA resources should not be utilized to support outside charities and funds cannot flow through IOTA.

Prizes and Awards

Students: To recognize student achievement, prizes and awards may be issued. Prizes and awards are gifts of tangible personal property presented to students in recognition of outstanding achievement in academic performance or other performance-related activities that involve a skill rather than luck, and are part of the educational experience. The prize or award cannot be cash or a cash equivalent (e.g., gift cards).

Employees: Awards may be issued to recognize employee achievement. An employee achievement award is an item of tangible personal property that must be awarded as part of a meaningful presentation. The prize or award cannot be cash or a cash equivalent. The award should be of a *de minimis* nature with a value of less than \$200 per employee and provided infrequently. On an annual basis, employee achievement awards may not exceed \$400 per employee. The purpose and description of the prize/award must be provided during the purchasing and payment process. Since monetary prizes and awards are not allowed, gift cards may not be purchased.

To award employees for exceptional contribution, IOTA must find that the employee did one (1) or more of the following:

- Proposed procedures or ideas that thereafter are adopted and effectuated, and that resulted in eliminating or reducing expenditures or improving operations.
- Performed special acts or special services in the public interest.
- By their superior accomplishments, made exceptional contributions to the efficiency, economy, or other improvement in the operations of IOTA.

Life transition events such as birthdays, weddings, holidays and other similar circumstances can happen to anyone and cannot be considered superior accomplishments, or merit an award.

For more specific information, please review the Finance and Accounting Policies Manual.

Gas Card Purchases Under the McKinney-Vento Program

When a student qualifies as homeless under the McKinney-Vento Homeless Assistance Act, the local education agency (“LEA”) is required to provide access to transportation to stay in a public school of origin or enroll in a neighborhood public school. The LEA may agree, determined on a case-by-case basis, to reimburse transportation between school and current residence at the state mileage reimbursement rate in lieu of LEA-provided transportation and may provide a gas card as reimbursement. The following is the procedure for gas card reimbursement for IOTA students, who have qualified under the McKinney-Vento Homeless Assistance Act:

- The parent or guardian of a homeless student must complete and submit to IOTA’s Homeless Student Liaison a McKinney Vento Request for Student Transportation Form.
- A Mileage Reimbursement Request (“Request”) form must be signed and completed by the parent or guardian, and submitted to IOTA’s Homeless Student Liaison. The Request expires at the end of the current school year or at withdrawal from school. The Request must be approved by the CFO or designee and IOTA’s Homeless Student Liaison (or equivalent position).
- If the request is approved, then each month the parent or guardian must complete and sign a Mileage and Attendance Monthly Form for verification and processing. The form must be sent to IOTA’s Homeless Student Liaison within thirty (30) days of the last day of the month being requested or sooner.
- IOTA’s Homeless Student Liaison shall reconcile the Mileage and Attendance Monthly Form against attendance in IOTA’s electronic student information database (e.g., PowerSchool) to verify the dates of attendance and make any necessary corrections to the request.
- IOTA’s Homeless Student Liaison shall submit the Mileage and Attendance Monthly Form to the School Operations Manager (or equivalent position) for processing. Where available, a “Fuel-Only” gas card is purchased in the nearest denomination needed for mileage reimbursement.
- IOTA’s Homeless Student Liaison shall maintain a log that includes the date the “Fuel Only” Gas Card was issued and who received the “Fuel Only” Gas Card.

- If the student relocates to housing within the bus boundary, the previous arrangement for Mileage Reimbursement will end and alternate transportation will be provided.

V.D. Purchasing

Purchasing refers to the process of acquiring goods and services best suited for the specific needs of IOTA. By creating purchase orders through approved IOTA processes, IOTA can purchase items/services to support the needs of students, staff, and class instruction. Textbooks, technology equipment, and furniture must be purchased centrally by Central Office to adhere to required specifications and maintain appropriate asset tagging. Only specific employees are authorized to make purchases or request purchases on behalf of the organization. Please speak to your manager for preauthorization on purchases and to ensure adherence to policies and procedures.

For commonly purchased items, a list of approved vendors is available in Helpdesk. Prior to purchasing an item, this list should be consulted to determine if an existing vendor offers the desired item. Questions should be directed to the Operations team for procurement processes.

New vendors will not be set up for products/services offered by existing approved vendors.

Signing Authority

Only specific employees are authorized to encumber financially and make representations on behalf of IOTA (for example, the only individual able to do so at the school-level is the principal). Those employees are responsible for making authorizations in accordance with policies applicable to the specific item being authorized. Please reference IOTA's *Finance and Accounting Policy Manual* for additional details. Categories of financial encumbrances include:

- Purchase Orders/Invoices;
- Expense Reimbursements;
- IOTA Credit Card Transactions;
- Service Contracts (requires legal and procurement review prior to execution);
- Loans (requires legal and finance department review prior to execution); and
- Lease Agreements (requires legal and finance department review prior to execution).

Other types of documents requiring a signature may indirectly encumber IOTA financially and should be reviewed by IOTA's Legal and Finance department if there is any uncertainty.

Purchases made by anyone lacking procurement authority shall become the personal responsibility of the person(s) executing the purchase agreement. An employee's failure to comply with any procurement requirement, including unauthorized purchasing, may result in disciplinary action up to and including termination. IOTA will not assume responsibility, under any circumstances, for payment for any materials, supplies, or services purchased by unauthorized individuals or in an unauthorized manner.

It is your responsibility to review the Finance & Accounting Policy Manual for a full list of authorized signers and the procurement process.

All grant applications and agreements must be signed by the Executive Director.

Employees who are not authorized to encumber and make representations on behalf of IOTA who nevertheless do so may be subject to disciplinary action, up to and including termination.

Employment Contracts

All employment contracts can only be signed by the Executive Director.

Use of Credit Cards

Please refer to the Finance and Accounting Policy Manual for the credit card policy.

Improper use of an IOTA issued credit card will result in disciplinary action, up to and including termination.

V.E. Donations and Fundraising

In keeping with IOTA's tax-exempt status, IOTA focuses on grant writing and fundraising for IOTA and its schools. However, IOTA encourages schools and employees to obtain additional monetary and non-monetary donations through individual grants, personal relationships, and fundraising events which will benefit the school and organization.

Employees should check with their supervisor or department head prior to soliciting any donations or setting up any fundraisers to ensure compliance with local, state, and federal laws as well as IOTA internal policies. Prospective donations from large organizations or individuals should be coordinated with IOTAN's Development Department prior to pursuing the donation.

Monetary Donations

A myriad of laws and regulations governing donations to charitable organizations, as well as rules related to using funds only in strict accordance with the donor's wishes, require the following:

- Solicitations of donations including school-site fundraising must be explicit as to the purpose(s) for which the funds are being sought.
- Donations exceeding \$25 must be acknowledged, in writing, and will be done so with IOTA's Development Department.
- Under rare, applicable circumstances, separate restricted accounts will be required to ensure that donor funds are handled appropriately.
- All donor funds will be promptly recorded and then deposited into the applicable bank account.
- Employees responsible for monitoring donor funds will ensure that the funds are used strictly in accordance with the donor's understanding as to why the funds were raised and/or any specific written restrictions.
- Once a restriction has been fulfilled, any remaining funds will be returned to the donor(s), if required, or transferred to unrestricted funds for use in the support of IOTA's mission.

If a potential donor wishes to make a financial gift to IOTA, please check with your school principal/manager and/or direct the donor to IOTA's Director of Development and Mentoring or the Chief Financial Officer. Donors should be reminded that to ensure their contributions are tax deductible, IOTA Community Schools should be listed as the recipient of the funds rather than the individual school, if applicable. IOTA will ensure that all donations earmarked for an individual school will be restricted to the specified use by the named school(s). Below is the FEIN:

IOTA Community Schools (FEIN: 47-0970499)

If the donation is for a specific school, the school to receive credit for the funds should be noted elsewhere on the documents (e.g., the memo area of the check) to ensure the donation is earmarked for the individual school and will be restricted to the specified use by the named school(s).

Donation of Assets

IOTA recognizes the value of donated goods that may be offered on a sporadic basis without charge to the organization. All donated goods must be related to an educational function and must be approved by the Principal or IOTA department head of the school or department receiving the donated asset.

Acceptance of Goods:

- A description of the goods, including the value and contact information for the donor must be provided to IOTA's Finance and Accounting Department upon acceptance.
- Technology equipment must meet the standards comparable to those already established by IOTA. Please contact the IOTA technology department prior to accepting any technology goods.
- Goods that will be attached to the building or grounds must be assessed by a member of the IOTA Operations or equivalent of the entity prior to acceptance. These goods may create ongoing costs, therefore a thorough analysis of such costs should be completed prior to acceptance (i.e. installation, electricity, maintenance)
- Acceptance of goods shall be made without any reciprocating commitment by any employee on behalf of IOTA
- IOTA may request evidence of ownership of any goods prior to acceptance
- All goods donated shall be accepted solely for benefit of the students and not for any salary, benefit and/or stipend

Use of Goods: All donated goods shall be considered property of IOTA. Employees who receive donated goods must leave those items with the school if they leave IOTA, unless otherwise stated, in writing, by the donor. Such instructions must be provided at the time of donation.

IOTA will not perform an appraisal and will not place any value for donated goods on behalf of the donor. The donor shall be responsible for obtaining his or her own appraisals for tax purposes along with any fees or other expenses as may be related to such appraisal.

IOTA may decline an offer for goods if it is deemed not to be in the best interest of IOTA to accept the donation. Examples may include, but are not limited to, the following:

- Technology or other goods that do not meet the IOTA required minimum standards; An offer that would initiate an additional expense for service or ongoing maintenance
- An offer that would create unreasonable inequity in to a specific segment of the student population.

Any uncertainty as to whether a donated good falls within acceptable IOTA policy should be directed toward either the IOTA department head of the department receiving the donated asset, or the IOTA F&A Department.

School Site Fundraising

Schools may fundraise in several different ways. Depending on the purpose of the fundraising, schools can choose the best method to raise funds to match the need. All school fundraisers must be approved by the Principal (or designee) prior to beginning the fundraiser. Furthermore, any fundraising occurring on a digital media platform (i.e. school-based webpages and social media pages, Go Fund Me, Donors Choose, etc.) will need to be communicated to IOTAN's Development Department.

Regardless of which fundraising method a school chooses; all fundraisers must be approved by the Principal (or designee) and comply with state and federal regulations. For a full list of processes and procedures, please review the Finance & Accounting Policy Manual.

Raffles

Legal requirements must be followed when conducting raffles to avoid any appearance of gambling. Students shall not be barred from an event or activity because they did not participate in the raffle. Potential donors, including parents/guardians and community stakeholders, should not be unduly pressured to contribute to IOTA or its schools. Staff is expected to emphasize the fact that donations are always voluntary.

Nonprofit organizations may conduct raffles to raise funds for beneficial or charitable purposes in the state subject to the rules outlined in Tennessee Code Annotated Section 3-17-101 et seq. An eligible organization must meet the following requirements:

- Must have IRS Tax Exempt Status as a 501(c)(3) or 501(c)(19) for a minimum of five (5) years
- Must have a physical presence in Tennessee for a minimum of five (5) years
- Must be registered with the Division of Charitable Solicitations

If any employee desires to organize a IOTA sponsored raffle, please contact IOTA's Finance and Accounting Department in advance for more information to comply with applicable laws.

V.F. Scholarships

IOTA is proud to act as a conduit for donors who wish to make contributions to assist students by helping to defray the cost of either their secondary or post-secondary education. It is recognized that donors may specify the conditions under which such aid may be awarded. However, IOTA retains the right not to accept any largess or make any award that in its opinion may be construed to be discriminatory in nature.

From time to time, IOTA may offer an award of up to \$250 to students to assist with the cost of post-secondary education. The qualifications for receiving these funds, the amount of the award(s) and the terms for selection of the final awardees will be made available to all IOTA students. At the time of selection, awardees will be provided with a IOTA pledge specifying the conditions and the amount of the award. However, the purpose of these awards is to promote continuing education and, as such, checks will not be made payable to an awardee. Awardees can request that funds be disbursed directly to a post-secondary school of his/her choice to be used solely to support his/her education under the condition that no refund of unused funds can be made directly to the awardee. As an alternative, awardees can elect to request reimbursement of education related expenses up to the amount of the award upon the presentation of adequate expenditure documentation.

IOTA may not use public funds or resources or to establish scholarship programs that aim specifically to provide financial assistance for students who cannot qualify for college attendance financial aid from any Federal sources due to the student's undocumented status. To avoid the mingling of private donations for this specific purpose with the state and federal funding, the schools are encouraged to work with an outside agency that accepts donations for this purpose.

V.G. Acceptance of Personal Gifts

No employee may solicit or accept gifts of significant value, lavish entertainment or other benefits from students, parents, donors, vendors and other stakeholders. Special care must be taken to avoid even the impression of a conflict of interest. Employees are not allowed to accept any gift which would cause the cumulative amount of gifts from an individual source to exceed \$250 during any calendar year, or applicable law, whichever is deemed lesser. If an employee is unsure if a gift will violate this policy, please consult the Controller.

The term "gift" does not include:

- Meals provided to IOTA staff at an event at which an official speaks, participates in a seminar or similar activity or provides a similar service.
- Reimbursement of travel expenses and meals paid for by a local, state, federal or foreign government agency.
- Payment for travel expenses from a nonprofit organization of which IOTA is a member.

V.H. Expense and Travel Reimbursement

IOTA may authorize payment for actual and necessary expenses, including travel incurred by an employee or candidate performing pre-approved, authorized services. However, the majority of day-to-day purchases (e.g., supplies) should be done through the appropriate purchasing processes (see Purchasing Section of the Employee Handbook). Every effort should be made to obtain items from IOTA-approved vendors using the requisition process or corporate credit cards. Purchases from vendors outside the home state are subject to that home state's tax, and that tax will be added to the cost of the item and charged to the budget of the site that incurred the charge.

Reimbursement requests are to be completed and processed through Bill.com. The reimbursement requests require approval) by the assigned approver (department head, Principal, or direct supervisor).

Therefore, employees must receive approval from their school's Principal, immediate supervisor, or appropriate department head prior to incurring expenses.

In general:

- The General Services Administration ("GSA") reimbursement rates will be used unless terms of a grant, contract, or IOTA's Employee Handbook require that a different rate, such as state-specific rates, be used.
- Expenses can be reimbursed up to forty-five (45) calendar days from the date of the transaction.
- Itemized receipts and/or proof of payment must accompany all expenses.

Failure to comply with the above may result in non-reimbursement of the expense.

Employee requests for expense reimbursements will be approved by the employee's cost center manager. Requests from the Executive Director will be approved by the Chief Financial Officer.

Mileage Reimbursement

A mileage log must be submitted for all mileage reimbursement requests and must indicate the points of travel, dates of travel, odometer readings and the miles eligible for reimbursement. Commuting miles from homes to IOTA campuses is not reimbursable and must be subtracted from the reimbursement request. For working from home employees, your home is not the principal place of business. Travel between campuses is not reimbursable if required based on your role (generally speaking, this includes all central office staff and school leaders).

The reimbursable rate per mile is determined using the IRS' standard mileage reimbursement rate in effect when the request for reimbursement is submitted and processed. Note: gas, oil or other vehicle maintenance items and insurance related to personal car use for business travel is not reimbursable since this is included in the IRS/government mileage rate.

Employees must acquire and maintain the minimum applicable legal requirements related to driving (e.g., ensure the employee possesses a valid license, and has the minimum insurance coverage) when driving is part of, or is incidental to, their job duties (e.g., traveling between school sites). Submission of a valid driver's license number and attestation to valid insurance will be required if driving as a part of job duties.

Meals and Entertainment

For tax reporting purposes, meal expenses are defined as the costs incurred for food and beverages in the conduct of business. Entertainment expenditures require pre-approval. Entertainment expenses include, but are not limited to, the cost of amusement or recreational facilities, attendance at the theater and sporting events.

Meals made necessary by travel are reimbursable. Every effort must be made to ensure that the cost of such meals is reasonable. For meals, IOTA has set a maximum daily reimbursement, including food, beverages, taxes and tips, of:

- \$17 for breakfast
- \$22 for lunch
- \$38 for dinner

Tips considered reasonable and necessary are eligible for reimbursement. In addition, exceptions are made for meals with potential donors or funders, but should still be reasonable.

Meals and entertainment expenses require the following documentation for reimbursement to occur

- Meals and entertainment expenses must be listed separately on the expense form (including those that were paid as part of a hotel bill).
- Itemized, detailed receipts must be included. Each employee must also include a form of payment such as a canceled check, credit card or bank statement.
- The description must include the number of individuals and the names of those attending (including yourself), their titles and business relationship, if applicable, and business purpose of meal and/or entertainment.
- IOTA does not reimburse an employee for alcohol.

Travel

Non-exempt employees will be paid for travel time when asked to work at a location other than an IOTA campus. These employees will be paid for time spent driving to-and-from their home to the new location, minus the time the employee regularly spends commuting and for bona fide meal breaks. When air, train or bus travel is required or an overnight stay, the employee will be reimbursed for time spent getting from one location to the next (i.e, time on the plane and time driving from the employee's home to the airport) but will not be reimbursed for time waiting at the airport, time spent for bona fide meal periods or time spent sleeping.

In the spirit of being a non-profit educational organization, employees are asked to spend prudently. All travel should be preapproved by a supervisor prior to purchase.

Sales and Lodging Tax Exemptions

Some states and/or municipalities allow exemptions for not-for-profit organizations. Please check the availability of the exemption for your destination(s). IOTA will provide a copy of the applicable IRS determination letter so that the exemption can be claimed.

Hotels

Reasonable lodging costs incurred in the course of business travel will be covered by IOTA whenever a day trip is

not appropriate, if approved in advance. IOTA may have negotiated rates at certain hotels and employees are expected to stay at those hotels, if available. All hotel bookings require approval by the department head in which the travel expense will be incurred. Additionally:

- IOTA employees are expected to stay in standard business class lodgings that charge a reasonable rate.
- IOTA will not pay for lodging costs when staying in a city longer than is justifiably necessary.

The itemized hotel bill showing the form of payment used (charge slip or zero balance) must be submitted with the expense form or credit card reconciliation as documentation. A charge slip alone is not acceptable. In the event of an express checkout, a hotel invoice along with a form of payment on the invoice (such as a credit card number) is acceptable.

When work commitments require Friday and Monday trips to the same city, the traveler is ordinarily expected to return home for the weekend. However, if such travel would be more costly or time-consuming than remaining at the distant location over the weekend, lodging and reasonable meal costs for the traveler would be reimbursable with the following restrictions:

- The travel must be pre-approved;
- Costs of entertainment such as gym use, movies, cocktails and cultural events are considered personal in nature and will not be reimbursed;
- Hotel laundry or valet charges are not reimbursable, unless for unexpected extended trips; and
- Items of clothing purchased when traveling are not reimbursable. This includes replacement of lost or stolen items, as well as clothing purchased as a result of an unexpected extended stay.

Air Travel

IOTA employees are expected to travel using the lowest available logical fare in economy class. All air travel requires approval by the department head in which the travel expense will be incurred. Additionally:

- The only legitimate reason for flying any class other than economy is if seats are not available in coach or if an employee has a disability for which a reasonable accommodation is required. If this is the case, approval must be obtained from their manager before purchasing the ticket.
- Only actual costs will be reimbursed upon completion of travel. No reimbursement will be made for the value of premiums earned through frequent traveler programs applied to business travel. This includes free upgrades or free flights. Miles and points earned are the property of the employee.

IOTA is not responsible for lost, stolen or damaged luggage. Please file a claim with the airlines and/or personal insurance company.

Flight changes which incur costs will only be paid for by IOTA if they are business-related and reasonable.

Car Rentals

Car rentals should be used only when needed and alternate forms of road transportation (e.g., taxis, public transit and personal vehicles) are not more feasible or available.

IOTA staff should rent “mid-size” models or lower. Upgrade charges are generally not reimbursable, though reasonable exceptions may be allowed if previously approved and adequately explained.

Loss Damage Waiver (“LDW”) insurance and liability insurance are included in the corporate contract. In a rare situation in which an IOTA employee is required to rent a car outside of the corporate contract, LDW should be accepted.

Rentals over a weekend or holiday period are generally not reimbursable, unless adequately explained and previously approved by a manager.

Every effort should be made to refuel using the most economical method, whether that be refueling at a gas station prior to returning the vehicle at the end of the rental period, instead of purchasing the refill directly from the car rental company.

Employee vehicles that are damaged or stolen on school site property will be reimbursed up to \$250. The burden of proof for demonstrating that the damage occurred on School/work property shall rest on the employee. This reimbursement request must be submitted via the AP team within 45 days of incident.

Other Transportation

Reimbursement will be made for reasonable expenditures for transportation other than air, travel and car rentals. This category includes:

- Taxi fares between office/home and airport as well as between airport/hotel and final destination (e.g., conference) when traveling. Employees should verify whether the hotel or conference location has a free shuttle from the airport to the hotel/conference prior to travel since many such shuttles are available free of charge.
- Tolls and parking fees incurred when using a personal car for business travel (gasoline is not reimbursable, see mileage reimbursement policy).
- Tolls, gas, and parking fees incurred during business travel while using a rental car.

Reimbursement guidelines are updated annually. All expense and travel reimbursement exceptions should be forwarded to the direct supervisor for review and approval prior to occurrence.

Non-Reimbursable Expenses

IOTA must adhere to certain guidelines as set forth by the Tennessee Department of Education for the use of State and Federal funds. The following is an illustrative list which outlines the majority of non-reimbursable expenses including, but not limited to: personal expenses, alcohol, tobacco, mini-bar expenses, spouse or family member expenses, laundry or cleaning expenses (except for unexpected extended trips), traffic citations, pay-per-view movies in hotels, cultural events, monetary gifts or gift cards, and unreasonable or extravagant expenses.

Other non-reimbursable expenses include the fee for obtaining a background check and/or a TB clearance in order to secure employment with IOTA.

V.I. Reporting of Theft and Other Criminal Activity

Employees must report any known alleged theft or other financially related criminal activity as soon as possible to their supervisor. All supervisors/managers must report any known alleged theft or other financially related criminal activity as soon as possible to IOTA's Controller. As appropriate and determined by IOTA's CFO or Controller, an internal investigation may be conducted by IOTA management and law enforcement may be notified.

VI. HEALTH AND RELATED BENEFITS

IOTA provides all IOTA regular and temporary, full-time employees with a benefits package that includes:

- Medical
- Dental

- Vision
- Basic Life and Voluntary Life
- Short and Long Term Disability
- Health Care Flexible Spending Account
- Dependent Care Flexible Spending Account
- Employee Assistance Program
- 401(k) Retirement Plan (if applicable)
- State Retirement Plans (if applicable)

For more details on IOTA's benefits package, please contact the People Team (peopleteam@iotaschools.org).

VI.A. Health Benefits

All IOTA regular and temporary full-time employees working a minimum of thirty (30) hours a week are eligible for benefits. For eligibility and timing, please visit our benefits website www.myiotabenefits.com. Employees may be eligible for health benefits if IOTA determines that the employee worked at least 30 hours per week during a measurement period as defined in the applicable Affordable Care Act rules and regulations. IOTA provides these benefits for employees, as well as their eligible dependents (e.g., spouses, domestic partners, and children). Upon enrollment of eligible dependents, IOTA will require documentation to verify eligible dependents. A matrix of acceptable documentation can be found at www.myiotabenefits.com. When an employee first joins IOTA, the employee is asked to select their benefits from the available providers and plans. If an employee fails to select a plan within thirty (30) calendar days from their start date, the employee will be defaulted to "no coverage" for the medical, dental and vision plans.

IOTA provides a monetary incentive if an employee opts out of medical benefits. This money is considered taxable income and is subject to all applicable taxes. Employees choosing to opt out of IOTA's medical benefits must do so every year agreeing to a waive attestation form. Please visit IOTA's benefits website at www.myiotabenefits.com for details.

Employees who have a spouse who also works for IOTA will not be eligible for double insurance coverage, nor will they be eligible for the monetary incentive and must provide IOTA with proof of marriage (e.g., marriage certificate).

For more information on IOTA's most up-to-date benefits providers and plans, please visit the IOTA Benefits Website at myiotabenefits.com or contact IOTA's People Team at peopleteam@iotaschools.org.

Open Enrollment

Once a year, IOTA holds an open enrollment period during which employees can change their benefit plans based on those available for the upcoming year. Open enrollment typically occurs annually in May and any changes made during open enrollment will take effect on July 1 of the same year. Employees are not allowed to make health benefit changes outside of this period unless certain qualifying life events have occurred (e.g., marriage, birth/adoption of a child, divorce, midyear loss or gain of other coverage). Under such circumstances, employees have thirty (30) calendar days from the date of the qualifying life event to submit their applicable changes to their benefit plan in ADP Workforce Now. If an employee fails to do so within thirty (30) calendar days of the event, the employee will have to wait until the next Open Enrollment period to make any changes to their benefit plans. For more information regarding benefit coverage and qualifying life events, contact IOTA's People Team at peopleteam@iotaschools.org.

COBRA Benefits

When coverage under IOTA's medical, dental, vision, or EAP plans ends, employees or their dependents can continue coverage under such plans under COBRA. COBRA continuation coverage is generally available for up to eighteen (18) or thirty-six (36) months, depending upon the reason benefits ended. To continue coverage, an employee must pay the full cost of coverage – the employee contribution and IOTA's previous contribution plus an administrative charge.

Medical, dental, vision and EAP coverage for an employee, their spouse, and eligible dependent children can continue for up to eighteen (18) months if coverage ends because:

- Employment ends, voluntarily or involuntarily, for any reason other than gross misconduct; or
- Hours of employment are reduced below the amount required to be considered a full-time employee or part-time, making an employee ineligible for the plan.

This eighteen (18) month period may be extended an additional eleven (11) months in cases of disability subject to certain requirements. This eighteen (18) month period may also be extended an additional eighteen (18) months if other events (such as a divorce or death) occur subject to certain requirements.

An employee's spouse and eligible dependents can continue their medical, dental, vision and EAP coverage for up to thirty-six (36) months if coverage ends because:

- The employee dies while covered by the plan;
- The employee and their spouse become divorced or legally separated;
- The employee becomes eligible for Medicare coverage, but their spouse has not yet reach age sixty-five (65); or
- The employee's dependent child reaches an age which makes him or her ineligible for coverage under the plan.

IOTA will notify employees or their dependents if coverage ends due to termination or a reduction in work hours. If an employee becomes eligible for Medicare, divorced or legally separated, die, or when a dependent child no longer meets the eligibility requirements, the employee or a family member is responsible for notifying IOTA by initiating a qualifying life event in ADP Workforce Now within thirty (30) days of the event or, if necessary based on the situation, via email. IOTA will then notify the employee or their dependents of the employee's rights.

Health coverage continuation through COBRA must be elected within sixty (60) days after receiving notice of the end of coverage, or within sixty (60) days after the event causing the loss, whichever is later.

There are certain circumstances under which coverage will end automatically. This happens if:

- Premiums for continued coverage are not paid within thirty (30) days of the due date;
- The employee (or their spouse or child) become covered under another group health plan;
- IOTA stops providing group health benefits;
- The employee (or the employee's spouse or child) become entitled to Medicare; or
- The employee extended coverage for up to twenty-nine (29) months due to disability and there has been a final determination that the employee is no longer disabled.

For more information regarding COBRA, contact IOTA's People Team at peopleteam@iotaschools.org.

VI.B. Retirement

401(k) Retirement Plan

IOTA provides active, regular employees twenty-one (21) years of age or older with at least three (3) calendar months of service an opportunity to participate in a comprehensive 401(k) plan. Eligible employees may contribute a portion of their pre-tax or post-tax income toward the IOTA 401(k) plan up to the maximum allowable by law.

Employees that are required to participate in a state retirement plan where IOTA contributes, are not eligible to participate. Employees eligible for Safe Harbor matching will receive an employer match contribution based on the employee’s contribution after three (3) months of service.

Temporary and seasonal employees do not qualify for the 401(k) retirement plan.

State Retirement Plans

TCRS

All employees whose job requires certification/licensure (e.g., teaching, counseling, administration credentials) and are deemed eligible by the Tennessee Consolidated Retirement System (“TCRS”) automatically participate in TCRS. For TCRS, “teachers” includes any employee working “as a teacher, librarian, principal, supervisor of teachers or any other position whereby the state requires the employee to be certificated as a teacher or licensed as nurse or physical therapist.” T.C.A. 8-34-101. Any teacher who has taught in Tennessee public schools for a period of at least one (1) year who transfers to a position that does not require a teacher’s certificate shall continue participation in the retirement plan as a teacher. Both the employee and IOTA are required to contribute to TCRS in addition to social security deductions. Employee contributions are made on a tax-deferred basis. For more information on TCRS, such as vesting rules and retirement benefits calculations, please visit the TCRS website at <http://www.treasury.tn.gov/tcrs>.

VI.C. Holidays

All regular full-time active employees will be paid for the following holidays (date observed). Regular part-time employees will be paid based on the predicted average daily hours upon hire for each holiday or the FTE percentage (ex. 50% FTE would be 4 hours for the holiday). Temporary employees, seasonal employees, independent contractors, employees on leave, and inactive employees do not qualify for holiday pay. IOTA reserves the right to conduct a quarterly audit of hours worked to ensure the accuracy of holiday hours to be paid. Any fluctuation that exceeds a 10% change will be notified in writing (email is acceptable) that the expected hours worked moving forward may be adjusted at a specific identified date. Employees will only receive holiday pay while in active, paid status. Specifically, an employee must either work or be on approved PTO/sick leave the day before or the day after a holiday. If an employee terminates service with IOTA the day before or during a holiday, he/she will not be paid for that holiday. Specific Holidays for each year can be found on IOTA Helpdesk.

**Spring break and fall break may be switched at the organization’s discretion for 12-month full-time regular employees based on the business needs. These employees should speak to the Chief over their department for confirmation.*

Holiday	Date	Teachers & Counselors	10-month Employees	12-month Employees
Independence Day (Full-Year Employees)	Thursday-Friday, July 4-5, 2024	N/A	N/A	2

Only)				
Labor Day	Monday, September 2, 2024	1	1	1
Fall Break	Monday-Friday, October 7-11, 2024	5	5	5*
Veteran's Day	Monday, November 11, 2024	1	1	1
Thanksgiving Break	Monday-Friday, November 25-29, 2024	5	5	5
Winter Break Week 1	Monday-Tuesday, December 23- 31, 2024	7	7	7
Winter Break Week 2	Wednesday-Friday, January 1-3, 2025	3	3	3
Martin Luther King Day	Monday, January 20, 2025	1	1	1
President's Day	Monday, February 17, 2025	1	1	1
Spring Break (Teachers & Counselors Only)	Monday-Friday, March 10-14, 2025	5	N/A	N/A*
Good Friday	Friday, April 18, 2025	1	1	1
Memorial Day (Full-Year Employees Only)	Monday, May 26, 2025	1	1	1
Juneteenth Day (Full-Year Employees Only)	Thursday, June 19, 2025	N/A	N/A	1
Total Number of Holidays		31	26	29

Please refer to the chart above for paid/unpaid holidays. Additionally, the last day for school-site 10-month classified staff is May 28, 2025, unless otherwise noted.

Bus Driver Paid Holidays:

- Labor Day - Monday, September 2, 2024
- Veteran's Day - Monday, November 11, 2024
- Thanksgiving - Thursday & Friday, November 28-29, 2024
- Winter Break - December 25-26, 2024 and January 1-2, 2025
- Martin Luther King Jr. Day - Monday, January 20, 2025
- President's Day – Monday, February 17, 2025
- Good Friday - Friday, April 18, 2025

Floating Holidays

Subject to manager approval, salaried, exempt employees who are required to work on IOTA recognized holidays and breaks may be eligible to take that time off on a different date within that fiscal year. Unused floating holiday time will not be paid out upon an employee's exit from the organization unless required by law.

Religious Observances

IOTA supports providing reasonable accommodations for its employees' sincerely held religious beliefs. To that end, an employee may request time off for religious observances that are not listed in IOTA's regular holiday schedule above. The employee shall make a written request for such leave to their immediate supervisor, which shall only be denied when an employee's absence from work would create an undue hardship on IOTA's operations.

Since religious holidays are scheduled events, the employee must provide their supervisor with adequate advance notice when requesting leave under this policy. If approved, and should an employee not have sufficient available PTO/sick leave to cover the requested day(s) off, IOTA shall grant the time off as unpaid.

VI.D. Attendance

Every job is essential to the efficient operation of the organization and employees are expected to be present, and arrive on time, every work day. If, for any reason, an employee is going to be late or absent from work, the employee must notify the appropriate individual(s) via the steps designated by their supervisor. If the employee's supervisor has not specifically designated the steps to take, the employee should call the supervisor directly and send an email. If that supervisor is not available, the employee should leave a message for them. Excessive absences and/or lateness are unacceptable and may lead to disciplinary action, up to and including termination.

Any employee who fails to report for work for three (3) consecutive work days without giving prior notice may be deemed to have voluntarily resigned from employment.

Where permitted under applicable state law, any employee who is absent due to illness or injury for three (3) consecutive workdays or longer shall submit a medical authorization supporting their absence and authorizing their return to work.

When substitute coverage is needed, absences should be requested in half or full-day increments. A full-day is defined as eight (8) hours.

An active employee must work the day before or the day after a holiday to receive compensation for said holiday or break. If an employee terminates service with IOTA, the day before or during a holiday or break they will not receive compensation for that holiday or break.

VI.E. Sick Leave and Paid Time Off ("PTO")

IOTA offers sick leave and/or PTO to all of its regular and temporary full-time and part-time active employees. IOTA does not offer sick leave and/or PTO to seasonal, consultant, or independent contractor status unless required by applicable law. All PTO, or planned sick leave (e.g., scheduled surgery), must be requested through the employee's supervisor as far in advance as possible and submitted via Workday.

Non-exempt (typically hourly) regular employees who take PTO must account for the hours they are absent

from work by applying accrued PTO. In the event a non-exempt employee takes time off that is not considered PTO, they will not be paid for that time.

Exempt (typically salaried) employees must report to their supervisor any days they are away from work during the normally scheduled workweek, so IOTA can track PTO and sick leave usage (as applicable). IOTA will not make deductions from an exempt employee's salary, except as otherwise expressly permitted by applicable law. Specifically, in any workweek in which an exempt employee performed any work, their salary will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness or disability.
- Absences for jury duty, attendance as a witness, or military leave in any workweek in which the employee has performed any work.
- Any other deductions prohibited by applicable law.

However, it is not an improper deduction to reduce an employee's accrued PTO for full or partial day absences for personal reasons, or if the employee has exhausted their sick leave. If you have any questions or concerns, or if you believe that an erroneous deduction has been made from your pay or your PTO balance, you should immediately report this information to your manager and the People Team. If it is determined that an improper deduction has been made, you will be promptly reimbursed.

PTO for Full-Time Regular Employees

PTO is time that is accrued and can be used for personal reasons including sick leave and vacation. PTO will begin to accrue on an employee's date of hire or rehire, and will continue to accrue each pay period the employee is employed. Accrued PTO is noted in Workforce Now. It is each employee's responsibility to monitor the amount of their accrued PTO. PTO cannot be used unless it has been earned. If an employee chooses to take time off without having enough time earned, the time taken will be unpaid, subject only to the restrictions regarding deductions from exempt employee pay noted above.

The maximum PTO that any employee may accrue at any time shall not exceed two hundred and forty (240) hours. It is not the responsibility of IOTA to notify employees when they have reached the maximum. If an employee has reached this maximum, the employee will cease to accrue any additional PTO until some PTO is taken. Employees whose accrued PTO reaches the maximum hours are encouraged to make arrangements to use their PTO.

All PTO must be requested through the employee's supervisor as far in advance as possible. The supervisor will make the final determination regarding the PTO request depending on workload and scheduling needs. Management reserves the right to deny a PTO request based on business demands. Supervisors are responsible for ensuring adequate staffing levels and should attempt, when feasible, to resolve PTO scheduling conflicts.

Employees are responsible for reporting their PTO per the process identified by their supervisor. Failure to report PTO may result in disciplinary action, up to and including termination of employment.

When an employee changes from a position that accumulates PTO to a position that earns a different time-off benefit (e.g., sick time), or changing employment from IOTA to another entity that owns, or is licensed to use, the IOTA brand, their PTO will be paid out based on the employee's salary while in the position that accumulated PTO. This payout will occur at the time the employee transitions to the new position and shall not exceed the maximum balance of two hundred and forty (240) hours.

PTO benefits will not be cashed out except when an employee separates from employment, or in a special circumstance approved on an individual basis by the Executive Director (or designee). Special circumstances can include financial hardship or an unforeseen emergency arising as a result of events beyond the control of the employee. Payment of PTO hours will not be allowed in excess of hours accrued, or the maximum as noted above.

Sick Leave for Full-Time Regular Employees

Sick leave is defined as time (in hours) that is given to eligible employees at the start of each fiscal year or accrued depending on the role.

Sick leave may be taken to receive preventive care (including annual physicals or flu shots) or to diagnose, treat, or care for an existing health condition. Employees may also use sick leave to assist a family member (i.e., children, parents, spouses/domestic partners/designated person, grandparents, grandchildren, or siblings), or any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship, who must receive preventative care or a diagnosis, treatment, or care for an existing health condition. Employees may also take paid sick leave to receive medical care or other assistance to address instances of domestic violence, sexual assault, or stalking. Paid sick leave is also available for bone marrow or organ donation by an employee or their family member, to provide care for a guide, signal or service dog of an employee or their family member, or if IOTA or an employee's child care provider's business is closed due to a public health emergency.

Sick leave cannot be used as a means to supplement holiday and/or PTO. Sick leave can be accumulated without limit, and is not paid out upon separation from employment. Workforce Now shall display the total balance of an employee's accumulated sick leave hours. Requests for the use of sick leave for any purpose not outlined in this handbook may not receive manager approval and may be considered unpaid time off.

Employees who are eligible to participate in a state-sponsored pension with IOTA shall be entitled to transfer sick leave accrued from previous employment in a school district, charter school or public school within the same state while participating in a state pension so long as the sick leave is verified appropriately by the prior employer. Please see IOTA's People Team for the "Transfer of Accumulated Sick Leave" form.

An employee is required to call their supervisor as soon as the need to be absent is known, but in no event less than ninety (90) minutes (i.e., 1 ½ hours) prior to the start of the work day, unless in the case of an emergency, to permit the employee's supervisor to plan adequately for the absence.

PTO and Sick Leave for Part-Time and Temporary Employees

Regular part-time employees will receive a proportional amount of PTO and Sick Leave hours relative to the number of hours for a full-time employee in a comparable position. Regular part-time employees will receive PTO and/or Sick Leave hours based on the average daily hours they have worked during the previous full quarter (first day of each quarter is July 1, October 1, January 1, and April 1) or predicted average daily hours upon hire. IOTA reserves the right to conduct a quarterly audit of hours worked to ensure the accuracy of accrued hours to be paid. Any fluctuation that exceeds a 10% change will be notified in writing (email is acceptable) that the expected hours worked moving forward may be adjusted at a specific identified date.

Temporary, Seasonal, and bus driver employees will accrue one hour of Sick Leave for every 30 hours worked.

PTO and Sick Leave Chart

All PTO and sick leave outlined below is provided per year for all full-time regular employees.

Tennessee PTO and Sick Leave Chart

Position Type	Tenure with IOTA	PTO	Sick Leave
10-Month certificated employees, i.e. eligible for State pension (ex. Teachers and counselors)	N/A	N/A	10 Days
10 Month non-certificated, i.e. not eligible for the State pension (ex. CSOs and IAs)	N/A	10 days (3.33 hours per pay period)	
12 Month Certificated Employees, i.e. eligible for State pension (ex. Certificated Home Office staff and School Administrators)	0 months – 36 months	5 Days (1.67 hours per pay period)	10 Days
	36+ months – 72 months	10 Days (3.33 hours per pay period)	
	72+ months	15 Days (5.00 hours per pay period)	
12 Month Non-Certificated Employees, i.e. not eligible for State pension (ex. Non-certificated Home Office staff, Office Coordinators, and School Operations Managers)	0 months – 36 months	15 Days (5.00 hours per pay period)	N/A
	36+ months – 72 months	20 Days (6.67 hours per pay period)	
	72+ months	25 Days (8.33 hours per pay period)	
Bus Drivers	N/A	N/A	1 hour per 30 hours worked

If a classified school-based employee is required to participate in TCRS, their PTO/sick calendar may reflect the pension-eligible appropriate listing above.

Donation of Sick Leave

Sick leave is non-transferrable, and as such all at-will employees are prohibited from donating or requesting donation of sick leave from any other IOTA employee.

VI.F. Time Off for Voting

If an employee does not have sufficient time outside of working hours to vote in an official state-sanctioned election, the employee may take off enough working time to vote. Such time off shall be taken at the beginning or the end of the regular working shift, whichever allows for more free time, and the time taken off shall be combined with the voting time available outside of working hours to a maximum of two (2) hours combined. Under these circumstances, an employee will be allowed a maximum of two (2) hours of time off during an election day without loss of pay. When possible, an employee requesting time off to vote shall give their manager at least two (2) days’ prior notice.

VI.G. Time Off for Jury Duty

An employee's manager and IOTA's People Team Department should be promptly notified when an employee receives a summons for jury duty. IOTA will continue a non-exempt employee's full salary and benefits for up to five (5) working days for jury duty. For exempt employees, IOTA will pay for time off if an employee is called to serve on a jury provided the employee continues to perform work duties as assigned. It will be the responsibility of the employee, when possible, to request a call-in program for performing their jury duty and to submit the required information reflecting their jury duty service in Workday.

Any compensation, less any mileage expenses, received for serving as a juror shall be endorsed over to the school site or Central Office so that the employee's compensation for any days of absence for the above purposes shall not be in excess of nor less than, their regular pay, unless required by applicable law.

VI.H. Bereavement Leave

All employees may be granted up to three (3) days off from work at the regular base pay rate for bereavement of a member of their immediate family (spouse, domestic partner, child, stepchild, parent, stepparent, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother, sister, stepbrother, or stepsister) without deduction from other leave benefits. Subject to manager approval, an employee desiring additional time off to attend services may use accrued PTO or sick time.

IOTA may require employees to submit a death certificate that justifies the use of any bereavement leave.

VI.I. School Appearance and Activities Leave

As required by law, IOTA will permit an employee who is a parent or guardian (including a stepparent, foster parent, or grandparent) of school children, from kindergarten through grade twelve (12), or a child enrolled with a licensed child care provider, up to forty (40) hours of unpaid time off per child per school year (up to eight (8) hours in any calendar month of the school year) to participate in activities of a child's school or child care. If more than one (1) parent or guardian is an employee of IOTA, the employee that first provides the leave request will be given the requested time off. Where necessary, additional time off will also be permitted where the school requires the employee(s) appearance.

The employee requesting school leave must provide reasonable advance notice of the planned absence. The employee must use accrued but unused paid leave (e.g., PTO or sick leave) to be paid during the absence.

When requesting time off for school activities, the employee must provide verification to their supervisor or IOTA's People Team of participation in an activity as soon as practicable. When requesting time off for a required appearance, the employee(s) must provide a copy of the notice from the child's school requesting the presence of the employee.

VI.J. Emergency or Weather Shutdown

In the event of severe weather conditions, natural disasters or other emergencies, IOTA may be closed. The decision to close IOTA may be made by the Executive Director (or designee) of IOTA. Employees should expect to be contacted directly to know IOTA's decision for the particular day. Any compensation for employees throughout the duration of such closures will be subject to the decision of IOTA's Executive Director or designee to the extent allowable under applicable law.

For exempt employees, no loss of pay will occur as a result of missed or truncated days for these reasons as long as they are on active duty at the time of the event (i.e., not on a leave of absence, taking PTO/sick day, etc.). Additionally, if exempt employees report to work and find that IOTA is unexpectedly closed due to an emergency, no loss of pay will occur for that day.

Non-Exempt full-time employees may receive up to five (5) paid days during an emergency or weather shutdown each year, if applicable, and on active duty at the time of the event.

VII. LEAVES OF ABSENCE

It is IOTA's policy to grant leaves of absence to all eligible employees on a non-discriminatory basis. A leave of absence ("LOA") will be granted for all legally mandated leaves including, but not limited to:

- Family/Medical Leave (FMLA)
- Pregnancy Disability Leave (TMPL)
- Military/Reserve Duty
- Emergency Services Leave

Personal unpaid leaves may also be granted. Please contact the People Team for information on available leaves. For a comprehensive breakdown and steps of all available leave of absences, please refer to the People Team's [Leaves of Absence Guidebook](#) on Help Desk. Unless specified in the individual policies outlined below, the following addresses various issues related to leaves of absence:

Request for Leave

Requests for a LOA should be provided thirty (30) days in advance, or as far in advance as practically possible. All leave requests must be submitted, in writing, to IOTA's People Team using the Request for Leave of Absence.

Compensation

Compensation during a LOA is not provided by IOTA unless required by applicable law. An employee may be eligible for wage replacement through IOTA's Supplemental Disability Insurance Administrator and/or state programs. Employees may also elect to replace lost wages with accrued sick leave or PTO while on leave. Payout of any sick leave or PTO will be pro-rated and coordinated with disability payments and/or state provided payments so as not to exceed an employee's base rate of pay.

Employment Status

While an employee is on an approved LOA, the employee will be placed on inactive status. During inactive status, employees do not continue to accrue benefits based on hours worked including paid holidays, PTO, sick, and retirement benefits.

Health Benefits

IOTA will continue an employee's health insurance policies while on an approved leave of absence in accordance with applicable law or up to 30 days while on a non-job protected leave of absence not to exceed the applicable law maximum. If an employee has exhausted a job protected leave of absence but qualifies for another job protected leave of absence within 30 days, IOTA will continue benefits coverage. Employees on leave are responsible for paying their employee benefit contributions that they would otherwise have deducted from their paycheck. Please refer to the arrears policy in the payroll section of the employee handbook. After exhaustion of previously stated applicable leave of absence(s), IOTA will initiate COBRA on the first day of the subsequent pay period (E.g. Either the 1st or the 16th). IOTA will offer employees COBRA benefits at their own cost (full premium plus administrative fee) who no longer qualify for continued benefits coverage as stated above. This is not meant to be an exhaustive description of possible leave of absence

scenarios. It is, however, meant to provide general guidance.

IOTA reserves the right to evaluate benefit eligibility associated with an employee's leave of absence on a case-by-case basis.

VII.A. Family and Medical Leave

Family and medical leave shall be provided in accordance with federal and state laws.

The following policy demonstrates IOTA's compliance with the Family and Medical Leave Act ("FMLA") which requires employers to grant twelve (12) unpaid work weeks of FMLA leave in a twelve (12) month period to eligible employees for certain medical and family-related reasons. IOTA abides by any state regulated leave laws. The more generous of the two laws will apply to the employee if the employee is eligible under both federal and state laws. IOTA has adopted the rolling calendar period for the purpose of calculating time off under FMLA. Using this method, time off under FMLA is measured backward twelve (12) months from the commencement of the applicable current leave of absence.

Employee Eligibility Criteria

To be eligible for FMLA leave, the employee must have been employed by IOTA for at least twelve (12) months, must have worked at least 1,250 hours during the twelve (12) month period immediately preceding commencement of the FMLA leave, and must work at a location where the employer has at least 50 employees within 75 miles of the employee's worksite.

Events That May Entitle an Employee to FMLA Leave

Twelve workweeks of leave in a twelve (12) month period for:

1. The birth of a child and to care for the newborn child within one year of birth;
2. The placement with the employee of a child for adoption or foster care and to care for the newly placed child within one year of placement;
3. To care for the employee's spouse, child, or parent who has a serious health condition;
4. A serious health condition that makes the employee unable to perform the essential functions of their job, including a serious health condition resulting from an on-the-job illness or injury;

Leave Designation. If an employee does not expressly request FMLA leave, IOTA reserves the right to designate a qualifying absence as FMLA leave and will give notice of the FMLA designation to the employee. If an absence is a qualifying event under FMLA, the leave will run concurrent with short-term disability, long-term disability, workers' compensation, and/or any other leave where permitted by state and federal law.

Interaction with Accrued Paid Time Off. FMLA leave, and paid vacation or sick time will run concurrently as provided under IOTA policy except where prohibited by state law.

Job Protection. An employee's job, or an equivalent job, is protected while the employee is on a legally recognized job protected leave of absence. Both federal and applicable state laws require that employees be returned to their positions or to another job of like pay and status at the end of FMLA or other job protected leave. Note: If an employee is unable to return to work after the expiration of federal or state job protected leave, an extension may be granted if the condition constitutes a disability under the Americans with Disabilities Act (ADA), state law or in certain workers' compensation cases.

Seniority. An employee on FMLA leave remains an employee and the leave will not constitute a break in service. An employee who returns from FMLA leave will return with the same seniority he or she had when the leave commenced, if applicable.

For a comprehensive breakdown and steps of all available leave of absences, please refer to the People Team's Leave of Absence Guidebook on Help Desk.

Employment During FMLA Leave

An employee on FMLA leave may not accept employment with any other employer without IOTA's written permission. An employee who accepts such employment will be deemed to have resigned from employment at IOTA.

VII.B. Pregnancy and Parent Leave

Tennessee Maternity and Parental Leave

Tennessee Maternity and Parental Leave ("TMPL") shall be provided in accordance with federal and state laws. This policy explains how IOTA will comply with the Tennessee Parental Leave Act (TCA 4-21—408), which requires IOTA to give each eligible employee an unpaid leave of absence of up to four (4) months, as needed, for adoption, pregnancy, childbirth and nursing an infant. With regard to adoption, the four-month period will begin at the time the employee receives custody of the child. FMLA leaves runs concurrently with TMPL.

Employee Eligibility Criteria

Employees must have been employed by the same employer for at least twelve (12) consecutive months as full-time employees, as determined by the employer at the job site or location, to be eligible for TMPL.

Events That May Entitle an Employee to Parental Leave

Employees are eligible for TMPL for adoption, pregnancy, childbirth and nursing the infant, where applicable.

Duration of Parental Leave

TMPL may only be taken in one period that does not exceed four months. "Four months" means the number of days the employee would normally work within four months. For a full-time employee who works five eight-hour days per week, four months means 88 working and/or paid eight hour days of leave entitlement based on an average of 22 working days per month for four months.

Seniority

An employee on TMPL remains an employee of IOTA and a leave will not constitute a break in service. When an employee returns from TMPL, he or she will return with the same seniority he or she had when the leave commenced.

For a comprehensive breakdown and steps of all available leave of absences, please refer to the People Team's Leave of Absence Guidebook on Help Desk.

Employment during Parental Leave

The purpose of this section is to provide leave time to employees for adoption, pregnancy, childbirth and nursing the infant, where applicable; therefore, if IOTA finds that the employee has utilized the period of leave to pursue actively other employment opportunities or if IOTA finds that the employee has worked part time or full time for another employer during the period of leave, then IOTA shall not be liable under this section for failure to reinstate the employee at the end of the leave.

Paid Parental Leave

Paid parental leave may be granted in accordance with the following general eligibility provisions:

Teacher, Principal, Supervisor, or other individual required by law to hold a valid license from the TDOE:

- Pursuant to Tenn. Code Section 8-50-814, an eligible employee (teacher, principal, supervisor or other individual required by law to hold a valid license of qualification for employment who has been employed for at least twelve (12) consecutive months) shall be granted six (6) weeks of paid leave after the birth or stillbirth of the employee's child or the employee's adoption of a newly placed minor child. Under TN Code, "stillbirth" means an unintended, intrauterine fetal death after a gestational age of not less than twenty (20) completed weeks or with a weight of three hundred fifty (350) grams or more.
- Eligible employees must provide notice to the People Team of their need for such leave no less than thirty (30) days in advance, provided however, that if the employee learns of the birth, stillbirth, or adoption, less than thirty (30) days in advance, then the employee must give notice to the People Team as soon as reasonably possible to be eligible to receive pay granted pursuant to code.
- Eligible employees who are granted leave pursuant to this section shall not be required to use sick or PTO. The leave granted pursuant to this section counts toward the employee's use of leave under FMLA and TMPL.
- Eligible employees may receive no more than six (6) work weeks of paid leave pursuant to this section within a twelve-month period.
- The six (6) work weeks of paid leave do not need to be consecutively taken, provided, that the paid leave is used within 12 (twelve) months of the birth, stillbirth, or adoption of the child. However, the paid time off must be taken in 1-week increments and cannot run concurrently with short-term disability. The employee will confirm dates with the People Team when requesting leave.

Full-time regular, FMLA employees not included in the definition above:

- For full-time regular employees who do not meet the 'eligible employee' definition above but who are FMLA eligible, will be eligible for 40 percent paid leave for six weeks following the birth or stillbirth of the employee's child or the employee's adoption of a newly placed minor child.
- This paid leave must be taken consecutively and may not occur more than once within a twelve (12) month period. Notification must be made to the People Team of their need for such leave no less than thirty (30) days in advance, provided however, that if the employee learns of the birth, stillbirth, or adoption, less than thirty (30) days in advance, then the employee must give notice to the People Team as soon as reasonably possible to be eligible to receive pay.
- Employees receiving this type of paid parental leave **are** able to receive short term disability concurrently, if eligible. The leave granted pursuant to this section counts toward the employee's use of leave under FMLA and TMPL.
- Part-time, temporary, seasonal, and non-FMLA eligible employees are not eligible for this paid parental leave.

VII.C. Military and Military Related Leaves

IOTA shall grant a military leave of absence to any employee who must be absent from work due to service in the uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA"). All employees requesting military leave must provide advance written notice of the need for such leave, unless prevented from doing so by military necessity or if providing notice would be impossible or unreasonable.

If military leave is for thirty (30) or fewer days, IOTA shall continue the employee's health benefits. For service of more than thirty (30) days, the employee shall be permitted to continue their benefits at their expense through COBRA. Employees are entitled to use accrued paid time off as wage replacement during time

served, provided such time accrued prior to the leave.

Except for employees serving in the National Guard, IOTA will reinstate those employees returning from military leave to their same position or one of comparable seniority, status, and pay if they have a certificate of satisfactory completion of service and apply within ninety (90) days after release from active duty or within such extended period, if any, as required by law. Exceptions to this policy will occur wherever necessary to comply with applicable laws. For those employees serving in the National Guard, if he or she left a full-time position, the employee must apply for reemployment within forty (40) days of being released from active duty, and if he or she left part-time employment, the employee must apply for reemployment within five (5) days of being released from active duty.

An employee who was absent from work while fulfilling their covered service obligation under the USERRA shall be credited, upon their return to IOTA, with the hours of service that would have been performed but for the period of absence from work due to or necessitated by USERRA-covered service. Exceptions to this policy will occur wherever necessary to comply with applicable laws.

Military Family Leave Entitlements

IOTA supports the military obligations of all employees and grants leaves without pay for uniformed service in accordance with applicable federal and state laws. Any employee who needs time off for uniformed service should immediately notify the People Team department and their supervisor and provide a copy of the official orders or instructions. Additionally, the employee must submit a Request for Leave of Absence to the People Team, who will provide details regarding the leave. If an employee is unable to provide notice before leaving for uniformed service, a family member should notify the supervisor as soon as possible.

Upon return from military leave, employees will be granted the same seniority, pay, and benefits as if they had worked continuously. Failure to report for work within the prescribed time after completion of military service will be considered a voluntary termination.

All employees who enter military service may accumulate a total absence of five (5) years and still retain employment rights.

Tennessee National Guard Duty

Employees called to active state duty by the Governor, under the authority of Tennessee Code Ann. 58-1-108, to perform official duties in connection with the Tennessee National Guard activities are performing military service and engaged in the performance of duty in the service of the state as provided in Tennessee Code Ann. 8-33-109. Accordingly, such employees shall be entitled to leaves of absence without loss of pay, accrued leave time or other rights or benefits as provided in Tennessee Code Ann. 8-33-109. Paid leave of absence length should be in line with 8-33-109, additional days for National Guard Duty should fall under the appropriate leave of absence.

An employee may take unpaid time off to perform training or emergency duty as a volunteer firefighter, reserve peace officer, volunteer emergency rescue personnel or civil air patrol.

Employees may take up to ten (10) days of unpaid leave for civil air patrol duty each calendar year and up to fifteen (15) days of leave per calendar year for the purpose of engaging in fire or law enforcement training. However, civil air patrol leave for a single emergency mission cannot exceed three (3) days, unless the emergency is extended by the entity in charge of the operation and the extension of leave is approved by IOTA. Please alert your supervisor that you may have to take time off for emergency duty. An employee must give advance notice, when possible, and no later than the end of the first day of leave when the need for leave is an

emergency.

VII.D. Personal Leave

All regular employees may request a personal leave of absence without pay by submitting the Request for Leave of Absence and the Leave of Absence Guidelines as far in advance as possible. The request will be reviewed on a case-by-case basis by the People Team. The decision to approve or disapprove is based on the applicable law, circumstances, length of time requested, employee's job performance and attendance record, reasons for the leave, effect the employee's absence will have on the work in the department, and the expectation that the employee will return to work when the leave expires. Employees on unpaid leaves will be reinstated, if possible, upon return from such approved leaves. While IOTA will make reasonable efforts to find a suitable available position, such position cannot be guaranteed. If a position becomes available, it may be different in terms of job duties and compensation from the position vacated at the start of the leave. Temporary and seasonal employees do not qualify for a personal leave.

If disabled (self), employees may apply for Short Term Disability and/or the applicable state benefits. In addition, employees have the choice of using existing PTO or sick leave for a leave under this policy. If no such leave is available, leave under this policy will be unpaid. During the time that an employee is on a personal leave of absence, the employee is not eligible to accrue PTO. Personal leaves of absence may not exceed 30 days, unless otherwise approved by IOTA and allowable under applicable law. Employees on a personal leave of absence for one month or less will continue to be enrolled in eligible IOTA health and welfare benefits plans subject to all employee contributions per IOTA's arrears policy. Employees on an approved personal leave longer than one month will have the option to convert to COBRA at their own expense (full premium plus an administrative fee) or elect an insurance policy independent of IOTA. Unemployment insurance benefits cannot be collected while on a personal leave of absence.

VII.E. Short Term and Long Term Disability Plans

All full-time employees are eligible for up to two (2) tiers of disability coverage provided by IOTA through Lincoln Financial.

1. IOTA's Short Term Disability Program – IOTA's Short Term Disability plan provides coverage beginning the 8th day (7-day Elimination Period), subject to a state mandated waiting period, and continues through the 90th day of a disability with doctor certification. Through a combination of state disability insurance payments (where applicable) and IOTA's insurance carrier's payments, the employee will receive 60% of pre-disability earnings to a maximum of \$1,500 per week.
2. IOTA's Long Term Disability Program – IOTA's Long Term Disability plan provides coverage beginning on the 91st day of a disability with doctor certification. The employee will receive 60% of pre-disability earnings to a maximum of \$10,000 per month. Coverage will continue for the length of the maximum benefit period as defined by IOTA's insurance carrier.

IOTA's People Team must be notified of the need for a leave of absence due to a medical condition. Before any payments will be made to the employee under this plan, a certificate of disability from their health care provider certifying the disability must be provided to the disability insurance carrier. The employee may be required to provide periodic updates of their status, such as the expected date of, and intent to, return. During the leave, the employee may be asked for additional information certifying the need for the leave within the limits of applicable law. Prior to returning to work, the employee must provide IOTA's People Team with a written release to return to work from the health care provider who is treating the employee.

This Disability Policy is not intended to supersede, change or modify an employee's eligibility for a protected leave of absence under applicable law, including FMLA. If approved, disability benefits run concurrently with any protected leave of absence under applicable law, including FMLA, and any applicable state pregnancy/parental leave laws.

VIII. OTHER EMPLOYMENT POLICIES AND PRACTICES

VIII.A. Safety and Emergency Preparedness

IOTA is committed to providing a workplace for all employees that is safe, healthy and pleasant. In order to provide such an environment, employees should familiarize themselves with all of the following safety policies. Failure to follow any of the safety policies may result in discipline, up to and including termination of employment.

Workplace Security

It is critically important that employees follow security procedures established at each work location for the protection of all employees and stakeholders, and the facility and the assets contained in that facility. The following are a set of important security principles.

- Employees who are issued keys, access cards, and/or gate clickers ("Access Items") should maintain those items in a safe and secure place and should not allow others to borrow those items. If an item has been misplaced or stolen, employees must report those items missing to their immediate supervisor within twenty-four (24) hours and may be responsible for the cost of the replacement. When an employee leaves IOTA, Access Items must be returned to their immediate supervisor within twenty-four (24) hours or as soon as practicable thereafter.
- Employees who are issued security codes to access facilities on off-hours must not share their code with anyone else.
- Any employee who believes they may be the last to leave the premises for the day should make sure all external entrances and windows are secured and properly locked.
- Employees who would like to have someone visit a IOTA work location should follow the visitor procedures for that location. All locations should have procedures requiring visitors to sign in and out.
- Employees should secure any valuable items (e.g., computers, LCD projectors) at the end of each day in a locked desk, cabinet, or closet.
- Employees should contact their location's security or their supervisor immediately if they observe any suspicious activity, including, but not limited to unidentified visitors, persons loitering, or other potential security risks.
- Employees are discouraged from bringing any personal property onto a IOTA facility, unless authorized pursuant to a duly executed agreement. Except as noted directly below, IOTA is not responsible for any lost, damaged, or stolen personal property brought onto a IOTA site. IOTA is also not responsible for any damages resulting from any use of unauthorized personal property while on a IOTA facility or within the scope of employment.
- On a case-by-case basis and as determined by IOTA's Chief Financial Officer or designee, IOTA may provide reimbursement or partial reimbursement to an employee for personal property that is stolen or damaged while at a worksite or work-related activity by means of no negligence by the employee. Such personal property must be reasonably foreseeable to be present with the employee on a worksite or work-related activity (e.g., personal cell phone, technology for classroom instruction authorized in advance by an immediate supervisor). Further, the employee shall bear the burden to show that the personal property was in working order prior to the theft or damage, and that the theft or damage occurred through no negligence of the employee.

- If an item of IOTA property has been misplaced or stolen, employees must report such items to their immediate supervisor within one (1) business day of learning of the misplacement or theft, and the employee may be responsible for the cost of the replacement (see the Technology Policy for additional information).

Workplace Facilities

Respecting IOTA facilities is important in creating a pleasant place to work. All employees are asked to do their fair share in keeping work areas, offices, bathrooms and common areas neat and attractive. Below is a set of important principles related to facilities:

- Employees consuming food or beverages in personal work areas or common areas should dispose of the related trash in a timely manner.
- Hazards, such as wet or slippery floors, leaks, plumbing problems, exposed wiring, or anything else that may promote an unsafe condition should be reported to the designated facilities liaison at the site or to the employee's immediate supervisor immediately.
- Employees should ensure paths of travel and doorways are clear from any blockage and no electrical or other cords are used in a manner in which they would create a tripping or other hazard.
- Employees should alert their immediate supervisor, school administration, or building maintenance immediately upon discovering any open or broken building entrances/exits, including, but not limited to, fences, doors, and windows.
- Employees whose job requires the use of hazardous materials and/or equipment may be required to complete annual training to ensure full knowledge of safety standards.
- Employees shall not alter any portion of a IOTA facility, (e.g. painting of walls, doors), without appropriate approval by their immediate supervisor and IOTA's Chief Financial Officer or equivalent position.
- Employees shall not bring any personal furniture items, such as refrigerators, space heaters, couches, and other furniture or appliances, without prior approval by their immediate supervisor.

Bloodborne Pathogens

All IOTA employees are required to complete the bloodborne pathogens training within 6 weeks of hire and annually within the first 6 weeks of the new school year.

Bloodborne pathogens are microorganisms (e.g., viruses) transmitted through blood, or other potentially infectious material (such as certain bodily fluids like vomit or feces, or tissues).

In the event of an injury resulting in the release of blood or other body fluids that could contain pathogens (e.g., HIV, HBV), the first step is to treat the injured party. Employees should familiarize themselves with their location's first response team for this matter.

Spilled blood or body fluids should not be cleaned up without the appropriate protective equipment and materials specifically designated for such fluids. In the case in which spilled body fluids need clean-up, this procedure must be followed by all IOTA employees, as follows:

1. Inform the Principal, Assistant Principal, or supervisor on duty. The informed supervisory individual should be aware of the individual(s) doing the actual clean-up and the purpose of the clean-up.
2. Clean up the spilled blood or body fluids, as follows:
 - a) Put on protective gloves (latex, vinyl or other leak-proof material).
 - b) Spread the absorbent material (use paper towels when possible) on the spilled blood or body fluids, or use the emergency materials located in the school's medical supply cabinet.
 - c) Neutralize the potential pathogens with a 10% bleach-with-water solution or use the solution

- provided by the trained custodial staff. Cover the spill for fifteen (15) minutes.
- d) Place all potentially contaminated materials in a leak-proof plastic bag.
 - e) Sweep/mop-up any additional neutralized/absorbed fluids and place in the leak-proof plastic bag.
 - f) Clean sweep/mop materials with hot, soapy water.
 - g) Remove gloves from inside-out and place in the bag.
 - h) Secure the bag, place a biohazard sticker on it and discard it properly. i) Wash hands thoroughly in hot, soapy water.

3. After all activity is completed and checked by the supervisory individual, the supervisor should complete an incident report.

Failure to complete the training by the due date may result in being placed on an unpaid leave of absence.

Emergency Preparedness

IOTA employees shall follow all applicable emergency preparedness plan(s) and each IOTA location shall conduct safety drills as required by law. Employees shall familiarize themselves with the appropriate plans, including, but not limited to:

- Emergency Communication Codes;
- Evacuation routes and procedures;
- Lock down codes and procedures;
- Location of emergency supplies; and
- Locations of alarms and fire extinguishers, and procedures for using them if the need should arise

Infectious Disease Outbreak Policy

IOTA will take proactive steps to protect all employees in the event of an infectious disease outbreak. It is the goal of IOTA during any such time period to strive to operate effectively and ensure that all essential services are continuously provided and that employees are safe within the workplace.

IOTA will ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used. We ask all employees to cooperate in taking steps to reduce the transmission of infectious disease in the workplace. The best strategy remains frequent hand washing with warm, soapy water; covering your mouth whenever you sneeze or cough; and discarding used tissues in wastebaskets.

Unless otherwise notified, our normal attendance and leave policies will remain in place. Individuals who believe they may face particular challenges reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans and consult with your supervisor and/or the People Team.

All business travel during an infectious disease outbreak may be suspended.

IOTA may temporarily suspend worksite attendance and utilize telecommuting as an alternative during an infectious disease outbreak. If attendance in the worksite is continued, it is critical that employees do not report to work while they are ill and/or experiencing symptoms such as fever, cough, sore throat, runny or stuffy nose, body aches, headache, chills and fatigue. The Center for Disease Control and Prevention should be referenced for their health guidelines during an infectious disease outbreak. Employees who report to work ill will be sent home in accordance with these health guidelines.

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your healthcare provider. In general, we would request medical information to confirm your need to be

absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought. Our policy is to treat any medical information as a confidential medical record. Any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.

In the event of an infectious disease outbreak, IOTA may implement social distancing guidelines to minimize the spread of the disease among the staff. These guidelines may include:

- Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, e-mail or instant messaging to conduct business as much as possible, even when participants are in the same building.
- If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit at least one yard from each other if possible; avoid person-to-person contact such as shaking hands.
- Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions.
- Do not congregate in work rooms, pantries, copier rooms or other areas where people socialize.
- Bring lunch and eat at your desk or away from others (avoid lunchrooms and crowded restaurants).
- Encourage members and others to request information and orders via phone and email in order to minimize person-to-person contact. Have the orders, materials and information ready for fast pick-up or delivery.

Workers' Compensation

Workers' Compensation is designed to ensure that employees who are injured, become ill, or are disabled on the job are provided with needed medical care and wage-loss protection. Employees with a work-related injury must immediately notify (within twenty-four hours of the incident) their immediate supervisor and IOTA's People Team (peopleteam@iotaschools.org or 901-657-4682). A report should be made regardless of whether an employee believes treatment may or may not be needed.

Employees may not qualify to see their personal physician under IOTA's Workers' Compensation insurance.

Employees should work with IOTA's People Team to follow appropriate reporting processes and determine which doctors qualify prior to seeing a doctor. However, in case of an emergency, employees should call 911 or go to the nearest hospital emergency room for treatment.

Time off for the purpose of a work related injury or illness, including treatment, will be considered time off under the FMLA and any other applicable federal or state mandated leaves. While they engage in the Workers' Compensation process, in accordance with law and the guidelines provided by the People Team, employees may have the ability to use accrued sick leave or PTO.

IOTA has a legal obligation to notify the insurance company of any concerns of false or fraudulent claims.

Refer to the Worker's Compensation Flow Chart on Helpdesk for step by step instructions.

Driver Safety Rules

All employees driving during the course of conducting business on behalf of IOTA shall adhere to the following Driver Safety Rules. Failure to adhere to these rules may be cause for discipline, up to and including termination of employment.

- Driving on company business while under the influence of intoxicants which could impair driving

ability is forbidden.

- Cell phone use while driving should be kept to a minimum and in accordance with applicable law. Drivers need to be aware when cell phone use is creating a distraction from safe driving and adjust their usage, accordingly, including pulling off the road to continue/finish the conversation if needed. Whenever possible, Drivers should complete calls while the vehicle is parked and/or use the phone in a “hands free” mode via a headset or speaker. While driving, attention to the road and safety should always take precedence over conducting business over the phone.
- No driver shall operate a vehicle when their ability to do so safely has been impaired by, including but not limited to illness, fatigue, injury, or prescription medication.
- All drivers and passengers operating or riding in a vehicle while on IOTA business must wear seat belts, even if airbags are available.
- Head lights shall be used 2 hours before sunset and until 2 hours after sunrise, or during inclement weather or at any time when a distance of 500 feet ahead of the vehicle cannot be clearly seen.
- All IOTA employee drivers shall maintain a current and valid license and proof of insurance. License number and attestation to proof of insurance will be required. In the event of a change (suspension, insurance lapse, etc.), IOTA employees must notify their supervisor and the People Team immediately and find an alternative method of transportation as necessary.
- All State and Local laws must be obeyed.

VIII.B. Technology Policies

Acceptable Use Policy

Technology is an integral part of classroom instruction, school operations, and organizational efficiency. IOTA aims to provide the tools and infrastructure for its employees to leverage technology efficiently and to provide the best service possible to IOTA’s stakeholders.

This acceptable use policy lays out IOTA’s guidelines for the following aspects of technology use:

- Use of IOTA’s Network
- Internet Safety, Content Filtering & Monitoring
- Organizational Data & Privacy
- Electronic Communication
- Social Media
- Mobile Phones
- Asset Management

For specific questions, contact IOTA’s Senior Manager of IT and Networks.

Use of IOTA’s Network

The IOTA network is the backbone of connectivity in all regions. This includes WAN, LAN, wireless, Internet, VOIP, IP speakers/clocks, IP security cameras, and IOTA’s core applications, including PowerSchool, Big Query, and other hosted systems.

Use of IOTA’s network should be limited to professional activities only and take into account shared use of this network among all IOTA regions. IOTA reserves the right to monitor all communications and network usage for improper use. Examples of improper use include:

- Accessing other users’ files or accounts, including email.
- Using IOTA’s applications & data systems to promote unethical practices or any activity prohibited by law.
- Transmitting material via IOTA’s applications & data systems that is threatening, obscene,
- disruptive or sexually explicit, or that could be construed as libel, slander, threats of bodily harm,

or harassment or disparagement of others based on their race, national origin, sex, sexual orientation, age, disability, religion, or political beliefs.

- Downloading and/or using copyrighted material without the author's permission.
- Vandalism or hacking of any applications & data systems. This includes uploading, downloading, or creating computer viruses and/or any malicious attempt to harm or destroy district equipment or materials or the data of any other user.

Internet Safety, Content Filtering, & Monitoring

IOTA provides content filtering based on the following criteria:

- Content poses a risk to staff and student safety (e.g., Facebook, X, Instagram, Snapchat).
- Content poses a risk to the integrity of all network and IT systems (e.g., file sharing, phishing).
- Content violates Children's Internet Protection Act (CIPA), which dictates that Internet access to minors must be filtered from content that is inappropriate, unauthorized, unlawful, and/or harmful.

In the event that an IOTA employee wishes to have a specific website or application reviewed, he/she should follow the steps below:

- Document the URL (e.g., www.website.com), the type of content on the website, and why he/she needs access to that particular website.
- Present this request to their school site administrator (Principal or Assistant Principal) or immediate supervisor.
- Administrators/Supervisors will review the request and provide feedback. When complete, the supervisor may submit to a ticket via Helpdesk.
- The IOTA's IT Department will review the request and determine the risk associated with the request and the effect of the request on other schools in the region.
- When complete, the IT Department will notify all participating parties of the decision. Appropriate changes will be instituted if changes are deemed applicable.

Organizational Data & Privacy

IOTA takes seriously the task of ensuring the security of its data systems and applications. All IOTA enterprise systems, including those hosted internally and externally, are encoded and inaccessible without IOTA-provided access. Access can only be provided to IOTA employees and, when applicable, third-party vendors providing services to IOTA.

Employees and students should be aware that all content and communications over IOTA-affiliated electronic networks, including email, phones, and data systems, are not private. IOTA reserves the right to access employee and student accounts and information via multiple systems and methods including, but not limited to:

- Gmail (e-mail)
- Google Apps for Education & Google Drive
- PowerSchool
- Big Query
- Scholastic
- IO Assessment (formerly known as EADMS)
- Illuminate
- Grow
- Employee & student computers & devices
- Employee & student files

Employees who violate IOTA's organizational data security guidelines will be subject to disciplinary action, revocation of the user account, and legal action as appropriate. Violations include:

- Sharing personal login information to IOTA applications & data systems.
- Accessing other users' personal files or accounts, including email.
- Additional violations as stated in the *Use of IOTA's Network* section. Violations of these policies should be reported to IOTA's IT Department immediately.

Password and Authentication Requirements

Multi-Factor Authentication (MFA)

IOTA has implemented MFA for its employees to prevent unauthorized access to individual accounts as well as any VPN access to the IOTA network. MFA is a security process that requires employees to provide two different authentication factors to verify their identity before accessing their IOTA account. MFA adds a layer of security designed to mitigate damages associated with unauthorized use of IOTA resources and as such is a vital component of IOTA's overall risk management strategy. Therefore, all IOTA employees are required to engage in one additional authentication step beyond the normal login process.

IOTA employees are obligated to promptly report to the IT Department any instance where their login credentials may have been compromised. Any user's access to accounts will be disabled immediately if any suspicious activity with their account is observed. Service will remain disabled until the issue has been identified and resolved. Any IOTA personnel found to have intentionally violated this policy or any part of IOTA's technology policies will be subject to the loss of account privileges.

Password Use Rules

- Never send passwords through email or in other forms of electronic communication without encryption.
- Never write passwords down.
- Never share your passwords with others including IT.
- Never reveal your password over the telephone.
- Never hint at the format of your password.
- Never reveal or hint at your password on a form on the internet.

Password Protection

1. Never use your corporate or network password on an account over the internet which does not have a secure login where the web browser address starts with https:// rather than http://
2. Report any suspicion of your password being compromised to the information technology department.
3. If anyone asks for your password= decline.
4. Don't use common acronyms as part of your password.
5. Don't use common words or reverse spelling of words in part of your password.
6. Don't use names of people or places as part of your password.
7. Don't use part of your login name in your password.
8. Don't use parts of numbers easily remembered such as phone numbers, social security numbers, or street addresses.
9. Don't use word or number patterns for parts of passwords like abcdefg, 123456, 654321, or zzyxxww.
10. Change your passwords immediately from the default password initially assigned.
11. Be careful about letting someone see you type your password.
12. Do not use the same password for organizational accounts that you use for external accounts such as external email accounts, passwords for ISP accounts, and other internet web site accounts.
13. Be aware that passwords stored on handheld devices and computers unencrypted are very

vulnerable and are easily compromised. Even passwords stored in a reversible encrypted format can be cracked.

Student Usernames and Passwords

Student usernames and passwords are set by the district's IT and IS staff. Student usernames are set to their first initial from their first name + first 13 letters of their last name *until* space/punctuation + student ID

Example for Jon Smith (student ID 12345) would be "jsmith12345" and Elver Sandoval-Bustamante (student ID 33257) would be esandoval33257.

Students can change their passwords independently for certain systems. For those that do not support self-service password resets, they should notify their teacher so the teacher can contact IOTA's technology helpdesk to request a password change.

Electronic Communication

IOTA may provide its employees with access to electronic communication accounts (e.g., e-mail, text messages). IOTA will use technology protection measures to block or filter, to the extent practicable, access of visual depictions that are obscene, pornographic, harmful to minors, or otherwise inappropriate over IOTA's network. IOTA may monitor users' online activities and to access, review, copy, store, or delete any electronic communication or files, and disclose them to others as it deems necessary (consistent with FERPA, the Health Insurance Portability and Accountability Act of 1996, or other applicable law). Users have no reasonable expectation of privacy, during or outside of work hours, regarding their use of IOTA technology, including, but not limited to, any electronic communication. System security features, including passwords and delete functions, do not neutralize IOTA's ability to access data at any time. Employees must be aware that the possibility of such access always exists.

All IOTA employees must use IOTA electronic communication for ethical, professional communication purposes, adhering to the following:

- Access to, and use of, IOTA electronic communication accounts is limited to conducting IOTA business and educational activities.
- Personal electronic communication accounts should not be used for communicating with students and/or parents/guardians.
- The use of the IOTA electronic communication accounts is permitted outside of work hours by exempt employees so long as such use is consistent with all IOTA policies.
- Communication by electronic means must reflect professional standards at all times.
- When any e-mail correspondence with students, parents, and/or guardians has the potential to escalate, the e-mail communication should immediately be discontinued. The staff member should contact the school administrator for next steps. (For additional information regarding e-mail communication with students, please refer to Section IV.C., "Professional Boundaries: Staff/Student Interaction Policy", of this Employee Handbook)
- IOTA's email accounts may not be used for political or personal gain.
- IOTA's email accounts may not be used for attempting or successfully sending anonymous messages.
- IOTA staff members may not delete, modify, or forge other users' names, emails, files, or data.
- Employees should not use personal devices or email accounts for IOTA-related communications.
 - Such communications should only take place using IOTA-issued devices and via the employee's
 - IOTA email account.

When any employee becomes aware of another employee having violated IOTA's Code of Conduct by means of electronic communication, the following steps apply:

- If the observed behavior appears minor, they may speak to this employee or report the matter to an appropriate supervisor in a timely manner; or
- If the observed behavior appears significant, they must report the matter to an appropriate supervisor as soon as practicable.

A supervisor receiving the report shall keep the matter as confidential as possible under the circumstances. It is the duty of the supervisor receiving the report to ensure that the matter is investigated and resolved to the extent possible under the circumstances.

Social Media

Individual Use

Social media, including applications such as Facebook, X, Instagram, and Snapchat, are not accessible while on the IOTA network. Employees may request access from IOTA's IT Department to specific applications based on their job description and responsibilities. IOTA employees are encouraged to limit their use of these types of applications, including use on personal devices and connections, during work hours, except in cases specific to one's job responsibilities.

IOTA employees should be mindful that all information posted to or uploaded to the Internet is ultimately accessible to users around the world. To avoid jeopardizing their professional effectiveness, employees are encouraged to familiarize themselves with the privacy policies, settings, and protections on any social media they choose to use. Employees should also be aware that information posted online, despite privacy protections, is often easily accessible and may be seen by students, parents, IOTA administration, and other IOTA stakeholders.

Educational Use

IOTA recognizes that social media may have educational value to further IOTA's mission and values, support student learning and staff professional development, and enhance communication with students, parents/guardians, staff, and community members.

Definitions

"Social media" means an online platform for collaboration, interaction, and active participation (e.g., sites for social networking, media sharing, blogs, microblogs, wikis, and virtual worlds).

"Social networks" are online spaces that allow users to create customized profiles and form connections with other users based on shared characteristics and interests (e.g., Instagram, Facebook, X, LinkedIn).

"Media sharing" are online spaces that allow users to post and share videos, audio files, and/or photos, which may be searchable (e.g., Instagram, YouTube, Flickr, Picasa, Shutterfly).

"Blogs" are online logs or journals in which authors and users can post textual, audio, or video content (e.g., BlogSpot).

"Microblogs" are online spaces that allow users to post short blog entries (e.g., X, Facebook, Foursquare).

"Wikis" are online resources or documents edited collaboratively by a community of users with varying levels of editorial control by the website publisher (e.g., Wikipedia).

"Virtual worlds" are online or software-based platforms that allow users to create avatars (i.e., a graphical

image that represents a person) to meet, socialize, and transact with other users.

Social Media Approval Process

Any IOTA teacher, staff member, coach, or volunteer who seeks to establish social media for IOTA- related purposes must submit a written request to the Chief of Staff or designee for approval. The request must include:

1. The online tools the requestor desires to use;
2. The social media platform's purpose;
3. How the platform will comply with this policy; and
4. The name of a proposed individual who will be responsible for monitoring the social media platforms content.
5. Access to management and oversight of the accounts in question

Approval of the proposed social media platform shall only be granted upon written confirmation from the Chief of Staff or designee, who must designate the individual responsible for monitoring the content posted to the social media account.

A social media account that is created by a parent-teacher organization, a booster club, or other IOTA-connected organization, or a student's or an employee's personal site, is not considered to be a IOTA- approved social media platform. Employees should not create social media accounts that use IOTA's (or school's) brand, either in explicit or implicit reference (e.g., "IOTASchoolsGroup", "IOTACounseling", and IOTA- Pencils).

Guidelines

An IOTA-approved social media platform shall be used only for its stated purpose(s) and in a manner consistent with this policy. An IOTA-approved social media platform does not create a limited public forum or otherwise guarantee an individual's right to free speech.

All IOTA-approved social media platforms shall be regularly monitored by IOTA designees, IOTA 's Information Technology Department, and IOTA's Chief of Staff. Examples of posts that may be removed include, but not limited to, posts that violate IOTA's policy or content guidelines, posts that violate laws against discrimination or harassment, or posts that are unrelated to the purpose of the particular social media platform. To this end, users must be informed of the social media platform's purpose and the limited nature of any potential discussion.

Each IOTA-approved social media platform shall prominently display:

- The purpose, along with a statement that users are expected to use the platform only for those intended purposes.
- A statement that the site is regularly monitored and that any inappropriate post will be promptly removed. Inappropriate posts include those that:
 - Are obscene, libelous, or so incite students to create a clear and present danger of the commission of unlawful acts on IOTA premises, violation of IOTA policy, or substantial disruption of IOTA's operations.
 - Are not related to the stated purpose of the site, including, but not limited to, comments of a commercial nature, political activity, and comments that constitute discrimination or harassment.
- Protocols for users include, but are not limited to, having no expectation of privacy, and communicating in a respectful, courteous, and professional manner.
- A statement that users are personally responsible for the content of their posts and that IOTA or its schools are not responsible for the content of external online platforms.

- A disclaimer that the views and comments expressed on the site are those of the users and do not necessarily reflect the views of IOTA or its schools.
- A disclaimer that any user's reference to a specific commercial product or service does not imply endorsement or recommendation of that product or service by IOTA or its schools.
- The individual(s) to contact regarding violation of IOTA policies or guidelines regarding the use of IOTA-approved social media platforms.

IOTA staff and students who post inappropriate or prohibited content on IOTA-approved social media platforms may be subject to cancellation of user privileges, and discipline in accordance with IOTA policy.

IOTA employees who participate in IOTA-approved social media platforms shall adhere to all applicable IOTA policies, including, but not limited to, professional standards related to interactions with students.

When appropriate, employees using IOTA-approved social media platforms shall identify themselves by name and IOTA title/position, and include a disclaimer stating that the views and opinions expressed in their post are theirs alone and do not necessarily represent those of IOTA or its schools.

Note: Nothing in this policy is meant to, nor should it be interpreted to, in any way limit employee rights under any applicable law to engage in protected concerted activities with other employees to improve terms and conditions of employment, such as wages and benefits.

Content as a Public Record: Information posted on IOTA-approved social media platforms may be considered a public record pursuant to the Tennessee Open Records Act (T.C.A. § 10-7-501 et seq.).

Use of Copyrighted Materials: Users of IOTA-approved social media platforms must comply with all applicable laws. In compliance with federal copyright laws, IOTA and its staff and students may make fair use of materials for instructional purposes so long as they are not likely to deprive a publisher or an author of income. Users should give credit when due and not plagiarize materials. Hyperlinking to outside sources is recommended. When hyperlinking to other online resources, the user shall ensure that the linked content is consistent with this policy.

Photographs taken by professional photographers cannot be scanned or used online without the photographer's express written permission.

Privacy: Social media sites and/or any other online platforms shall not be used to transmit confidential information about students, staff, or IOTA operations. Employees posting material to social media platforms should always abide by the terms of use of those platforms and note particularly that users under 13 years of age are typically not permitted.

IOTA policy contained in each school's Student Policy Manual pertaining to the posting of photographs of students and the privacy of telephone numbers, home addresses, and e-mail addresses shall also apply to IOTA-approved social media platforms.

Mobile Phones

IOTA may provide mobile phones to a limited number of employees during the term of their employment at IOTA. These phones are provided to allow employees to efficiently conduct business and to allow employees to

be more accessible to parents, colleagues, and community members. IOTA-issued mobile phones are not intended for personal use. Calls, texts, and use of data not related directly to IOTA or school business are strictly prohibited.

Terms of Use:

- Each mobile phone is the property of IOTA and is issued to IOTA employees for work-related business only.
- Employees are responsible for reimbursing IOTA for any charges related to any non-business calls above and beyond the employee's service plan.
- IOTA reserves the right to issue, revoke, or modify usage of mobile phones for employees.
- Each employee issued an IOTA mobile phone is responsible for the safekeeping of the phone during their term of employment. IOTA employees are expected to treat and safeguard the phone like any other personal belonging.
- By accepting a mobile phone, an employee's phone records may be viewed by IOTA staff, including, but not limited to IOTA's IT Department, IOTA school site administrators, and other office personnel.
- IOTA will pay for all approved usage (including data services and text messaging) and applicable taxes and service charges, based on each employee's service plan.
- Employees traveling internationally on approved trips on behalf of IOTA must request international service at least one (1) week in advance of travel from the IT Department.
- International trips not in direct service to IOTA will not be reimbursed/financed by IOTA. It is the responsibility of the traveling employee to organize appropriate coverage while they are out of the office.
- Employees are responsible for reimbursing IOTA for damage and/or abuse of their mobile phone for an amount up to the full retail cost of the mobile phone.
- Examples of *acceptable* use of IOTA issued mobile phones include:
 - Placing or accepting calls to/from parents, administrators, or other IOTA employees:
 - Sending or receiving texts to/from other parents, administrators, or other IOTA employees.
 - Using data plans to access IOTA email or online resources related to IOTA.
 - Accessing IOTA voicemail.
- Examples of *unacceptable* use of IOTA issued mobile phones include:
 - Calling or texting non-school or non-IOTA employees.
 - Calling 976, 900 or other fee-based phone services.
 - Calling 411 or directory assistance services.
 - Charging or billing other services to your cell phone account.
 - Using the data plan to access content unrelated to IOTA.
 - Using the data plan to access personal email unrelated to IOTA.

Asset Management

The purpose of the asset management policy is to ensure that all assets are secure and properly secured, maintained, and used. Use of IOTA technology is a privilege. This policy applies to all IOTA employees and any other personnel granted access to IOTA's technology assets.

Securing Assets

IOTA employees should, at all times, be aware of the threat of theft and take all necessary steps to safeguard their assets. Employees who demonstrate negligence are responsible for reimbursing IOTA for the loss or damage of any IOTA asset put under their supervision for an amount up to the full retail cost of the asset.

Types of negligence include:

- Leaving assets in one's vehicle overnight.
- Leaving assets unattended in a hotel room while traveling.

- Leaving assets unattended in a public space, including airports & restaurants.
- Leaving laptops or device carts unattended or unsecured.
- Not reporting stolen equipment to one's immediate supervisor, school site administrator, and/or IOTA's IT Department.
- Repeated loss of assets, even if accidental.

When an Asset Goes Missing

When an IOTA-issued asset goes missing, the employee should:

- Immediately contact their immediate supervisor or school site administrator.
- Immediately contact IOTA's IT Department.
- If advised, file a police report at their school site or central office.
- Submit the police report within five days of the incident to IOTA's IT Department.

Depending on the level of negligence, the employee may have their privileges revoked.

Damage & Abuse of Assets

IOTA aims to sustain the life of its technology assets, including those used by staff & students, as long as possible. IOTA employees are expected to treat and safeguard this technology like any other personal belonging. As technology is frequently transferred from one employee to another, employees should refrain from personalizing any technology (e.g., placing stickers on a laptop computer) so that technology can be repurposed as needed.

As noted previously, employees who demonstrate gross negligence are responsible for reimbursing IOTA for an amount up to the full retail cost of the asset. Types of gross negligence include:

- Intentionally damaging IOTA's assets.
- Allowing someone else to intentionally damage IOTA's assets.
- Repeated damage to IOTA's assets, even if accidental.

VIII.C. Employment of Relatives

Relatives of employees may be eligible for employment with IOTA only if the individuals involved are qualified, do not work in a direct supervisory relationship, and are not in job positions in which a conflict of interest could arise. Relatives of IOTA employees are subject to the same procedures and requirements as any other job applicant. IOTA employees may not interview any relative seeking to join IOTA, nor may that employee influence the decision to hire or not hire any relative who is a job applicant. IOTA defines "relatives" as spouses, registered domestic partners, children, siblings, parents, in-laws, and step- relatives.

Workplace Relationships

Consensual relationships in the workplace are discouraged. Consensual relationships between supervisors and employees and between faculty or staff and parents or students are potentially exploitative and must be avoided. They raise serious concerns about the validity of the consent, conflicts of interest, and unfair treatment of others. Moreover, consensual relationships in the workplace can lead to problems with morale, decreased productivity and increased liability. IOTA has a strong policy against sexual harassment and is concerned that consensual relationships might potentially violate the policy. IOTA aims to prevent sexual harassment from occurring in the workplace. To help prevent sexual harassment, employees who enter into consensual relationships should notify administration regarding the relationship, as well as review the sexual harassment policy. Moreover, employees are expected to abide by the sexual harassment policy, behave professionally at work, and not let the relationship affect their work or the workplace.

Employees involved in consensual relationships in IOTA's workplace are prohibited from evaluating the work performance of others with whom they have a relationship, or from making hiring, salary, or similar decisions which may impact such persons.

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

The following guidelines have been developed to provide IOTA employees with some examples of how consensual relationships in the workplace will be treated:

- Employees who allow personal relationships with co-workers to affect the working environment may be subject to disciplinary action, which may include counseling for minor problems. Failure to change behaviors and maintain expected work responsibilities is viewed as a serious disciplinary matter.
- During non-working time, such as lunches, breaks and before and after work periods, employees are not prohibited from having appropriate personal conversations in non-work areas as long as their conversations and behaviors could in no way be perceived as offensive or uncomfortable to a person.
- Supervisors, managers, executives or anyone else in sensitive or influential positions must disclose the existence of any relationship with another co-worker that has progressed beyond a platonic friendship. Disclosure may be made to the immediate supervisor or IOTA's People Team. This disclosure will enable the organization to determine whether any conflict of interest exists because of the relative positions of the individuals involved.
- Where problems or potential risks are identified the organization will work with the parties involved to consider options for resolving the conflict. The initial solution will be to make sure that the parties involved no longer work together on matters where one is able to influence the other or take action for the other. Matters such as hiring, firing, promotions, performance management, compensation decisions, financial transactions, etc. are examples of situations that may require reallocation of duties to avoid any actual or perceived reward or disadvantage.
- In some cases more extreme measures may be necessary such as transfer to other school sites, positions or departments. Refusal of reasonable alternative positions, if available, will be deemed a voluntary resignation.
- Continued failure to work with the organization to resolve such a situation in a mutually agreeable manner may be ultimately deemed insubordination; and therefore, serve as a basis for immediate release.
- The provisions of this policy apply regardless of the sexual orientations of the parties involved.
- Where doubts exist as to the specific meaning of the terms used above, employees should make judgments on the basis of the overall spirit and intent of this policy.
- Any employee who feels they have been disadvantaged as a result of this policy, or who believes this policy is not being adhered to, should make their feelings known to IOTA's People Team.

VIII.D. Personnel References and Recommendations

IOTA employees may receive requests to provide letters of recommendation, verbal references, and/or verifications of employment ("VOE") from outside organizations, or current/former colleagues. This Personnel References and Recommendations policy is intended to protect IOTA and the individual author from liability.

Letters of Recommendation: A letter of recommendation may be placed on IOTA letterhead or made on IOTA's behalf only if written by an IOTA Assistant Principal, Principal, Executive Director (or designee), or an immediate supervisor of the requesting individual. Any such letter of recommendation may only be written by an IOTA employee familiar with the requesting individual's work performance and, if applicable, separation from employment with IOTA. The letter of recommendation must be written honestly and statements

regarding the individual's work performance must be supported by demonstrable evidence. Statements regarding an individual's character or other personal traits cannot be exaggerated or misleading. Letters of recommendation that do not meet the guidelines in this policy may not be placed on IOTA letterhead, or associated, or given the appearance of being associated with IOTA in any manner.

Employees are not required to write letters of recommendation when requested. If a recommendation letter will not be written, the requesting individual should be informed in a timely manner.

Verbal References: Responses to requests for verbal references (e.g., phone call) from outside organizations or current/former colleagues, such responses shall only be provided by an IOTA Assistant Principal, Principal, Executive Director (or designee), or an immediate supervisor of the requesting individual. The person providing the response must be familiar with the requesting individual's work performance and, if applicable, separation from employment with IOTA. Any such responses must be provided honestly and statements regarding the individual's work performance must be supported by demonstrable evidence. Statements regarding an individual's character or other personal traits cannot be exaggerated or misleading.

Employees are not required to provide responses to requests for verbal references when requested.

Verifications of Employment: IOTA's People Team Department handles all requests for VOE. If an employee receives a request to provide a VOE, the employee should contact IOTA's People Team without unnecessary delay (peopleteam@iotaschools.org). IOTA's People Team can verify current employment and provide an employee's position and start date over the phone.

VIII.E. Employee Records

The information in an IOTA employee's personnel file is maintained as both a convenient resource for the collection of employee information and to comply with applicable law. An employee's personnel file is always confidential, unless otherwise required by law, and must be kept current.

An employee may request a copy of their personnel file from IOTA's People Team with a minimum of 72 hours advance notice.

Each employee must update their information via ADP Workforce Now, and provide IOTA's People Team with supporting legal documentation (as applicable), when any of the following takes place:

- Name change because of marriage, divorce or legal name change.
- New address and/or telephone number.
- Change of name of person to contact in the event of an emergency.
- Change in number of dependents because of marriage, divorce, birth or adoption.
- Change of beneficiary.

All requests for personnel record information are to be directed to and handled by the IOTA People Team. To avoid delays, especially in medical emergencies, it is important that the emergency contact information be kept current.

IOTA will take appropriate steps to keep employee personnel records confidential. There are certain times, however, when information may be given to persons outside of IOTA, including, but not limited to:

- In response to a subpoena, court order, or an order of an administrative agency;
- In a lawsuit, grievance, or arbitration; or

- When required by law.

VIII.F. Employment Changes

IOTA is a unique and special place to work, and one in which many employees may choose to establish their careers. For a variety of professional and personal reasons, employees may make a transition, either within the organization or elsewhere. IOTA strives to make all transitions as positive as possible.

Types of Employment Changes

Transfers (Site/Location changes): Any employee interested in transferring to another location should contact their immediate supervisor to learn of available opportunities prior to contacting the desired location. A supervisor will inform the employee of next steps.

Promotions: IOTA is committed to supporting career development for its team members, and thus actively promotes team members within the organization. IOTA employees are encouraged to apply for open positions and will be evaluated based on their qualifications and consistent with IOTA's Equal Employment Opportunity Policy.

Separation from Employment: Separation from employment with IOTA can occur for several different reasons.

Resignations: Although IOTA hopes all employment with the organization will be a mutually rewarding experience, IOTA understands that varying circumstances cause employees to voluntarily resign from employment. Resigning employees are encouraged to provide two (2) weeks' notice, preferably in writing, to facilitate a smooth transition out of the organization. IOTA reserves the right to decline or modify an end date as appropriate. IOTA may deem the individual to be ineligible for rehire depending on the circumstances regarding the notice given. The final paycheck(s) will be delivered within twenty-one (21) days of the last day worked.

Employees who resign will not be allowed to use PTO or Sick Leave hours to extend their employment.

Terminations: All at-will employees may be terminated at any time, with or without cause or advance notice. Without impairing the at-will nature of employment, IOTA may release an at-will employee for various reasons that may include poor performance, misconduct, or other violations of IOTA's rules of conduct. Notwithstanding these lists of rules, IOTA reserves the right to discharge or demote any at-will employee at any time, with or without cause, or advance notice. The final paycheck(s) will be delivered within twenty- one (21) days of the last day worked.

In the event of an involuntary termination due to a reduction in force/downsizing, change in the organization direction, job elimination or termination for performance, IOTA may provide severance to the affected employees. This does not apply to terminations for cause, refusal to be reassigned, or refusal to be relocated.

Certificated staff members who are terminated for credential compliance issues cannot be rehired (internally or outsourced) as long-term substitutes or part-time teachers unless they have a valid ESSA compliant credential.

Job Abandonment: Employees who fail to report to work or contact their supervisor for three (3) consecutive workdays may be considered to have abandoned the job without notice, effective at the end of their normal shift on the third day. The supervisor will notify the People Team at the expiration of the third workday and

initiate the paperwork to terminate the employee. Employees who are separated due to job abandonment are ineligible for rehire.

Retirement: Employees who wish to retire are required to notify their supervisor and the People Team Department in writing at least one (1) month before the planned retirement date.

Leaving IOTA

Separating employees must return all IOTA property at the time of separation, including cell phones, keys, PCs, security badges, and identification cards. Upon the last day of employment, all account access will be terminated and digital files (including but not limited to emails and files stored in Google Drive) will no longer be accessible by the former employee. Separating employees are prohibited from maintaining student files and/or information.

The separating employee's manager should contact IOTA's People Team as soon as notice is given to coordinate the exit process.

Accrued PTO time (if applicable) will be paid in the final paycheck and benefits (life, medical, dental and vision) end on the last day of the month. Upon separation, any PTO balance paid to a federally-funded employee above the amount of leave earned in the current project shall not be paid from federal funds. An employee, unless dismissed for gross misconduct, has the option to convert to individual life insurance, and/or to continue Medical/Dental/Vision Benefits in accordance with COBRA. Information about COBRA continued health coverage is provided during the exit process and can be pro-actively requested by contacting the People Team.

EMPLOYEE ACKNOWLEDGMENT OF RECEIPT AND UNDERSTANDING

I have received my copy of IOTA Community Schools' 2024-2025 Employee Handbook. I understand and agree that it is my responsibility to read and familiarize myself with the policies, rules and procedures contained in the most current version of IOTA's Employee Handbook. If I have any questions about any section of IOTA's Employee Handbook, I understand that I am expected and encouraged to seek clarification from the People Team.

I understand that the statements contained in this Employee Handbook are not intended to create any contractual or legal obligation on the part of IOTA Community Schools.

In addition, I understand that this Employee Handbook summarizes IOTA's policies and practices in effect on the date of publication. I understand that nothing contained in the Employee Handbook may be construed as creating a promise of future benefits or a binding contract with IOTA for benefits or for any other purpose. I also understand that these policies and procedures are continually evaluated and may be amended, modified or terminated at any time.

I HAVE READ AND UNDERSTAND THE ABOVE STATEMENT, AGREE TO READ THE IOTA EMPLOYEE HANDBOOK, AND TO FOLLOW THE ORGANIZATION'S POLICIES AND PROCEDURES.

Acknowledgement of the Employee Handbook is done upon hire and annually each year through IOTA's HRIS system.