

Business Practices



“Aspire to Excellence”

Functional Industries, Inc.

“Meeting Tomorrow’s Needs Today”

About This Manual

Functional Industries' Business Practices Manual is designed to be utilized for a wide range of activities, processes and purposes which include:

- To provide comprehensive narrative descriptions of Functional Industries' mission, vision, values, purpose and currently prescribed organizational processes, practices and protocol
- To serve as a document and resource for training and reference
- To centralize information and references that document Functional Industries' adherence to current CARF accreditation standards, as well as other licensing and/or regulatory requirements
- To stimulate the discussion and development of exceptional business and service protocol and practice
- To serve as a foundation for continuous organizational development, service enhancement, and ongoing quality improvement
- To serve as a comprehensive reference tool that connects all of Functional Industries' business and program practices

(Alternative Formats Available Upon Request)

Revised 2.10.2017

TABLE OF CONTENTS

Introduction

Mission	1
Vision	1
Values	1
Purposes	3

Input from Persons Served and Other Stakeholders

Gathering Input.....	4
Input Utilization	6
Program Planning.....	6
Performance Improvement and Strategic Planning	7
Organizational Advocacy	10
Financial Planning.....	12
Resource Planning.....	14
Leadership	14

Accessibility

Leadership	17
Accessibility Planning.....	18
Integration	21
Reasonable Accommodations	22

Performance Measurement, Management and Improvement

Data Collection.....	24
Information Utilization.....	26
Data Integrity.....	27
Business Improvement	29
Service Delivery Improvement.....	29
Performance Information Dissemination	31
Information Technology.....	32

Rights of Persons Served

Communication of Rights	35
Diversity	36
Rights Policies.....	37
Confidentiality.....	39
Privacy.....	39
Freedom from Abuse.....	39
Information Access.....	39
Informed Consent, Refusal and Choice.....	40
Access and Referral.....	40
Complaint, Grievance and Appeal Processes.....	41

Health and Safety

Health and Safety Training.....	43
Emergency Plans and Evacuation Procedures.....	43
First Aid.....	44
Critical Incident Identification, Analysis and Reporting.....	46
Infection Control	49
Transportation	50
Inspections.....	51
Hazardous Materials.....	51

Human Resources

Staff Configuration.....	52
Education and Experience	52
Position Requirements and Job Description.....	53
Hiring Practices	53
Personnel Policies.....	54
Recruitment and Retention.....	55
Staff Training	56
Performance Management.....	57
Personnel Policies.....	57
Personnel Verification.....	60

Leadership

Assessing the Environment	61
Leadership Structure.....	61
The Board’s Relationship to Executive Leadership	62
Person-Centered Philosophy~Promoting Self-Sufficiency through Self-Determination .	62
Guidance.....	65
Cultural Competency and Diversity	66
Corporate Responsibility	66
Advocacy.....	67
Corporate Compliance.....	68
Continuing Education.....	69
Succession Planning	69

Legal Requirements

Legal and Regulatory Compliance	70
Guidance.....	70
Privacy of Stakeholders and Confidential Information	71

Financial Planning and Management

Fiscal Planning	72
Response to Financial Instability	73
Financial Records	73
Financial Reports.....	73
Cash Management	74
Annual Budget.....	74
Internal Controls.....	74
Service Design and Delivery	75
Service Billing.....	75
Fee for Service.....	75
Audit.....	76

Risk Management

Risk Management	77
Marketing, Social Media, Media Relations & Public Representation	77

Governance

Governance Duties 78
Governance Responsibilities, Practices and Policies 78
The Board’s Relationship to Executive Leadership 80
Board Processes..... 80
Executive Leadership Development, Evaluation and Compensation..... 81

INTRODUCTION

Mission

“To create and promote innovative opportunities that reveal the natural potential of each person we serve.”

Vision

“Connecting people, enriching lives”

Values

Functional Industries’ core values:

- Continuous quality improvement
- Collaborate with stakeholders
- Understand consumer choice
- Respect the worth of all people
- Cultivate every resource

Functional Industries values the role of work in achieving rehabilitation, self-sufficiency, and community involvement. The importance of work is promoted in all aspects of our programs and services, beginning at initial intake/orientation and continues throughout each component of FII’s person-centered planning and individual development process.

A person-centered philosophy guides all service delivery. FII believes in the strengths, gifts and abilities of the people we serve and our employees, and is dedicated to assisting them in fully utilizing their individual talents in integrated employment settings.

Functional Industries’ programs and services are based on a person-centered philosophy and are developed based on the input from the individuals receiving services and other stakeholders. Functional Industries is committed to the ongoing development and expansion of employment opportunities that are tailored to meet the employment interests and skills of persons served as well as the needs of employers.

In addition, Functional Industries is committed to:

- The continuous achievement of customer-driven organizational outcomes and the ongoing enhancement of the quality of our services
- The essential involvement of individuals receiving services in all aspects of our organizational processes and organizational development
- The promotion of diversity and cultural competency in all Functional Industries' activities and associations
- The implementation of innovative and flexible services that produce meaningful outcomes in the lives of people receiving services
- Listening to persons receiving services and understanding the aspirations that they have for their lives, using this information as the foundation for service design and delivery
- The continuous understanding and knowledge of employer needs
- Exceeding the expectations of persons served, customers, and stakeholders
- Working in collaboration with stakeholders, community organizations, and partners

Purposes

In order to actively pursue our mission, vision and values, the purposes of Functional Industries are:

- To develop individualized services that are based on the needs and desires of persons receiving services
- To treat individuals receiving services, employees and all other stakeholders with kindness and respect
- To actively and successfully assist individuals in developing employment related skills and in securing meaningful integrated employment
- To develop and maintain enduring relationships/partnerships with employers
- To achieve and maintain the continuous satisfaction of individuals receiving services, employers and stakeholders
- To recruit, train, and retain a highly skilled, dedicated, and compassionate workforce
- To provide a positive, challenging and dynamic work environment that is committed to maximizing the potential of employees and supporting them in their career development
- To provide leadership, resources, and training for stakeholders, community organizations, and individuals

Policy, Procedure, and Process Reviews

All formal and informal corporate policies, procedures, and processes are reviewed annually and updated (if necessary) by the leadership team, board of directors, and corporate compliance officer.

INPUT FROM PERSONS SERVED **AND OTHER STAKEHOLDERS**

Principle Statement

Recognizing that our business is *about the people*, Functional Industries maintains a continual focus on the expectations of persons served and other stakeholders. Comprehensive policies and procedures direct our focus to soliciting, collecting, analyzing and utilizing input from *all* stakeholders to create programs and services that meet or exceed the expectations of the persons served, the community and other stakeholders. The input of stakeholders is the foundation upon which Functional Industries continues to build its success.

Gathering Input

A key to strategic solicitation of value-laden input is identification of *all* stakeholders. While Functional Industries maintains a central focus on individuals served, we clearly recognize other groups provide beneficial input from diverse perspectives.

Concerted effort is directed to gathering input from families, legal representatives, caregivers, referral sources, payers, regulators, boards, case managers, consumer advocates, accreditation authorities (CARF), Functional Industries' staff and business partners. Input obtained from these and other stakeholders is used to help determine stakeholder expectations and preferences, and to help the governance better understand how the organization is functioning from the perspective of its stakeholders.

In order to fully realize the potential of all information sources, a myriad of methods are employed to obtain input and encourage discourse. Mechanisms utilized to solicit and collect information range from the formal to informal. Strategies include point in time and continuous data collection techniques. Deliberate focus is directed to maintaining a variety of information conveyance modes to encourage dialogue, allow for communicative preference, and facilitate a dynamic exchange of information.

Functional Industries utilizes a variety of mechanisms and venues to solicit and collect information from stakeholders. These mechanisms and venues include, but are not limited to:

- Client Advisory Committee
- Employee Steering Committee
- Individualized Personal Program Plans
- Program/Service Development
- Surveys

- Suggestion Boxes
- Formal and informal communication via telephone, e-mail, and in person
- Interdisciplinary Team Meetings
- Provider Consortiums
- Workforce Development Partnerships
- Trade Association Memberships
- Stakeholder Input Forums
- Face to Face Meetings with Stakeholders
- Agency Sponsored Conferences and Community Seminars
- Agency Website
- Complaint, Grievance and Incident Summaries
- Interagency Collaboratives
- Community Taskforces
- Service Delivery Initiatives
- Business Leadership Networks
- Stakeholder Advisory Committees
- Performance Improvement Activities
- Exit Interviews
- Departmental & Divisional Meetings
- Functional Industries Board Meetings
- Stakeholder Focus Groups
- Staff Meetings
- Information Measurement and Strategic Planning Activities
- Internal/External Inspections
- Regulatory Compliance Reports
- Performance Improvement Process
- Performance Improvement Analysis
- Finance, Human Resources and Environmental Scans

Example

Input is encouraged by an organizational “open door” philosophy practiced throughout Functional Industries. This encompassing philosophy is readily apparent through observation of Functional Industries’ staff. One need only see the ease and comfort with which individuals served converse and interact with Functional Industries’ staff, whether in an informal or formal setting, to understand our overriding commitment to obtaining and utilizing consumer input.

Input Utilization

Functional Industries utilizes stakeholder input to gain a better understanding of organizational performance (as perceived by stakeholders) and to improve the overall quality of our programs/services.

Stakeholder input is continually analyzed and the resultant information is integrated into the business practices of our organization to help determine if our agency is:

- Meeting the current needs of *all* stakeholders
- Offering relevant services/programs
- Identifying potential new opportunities for growth and development

Stakeholder feedback is continually utilized in program planning, performance analysis, performance improvement, strategic planning, organizational advocacy, financial planning and resource planning and management.

Program Planning

Program planning is conducted using input from stakeholders in a variety of ways: developing and/or revising individual program plans; modifying service delivery design or strategy; identifying, developing, improving or eliminating services.

Examples

To illustrate the impact of stakeholder input on program planning we ask you to consider the following examples:

- Functional Industries' entire individualized person-centered planning process is predicated on consumer choice and consumer directed service provision. Review of planning process documents, the resulting plan and team meeting minutes demonstrates consumer and other stakeholder investment in developing consumer directed services.
- Individuals receiving services expressed a desire for increased community based employment options via the personalized planning process, consumer surveys, advisory meetings, etc. In addition, stakeholders provided similar input through the multiple means available to them including team meetings, provider forums, interagency collaboratives and advisory panels. Action taken relative to this aggregate feedback is evident in the strategic planning process, which identifies increased community based vocational opportunities as an organizational goal. Progress toward this goal is evaluated and communicated through annual written performance improvement analyses, annual performance measurement and management reports, and a variety of

electronic mediums. Identifying a goal and establishing a means to evaluate progress drives Functional Industries' service delivery design modification and service improvement strategies. Functional Industries' increased dedication of human resources to job development and job coaching activities through reassignment, recruitment and cross training serves as one example of input driven service delivery modification. Resulting increases in competitive or supported employment placements and community employment options speak to performance improvement as defined by individuals receiving services and other stakeholders.

- Utilizing Adult Rehabilitative Mental Health Services (ARMHS) as a funding avenue to meet the distinctive support needs identified by individuals with mental health diagnoses demonstrates our commitment to new service development based on stakeholder input. Individuals receiving services, local and state governmental and non-governmental agencies supported Functional Industries' development of ARMHS service provision. Developing ARMHS services and the corresponding funding is one means of addressing financial accessibility. Additionally, ARMHS services are an example of the collaborative efforts our organization values, as we partner with our local mental health provider in ARMHS service delivery.
- Client Advisory Committee identified passenger van height as an accessibility issue for individuals with limited mobility in accessing community sites. Their input was brought to leadership in the accessibility planning process. "Running boards" were identified as one possible solution. A pilot project was conducted utilizing a single van. Consumer feedback indicated that running boards made van entrance and egress safer/easier. This pilot was expanded to all passenger vans in the fleet.

Performance Improvement and Strategic Planning

We are committed to the continuous utilization of our strategic integrated planning process for the purpose of organizational responsiveness to the changing needs and expectations of the people we serve and our stakeholders, in conjunction with the changing business needs of our organization.

We view strategic planning and performance improvement to be inextricably connected. Functional Industries' strategic planning process is based on the collection, analysis and utilization of input from persons served, staff and other stakeholders. Through this customer driven process, expectations of persons served and stakeholders delineate organizational outcomes, which direct the development of divisional, team, and individual goals or objectives.

Our strategic planning process is an essential foundation for the development and assessment of our information measurement and management system and overall performance improvement process.

Following this process ensures that our leadership maintains a viable planning structure, focused on our mission, core values, and vision, that guides Functional Industries’ business practices. The framework of our strategic planning process is based on CARF’s ASPIRE to Excellence® model, outlined below, and uses the CARF standards as a guide to ensure an ongoing process of continuous quality improvement.

»a	Assess the Environment	«
»s	Set Strategy	«
«p	Persons Served and Other Stakeholders	«
	- Obtain Input	
»i	Implement the Plan	«
»r	Review Results	«
»e	Effect Change	»

Functional Industries’ ongoing strategic planning process has established a foundation for success by taking advantages of identified strengths and opportunities and proactively addressing weaknesses and threats. The following are taken into consideration when setting our organizational strategy:

- Input from persons served, staff & other stakeholders
- Expectations of persons served & other stakeholders
- The competitive environment
- Financial opportunities and threats
- Functional Industries’ current and projected financial position at specified point(s) in the future with respect to allocating resources necessary to accomplish the strategic plan
- Functional Industries’ capabilities
- Service area needs
- Demographics of the service area
- Functional Industries’ relationships with external stakeholders
- The regulatory environment
- The legislative environment
- Current literature and professional consensus concerning available technology and using technology that has been identified to best meet Functional Industries’ needs to support efficient operations, effective service delivery and overall performance improvement
- Information obtained through the analysis of Functional Industries’ previous performance

Our organization embraces opportunities that present themselves to improve efficiency and effectiveness as technology continues to evolve and change. We are committed to researching, implementing and utilizing new technological advancements to support efficient business operations, effective service delivery and overall performance improvement.

When implementing the strategic plan, our organization ensures that:

- Legal and regulatory requirements have been met
- Our fiscal practices are sound
- Risks are managed and losses mitigated
- Technology has been integrated
- Our human resources are valued
- We communicate and protect the rights of the people we serve
- We eliminate identified barriers to accessibility
- We share our strategic plan with persons served, employees and stakeholders, as relevant to their needs

Performance improvement is dependent on the subsequent implementation of input directed, outcome-focused strategies defined via the strategic planning process. Functional Industries' comprehensive customer driven information measurement and management system serves as an evaluative tool for these strategies. Identified outcome measures are derived from stakeholder feedback. Measures of effectiveness, efficiency, service access and quality are defined through expressed stakeholder expectations.

Once the performance improvement process has been designed, implemented, and data have been collected, we then review our results – in essence, we measure how well we have done in relation to our organizational goals and objectives. An annual written performance analysis that compares our identified performance indicators in relation to our performance targets is then completed, specifically addressing the following:

- Business functions
- Effectiveness of services
- Efficiency of services
- Service access
- Satisfaction and other feedback from person served and other stakeholders
- Extenuating or influencing factors
- Areas needing performance improvement
- Action plan to address improvements needed to reach established or revised performance targets
- Actions taken or changes made to improve performance

Annual performance analyses are used by our organization to review the implementation of our mission and core values, to improve the quality of our programs and services and to facilitate organizational decision making and ongoing strategic planning.

Accurate performance information is also provided to persons served, employees and other stakeholders as part of the strategic planning and performance improvement processes via performance analysis summaries, annual reports, presentations, trainings, poster boards and focus groups in a format that is useful to them, taking into

consideration the needs of each specific group when determining the format, content and timeliness of the information that is being communicated.

Once we have evaluated our strengths and identified where we can improve our services, we “effect change” and appropriate modifications are made to our performance improvement process. We then begin the ASPIRE model again, starting with “assessing the environment” as we continue our journey toward continuous quality improvement.

Example

Utilization of stakeholder input is essential to Functional Industries’ strategic planning process, performance measurement and management system, performance analysis, and performance improvement process. The following example reveals the central role input plays in strategic planning and performance improvement.

- Persons served identified increased community based employment success as a desired result of their participation in Functional Industries’ services. An analysis of organizational strengths, weaknesses, opportunities and threats (SWOT analysis) was conducted relative to this objective. Conducting a SWOT analysis directed the allocation of resources. Through the strategic planning process, increased community work options were identified as an organizational outcome and approaches to effecting performance improvement were identified. Measures of effectiveness and efficiency are based on consumer identified outcomes. Stakeholder feedback is one means implemented to evaluate overall performance (satisfaction) relative to this goal.

Organizational Advocacy

Functional Industries’ advocacy efforts take a variety of forms. One constant is the input driven nature of these endeavors. Recognizing Functional Industries’ position as a provider of premier vocational rehabilitation services, our focus is often brought to bear on work related issues. However, as a responsible advocate, Functional Industries maintains a “finger on the pulse” on a variety of issues (i.e. habilitation, residential services and independent living skills) to better effect positive changes throughout our service delivery systems.

Examples

Functional Industries’ organizational advocacy efforts include participation or membership in a range of organizations. Additionally, Functional Industries engages in “grass roots” individualized advocacy efforts in partnership with our stakeholders. The following examples serve as a sampling of the organizational advocacy efforts undertaken by Functional Industries:

- Functional Industries’ representatives attending interdisciplinary team meetings advocate individually for the persons we serve to fully explore vocational interests they have expressed through the individual planning process. Being fully informed of associated risks and measures taken to manage risk, we encourage individuals to take advantage of work opportunities through expounding on available vocational supports. Additionally, the composition of an interdisciplinary team allows for advocating for expressed vocational outcomes with organizations, entities and individuals that perform diverse support roles throughout the social service system. Through individual advocacy efforts, we are able to produce a systemic impact.
- The people we serve communicate their valuing employment through a variety of means. Functional Industries actively conveys this information at every opportunity to decision makers outside of our agency. Occasions to promote the value of employment include: participation on Department of Employment and Economic Development’s Performance Based Agreement Workgroup, membership in the Minnesota Organization of Habilitation and Rehabilitation (MOHR), participation on the Extended Employment – Certified Rehabilitation Providers (EE-CRP) governmental affairs committee, participation on the EE-CRP “special minimum wage impact” subcommittee, presenting at the Minnesota House of Representatives Mental Health Caucus and attendance of joint MN Rehabilitation Services/Community Rehabilitation Program Meetings.
- Functional Industries’ participation in the CommUNITY Initiative demonstrates our efforts to maintain a focus on the positive impact of work on mental health management and recovery for individuals.
- Through our ongoing involvement with the MN Business Leadership Network and MN Works Project, Functional Industries works in collaboration with the business community to promote best employment practices and enhance competitive employment opportunities for skilled candidates with disabilities. These business led endeavors advocate for vocational opportunities for individuals with disabilities from *within* the business sector. Provider members serve as a resource for businesses’ efforts to “tap into” this often underutilized labor pool. These advocacy efforts are driven by stakeholder input identifying increased community employment opportunities as a desired outcome directly related to our organizational performance improvement efforts.
- Functional Industries maintains a business membership in ARC. Additionally, individuals served, individual staff members, members of management and the Board of Directors are ARC members. Individually and organizationally, we lend our support to the advocacy efforts of ARC.

- Functional Industries' role within the Wright County DD Provider Consortium is multifaceted. First, it serves as an opportunity to promote vocation as an important aspect of a fulfilling life, as expressed by the individuals we serve. Second, contact with an array of non-vocational service providers engenders a unified approach to service delivery. Partnership and open dialogue encouraged through the consortium results in better overall service delivery. Third, participation in the consortium affords an opportunity to learn from others' areas of expertise and to educate about, as well as advocate for, vocational rehabilitative services.
- Perhaps the greatest barrier to employment for the individuals we serve involves the limited availability of transportation. Functional Industries' commitment to advocacy efforts in this area is evidenced through our active involvement on a variety of transportation advisory committees (at the local, regional and state level), our partnerships with area transit providers and the dedication of organizational resources to maintaining a fleet of vehicles.

Financial Planning

Fiscal stability is the foundation upon which Functional Industries has built our non-profit corporation. Investment of resources is based, in part, on the input we work diligently to gather from our stakeholders. As with any business, we believe it is important to provide the services our customers want in order to maintain and retain both viability and financial stability.

Examples

Financial planning decisions and actions based on stakeholder input include, but are not limited to:

- Transportation is a significant investment undertaken by Functional Industries to address a stakeholder identified need. We establish means to fund transportation, whether through budgeting funds or pursuing outside resources. Functional Industries has invested in a fleet of vehicles, including the purchase of wheelchair accessible buses through the Department of Transportation 5310 Grant process. Rising gas costs and vehicle maintenance negatively impact the cost benefit ratio of this enterprise. However, stakeholders consistently citing availability of transportation as a critical need has ensured that continued consideration of transportation funding will remain a necessary component in current and future financial planning.
- Creating an attractive, functional, safe, healthy and accessible environment continues to be accomplished through consideration of stakeholder input. Physical plant modifications represent a number of stakeholder directed financial planning decisions. Building modification projects range widely in expense. Financial planning has directed funds to projects ranging from constructing a new facility on the Buffalo Campus to lowering paper towel

dispensers and hand dryers, painting building exteriors, installing a sink at an accessible height in the Buffalo location break room, installing storage cubbies, painting building interiors, updating furnishings, installing work carrels, technology purchases, etc.

- Perhaps the greatest single financial investment for any company is in human resources. Functional Industries values our human resources and recognizes the critical role qualified personnel play in the success of our organization and the persons they serve, as voiced through stakeholder input. Concerted effort is directed at recruiting and retaining quality personnel. Our leadership's financial planning dedicates considerable resources to ensuring competitive compensation and benefits for quality staff.

Resource Planning

Allocation of resources is another area in which Functional Industries is responsive to expressed stakeholder expectations. As with financial planning, resource management is directed by the sound business practice of providing the services our customers want and delivering them in a manner they desire. Dedication of resources to program development or modification for purposes of performance improvement or service expansion are all driven by input from persons served, staff and other stakeholders.

Example

The following example is indicative of the dedication of resources to achieve and exceed stakeholder expectations.

- Identified stakeholders of Functional Industries have provided input expressing a desire for continued expansion of community employment options. Response to this stakeholder input is multifaceted. Functional Industries has embraced a paradigm switch from a traditional center based approach of service delivery to a community based model. This necessitated reorganization and restructure of programs, personnel and other resources. In this reorganization, increased resources have been dedicated to developing community based employment opportunities. Divisional changes have been instituted. More job developers have been hired. Cross training has been conducted to empower all staff to exercise their talents in increasing community based employment opportunities. Personnel whose primary job duties include job training and retention efforts have increased significantly.

Leadership

Functional Industries believes that a well-informed leadership team is essential to the success of our business enterprise. To this end, our leadership listens to, learns from and maintains familiarity with input collected from *all* stakeholders and responds to their input as appropriate.

The composition of Functional Industries' Board of Directors provides for a strong understanding of the value of input driven business practices. The board of directors represents a true cross section of the communities we serve and is comprised of parents, founders, professionals, consumer liaisons, advocates, and business persons which creates an outstanding balance of resources. Some board members have served on the board for many years, which lends stability to the organization, and provides newer board members historical perspective pertaining to the growth and challenges of the organization. The diverse experience represented on Functional Industries' Board not only promotes responsiveness to input, it also *provides* a source of valuable input.

Multiple means are employed by the board to listen to, learn from and become familiar with input collected from stakeholders. It is a function of the board and management personnel to make themselves available and to communicate on a regular basis with the people we serve, staff and other stakeholders. In an effort to facilitate access and communication, the board has directed that board meetings and other meetings and events where consumers and other stakeholders can have access to our leadership be made accessible to all persons. Additional formal and informal processes exist to insure leadership has a method to meet this obligation, including:

- Annual Review of Corporate Policies, Procedures, & Practices
- Monthly Divisional Updates
- Client Advisory Minutes
- Staff Presentations
- Steering/Leadership Committee Minutes
- Satisfaction Survey Results
- Strategic Planning Process
- Performance Analyses
- Complaint, grievance or incident report summaries
- Attendance of Functional Industries' Social Events
- Fundraising Event Participation
- Chamber of Commerce Memberships
- Service Club Memberships
- Parent Support Groups
- ARC Membership

Functional Industries' leadership contends that the "age of the customer" has arrived in employment and community services. Our governing authority believes that management lessons regarding consumer satisfaction learned from our involvement in the for-profit business world *must* be continually applied as a matter of sound business practice.

Responding to stakeholder input is a key function of our leadership, precisely because it provides opportunities to greatly improve the quality of life of the individuals we serve. To reiterate, *our business is about the people!*

Examples

Consider the following illustrative examples of our leadership's responsiveness to input:

- Input generated from Client Advisory meetings is collected and disseminated through meeting minutes, which includes review by Functional Industries' President and Board of Directors. Members of the Client Advisory actively provide input regarding their workplace. Concerns expressed by the Client Advisory Committee (CAC) result in action, particularly with regard to physical plant modifications. Some modifications resulting from CAC input

include installation of additional emergency lighting for power outages, remarking walkways on the production floor, installing storage cubbies in the break room, marking one exit and one entrance door of the break room to ease congestion during transition times, reducing work floor buzzer volume and identifying an accessible height for the break room sink.

- Consumer satisfaction surveys are completed on an annual basis and incorporated into our performance measurement and improvement system and annual performance analysis. Surveys are a central component of our strategic planning process and survey results are utilized in the formation of organizational goals. Functional Industries' Board is active in the development of organizational goals and intimately involved in the strategic planning process.
- Divisional updates provide input to the board that facilitates fulfilling their requisite duties. Divisional updates assist the board in the annual development of an operating budget that addresses all areas of operation, which reflects and anticipates needs and resources. Furthermore, through this means our leadership maintains a familiarity with ongoing program development and performance improvement efforts.
- Functional Industries' leadership remains informed of current issues through their continuing involvement with external entities such as ARC, Multiple Chambers of Commerce, Service Clubs, Economic Development Partnership, Parent Support Groups and area Workforce Centers.

ACCESSIBILITY

Principle Statement

Functional Industries works diligently to promote accessibility and the removal of all barriers for the persons served, personnel and other stakeholders. To this end, we have developed a comprehensive accessibility planning process that places emphasis on action, both proactive and corrective, to address barriers to accessibility.

Leadership

Functional Industries' administration and governing authority are actively involved in promoting and ensuring full program and service access for all persons. Our leadership's advocacy efforts include respecting ethno-cultural diversity and ensuring that language and cultural differences are not barriers to *fully* accessing and *truly* participating in all available services.

Functional Industries' leadership is committed to the recruitment of qualified persons with disabilities and/or other barriers to employment, providing reasonable accommodations to promote equal opportunities for participation throughout all levels of our organization and to providing equal access or referral to social, legal and/or economic advocacy resources.

It is the desire and responsibility of all individuals in leadership roles to advocate for:

- Equal access to all programs and services
- Value for persons receiving services
- Safety of persons receiving services

The governance utilizes a comprehensive, but “user-friendly” accessibility planning process to identify and address the needs of persons served, agency personnel and other stakeholders. This planning process is specifically designed to remove barriers that limit access to services and/or leadership.

The goal of Functional Industries' accessibility planning process is to identify and address accessibility issues in order to enhance quality of life for those served, maintain nondiscriminatory employment practices, meet legal and regulatory requirements and satisfy stakeholder expectations.

Accessibility Planning

Members of the administrative team regularly review and update Functional Industries' Accessibility Plan and assess what, if any; architectural, environmental, attitudinal, financial, communication, transportation, employment, technological, community integration or other barriers limit access to Functional Industries' services and/or leadership as identified by the persons served, agency personnel or other stakeholders. The corporate compliance officer presents the results of these administrative reviews and resultant "access plans" to the governance at regularly scheduled board meetings (as needed – at least annually).

Input regarding barriers requiring redress is communicated to the administrative team through multiple means as identified in the preceding section (Input from Persons Served and Other Stakeholders). Additional mechanisms for identifying accessibility barriers include monthly building inspections conducted by the director of facilities operations, external inspections conducted by a qualified authority including representatives from the local fire department, insurance loss control consultants and risk administrators, accessibility reviews conducted by recognized authorities in specific disability areas (MN State Services for the Blind, MN Deaf and Hard of Hearing Services, MN Brain Injury Association), accessibility checklists, building "walk-throughs" and safety committee reviews.

Accessibility plans identify barriers and the corrective action that is necessary to address them, establish a priority ranking for each item, project the costs associated with each item, identify potential funding sources, target completion dates, identify the party responsible for each item and summarize how barrier removal will facilitate consumer choice, community integration and access.

Promoting accessibility is our enduring commitment. Maintaining vigilance concerning Functional Industries' accessibility and effecting change to address integration of persons served into their communities of choice is a perpetual organizational focus. Functional Industries' ongoing planning to enhance accessibility includes:

- Promoting the recruitment of persons with disabilities or their personal representatives as members of our organization's leadership and staff
- Providing reasonable accommodations and supports to promote equal opportunity for participation of persons served as members of our organization's leadership and staff
- Providing for our organization's participation in community efforts to promote social, economic, employment and transportation opportunities for persons with disabilities

- Developing ongoing provisions to ensure that all programs and services are available to otherwise qualified persons with disabilities
- Conducting ongoing self-evaluation of our organization's programs and policies in terms of accessibility
- Developing transition plans if there is a need to remove physical barriers or obstacles
- Implementing a referral system that assists the persons served in accessing and using other resources that are accessible when an accommodation cannot be made by our agency

Examples

The following examples were taken directly from previous Accessibility Plans, for complete information readers are referred the current Accessibility Plan document.

Barrier: Concerns (in winter months) regarding consumer safety when walking across FII's parking lot when arriving to/departing from work

Solution: Coordinate a designated load/unload zone (that is adequately "de-iced") for all vans/buses at the back entrance of FII's building

Priority: A (ASAP)

Cost: \$12.00 (Ice-Melt)

Funding: General Fund

Identified by: Staff, consumer, visitor, and stakeholder oral & written concerns pertaining to the possibility of slips/trips/falls in the parking lot or on the sidewalks, due to icy conditions

Date: January 2017

Project Mgr.: Director of Buildings/Grounds, case managers & job coaches

Target: January 2017

Completed: January 2017

Remarks: Designated parking spaces for FII vans and employee vehicles were determined at the Safety Committee meeting and cones were placed in the parking lot while the new load/unload procedure was implemented and explained to all drivers (internal and external transportation providers). FII's Building & Grounds Department is responsible for keeping the designated areas free from snow and ice.

Impact: Significant reduction in minor slips/trips/falls in the FII parking lot and a safer environment for persons served, staff members, and visitors.

Barrier: Height of passenger vans makes entrance/egress difficult for persons with limited mobility

Solution: Install running boards on all passenger vans

Priority: A (next three months)

Cost: \$1,700.00

Funding: Unrestricted vehicle maintenance funds

Identified by: Internal review – safety committee & consumer advisory council

Date: March 2009

Project Mgr.: transportation coordinator & maintenance coordinator

Target: May 2009

Completed: April 2009

Remarks: Decision to install a passenger-side running board on each van resulted from a satisfactory result from installing running boards on two “test” vehicles in April of 2009.

Impact: Provided safer and easier entrance and egress from vehicles.

Barrier: The current schedule of our local transit system does not permit the persons we serve to arrive on location prior to 8:30 AM.

Solution: Work with transportation provider to change the current schedules to allow for earlier AM pick-ups

Priority: B (next year)

Cost: To be determined

Funding: To be determined – may not be necessary

Identified by: Client Advisory Committee, staff and other stakeholders

Date: November 2015

Project Mgr.: Vice President of Client Services & Transportation Coordinator

Target: Winter/Spring 2015-2016

Completed: April 2016

Remarks: Worked closely with Trailblazer Transit to change existing routes to accommodate earlier arrival at our facilities

Impact: Individuals can now participate in more hours of daily programming

Barrier: Misconceptions regarding persons with disabilities

Solution: Provide appropriate education – marketing & promotional materials

Priority: B (year)

Cost: \$3,000.00

Funding: To be determined – possibly CMIF grant funded or donations from civic groups

Identified by: Consumer Advisory Council, staff and referral sources

Date: May 2010

Project Mgr.: director of program services & president

Target: August 2011

Completed: April 2011

Remarks: “Seed money” was provided through donations from local civic organizations to secure the services of a consultant to assist in the initial development of a variety of promotional materials. Specifically, the consultant assisted us in developing a new logo and corporate “layout format” that will be used as a baseline when developing future promotional materials.

Impact: We now have attractive promotional materials that are used in our marketing and public relations activities. These materials enhance our efforts to inform the public about the programs and services we have to offer.

Integration

Assisting individuals to attain the highest degree of integration into their respective communities is integral to our mission as evidenced by our strategic planning process, performance measurement and management system, performance improvement process and general business practices. Through our involvement with area businesses and partnerships with other services, community members have come to recognize Functional Industries as a resource from which they can learn more about advocacy for the rights of individuals with barriers to employment and community inclusion. Our reputation as a leading resource on these topics expands both our opportunity and ability to promote and advocate for increased accessibility.

Examples

Accessibility, promotion and advocacy are manifest in our community involvement and provision of services to the business community. Many of the means through which we gather input are also utilized as opportunities to educate about and advocate for accessibility that leads to increased integration. Recognition of contributions made to the community by individuals with disabilities is a key component of our efforts to promote and educate. Additionally, we strive to acknowledge businesses' actions which promote integration as a means for furthering this objective. Consider the following examples:

- Area Chambers of Commerce
- Wright County Consortium
- Interdisciplinary Team Meetings
- ARC Membership
- CommUNITY Initiative
- Transportation Advisory
- Mental Health Advisory
- Staff & Board Member Orientation
- Functional Industries' Annual Report
- Workforce Development Partnership
- Community Presentations
- Sponsorship of Advocacy Education/training Events
- Brochures/Promotional Materials
- Job Fairs
- SOAR CTIC
- MN Business Leadership Network
- Meeker CTIC
- Job Development Activities
- Job Coach Services
- MRA Employer of the Year Nominations/Awards

Reasonable Accommodations

All services provided by Functional Industries are accessible to any person who meets its specific eligibility/entrance criteria. Reasonable accommodations are provided as necessary to enable individuals to fully access any desired service and *truly* participate in all activities sponsored by our organization. This includes providing equal opportunity for all persons served to participate on established committees, attend board meetings and to attend and participate in company sponsored training and/or social events. Multiple avenues for stakeholder input are utilized to identify and take action on accommodation requests. Central to this process is the comprehensive person-centered planning process that is completed with each individual served. Additionally, standing committees such as the Safety Committee, Client Advisory Committee, Board Executive Committee and Leadership Forum ascertain and act on needs for reasonable accommodations.

Examples

Implementation of reasonable accommodations is a natural feature of Functional Industries' daily operations. So much so, that they are often not even recognized as an accommodative effort. The following examples illustrate accommodations that have been made:

- Meetings to initiate services include a discussion of any accommodations an individual may need to access chosen services. At this time, individuals establish a work schedule based on hours of operation and may be adjusted to

accommodate for individual vocational rehabilitative considerations and/or functional limitations caused by disability.

- Through our comprehensive personal planning process individuals and other stakeholders identify reasonable accommodations. Collaborative efforts are then undertaken to make the accommodation. For example, an individual seeking supported employment in the community as a receptionist identified the need for a headset to effectively respond to telephone calls. A headset was purchased and training in its use was provided. Subsequently, with job development assistance, the individual secured a position as a receptionist wherein she utilized the equipment to complete her requisite duties.
- The need for environmental modifications has been identified through the accessibility plan, thus providing individual staff members with necessary accommodative equipment.
- An individual hired as a cashier at a local retailer identified the need for a platform to effectively complete his work duties. Functional Industries' Job Developer worked with the individual, at his and the employer's request, to purchase the construction of a platform.
- Educational efforts are often employed to assist in implementing reasonable accommodations. Many employers have instituted prescriptive attendance policies. Individuals who struggle with attendance due to their mental health symptoms are often impacted negatively by these policies. There have been several local employers who have made a reasonable accommodation, relative to their attendance policy, to maintain the employment relationship with a quality employee after benefiting from Functional Industries' educational intervention and assistance.

PERFORMANCE MEASUREMENT, MANAGEMENT & IMPROVEMENT

Principle Statement

Functional Industries shares and provides persons served and other interested stakeholders with ongoing information regarding actual performance as a business and our ability to achieve optimal outcomes for persons served through our programs and service provision. Functional Industries is committed to the process of continuous quality improvement as evidenced through the utilization of stakeholder input to develop and implement performance improvement strategies.

Data Collection

Functional Industries utilizes our strategic planning process to insure organizational responsiveness to the changing needs of stakeholders and to maintain a viable performance measurement and management system and performance improvement process to guide our leadership in business practice. Key to our strategic planning and performance improvement processes is the collection of *input*, as outlined in planning and performance improvement documents and this manual. Because our customers define quality, it is important to understand *their* quality outcome expectations. While collection of demographic information is essential in delineating our key customers, it is imperative to go beyond this identifying information. Functional Industries' person-centered planning process moves beyond the merely demographic and seeks to elicit input regarding reasons for seeking service, desired activities and goals that persons served wish to achieve. Additional tools for eliciting input ensure accuracy in establishing desired outcomes and corresponding performance measures.

Functional Industries' performance measurement and management system collects data that allow for comparative analysis that address the needs of persons served and other stakeholders, as well as Functional Industries' business needs and include:

- Financial information
- Accessibility information
- Resource allocation
- Surveys, as applicable
- Risk management
- Reports pertaining to governance, as applicable
- Human resources activities
- Technology
- Health & safety reports
- Strategic planning information

- Trends in the field, including research findings, as applicable
- Service delivery

The data collected, as listed above, is used to set written business function and service delivery objectives, performance indicators and performance targets.

Performance targets, or desired outcomes, established through this planning process are monitored, as well as benchmarked, through the performance measurement and management system and performance improvement process. This system outlines performance indicators and measures in the following areas:

- Business function
- Effectiveness and efficiency of services
- Service access
- Satisfaction and other feedback from persons served and other stakeholders

Our system also addresses the following for each indicator measured:

- To whom the indicator will be applied
- Identification of the person(s) responsible for collecting the data
- How and from what source the data will be collected
- A performance target based on an industry benchmark, Functional Industries' history, or established by Functional Industries or other stakeholders
- Extenuating/influencing factors that should be considered when analyzing performance

Sample performance measures include achievement of stakeholder identified outcomes, consumer satisfaction with outcomes and service delivery, service utilization, timelines of services, service delivery cost per service unit, increased earnings and increased hours worked.

For business function improvement, our system sets and measures performance indicators utilizing data from the following areas:

- Financial information
- Accessibility
- Resource allocation
- Surveys
- Risk management and analysis
- Human resources
- Technology analysis
- Environmental health and safety
- Field trends, including research findings
- Service delivery system

For service delivery improvement, our data collection system:

- Includes the characteristics of the persons served
- Collects data on persons served at:
 - The beginning of services
 - Appropriate intervals during service
 - The end of services
 - Point(s) in time following services

Information Utilization

Functional Industries utilizes a strategic planning process that works together with the performance improvement system in an effective and efficient manner for continuous organizational improvement. The information that is obtained from all of our stakeholders is assessed and used as a foundation for our strategic planning process and for the formulation of organizational outcomes. The organizational outcomes are outlined and measured in the performance measurement and management system and highlighted in the strategic planning process for organizational improvement.

Functional Industries uses the information gained during the strategic planning and performance improvement processes and through the performance measurement and management system to accomplish the following:

- Develop and revise the mission, vision, core values and purpose of Functional Industries
- Conduct financial management and budget planning
- Enhance our communication with stakeholders and enhance our understanding of their needs
- Use information for continuous organizational improvement
- Develop our staffing patterns and employee resources
- Improve our marketing strategies and job development services
- Maintain outcome information regarding organizational performance that can be used in grant applications, press releases, annual reports, marketing events and information for new referrals
- Identify efficient and effective service models that utilize a best practices approach
- Develop employee performance appraisal systems that are clearly linked to organizational outcomes
- Utilize information for employee recognition
- Information regarding outcomes achieved is used to assist in securing new funding
- Conduct organizational planning for both long range and short term
- Develop a broader understanding of consumer outcomes
- Analyze information for common issues and develop an action plan for solutions
- Develop a plan for service expansion and new service needs based on consumer characteristics, trends, local gaps in services and input from stakeholders

Through the strategic planning and performance improvement processes and performance measurement and management system, Functional Industries uses the measured results to continuously improve services. We identify service areas for potential growth and improvements. Outcome information is incorporated into our financial management systems and budget development. Staff development programs are designed to assist in promoting and achieving organizational outcomes. Organizational performance information is used when responding to requests for proposals and grant applications.

The tracking of consumer characteristics, trends and demographics is completed to strategically plan for future service needs and growth opportunities. We use knowledge of consumer characteristics as an essential tool for establishing staffing patterns, planning for employee development, organizational positioning, developing networks and community partnerships, increasing referrals, conducting SWOT analyses and understanding consumer outcomes.

We value the importance of using the input and additional information that we have gained from our stakeholders throughout our organizational planning. Stakeholders are provided with information regarding their impact on organizational improvement through team meetings, annual reports, presentations, trainings, poster boards, our performance measurement and management system, and performance analysis summaries.

Functional Industries is committed to the continuous improvement of the quality of service delivery. We recognize the importance of obtaining and utilizing information from our stakeholders in the strategic planning and performance improvement processes and our performance measurement and management system. We have developed a broad range of tools to successfully gain valuable input from our stakeholders and use this information for the ongoing enhancement of our services.

The strategic planning process, performance improvement process and performance measurement and management system are the foundation for continuous improvement for all of Functional Industries' business practices, service delivery systems, human resource practices, organizational structure and corporate growth strategies. Specific examples of the ways that Functional Industries utilizes the strategic planning process and the performance improvement process for continuous organizational improvements are delineated in the referenced documents.

Data Integrity

Accurate and consistent data is the deciding factor in our organizations maintaining a fact based decision-making model. Data elements collected by our organization are direct stakeholder desired outcomes provided through exhaustive input solicitation efforts. Validity of collected data is bolstered by its composition of directly observable event occurrence, verifying that we have measured what was intended to be measured. Additionally, the outcome data utilized in our strategic planning process and performance

measurement and management system is quantitative and clearly defined which assists in ensuring reliability. Examples of the data points utilized by our systems include:

- Number of available work options
- Employment attained
- Number of placement hours to obtain employment
- Average wage
- Movement between programs

Measures of effectiveness, efficiency, service access and satisfaction of persons served and other stakeholders are applied to the organizational goals set forth through the strategic planning process. Multiple data sources are utilized to ensure accuracy, reliability and completeness of data.

Business Improvement

Input and data collection paired with shrewd analysis are the cornerstones of our business. Functional Industries continually collects information from a wide variety of sources, as outlined in the *Input from Persons Served and Other Stakeholders* section of this manual. The analysis of this data serves as the basis for business improvement decisions. Functional Industries' entire strategic planning and performance improvement processes and performance measurement and management system are founded on input from stakeholders and completion of SWOT analyses. Financial planning and resource management activities include consideration of desired outcomes as identified through the strategic planning process. Business growth is contingent on increasing service provision to include underserved groups. One way we approach this expansion of business is through consideration and implementation of an accessibility plan supported by the annual budget.

Functional Industries is committed to risk analysis and risk management activities as an integral component of our business improvement efforts. Functional Industries' President annually presents the board of directors, for their approval, a comprehensive risk management strategy that will adequately protect Functional Industries and its resources.

This includes developing a risk management plan that incorporates insurance policies providing adequate amounts and types of coverage that protect assets and defend individuals, such as staff, board members and persons served against claims due to adverse events for which the organization is liable.

The risk management plan must include the following insurance coverage types: vehicle, workers' compensation, directors and officers' liability, errors and omissions, property and casualty.

While insurance coverage is an important factor in managing risk, Functional Industries believes the proactive elements of our risk management procedures are equally important. Measures taken to mitigate risk include: comprehensive health and safety procedures, written procedures regarding communications that address media relations and social media, emergency management plans, personnel training programs (e.g., first aid, CPR, VA reporting, defensive driving), OSHA compliance, facilities maintenance, accessibility planning and corporate compliance policy.

Service Delivery Improvement

Functional Industries exists to make a difference in the lives of persons served; our business *is people*. Performance measurement data is based on the achievement of outcomes, including service effectiveness, efficiency in achieving outcomes, service access and levels of satisfaction expressed by persons served and other stakeholders. Performance achievement level is benchmarked through historical performance as

delineated by the performance measurement and management system. This provides a baseline against which to compare ongoing performance improvement.

Functional Industries' performance measurement and management data collection system is composed of a variety of elements including:

- Semi and Annual Interdisciplinary Team Meetings
- Annual Surveys
- Consumer Rosters
- Job Placement Statistics
- Consumer Wage Reports (90 day average reports)
- Accounts Receivable Customer Analysis Report
- Extended Employment demographics

Identifying characteristics of persons served, as well as those awaiting service or referred elsewhere, assists Functional Industries to effectively position itself and the services we provide. Demographic information collected includes age, gender, ethnicity, educational level, living arrangements and primary language. Demographic information is collected through means such as:

- Initial Meetings
- Extended Employment Demographics
- Consumer Roster
- Emergency Information Sheets
- Individualized personal planning documents

This information aids in the identification of additional markets for services, directs service delivery planning to address unmet needs and assists in strategic planning.

Examples

- Demographic data identified an under met need for employment placement services for individuals with mental illness. Functional Industries was able to secure grant funds and adjusted service delivery to a day treatment conversion model of supported employment. Additionally, identification of this service need lead to the development of Functional Industries' Adult Rehabilitative Mental Health Services provision, thereby meeting a service need and cultivating an additional funding stream.
- Information collected indicated individuals who are deaf and hard of hearing were underserved. This information directly impacted our accessibility planning to direct the purchase of communicative devices to increase service access. Additionally, it promoted Functional Industries to partner with multiple entities to provide training to improve quality of service provision for individuals with hearing impairments.

Information regarding persons served is collected on an ongoing basis. Information collected at service initiation provides a baseline that allows for comparative analysis as information is collected throughout a person's tenure in our programs, including at service completion. Follow up information is sought following services through survey information.

Indicators of outcomes are identified and collected based on input from persons served. The data contained within our performance measurement and management system allows us to generate reports of aggregate data in terms of effectiveness, efficiency, service access, satisfaction of persons served and other stakeholders and the characteristics of persons served. These reports are completed on all individuals served. The reports are written in a format that provides for interpretation of results and to document suggestions for improvement.

Performance Information Dissemination

Performance improvement is dependent on the subsequent implementation of input directed, outcome-focused strategies defined via the strategic planning process. Functional Industries' comprehensive customer driven performance measurement and management system serves as an evaluative tool for these strategies. Identified outcome measures are derived from stakeholder feedback. Measures of effectiveness, efficiency, service access and quality are defined through expressed stakeholder expectations.

Once the performance improvement process has been designed, implemented, and data are collected on an ongoing basis, we then review our results – in essence, we measure how well we have done in relation to our organizational goals and objectives.

An annual written performance analysis that compares our identified outcome measures to our targets is then completed, specifically addressing the following:

- Business functions
- Service delivery of each program seeking accreditation including:
 - Effectiveness of services
 - Efficiency of services
 - Service access
 - Satisfaction and other feedback from person served and other stakeholders
- Areas needing performance improvement
- Extenuating or influencing factors
- Action plan to address improvements needed to reach established or revised performance targets
- Actions taken or changes made to improve performance

Annual performance analyses are used by our organization to review the implementation of our mission and core values, to improve the quality of our programs and services and to facilitate organizational decision making and ongoing strategic planning – to capitalize on organizational strengths or to assist in making revisions or improvements in any areas showing weakness.

Accurate performance information is also provided on a timely basis to persons served, employees, the public, purchasers of service and other stakeholders in a format that is useful to them. The format, content and timeliness of the information communicated may vary depending on the specific needs of the identified group. In addition, reports are reviewed annually by the board of directors and administrative staff to ascertain their appropriateness to the needs and characteristics of persons served. Means used to share performance information may include:

- Performance Analyses
- Strategic Planning Process
- Board Meetings
- Flat Screen TV in FII's Corporate Office
- Interdisciplinary Team Meetings
- Trainings
- Annual Reports
- Poster Boards
- Brochure Materials
- Presentations
- Functional Industries' website
- Focus Groups

Information Technology

Utilization of information technology is an integral component of modern business practice and strategy. Functional Industries recognizes the importance of maintaining uninterrupted service and guarding against possible threats. Our organization also understands the expertise required for system configuration, maintenance and troubleshooting. Functional Industries partners with external professionals, recognized for information technology (IT) expertise, to provide guidance for the continued development and maintenance of our information technology system needs and identify specific items needed in our technology plan to support information management, as well as our performance measurement, management and improvement activities for service delivery and business functions.

Nor-Tech assisted with the configuration of our organizational computer systems and infrastructure and continues to provide expertise in ongoing evaluation of system needs. Additionally, at least annually, we mutually review and assess hardware and software needs/updates when we review our technology plan.

Software support comes through four primary entities: CGS, Inc., MN DEED (Minnesota Department of Employment and Economic Development), Nor-Tech and Krim Technology Solutions (KTS). CGS, Inc. provides ongoing technical support relative to our accounting software. MN DEED supports all state funded billing submission software. Nor-Tech supports our operating system and Microsoft business software. Krim Technology Solutions, in collaboration with Nor-Tech, ensures our technology and system plan is appropriate and adequately meets our organizational needs as technology rapidly changes.

Network system security access is limited to Functional Industries' President, Vice President of Human Resources, Director of fiscal management, Human Resources and Information Technology Generalist.

Functional Industries, with the professional partnership through Nor-Tech and Krim Technology Solutions, has implemented a technology and system plan that addresses the following elements:

(see FII's Technology Plan for greater detail)

- Hardware
- Software
- Security
- Confidentiality
- Backup policies
- Assistive technology
- Disaster recovery preparedness
- Virus protection

Each computer terminal is password protected. Passwords are maintained secure by the human resources generalist in our HRIS software. All staff members are orientated to the computer use and access policy delineated in the employee handbook. Staff members receive training to "lock" their individual terminals when they are booted but unattended. Password protection is utilized to ensure access to confidential information is limited to appropriate personnel. Payroll information, for instance, is accessible only to the president, vice president, director of fiscal management, vice president of human resources and human resources generalist.

Backup of information systems includes external hard drives that are backed up nightly. External hard drives are changed out, in conjunction with the monthly reboot of our servers, and then are stored off site to ensure protection. Functional Industries' IT tech liaison tests the servers and backup system remotely on a monthly basis.

Functional Industries' personnel maintain a general awareness of assistive technologies available. Our organization works in partnership with external authorities including:

- System of Technology to Achieve Results (STAR)
- MN Deaf and Hard of Hearing Services

- State Services for the Blind
- MN Brain Injury Association
- Postsecondary Education Programs Network (MCPO)
- MN Rehab Services Division of Dept. of Employment and Economic Development

Virus vulnerability is monitored through our partnership with Nor-Tech. Nor-Tech technical support notifies Functional Industries of new or emerging threats and installs patches or fixes as they become available.

In addition to the expertise provided through external partnerships, Functional Industries' personnel are involved in system design through non-technical means. While we do not currently provide services via the internet, our organization has identified, through technology planning, the benefits of utilizing our website to increase access to services through online information and potentially through online registration. To this end, we have enhanced our website and continue with website development and will be addressing issues such as security, alternative access formats, obtaining feedback regarding our website's "user-friendly" interface, dedication of personnel and links or connections with affiliates through technology planning tools available through www.techsoup.org. By utilizing the technology planning tools available through TechSoup, we are able to put forth our expertise regarding vocational rehabilitation when planning with IT professionals for our unique IT needs.

RIGHTS OF PERSONS SERVED

Principle Statement

Functional Industries is committed to protecting and promoting the rights of persons served. This commitment guides the delivery of services and our ongoing interactions with the persons served and their legal representatives.

Communication of Rights

Functional Industries has implemented a system of rights that nurtures and protects the dignity and respect of the persons served.

Staff members are responsible for ensuring that rights information is transmitted in a manner and fashion that is clear and understandable. Rights information is included in handbooks, conveyed in annual and semi-annual individual planning meetings and may be presented through audiotapes, videotapes, pictures and other formats. Dedicated efforts are made to clearly communicate and educate people regarding governmental policy, current laws and regulations that establish rights, including but not limited to, labor law.

Functional Industries believes that understanding rights entails more than knowledge of associated entitlements. We contend that true/complete comprehension of rights information includes awareness of corresponding responsibilities, limitations and any mitigating factors. Concerted effort is devoted to conveying complete rights information to the individuals we serve that are always available for review and/or clarification.

In addition to rights training, persons served are encouraged and supported in self-advocacy efforts. These efforts place great emphasis on facilitating the comprehension of rights, taking into consideration cultural differences, ethnicity, academic aptitude and learning styles of persons served.

Examples

Some examples of the venues for communicating rights to the individuals we serve include:

- Consumer Bill of Rights
- Initial Planning/Orientation Meetings
- Annual Individual Planning Meetings
- Interdisciplinary Team Meetings
- Program Participant Handbooks
- Website
- Marketing Brochures
- Organizational Code of Ethical Conduct

- Client Advisory Meetings
- Postings (wage and hour, ADA, EEOC, etc.)
- Employee Development Classes
- Rights Training
- Right to Know, Grievance Policies & Procedures
- Formal/Informal Face to Face Discussions
- Benefits Management Meetings

Diversity

Functional Industries embraces the diversity of the individuals we serve. Recognition of the unique qualities of each individual is evident in our individualized person-centered planning process. Service delivery is directed by individuals served identifying and choosing the services they want, and then determining how these services will be delivered to best meet their needs. Focusing on individuality in service provision effectively addresses many diversity issues. Further, awareness of the diversity present in the group of persons we serve promotes sensitivity to issues based on factors such as culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status and language. Provision of quality outcomes is dependent on our awareness of, as well as, sensitivity and training specific to, our local community. While the cultural aspects of our local community are relatively homogeneous, Functional Industries continues to take the initiative in identifying and addressing diversity factors through human resource management, personnel training, and accessing training resources in the community. Documentation revealing our responsiveness to issues of diversity is found in:

- Consumer Rights
- FII's Cultural Competency and Diversity Plan
- Initial Program Planning/Orientation Meeting Notes
- Individual Service Plans
- Personnel Training Files
- Functional Industries' Accessibility Plan
- Functional Industries' Sponsored Trainings
- Consultation with External Authorities
- EEOC Compliance
- Personnel Policies
- Handbooks
- Website

Examples

The following examples demonstrate our commitment to recognizing and responding to diversity. Some instances reflect efforts associated with the individuals we serve, while others reveal action taken regarding diversity in the context of the greater community. Larger community efforts demonstrate our integrated approach to business practice by their impact on program expansion, accessibility, diversity awareness, etc.

- Demographic information available through local labor market statistics indicated a growing population of Spanish speaking individuals. Functional Industries hired a job developer who is bilingual in Spanish and English and is versed in Hispanic culture.
- Personnel receive training specific to types of disability. For instance, one case manager receives continued training on aspects of mental health service provision, another focuses on learning about and being sensitive to the unique issues relative to Traumatic Brain Injury.
- Functional Industries consulted with a regional manager of MN Department of Deaf and Hard of Hearing Services. While the consultation served to identify accessibility recommendations to be addressed through our Accessibility Plan, it also increased cultural competency in service provision.
- Functional Industries co-sponsored a training event for employment specialist professionals with RSA Region V CRP-RCEP; Midwest Center for Post Secondary Outreach; MN Department of Economic Security; Vocational Rehabilitation Services, V.R. Program; The Center for Sight and Hearing, Rockford, Illinois and the U.S. Department of Education. The training focused on provision of vocational rehabilitation services to people who are deaf or hard of hearing.

Rights Policies

Functional Industries ensures that the rights of persons served are protected and that we are complying with current governmental laws and regulations by maintaining current information regarding rights, updating our policies and procedures as needed and providing ongoing training on the topic.

Comprehensive policies regarding the protection of human rights and the dignity of persons served have been developed, adopted and implemented. Rights policies are communicated to the persons receiving services in a manner understandable to them prior to service delivery and through regular (annually for persons served longer than one year) updates throughout their tenure at Functional Industries.

Functional Industries, Inc. has developed an array of policies, procedures and practices to promote the following rights of the persons served:

- Confidentiality of information
- Privacy
- Freedom from abuse, financial or other exploitation, retaliation, neglect or humiliation
- Access to their own files & pertinent information to assist with decision making
- Access/referral to legal entities for appropriate representation

- Access to self-help and advocacy support services
- Adherence to research guidelines and ethics when persons served are involved
- Investigation and resolution of alleged infringement of rights.
- Other legal rights
- Informed consent or refusal or choice regarding:
 - Service delivery
 - Release of information
 - Concurrent services
 - Composition of service delivery team
 - Involvement in research, grants, and/or “demonstration projects”

Examples

Documentation of policies and practices promoting rights of persons served include:

- Consumer Rights
- Individualized Person-Centered Service Plans
- Codes of Ethical Conduct
- Health Insurance Portability and Accountability Act (HIPAA) and Personal Information and Protection Electronic Documents Act (PIPEDA) Statements
- Maintenance of a single confidential record for each person served
- Consent for Release of Information forms
- Tennessee Forms
- Notice of Privacy Practices
- Initial Program Planning Meeting Notes
- Interdisciplinary Team Meeting Notes
- Grievance and Appeal Process Policy Statements
- Right to Know Policy/Forms
- Sign out/in sheets
- Posting requirements
- Client Rights Acknowledgement
- Client Advisory Committee Minutes
- Board Meeting Minutes
- Employee and Program Participant Handbooks
- Staff Training Files
- VA Training Materials
- Common Entry Point Forms
- Internal Investigation Results Summaries
- Website Postings

Organizational policies, procedures and practices are designed to nurture and protect the dignity and respect of the persons served.

Confidentiality

Confidentiality of information is a basic tenet of Functional Industries' business practices. A variety of policies, procedures, processes, and practices are in place to maintain the confidentiality of information.

Explanation and utilization of a Tennessee Warning at service initiation is one obvious example of confidentiality in practice. Written policy specifies instances in which signed, informed consent for the release of information is obtained and retained. Procedures are in place to assure that the person served or his/her legal representation authorizes the release of confidential information. Information released is limited to specific information for a specified purpose. These practices are further evidence of our commitment to maintaining confidentiality.

Privacy

The expectation of privacy is a fundamental human right. Every effort is made to afford individuals served the same degree of privacy *anyone* might expect. In instances where the expectation of privacy is limited, full disclosure of those limits is required as a matter of course. Most commonly, limits to privacy are based on desired service, such as assistance with personal cares; such instances are documented through the individual service plan and detailed in supporting documentation.

Freedom from Abuse

The Vulnerable Adult Abuse Prevention Act established in MN Statutes 626.557 governs Functional Industries' policy regarding freedom from abuse, financial or other exploitation, retaliation, humiliation or neglect. It is the policy of our organization to provide for the full implementation of all requirements of this law. Employees are responsible for developing a full knowledge of the law and its protections, and reporting all suspected maltreatment of individuals served. Functional Industries' staff receives vulnerable adult abuse prevention training to ensure implementation of all related policies and procedures. Our dedication to abuse prevention goes beyond our obligatory role as mandated reporters to include staff training directed at prevention, conveyance of rights to individuals served, internal investigation of reported maltreatment and reporting to appropriate law enforcement and/or human services agencies.

Information Access

Informed choice and consumer directed service provision dictate that individuals have access to pertinent information, in sufficient time, to facilitate decision making. Persons receiving services have access to their own records. Relative policies and procedures are located in non-staff employee handbooks and reviewed during initial orientation to services and then on an annual basis for individuals employed longer than one year. Functional Industries' individualized person-centered planning process directs sharing of

pertinent information with persons served precisely because they are the decision maker in our service delivery model.

Informed Consent, Refusal and Choice

Informed consent or refusal and expression of choice are the premise for Functional Industries' individualized personal planning process. Central to our service delivery strategy is the goal of empowering individuals to maximize their employment, independence, inclusion and integration into the community, and to increase their social and economic self-sufficiency through "self-determination". Self-determination is a process that differs from person to person according to what they determine is necessary and desirable to create a meaningful life and satisfying career. Individuals served are free to choose only the services they want and to determine what ways services will be delivered to best meet their needs. Our services specifically acknowledge the rights of the person served to take charge and responsibility for their lives and their careers. In our programs the individual, not the service delivery system, determines:

- The types of services he or she desires and who will provide them
- What, if any, information is released, and to whom it will be released
- Concurrent Services
- Composition of their service/interdisciplinary team

Policies and procedures are in place to provide for the investigation and resolution of alleged infringement of rights.

Access and Referral

Functional Industries does not provide every service a person may want or need. When this is the case, staff members may refer persons served to services outside our organization and coordinate these services with those provided through our programs. Functional Industries' awareness of community resources is developed through our active involvement with area businesses, partnerships with other service entities and our dynamic processes for information exchange. Stakeholders recognize us as a resource and look to us to provide information when they identify desired services that we do not directly provide (e.g., legal, self-help, advocacy, etc.) Functional Industries maintains current information on external resources through the following affiliations and awareness of informational authorities:

- Wright County Provider Consortium
- ARC Membership
- Workforce Development Partnership
- CommUNITY Mental Health Initiative
- Chambers of Commerce
- Transportation Advisory Committee
- Mental Health Advisory Committee
- Minnesota STAR Program

- Handy Tech of North America
- Postsecondary Education Programs Network (MCPO)
- MN Brain Injury Association
- Ombudsman Project
- Legal Assistance Project
- Wright County Intake and Referral Unit
- Consumer Survivor Network
- NAMI
- MN Department of Employment and Economic Development
- Friendship Ventures
- Camp Courage
- CommUNITY Initiative Vocational Committee
- External Authorities' Final Disposition Reports

Complaint, Grievance and Appeal Processes

Conflict resolution information is provided to persons served and/or legal representatives in a manner that is understandable to them. Staff members ensure that persons served and/or legal representatives are aware of and know how to resolve conflicts, should any arise. Generally, conflicts pertain to matters between the person receiving services and/or legal representatives and a staff member. Initial attempts to resolve conflict include discussion and/or mediation. However, if these attempts are unsuccessful, formal action, as outlined in Functional Industries' Grievance Procedure is used.

Formal grievance and appeal processes are in place that:

- Demonstrates our agency's knowledge and implementation of applicable regulatory guidelines and legal requirements
- Specifies actions taken will not result in reprisal
- Are understood by persons served, advocates, legal representatives, etc.
- Allows formal complaints to be voiced and heard
- Provides for a written a response to the stakeholder regarding the actions to be taken to address/resolve the specific complaint
- Allows decisions to be challenged
- Specifies timelines for each step of the process
- Clarifies the rights and responsibilities of each party
- Addresses the availability of advocates and other assistance

Functional Industries' formal grievance processes contain elements similar to those found in plans developed by government, local school districts, protection and advocacy groups, client assistance programs, employment agencies, funding sources and other businesses.

Established guidelines include procedures for level of review and the rights and responsibilities of each party involved in the grievance. Our formal grievance process allows a complaint to be heard, and our appeal process allows a decision to be challenged.

Documentation of conflict resolution efforts and our formal grievance procedure consist of:

- Program Participant Handbooks
- Client Advisory Minutes
- Grievance Procedure Acknowledgement
- Interdisciplinary Team Meeting Notes
- Board Minutes
- Individualized Person-Centered Service Plans
- Case Notes
- Incident Reports
- Employee Development Class Curricula
- Satisfaction Surveys
- Suggestion Boxes
- Stakeholder Input Collection Methods
- Steering Committee Minutes
- Website Posting

Functional Industries' governing body conducts an annual review of complaints to determine the existence of any trends, identify areas for performance improvement and note any actions that need to be taken.

Our system of formally reviewing complaints, grievances and appeals assists in risk management and provides valuable information that is used to facilitate change that results in better customer service. This comprehensive review is helpful in identifying changes that need to be made in service delivery and in determining the effectiveness of changes that have been made.

HEALTH AND SAFETY

Principle Statement

Functional Industries promotes and provides healthy, clean and safe environments that support quality services and minimize risk of harm to persons served, employees, individuals conducting business with our company and other stakeholders. Written procedures promote the safety, manage risk and protect individuals whenever/wherever services are provided.

Health and Safety Training

Functional Industries maintains that health and safety are everyone's responsibility. The president, or designee, is responsible for ensuring that ongoing competency-based training is provided to promote awareness of this fact.

Mandatory health and safety training for personnel occurs at the time of hire and on an annual basis for personnel employed more than one year. Identified areas of need, corporate policy and contractual and legal requirements guide the specific type and frequency of training provided.

Curriculum for competency-based training sessions/programs is directed by input from local authorities with expertise in areas such as: health, safety, risk management, law enforcement, emergency response, health care and legal referral.

Specific training is provided to staff based on; the identified need of the persons they are serving; the services they will be providing; and to ensure that governmental regulations and legal requirements are satisfied.

Regular competency-based training occurs on the following topics and techniques: health and safety practices, identification of unsafe environmental factors, emergency plans/procedures, evacuation procedures, identification/reporting of critical incidents, reducing physical risks, CPR, first aid, fire suppression, management of aggressive behavior, infection control and hazardous materials handling.

Emergency Plans and Evacuation Procedures

Functional Industries has written emergency plans to comply with, as well as compliment, local requirements for dealing with the following emergency situations: fires, natural disasters, utility/water outage, workplace violence, safety during violent or other threatening situations caused by an external entity, medical emergency, bomb threats, and evacuation.

Functional Industries' Health and Safety Committee has developed written procedures to address the following aspects of evacuation:

- When evacuation is appropriate
- Complete evacuation from the physical facility
- The safety of evacuees
- Accounting for all persons involved
- Temporary shelter, when necessary
- Identification of essential services
- Continuation of essential services
- Emergency phone numbers
- Notification of appropriate emergency personnel
- Essential notification of other essential stakeholders

Functional Industries tests emergency plans on a monthly basis on each shift. At least one emergency plan- (e.g., the plan for fires, tornadoes, bomb threats) is tested monthly on a rotating basis at all locations owned, occupied, rented or leased by Functional Industries. Emergency plan tests result in a written drill performance report. Results are immediately reviewed, possible remedies are identified/implemented and drills are rerun to achieve satisfactory results, as needed. Results are also analyzed for performance and address areas needing improvement, required corrective action to be taken, results of performance improvement plans, and recommended education and training. At least quarterly, at safety committee meetings, the types of plans tested during the preceding quarter are reviewed by the committee to determine whether corrective actions are necessary to achieve desired results. Review results are contained in safety committee meeting minutes.

It is the responsibility of the president, or designee, to ensure that corrective actions identified by the safety committee are instituted. Documentation of any corrective actions taken is maintained in safety committee meeting minutes and the emergency drills report log. Documentation includes a description of any action to be taken, persons responsible for implementation and follow-up to ensure action was taken that resolved the problem(s).

Divisional directors are responsible for ensuring that all persons served, personnel and frequent visitors to our facilities receive training regarding what action to take in case of emergency. Training is conducted during initial orientation to Functional Industries and on a regular basis (annually for persons employed more than one year) throughout their tenure with our organization.

First Aid

Functional Industries' commitment to providing a safe environment is reflected in the first aid expertise and emergency resources that are available to meet the needs of the populations we serve; including people trained to respond and locating first aid

equipment and supplies in locations that are known and quickly accessible during work hours.

The Health and Safety Committee utilize guidelines established by local health and safety authorities to assist in identifying employees that are mandated to receive training in first aid and CPR. The need for specific training is documented in the employee's signed position description, indicating that the employee has been informed of the need for this training to continue in their employment.

A policy is in place that specifies the time frame within which training is to be completed. In addition, the vice president of human resources has implemented a procedure to track the completion of mandatory training so that all employees participate within the specified time period.

Our organization has implemented guidelines as defined by local health and safety authorities on the availability of first aid equipment and supplies. First aid supplies and equipment is readily accessible to personnel. First aid kits contain items recommend by health and safety authorities and are available at all sites where services are provided and in all agency owned vehicles.

First aid supplies are regularly checked by designated members of the Health and Safety Committee and replenished as needed. A monthly checklist is completed by designated personnel documenting that required items are available and that outdated supplies are appropriately disposed of. Designated personnel are responsible for immediately procuring any needed items.

Policies and procedures are in place to ensure that information about persons served is readily available to personnel on a need-to-know basis. An initial orientation to emergency information on persons served is provided immediately to employees upon their employment. A procedure has been established to document this orientation to ensure that employees participate in a timely manner.

Initial orientation to emergency information includes general information regarding significant medical needs, training in specialized care and location of emergency contact information. The names and phone numbers of doctors, legal representatives and other significant persons are kept in assigned areas accessible to designated personnel, as identified by procedures. The phone numbers of the local police/sheriff, ambulance and fire department are displayed near all phones (land lines), two-way radios, and on staff name badges.

New employees are required to provide emergency contact information at the time of hire. This information is contained in their personnel file and can be easily accessed by designated personnel in case of an emergency.

Emergency information pertaining to the persons served is maintained in their case file and is readily available in case of emergency. Portable files containing emergency

information are utilized when services are provided off-site (e.g., crews, enclaves, etc.). Case managers are responsible for ensuring that current emergency contact information is maintained for each individual they serve.

Critical Incident Identification, Analysis and Reporting

It is the responsibility of the president, or designee, to ensure Functional Industries' practices follow all legal and contractual requirements for reporting of incidents to the proper authorities.

Written procedures vary in form and format, but all procedures for incident reporting address:

- Prevention
- Prompt reporting of each incident to:
 - Identified person within Functional Industries
 - Regulatory agencies as required
- Identification, documentation, remedial action and timely debriefings after all reportable events includes, but is not limited to:
 - Medication errors
 - Use of seclusion or restraint
 - Incidents involving injury
 - Communicable diseases
 - Infection control
 - Violence and aggression
 - Use or possession of weapons
 - Elopement and/or wandering
 - Vehicular accidents
 - Biohazard incidents
 - Unauthorized use or possession of licit or illicit substances
 - Abuse or neglect
 - Sexual assault
 - Suicide or attempted suicide
 - Other sentinel events

Policy has been developed that includes procedures for determining what constitutes a critical incident, how investigations are to be conducted, how documentation is to be completed, who is responsible for completing documentation, who is to be notified and where documentation of incidents is to be kept.

Division directors are responsible for ensuring that all staff members are aware of incident reporting procedures. Incident reporting requirements are reviewed during each staff member's initial orientation and further training is provided on an ongoing basis.

Standardized forms are used to report incidents, accidents and injuries. Copies of completed forms and written documentation summarizing the incident, accident or injury are retained in incident logs, records of persons served and/or personnel files.

These reports and summaries, along with reports of any "near-misses" (situations where serious consequences were avoided) are reviewed by the safety committee and Functional Industries' leadership. The purpose of this review is to identify and eliminate hazards, review and analyze trends and promote a safer environment.

Incident reports are reviewed at safety committee and administrative team meetings in an effort to identify trends and/or frequency of certain incident types. If trends or increased frequency in certain incident types is identified, the safety committee identifies, and documents in meeting minutes, measures instituted to reduce the likelihood of similar incidences recurring. This information is communicated to the president and other appropriate parties. Quite often specific incidents and the action taken become the topic of future staff training.

A training system is in place that ensures that all personnel are trained, and are aware of, incident reporting requirements. This training takes place at the time of hire, on an annual basis for individuals employed more than one year and on an "as needed" basis. Documentation of completed training is included in the employee's personnel file and is reviewed by his/her direct supervisor at the employee's annual review.

The reporting of all critical incidents is required. Timely reporting of incidents ensures that significant information is communicated and that significant events that could jeopardize the health and/or safety of consumers and personnel are reported.

A form for reporting critical incidents has been developed to ensure that all necessary information about the incident is included. Information that is required to complete this form includes the time, date, and location of the incident; who was involved; what led to the incident; a detailed description of what happened; the consequences of the incident; witnesses; who was notified; and follow-up recommendations. Personnel completing this form are responsible for providing descriptive and factual information and for forwarding a copy to the corporate compliance officer.

It is the responsibility of the corporate compliance officer to determine what format and where the documentation of incidents will be maintained. He/she is responsible for ensuring that incident reports are stored in a secure area and developing timelines for how long documentation of critical incidents must be kept. The corporate compliance officer also maintains an incident log to summarize causes and trends. Software programs are also utilized to ensure consistency in documentation and to facilitate analysis.

Critical incidents are reviewed by the organization's leadership at monthly administrative team meetings. Regardless of who reviews the critical incidents, they are required to complete a thorough analysis that includes the following:

- A determination of the cause of each incident. Did the incident occur as the result of an environmental flaw, lack of personnel training, or a failure to follow the organization's policies and procedures?
- Identification of trends in critical incidents. Are common themes emerging in the incident reports? This examination of trends evaluates the location of critical incidents, time of the incidents, personnel involved in the incidents, involvement of persons served in the incidents, types of incidents, methods of intervention, etc.
- The purpose of the above analysis is to enable the development of actions for improvement to prevent similar events from occurring in the future. Once an analysis of the critical incidents has been completed, the leadership and/or committee members are responsible for making recommendations and determining actions that the organization needs to take to improve the areas identified.

The leadership and/or designated committee revisits the recommendations at its next meeting to evaluate the results of the actions taken for improvement, ensuring that the recommended changes that have been made were effective. Meeting minutes are completed and then shared with all those affected by the recommendations to ensure communication of areas of need, as well as provide documentation of need.

The corporate compliance officer completes an annual written analysis of all critical incidents and includes this information in a report that is provided to the organization's leadership. This written analysis addresses:

- Causes
- Trends
- Actions for improvement
- Results of performance improvement plans
- Necessary education and training of personnel
- Prevention of reoccurrence
- Internal and external reporting requirements

This annual report is a critical component to the concept of prevention in both risk management and performance improvement activities. In order to determine causes and trends of critical incidents, our organization requires that all critical incident reports be reviewed at least annually (this includes reviewing the annual written analysis of critical incidents).

Infection Control

The persons served, personnel and other stakeholders are provided ongoing training regarding the prevention and control of infections and communicable diseases. Training is based on individual needs and complies with legal and regulatory requirements regarding the use of standard or universal precautions in the programs we provide and with the persons we serve.

Transportation

Persons served have identified limited transportation options as a critical area of concern, particularly as it relates to employment. Functional Industries' dedication to providing quality services is demonstrated through the significant investment of owning, maintaining and operating a fleet of vehicles.

Functional Industries' Vice president of human resources is responsible for ensuring that all drivers and company owned vehicles meet applicable legal requirements. In addition, the transportation coordinator, with assistance from the director of facilities operations, ensures that all company owned vehicles receive required maintenance and are properly equipped with first aid kits, emergency supplies/equipment and written emergency protocols as identified by Functional Industries' Safety Committee.

Functional Industries has a long-standing vehicle operator training program that has a proven history of success in training drivers to safely operate vehicles, as well as preparing drivers to effectively respond to situations they may encounter when transporting persons served. This eclectic training, conducted by agency personnel and external authorities, covers a variety of topics.

Functional Industries' comprehensive training process begins with "New Driver Orientation" conducted by the Transportation Coordinator. This specialized orientation process incorporates individualized one-on-one instruction, group classroom instruction, situational assessment and standardized behind the wheel training. Ongoing training is provided to all drivers through agency sponsored in service training and/or community based continuing education. Training topics include but are not limited to: defensive driving, sensitivity training, emergency procedures, accident reporting, proper techniques for assisting persons with disabilities, orientation to disability, vehicle inspection and routine maintenance.

In addition, all drivers are required to participate in Functional Industries' Two Way Radio Communications Training Program. This program was developed, and is monitored by, Functional Industries' Transportation Coordinator with assistance from a contracted technical support provider with expertise in all aspects of radio communications. Training includes hands-on training in radio operation, troubleshooting, on-air etiquette and implementation of emergency procedures. All transportation personnel receive initial orientation to dispatching functions and are required to participate in ongoing training. Driver training information is retained in individual employee training files.

Inspections

Comprehensive external inspections are conducted annually by qualified authorities, which include representatives from the local fire department, insurance loss control consultants and risk administrators. Resultant written reports identify areas inspected and outline possible areas of improvement. The dynamic nature of Functional Industries' Health and Safety Program becomes evident in our active response to any recommendations.

Members of the safety committee conduct monthly self-inspections designed to identify potential health and/or safety hazards. These comprehensive self-inspections are conducted on all shifts and at locations where services are being delivered. The scope and process for self-inspections was developed after considering input from local health and safety authorities. The safety committee uses a checklist in the process to ensure that all applicable areas are consistently addressed. Recommendations cited are duly noted on the inspection checklist along with suggested actions necessary for improvement. Actions taken to remedy identified concerns are communicated through the inspection reports and are noted in safety committee meeting minutes. Written inspection summaries are maintained in the safety committee inspection book.

Hazardous Materials

If any hazardous materials are used at Functional Industries, there are specific written procedures that ensure the safe handling, storage and disposal of that substance. (i.e. material/cleanser MSDS sheets)

HUMAN RESOURCES

Principle Statement

It is the intent of Functional Industries' to recruit, develop, and retain competent and caring personnel to perpetuate the success of our organization and the people we serve.

Staff Configuration

We believe human resources represent our single greatest asset *and* investment. Functional Industries is committed to maintaining adequate staffing levels to ensure the delivery of quality services that meet or exceed the performance expectations of our organization, as well as the expectations of our stakeholders.

It is the responsibility of the president to establish and maintain a staff configuration that meets the needs of program participants in a manner consistent with the mission and goals of our organization.

Extensive cross-training is conducted with personnel to assist them in meeting established outcome expectations of persons served. Through dedicated efforts to develop skilled, readily interchangeable/cross-trained staff, we ensure adequate staffing patterns to maintain safety, provide coverage for absenteeism, meet organizational outcomes and further develop our human resources.

In addition to administrative oversight, our organization utilizes information obtained from our information measurement and management system and strategic planning process to evaluate the effectiveness and efficiency of current staffing patterns and configurations. Related data and information is obtained on a regular basis and is incorporated into a variety of reports that are shared with persons served, agency personnel and other stakeholders. Means for conveying this information includes, but is not limited to; performance analysis reports, annual reports, divisional updates and team meetings.

The governing authority receives and reviews these reports and uses this information to guide decision making related to workforce development, resource allocation and financial planning. Evidence of the utilization of this information is found in board meeting minutes, strategic planning documents, etc.

Education and Experience

Qualified personnel are critical to the success of Functional Industries.

The vice president of human resources is responsible for determining the minimum education and experience requirements for all positions.

These minimum requirements are clearly stated on each position description and reviewed, at a minimum, annually. This annual review corresponds with the employee's annual performance appraisal and is documented in the employee's personnel record.

The vice president of human resources utilizes local, state, federal and/or national resources to establish and annually review the relevance of the selected education and experience requirements for each position description.

Position Requirements and Job Description

The vice president of human resources is responsible for providing the oversight necessary to ensure that all personnel meet the following, as required by their job duties and/or position description:

- State practice acts
- Related federal and state legislation governing practice
- Applicable licensure, registration and/or certification requirements
- Specific educational degrees
- Professional standards of practice
- Professional and on-the-job training to maintain established level of competency

Divisional directors and vice presidents assist the vice president of human resources in developing an individual job description for each position within their division. The vice president of human resources is responsible for ensuring that each position description addresses the minimum requirements of the position including education, experience, overall responsibilities, specific duties, physical expectations, and essential job functions.

The vice president of human resources is responsible for determining the essential functions each identified position within the organization... essential functions are duties that are fundamental to the position and cannot be reasonably performed by another employee.

Individual position descriptions are reviewed and revised as needed to ensure they reflect current practice. At a minimum this review and revision is completed at the time of annual reviews.

Hiring Practices

The organization has implemented written procedures which identify actions to occur in order to verify required credentials and backgrounds of personnel and to ensure that required credentials remain current.

The vice president of human resources is responsible for ensuring that criminal background studies are completed through the Department of Human Services (DHS), and other agencies as appropriate, for staff members providing direct service to vulnerable individuals; all personnel are subject to background checks and clearance through the Office of Inspector General (OIG).

The vice president of human resources and/or their designee is required to check a minimum of two personal and one employment reference prior to any offer of employment.

The vice president of human resources or designee must check a minimum of one professional reference prior to securing the services of any consultant.

The vice president of human resources is responsible for ensuring that annual motor vehicle driving record evaluations are conducted for all staff that drive agency owned vehicles.

The vice president of human resources is responsible for verifying the credentials of agency personnel, as well as consultants. Verification of credentials must be done using a primary source, not photocopies or facsimiles.

Personnel Policies

Personnel policies are contained in Functional Industries' Employee Handbook.

Note: The Employee Handbook and the policies contained within are available in alternative formats upon request.

As part of our standard orientation process, new employees receive a copy of Functional Industries' Employee Handbook on their first day of employment and sign an acknowledgement of receipt. Any questions pertaining to the Employee Handbook and/or the policies contained within are to be directed to the employee's supervisor, the vice president of human resources or the president.

Note:

- Functional Industries contracted with Paychex (third party consulting firm) when we developed our employee handbook and the personnel policies contained within.
- Paychex continues to provide consultation regarding review, revision and modification of the policies enumerated in the handbook.
- Paychex also provides ongoing consultation to ensure that personnel policies contained in our employee handbook comply with applicable legal or regulatory requirements.

- The Employee Handbook and the policies contained within are reviewed annually by leadership and updated as needed.

Recruitment and Retention

Recognizing the value of our organization's human resource, dedicated effort is directed to attracting and retaining well-qualified personnel; ensuring employees receive competitive compensation is a primary goal. Leadership monitors labor market wage information in an effort to develop competitive salary ranges for each position.

While rate of pay certainly impacts recruitment and retention efforts, we realize it is not the only influence. Functional Industries' President monitors and reviews current benefits and their value to employees.

As indicated in our employee handbook, Functional Industries is "committed to providing the best possible climate for maximum development and goal achievement for all employees." Maintaining this positive workplace atmosphere aids our human resource development efforts. Being a provider of vocational rehabilitation service, we recognize the importance of identifying a "good job match" relative to recruiting and retaining staff. We are committed to matching individuals to positions that maximize their skills and abilities.

Staff training and the potential for advancement/career development represent two means of retention not previously addressed. Functional Industries provision of training and continuing education through our personnel training programs is evidence of our commitment to the development and retention of quality staff. Our organization practices the adage "promote from within". Staff training represents a human resource investment that affords opportunities for advancement. This investment aids retention efforts by developing a pool of qualified applicants for positions vacated or created through organizational growth.

While concerted effort is directed to employee retention, people do choose to leave our employ. We believe it is important to capture information and review for trends in turnover. Input from staff is key to the identification of any issues requiring redress. The following methods are employed to collect information relative to personnel turnover:

- Exit Interviews
- Steering Committee
- Annual Performance Reviews
- Staff Surveys
- Team Meetings
- Suggestion Boxes
- Divisional Meetings

Staff Training

Staff training programs are guided by the ever-changing needs of persons served, identified needs specified by other stakeholders, specific CARF standards, applicable laws and regulations, the mission of our organization and the cultural and socioeconomic diversity of the communities served.

New employees participate in an extensive orientation and training process during their first two weeks of employment. At a minimum this process addresses:

- Confidentiality requirements
- Customer service
- Cultural competency and diversity
- Expectation regarding professional and ethical code of conduct
- Health issues and advocacy including prompt communication/reporting about health issues
- Promoting wellness of individuals served
- Mobility
- Person-Centered practice
- Professional boundaries and personal privacy
- VA Reporting of suspected abuse and neglect
- Rights of the persons served
- Rights of personnel
- Safety of Persons served
- Unique needs of persons served

Each new employee is required to take a post test upon completion of each training module to ensure they understood the information presented. The employee is required to answer a minimum of eighty percent of the questions correctly to achieve a passing score. If the employee fails to pass the test they are required to participate in the training module again.

Ongoing staff training and continuing education is provided directly by Functional Industries' personnel and/or through a variety of community resources. Position descriptions, which are reviewed annually, delineate the minimum requirements for each position, including education and experience qualifications, overall responsibilities, specific duties, physical expectations and essential job functions.

The vice president of human resources identifies the specific skills and characteristics needed by personnel. Through assessing individual knowledge and competencies, the vice president of human resources identifies the need for additional training related to the

types of services being delivered and the individual needs of persons served. Examples of staff training resources utilized include, but are not limited to:

- Red Cross CPR/First Aid Training
- FII Vulnerable Adult Training
- RSA Region V CRP RCEP Trainings
- FII Data Privacy Act and Confidentiality Training
- Mental Health Core Training
- Minnesota Rehab Association Training Conference
- APSE Training

The vice president of human resources or designee is responsible for maintaining comprehensive documentation of the specific training received by each employee. This documentation is retained in the employee's training file and central training records.

Performance Management

Performance management of our human resource is an ongoing process. The commitment to providing quality services and actively developing personnel demands a continuous flow of information. Personnel receive regular feedback regarding job performance, work assignments and organizational direction. Dialogue is encouraged to maximize employee involvement in improving our operations, as noted in the employee handbook.

In addition to this ongoing exchange, formal annual performance reviews are conducted. Performance reviews include an annual review and update of job descriptions. Annual reviews are completed using position descriptions. Reviews are conducted with input from personnel being evaluated. Our performance review process provides the basis for better understanding between personnel and their immediate supervisor with respect to job performance, potential and development within our organization. This process is used to assess performance based on objectives from the preceding year and to establish goals for the coming year. Upon completion of the review process the employee and supervisor sign and date the evaluation which is subsequently placed in their personnel file.

Personnel Policies

Functional Industries implements personnel policies that are accessible to applicable personnel. All new employees go through an orientation with Human Resources. There is an orientation check list that is completed by human resources and the new employee. During orientation each employee receives the employee handbook and also reviews various policies and procedures. The employee handbook is reviewed annually and generally updated every two years. The employee handbook, policy and procedures are placed on the company drive.

The employee handbook and policies are reviewed annually and updated as needed. The handbook is updated every other year.

All new employees go through an orientation with HR. FII's grievance policy is reviewed with the employees and the employee signs and dates that they have received the policy. This is placed in the personnel file, it can also be found on the company drive. The grievance policy is reviewed annually with employees during our monthly training schedule.

Functional Industries, Inc.'s discipline policy and procedure is designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable behavior and/or performance issues. It has been designed consistent with our organizational values, HR best practices and employment laws.

Our discipline policy outlines steps that occur when performance issues arise. These steps include a verbal warning, an initial written warning (performance reminder or performance improvement plan) and a possible second written warning prior to termination. FII's discipline policy and procedure can be found on the company drive.

It is company policy to ensure that employee terminations are handled in a professional manner with minimal disruption to ongoing work functions. Types of terminations are voluntary and involuntary and procedures for both types of termination can be found in our termination policy.

Functional Industries Inc. offers employees promotions to higher-level positions when appropriate. Management prefers to promote from within and may first consider current employees with the necessary qualifications and skills to fill vacancies above the entry level, unless outside recruitment is considered to be in the company's best interest.

All employees are encouraged to seek advancement opportunities and to obtain promotion and career guidance from their supervisors, division directors and the HR department.

Job openings and promotions for which management solicits candidates from within the company normally will be posted on the employee break room bulletin board and announced on the company's Web site. When job openings or promotion opportunities are posted:

- Interested employees must complete an internal application and forward it to the HR department.
- Division directors may initiate the procedure within the same time period and propose employees for the position.
- The HR department may, at its discretion, solicit outside candidates during or after the posting period.

Employee candidates for promotion will normally be screened and selected based on attendance and work records, performance appraisals and job-related qualifications. Promoted employees will be subject to an introductory period in their new positions along with a 2 week discussion, 6 week review and a 90 day review.

All regular exempt and non-exempt job openings are posted on Functional Industries, Inc. bulletin boards for employees to review. The bulletin boards are located in the employee break room. Jobs remain posted for 5 business days.

Our organization is committed to equal employment opportunity. We will not discriminate against employees or applicants for employment on any legally-recognized basis [“protected class”] including, but not limited to: veteran status, uniform service member status, race, color, religion, sex, national origin, age, physical or mental disability or any other protected class under federal, state or local law.

In Minnesota, the following are a protected class: race; color; creed; religion; national origin; sex; pregnancy, childbirth and related disabilities; marital status; disability; genetic information; sexual orientation and age [over the age of majority].

You may discuss equal employment opportunity related questions with the vice president of human resources, the corporate compliance officer or any other member of management.

Annually HR submits an EEO-1 report which identifies the diversity of our employees as well as tracks the movement within the company and FII’s Affirmative Action Plan is submitted every four years. FII is a contractor with the State of Minnesota and in compliance with Minnesota Law. FII is an Equal Opportunity Employer related to employment, compensation, assignment of work and promotion. (see transfer/promotion policy)

Documents included:

- Employee handbook
- Review documents
- Position Description Book
- New Hire Orientation
- Background study policy
- Training schedule
- HRIS and training book ~ documents that prove attended training
- Grievance policy
- Hiring policy
- Termination policy
- Transfer/Promotion policy
- EEO policy
- Discipline policy

As stated in Functional Industries’ Employee Handbook, we believe that performance leading to career advancement is rewarding for both the employee and the organization.

Whenever possible we will promote qualified employees to new or vacated positions. Job openings are posted in employee break rooms.

Personnel Verification

The vice president of human resources is responsible for the oversight to ensure verification of certifications, degrees and essential training necessary for employment either at the new hire orientation or within 2 weeks of employment. The human resources staff matches the need for credentials with the job description. The employee is responsible for supplying the original credentials that are required. When employee requests credentials from the primary source, the credentials are mailed directly to human resources where the credentials can be verified. Once the credentials are verified, human resources makes a copy of the credentials and places the copy in the personnel file.

Supervisors are responsible for tracking updates on trainings/credentials for all the positions they oversee. It is the supervisor's responsibility to ensure that their employees meet and maintain the requirements of the position held.

Required credentials that could be verified through this process, dependent on specific position description, can include, but are not limited to, the following:

- Credentials identified by legislation or governing practices
- Licensure requirements
- Registration requirements
- Certification requirements
- Professional degrees
- Professional training to maintain specified competency levels
- "Hands on" training requirements specific to the position
- Professional standards of practice

LEADERSHIP

Assessing the Environment

To be relevant and responsive in rapidly changing environments, we realize that we must be vigilant of the context in which we conduct our business affairs. To this end, organizational leadership conducts ongoing environmental assessments to obtain information to establish a foundation for development and implementation of organizational strategies.

Assessments are conducted within the context of our organization's purposes, locations, and spheres of influence, and relate to our mission and vision and how both fit into the social, economic, competitive, legal, and regulatory environments in which we operate. The collection and analysis of information regarding these factors provides the basis for the creative thought ("visionary thinking") necessary to guide organizational planning and action toward a future of service and business excellence!

Leadership Structure

Functional Industries has recruited, retained, and developed a leadership team that embraces the values of accountability and responsibility to our organization's stated mission and is accessible to persons served and personnel.

Our organizational chart clearly identifies our leadership structure by identifying who reports to whom. The board of directors has clearly identified the relationship that exists between itself and all levels of leadership and has documented respective duties and responsibilities. Clarity is provided in regard to functions and roles performed by each position through position descriptions, bylaws, policies, etc. Functional Industries' governance, president and personnel demonstrate knowledge of these identified relationships while conducting the affairs and day-to-day business of our organization.

NOTE: Our president, or designee, is ultimately responsible for the services seeking CARF accreditation. However, because these established standards of quality serve as ongoing guidelines in the development and provision of high quality programs and services, all personnel affiliated with Functional Industries are expected to have working knowledge of, and participate in the implementation of all applicable standards for service delivery.

Examples

We believe that a clearly identified leadership structure and well-defined roles within that structure are essential to the success of our business enterprise and service delivery systems.

Documentation defining leadership structure and roles within that structure can be found in the following:

- Board Member Orientation
- Board Director Policy & Procedure Manual
- Board Meeting/Training Minutes
- Organizational Chart
- Leadership Forum Minutes
- Steering Committee Minutes
- President's Evaluation
- Employee Handbook
- Position Descriptions
- Performance Reviews
- Bylaws and Articles of Incorporation

The Board's Relationship to Executive Leadership

Functional Industries has clearly defined the functions of its governance versus the duties appropriately delegated to members of the executive leadership team.

The board of directors ensures that the organization has a vision for its future via goals, aims, missions, or ends and that the administration of the organization as a business entity is done legally, ethically and with integrity to achieve those goals.

The board is responsible for holding the organization's management accountable for performance. The board delegates authority to the organization's management to conduct the agency's business via resources (e.g., money, people, and technology) and ensures that executive leadership develops plans and acts to achieve organizational goals. This delegation and review process serves as a continuous oversight mechanism, culminating in an annual review of the organization's (and therefore, the executive leadership's) success.

On occasion the board may access varied management and staff to assist in carrying out its governing duties. So as not to cross into management authority, the board has developed protocol on when and how it may consult with management/staff to support its governing duties. This protocol was developed between the board and executive leadership so that managerial operations are maintained as a priority for those assigned to that responsibility, while still providing the board adequate administrative support.

Person-Centered Philosophy...

Promoting Self-Sufficiency through Self-Determination

Central to the service delivery strategies implemented by our organization is the philosophy of empowering individuals to maximize their employment, independence,

inclusion and integration into the community, thus increasing their social and economic self-sufficiency through self-determination.

“Self-determination, as defined by our leadership team, is NOT a service delivery strategy or employment program with predetermined services and a set way of delivering them. Self-determination IS a process that differs from person to person according to what they determine is necessary and desirable to create a meaningful life and satisfying career. Persons served do not receive services as determined by traditional models. They are free to “order off a menu”... choosing only the services they want, and determining what ways the services should be provided to best meet their needs.” – Rod Pederson, President & CEO

Achieving self-sufficiency through self-determination requires an approach that is both person-centered and person-directed. Services must acknowledge the rights of the persons served to take charge and responsibility for their lives and their careers. In our organization, the individual, not the service delivery system, will decide:

- What type of services she or he requires, and who will provide them;
- How she/he will spend her or his time, which will include determining the type of employment and/or training opportunities he or she wishes to engage in; and
- How she or he will relate to employers, coworkers, service providers, and the community.

Our organization creates and/or enhances self-sufficiency by supporting the following principals:

- | | |
|----------------|---|
| Freedom | The ability of the persons served together with freely chosen stakeholders to plan their career path and the necessary supports. |
| Authority | The ability for persons served (with a support circle, if needed) to develop their desired career path and strategies to achieve desired outcomes. |
| Autonomy | The arranging of resources and personnel (both formal and informal) that will assist the individual in securing optimal employment and a life rich in community affiliations. |
| Responsibility | The acceptance of a valued role in a person’s community through employment, organizational affiliations, spiritual development, and general caring of others in the community, as well as the accountability for spending public dollars in ways that are life-enhancing for the person served. |

Our Focus on Self-Sufficiency Promotes the Following Values:

- | | |
|----------|--|
| Respect- | Self-sufficiency, by its very nature, recognizes that the person is valuable, capable, and deserves to be treated with respect. Respect is more than politeness and paying “lip-service”. It is acknowledging the individual’s |
|----------|--|

value as a person, seeing her or his strengths and abilities, treating them as we ourselves wish to be treated, and holding her or him in esteem.

- Choice- Choice is central to self-sufficiency. The people we serve often have very limited choices. They often have not been able to make choices regarding some of the very basic aspects of their lives such as where they live, with whom, how they will spend their time and the money they earn, and what kind of work they do. Our programs promote true choice by encouraging the persons served to pick from the same wide-variety of lifestyles, careers, goals, and preferences that most people enjoy.
- Ownership- Our approach to self-sufficiency not only supports the persons served in developing more choices in their lives; it provides them with the tools to take ownership of their lives. Ownership implies more than just decision-making. It means the individual is the final and total authority. While most of our program participants are supported in the decision-making process by a “circle of support”, self-sufficiency gives the person served the final say. Ownership affords them control over their lives and services. Ownership also means the individual accepts responsibility for her/his actions and decisions, including spending public monies prudently.
- Support- Support is the cornerstone to creating self-sufficiency. Most people have some sort of support network that they turn to when they must make an important decision or take a step forward in their lives. The persons we will serve are no different. However, until they achieved self-sufficiency, the people who helped them establish goals and devise plans were mostly paid workers who were most often assigned rather than chosen. As the persons served attained self-sufficiency, they select and invite each member into their circle of support. Members of the circle of support can be family members, friends, employers, and people from the community... anyone they want. Most importantly the person served selected the people with whom the individual has or wishes to build a trusting relationship.
- Opportunity- Many of the people we serve have had only limited opportunity to experience many aspects of life. Our focus on the development of self-sufficiency expands those opportunities, allowing and encouraging individuals to explore the possibilities that are present through employment and involvement in the community. Our leader and staff members realize that when someone has had limited experience, it may be difficult for others to allow them to take risks. However, we believe that opportunity also includes the ability to take risks, to make mistakes, and to grow from our mistakes!

We believe for the people we serve to become more self-sufficient, those of us who provide services and those who fund them must make specific changes in both the way we think about the people we serve and the way we serve them. Without a shift in the

traditional service delivery strategies, no philosophy can truly support the people we serve to become more self-sufficient individuals.

Further, we believe in order for self-sufficiency to happen, the current service delivery strategies must shift:

- From viewing the people we serve as having limitations that prevent them from participating fully in life to seeing them as valuable citizens, who have many talents, strengths, and abilities to contribute to their community and local economies.
- From seeing the people we serve as service recipients to seeing them as individuals with rights and entitlements.
- From providing agency-controlled services to supporting consumer-driven services.
- From control to empowerment

These are the beliefs that motivated our founding fathers and mothers to establish Functional Industries and that continue to provide clarity to our enduring vision of full inclusion of the people we serve in the communities and labor markets of their choosing!

Guidance

Identified leadership provided guidance in establishing Functional Industries' Mission Statement: *"To create and promote innovative opportunities that reveal the natural potential of each person we serve"*.

A primary role of Functional Industries' Board of Directors is to be responsive to the environment in which our organization functions and to be vigilant in the context in which we conduct our business affairs. Secondary to this function is the responsibility to conduct planning activities that ensure our organization positions itself strategically to respond to future opportunities, as well as challenges.

In fulfilling these purposes it is the responsibility of the board of directors to annually:

- Approve an annual operating budget prior to the start of the fiscal year
- Conduct strategic planning
- Review the accessibility status report - ensure implementation of recommendations
- Review the performance analysis report
- Review the financial audit
- Review the organization's policies
- Review a risk management assessment and plans

- Ensure that insurance coverage is in place to adequately protect the needs, risks and assets of Functional Industries
- Assess the use of technology in the management and operation of our organization to support information management and performance improvement
- Communicate organization's person-centered philosophy to stakeholders in an understandable manner
- Identify specific examples of how the perspectives of persons served, leadership, and personnel are included in the development services, systems, approaches, and interventions.

Through performance of these requisite duties our leadership demonstrates their commitment to:

- Regularly reviewing the mission, vision, values, and direction of Functional Industries
- Promoting value-laden programs and services
- Balancing stakeholder expectations
- Financial solvency
- Compliance with insurance and risk management requirements
- Continuous performance improvement
- Development and implementation of corporate and social responsibility
- Compliance with all legal and regulatory requirements

Cultural Competency and Diversity

Although Functional Industries is not suggesting that our leadership and personnel need to know everything about all cultures, we feel it is imperative that our leadership and staff members develop a basic understanding of the major values and beliefs of the people we serve and other stakeholders, especially those who may come from different cultural or spiritual backgrounds. To this end, we have created and implemented a cultural competency and diversity plan that addresses individuals served, staff and other stakeholders that is reviewed annually for relevance and updated as needed.

Education and training is provided to all employees and board members to assist us developing awareness and sensitivity specific to the diversity of our service delivery areas. Diversity in terms of culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status and language are addressed. Training focuses on the cultural and spiritual beliefs of the countries of origin, especially their views of disabilities and its causes, and the influence of culture on the choice of service outcomes and methods. Attendance at cultural diversity training is documented and included in personnel files and/or training records.

Corporate Responsibility

Functional Industries has developed written codes of ethical conduct that identify and document the required ethical practices and values of our organization in the following

areas: business, marketing, contractual relationships, service delivery, professional responsibility, human resources and other important topics. The information found in these documents is woven into the very fabric of organizational policy, procedure and daily activity.

Functional Industries' Codes of Ethical Conduct clearly state the major philosophy, beliefs, principles and core values that guide our attitudes and actions. Functional Industries' Codes of Ethical Conduct are uniquely designed to promote the kind of relationships within which quality services can best be carried out and to give practical guidance in decision-making situations.

Board members and staff members receive a copy of Functional Industries' Code of Ethical Conduct during their initial orientation to our organization. The Vice president of human resources, or designee, is responsible for reviewing the codes and related policies with staff and/or board members during the orientation process. Thereafter, the codes and related topics are reviewed with staff and board members on an annual basis.

Functional Industries has established an ethics committee to investigate and act on allegations of violations of ethical conduct and/or allegations of infringement of the rights of persons receiving services and/or other stakeholders. Functional Industries has written procedures to deal with allegations of violations of ethical codes that address our no-reprisal approach for staff that report and time frames that are adequate for prompt consideration to ensure timely decisions are made.

The human resources director is responsible for ensuring the ongoing training of personnel and other stakeholders on established ethical codes of conduct and enforcing existing policies and written procedures on waste, fraud, abuse and other wrongdoing.

Membership of the ethics committee is comprised of Functional Industries' Board Chairperson, Corporate Attorney, Vice president of human resources, Corporate Compliance Officer and President. Confidential meeting minutes are taken and retained by the Corporate Compliance Officer. These minutes document how the committee addressed allegations of violations (providing evidence that a no-reprisal approach was taken for personnel reporting and that a realistic time frame was implemented to initiate the investigation) and how the situation was resolved.

Advocacy

Leadership's involvement within the scope of our operations and in the community at large provides them a knowledge base relative to expectations of our community, persons served and other stakeholders. The sense of community inclusion developed by leadership is further enhanced by a commitment to ethical business practices often absent in "Corporate America". Leadership's advocacy efforts for persons served are enhanced by our positive image in the communities we serve image... resulting from our ethically sound business practices and service provision.

Examples

Corporate responsibility is a sound business practice that enhances advocacy efforts by establishing a positive reputation within the greater community. The following examples illustrate corporate responsibility/advocacy and corporate citizenship demonstrated by our organization's leadership:

- Holding positions on local boards and committees that address accessibility, housing, leisure pursuits, and employment for persons in need of human services
- Participating in educational events for communities on service delivery/provider issues
- Conducting educational events for local "first responders" (i.e. mental health first-aid)
- Developing/disseminating marketing materials to promote hiring persons served
- Maintaining active involvement in community organizations and service groups
- Providing reasonable accommodations to promote equal opportunities for participation throughout all levels of our organization
- Providing access or referral to social, legal, or economic advocacy resources.

Corporate Compliance

Functional Industries' governance has adopted a formal resolution to establish a corporate compliance program.

Corporate compliance policy designates a staff member to oversee, monitor and report matters of compliance in regard to regulatory or licensing requirements. Functional Industries' governance has provided the corporate compliance officer direct, unimpeded access to the organization's leadership and board of directors.

The benefits provided by Functional Industries' Corporate Compliance Program include:

- Reducing the likelihood of violations of licensing or regulatory requirements
- Reducing the likelihood of civil liability, which comes chiefly in the form of demands for returns of overpayments, civil money penalties, and whistle-blower lawsuits
- Providing management with a different and generally more accurate view of our organization

- Establishing a structure of information relevant to the compliance program
- Establishing a structure to maximize the right of confidentiality under the attorney-client privilege

Continuing Education

It is the responsibility of leadership to provide personnel the resources and education necessary for them to stay current in the field. Our goal is to consistently demonstrate state-of-the-art program strategies and interventions that are based on accepted practices in the field, current research, evidence-based practice, clinical practice guidelines, and professional consensus.

Examples of resources and educational opportunities provided by our leadership include, but are not limited to:

- Journal subscriptions
- On-line access to learning and reference materials
- Guest speakers
- Sponsoring educational events at the organization
- In-Service programs
- Collaborative resources or educational efforts with other area service providers
- Financial support and/or time off work to participate in committees, meetings, and educational events.

Succession Planning

Leadership has developed both formal and informal policies and procedures that identify actions to be taken by the organization should key leadership personnel be unable to perform their duties due to retirement, resignation, serious illness, death, or other reasons.

Note: Policies, procedures, and processes are annually reviewed by the corporate compliance officer, leadership team, and board of directors. When deemed necessary, policies, procedures, or processes are updated to reflect changes in legal and/or regulatory requirements, corporate structure, fiscal constraints, local labor market etc.

LEGAL REQUIREMENTS

Principle Statement

It is the intent of Functional Industries to comply with all applicable legal and regulatory requirements of the governmental authorities and legally authorized entities under whose authority we operate.

Legal and Regulatory Compliance

Functional Industries has developed and implemented extensive policies, procedures, and processes to comply with the following legal and regulatory requirements:

- Rights of the persons served
- Confidentiality requirements
- Reporting requirements
- Contractual agreements
- Licensing requirements
- Corporate status
- Employment practices
- Mandatory employee testing
- Privacy of persons served
- Debt covenants
- All others, as applicable

Note: Policies, procedures, and processes are annually reviewed by the leadership team, board of directors and Corporate Compliance Officer, and when necessary updated to reflect changes in legal and/or regulatory requirements.

Guidance

Functional Industries also provides guidance to personnel in responding to legal actions. Functional Industries is committed to protecting our personnel when under they are under legal scrutiny. Personnel are provided assistance during any work-related investigative process. For example, written procedures are in place to guide personnel in responding to subpoenas, search warrants, investigations and other legal action.

The following provide several examples of documents that provide guidance to personnel when they are under legal scrutiny and/or responding to an investigation:

- Policy: Response to Legal Actions
- Policy: Contractual Relationships
- Code of Ethical Conduct
- Vulnerable Adult Reporting Process

- Written Grievance Procedure
- Donation acknowledgment letters
- Functional Industries' Employee Handbooks
- Leadership Forum Minutes
- Client Advisory Committee Minutes
- Board Meeting Minutes
- Board Member Orientation / Training Handbook
- Established work bidding procedures
- Reports from Regulatory Agencies

NOTE: CARF COMPLIANCE

Upon request... reports, recommendations, and outcomes of external reviews germane to CARF standards or applicable to determining an accreditation outcome will be shared with CARF surveyors.

Privacy of Stakeholders and Confidential Information

To protect the privacy of all stakeholders and any confidential information that our records may contain, Functional Industries ensures that applicable legal and regulatory requirements concerning privacy of health information are adhered to.

Functional Industries' policies and procedures address the following:

- Confidential administrative records
- Records of persons served
- Confidentiality of records and security of all records
- Compliance with applicable laws concerning records
- Time frames for documentation in the records of the persons served

FINANCIAL PLANNING AND **MANAGEMENT**

Principle Statement

Functional Industries, Inc. strives to be financially solvent, conducting fiscal management in a manner that supports our mission, values and annual performance objectives.

Fiscal Planning

Fiscal stability is the foundation upon which Functional Industries has built our nonprofit corporation. We hold the belief that through financial solvency our organization can position itself to take advantage of opportunities and deal effectively with the challenges faced by our dynamic and growing organization.

The governing authority is responsible for ensuring that Functional Industries demonstrates sound business practices and complies with applicable requirements to maintain and retain financial stability.

Fiscal management focuses on daily operational cost containment and incorporates planning for long-term solvency.

Financial planning and management activities are strategically designed to meet established outcomes for the persons served, as well as organizational performance objectives in accordance with our strategic plan.

Fiscal practices adhere to generally accepted accounting principles and established business practices.

A variety of sources provide detailed analysis and documentation of both short and long term plans for maintaining and retaining financial solvency. These sources include, but are not limited to: monthly financial reports, strategic planning documents, board minutes, administrative team meeting minutes, cash management policies, annual budget, annual reports, and annual audits.

Functional Industries believes that monitoring environmental factors, such as financial trends, funding guidelines and legislative changes is essential to maintaining financial solvency and the ability to plan proactively to retain it. The governing authority has incorporated ongoing review (formal/informal) of environmental trends as a “discussion item” for monthly board meetings. Documentation of environmental reviews and/or related discussions can be found in board meeting minutes.

Response to Financial Instability

Functional Industries is a fiscally stable corporation that maintains adequate financial reserves, a positive cash flow, and proactive business and cash management policies and procedures.

However, in the event of financial instability, the board of directors has mandated that the president shall develop a written plan to address the factors surrounding the financial instability.

This plan will address contributing factors, goals and/or objectives, identification of persons responsible for plan implementation and timelines for completion of established objectives. Once completed, the plan must be presented at a meeting of the full board, gain board approval, and be documented in the board meeting minutes.

Financial Records

Functional Industries maintains financial records as required by funding sources and dictated by prudent business practices.

Each year, Functional Industries contracts with a certified public accounting firm to have them review/audit our financial records to ensure that all records are guided by, and conform to applicable legal requirements and generally accepted accounting practices. Records reviewed include: payroll records, budgets, monthly financial reports, bank statements, donations, grants, wage incentive payments, and records of accounts receivable and accounts payable.

Financial Reports

Reports summarizing fiscal operations and financial status are generated on a monthly basis and reviewed by members of the administrative team and the board of directors. These reports include information on actual versus budgeted income and expenses on a monthly and year to date basis, with variances and a balance sheet. The monthly Statement of Financial Activities, Statement of Financial Position, and Cash and Investment Report are used as planning tools by the governing authority to assist them in maintaining and retaining financial stability.

Detailed reports documenting Functional Industries' fiscal operations and financial status are generated monthly. The president and the director of fiscal management review these reports. However, these significantly detailed reports are disseminated to board members and administrative staff on a quarterly or per request basis.

Cash Management

Each year when planning and performing their audit, the independent certified public accountants consider Functional Industries' internal control over financial reporting in order to determine the auditing procedures they will use to express their opinion on Functional Industries' general purpose financial statements and internal controls over financial reporting.

In addition, the independent auditors review both policies and practices for receiving cash, checks, or other financial instruments; distributing funds, including petty cash, or other cash checks, or other financial instruments; managing the use, receipt or disbursement of funds through purchase orders, invoices, organizational credit cards, and/or lines of credit with outside vendors; and investing funds.

Annual Budget

Functional Industries operates on a July 1st to June 30th fiscal year. The president and director of fiscal management are required to prepare an annual budget that demonstrates the organization's anticipated fiscal needs and present it to the board of directors for their approval at the June board meeting. Once approved, the budget becomes effective July 1st of the following fiscal year. A copy of each year's annual budget is filed with the June board meeting minutes.

The annual budget reflects projected revenues and expenditures, input from various stakeholders as required, comparison to historical performance and consideration of cash flow, as necessary. Written copies of the annual budget are disseminated to personnel and other stakeholders as required and/or appropriate.

Budget summary reports are generated by the director of fiscal management and are reviewed by management and the governance on a monthly basis. These reports include information on actual and budgeted income and expenses on a monthly and year-to-date basis, with variances and a balance sheet. Reports contain sufficient detail to allow management and the governing authority to utilize them as tools to plan for maintaining financial stability.

Internal Controls

To reduce risk, Functional Industries, Inc. has established who has responsibility and authority in all financial activities, such as purchasing materials and capital equipment, writing checks and making investments. Initial and ongoing training is provided on billing and coding for personnel with these responsibilities. Functional Industries' system of internal controls is based on the sophistication of our fiscal activities and has been designed to allow for changes/fluctuations in our business enterprise. This system was developed and is monitored by the organization's leadership with assistance from qualified external auditors/accountants.

A comprehensive array of fiscal policies and procedures has been developed and are maintained, including internal control practices. Policies address methods for receiving cash, checks, or other financial instruments; disbursing funds, including petty cash, other cash checks, or other financial instruments; managing the use, receipt, or disbursement of funds through purchase orders, invoices, organizational credit cards, and/or lines of credit with outside vendors; and investing funds.

Service Design and Delivery

Cost-effectiveness is central to the success of Functional Industries' service-design and service-delivery strategy. Whenever possible, natural supports, generic community resources and networking with other agencies are used to enhance both the quality and cost-effectiveness of the services provided.

The president, with input from members of the administrative team, is responsible for determining and reviewing all direct and indirect costs for providing specific services.

Service Billing

Functional Industries ensures that billing statements match service delivery information in the records of the persons served. Our proactive approach helps reduce or eliminate costly audit exceptions. Our Corporate Compliance Officer implements a system of quarterly reviews that provides for the implementation of any necessary corrective actions to assist in this process.

Quarterly reviews focus specifically on the appropriateness of the current service billing and coding practices. Reviews are conducted by personnel trained to compare the dates and service codes entered into our organization's billing systems to the dates, units, and types of services provided to the persons served.

The governance feels that instituting this system of quarterly reviews into our overall fiscal management policies/procedures will ensure that all services are being billed appropriately, underscoring our commitment to excellence and transparency.

Fee for Service

Functional Industries, Inc. provides a limited amount of services to individuals on a fee for service basis (service fees paid by the person served). Fee structures are the same for "private pay" individuals as they are for other referral sources. Service fees are based on current service contracts and/or operating agreements (VRS Operating Agreement, Host County Contract, Extended Employment Contract, Department of Human Services Contracts, etc.). The organization is responsible for disclosing to the persons served all fees for which they will be responsible prior to the provision of such services.

Leadership is responsible for periodically reviewing established fee schedules and comparing them to the fees other agencies are charging for similar services. Fee schedules are modified when deemed appropriate by the governing authority and any subsequent changes in fee schedules are disseminated in a timely manner to stakeholders that may be impacted by modifications to the fee schedules.

Audit

Each year Functional Industries contracts with an independent certified public accounting firm to conduct a “full audit”, in accordance with generally accepted auditing standards, of all financial activities that transpired during the fiscal year.

A member of the firm’s audit team presents a summary of the audit findings at a regularly scheduled board meeting and addresses any questions or concerns the board may have pertaining to the full audit or resultant recommendations. The president is responsible for implementing any recommendations that result from the independent examination and providing follow-up necessary to ensure that all recommendations are consistently followed. When recommendations result in the need to revise policies and/or procedures, the president makes the necessary revisions and presents the revised policies and/or procedures to the board for review and approval.

NOTE: CARF COMPLIANCE

Functional Industries’ Annual Audit produces both an Independent Auditors’ Report and a Management Letter. Copies of these letters will be available to CARF surveyors for their review, as will evidence of any correction of material matters or reasons why material matters will not be corrected.

RISK MANAGEMENT

It is the responsibility of the vice president to annually present to the board of directors, a comprehensive risk management strategy that is designed to control threats to our stakeholders, property, income, goodwill, and our ability to accomplish established goals.

This includes developing/updating a risk management plan designed to manage risk and reduce the severity of a loss if one were to occur. This risk management plan must include the following: identification of loss exposures, evaluation and analysis of loss exposures, identification of how to rectify identified exposures, implementation of actions to reduce risk, monitoring of actions to reduce risk, reporting results of actions taken to reduce risks, and inclusion of risk reduction in performance improvement activities.

The risk management plan must also include provisions to ensure that FII's "insurance package" provides adequate amounts and types of coverage for all aspects of Functional Industries' business enterprise and that current coverage will protect and defend individuals, such as staff, board members, volunteers and persons served against reasonable claims due to adverse events for which the organization is liable. Types of required insurance include vehicles, workers' compensation, directors' and officers' liability, errors and omission, business interruption, property and casualty, and health and related coverage as defined by the current employee benefit package.

Each year an experienced insurance broker, who is knowledgeable about insurance needs and types of available coverage, attends a board meeting to review Functional Industries' risk management strategy, and assess the adequacy of our current insurance package.

Marketing, Social Media, Media Relations & Public Representation

The President & CEO and Chairperson of the Board of Functional Industries are the only spokespersons for the association. If an employee receives a media inquiry, the employee should respond by saying that s/he has no authority to comment and refer the question the President & CEO.

In representing Functional Industries in community interactions, team members should act in accordance with the highest standards of professional integrity. Care should be exercised in actions or statements that are presented to the general public about: a) Functional Industries; b) other organizations and/or individuals with whom FII does business or associate, so that actions or statements do not negatively reflect back to Functional Industries.

Functional Industries currently does not use social media. (I.e. Facebook, Twitter, blogs, message boards) If it is determined that FII will use social media, this procedure will be updated prior to implementation of the use of social media.

GOVERNANCE

Principle Statement

The governing board is committed to providing effective and ethical governance leadership on behalf of its stakeholders' interest to ensure that the organization focuses on its purpose and outcomes for persons served.

Governance Duties

The board clearly documents its approach to governance through written policies designed to facilitate ethical governance. Policies assure stakeholders that the governance is active and accountable within the organization and meeting all applicable legal requirements of governance.

Governance duties are performed in accordance with applicable statutes and provisions of articles of incorporation and bylaws. Board members are subject to three basic legal duties in performing their responsibilities: duty of care, duty of loyalty and duty of obedience. Accountability is assured through mechanisms of oversights, such as meetings, reports and timely reviews of corporate performance.

Governance Responsibilities, Practices and Policies

The board is solely responsible for determining the appropriate skills and characteristics required for a competent and contributing board member.

Functional Industries, Inc. and its board of directors has considered and identified criteria for serving as a board member (such as skills, diversity, representation of individuals with disabilities, etc.) and follows a selection process that accounts for the perceived needs of the board at the time of selection, attempting to attract board members who have the time to devote to board activities to advance the purposes of the organization.

New board member orientation requires that both current board and executive leadership conduct a comprehensive orientation to ensure that each new board member becomes familiar with the organization's mission and vision, strategic direction, values, ethics, financial matters, governance practices, and policies in keeping with legal and other reporting requirements (e.g. tax filings).

Board membership criteria and member selection processes are designed to attract board members with the necessary skills and knowledge to do their job well. However, Functional Industries continually strives to build governance capacity through ongoing education. Rather than specifically relying on the individual expertise of a particular board member, our organization continues to make a concerted effort to advance the

skills of the entire board, as the whole board is ultimately responsible, speaking with one voice.

The board is committed to managing its own governance. One way this is accomplished is by formally reviewing the collective performance of the board, as well as the performance of individual board members. In the event that performance issues arise with any specific board member (such as not attending meetings or lack of meaningful attendance) the board will follow a defined exit process to discharge the board member.

The board acts independently to select a chairperson who they deem best for the organization and the board at the given time. Their decision is guided by criteria and a selection process developed by the full board to address the needs at the given time.

Functional Industries, Inc. adheres to the belief that good governance means performing efficiently and effectively within clearly defined roles, functions and perimeters. The structure of Functional Industries' governance- board size, mix, and terms of service- were all decisions made after carefully considering the unique circumstances of our business entity.

Board size was arrived at after a careful assessment of the optimum number of board members with requisite skills needed to thoroughly exercise governance oversight. Functional Industries' board is currently comprised of nine members. The governance decided that a board comprised of nine members would strike a balance between the broad-based skills and expertise necessary for the board, with the pragmatic considerations of managing the structure and processes of a larger board.

Board members are elected to serve three-year terms, with no limitation placed on the number of three-year terms they may serve. The governance believes that this approach, with acceptable board performance, ensures continuity of knowledge and community relationships.

Board members are required to be independent and unrelated to executive leadership. This requirement allows the board to act without undue influence from management.

The board sets the ethical tone of the organization and models integrity by its conduct. The board has established policies to address situations where financial links may exist between board members and the organization. Current policy is supported by signed conflict of interest and ethical code of conduct declarations.

Many governance decisions are complex and significant; requiring the board to seek expert advice. Often such expertise can be provided by our organization's internal experts; however, when adequate guidance can be provided by internal experts, the board seeks professional advice from external sources (i.e. in complex legal and/or financial matters).

The board as a whole is continuously assessing its performance in an effort to determine its overall effectiveness in governing the affairs of the organization. This assessment is designed to ensure that the board is fulfilling its duties and evolving within the context of the challenges faced by the organization. Ongoing assessment of the board's achievement and opportunities for improvement is designed to facilitate Functional Industries' evolving governance model and ensure that the activities of the board remain relevant to meeting the needs of the organization and its stakeholders.

The Board's Relationship to Executive Leadership

Functional Industries has clearly defined the functions of its governance versus the duties appropriately delegated to members of the executive leadership team.

The board of directors ensures that the organization has a vision for its future via goals, aims, missions, or ends and that the administration of the organization as a business entity is done legally, ethically and with integrity to achieve those goals.

The board is responsible for holding the organization's management accountable for performance. The board delegates authority to the organization's management to conduct the agency's business via resources (e.g., money, people, technology, etc.) and ensures that executive leadership develops plans and acts to achieve organizational goals. This delegation and review process serves as a continuous oversight mechanism, culminating in an annual review of the organization's (and therefore, the executive leadership's) success.

On occasion the board may access varied management and staff to assist in carrying out its governing duties. So as not to cross into management authority, the board has developed protocol on when and how it may consult with management/staff to support its governing duties. This protocol was developed between the board and executive leadership so that managerial operations are maintained as a priority for those assigned to that responsibility, while still providing the board adequate administrative support.

Board Processes

Board processes include:

- Agenda planning
- Contributing to and reviewing meeting materials
- Overseeing the following committee work:
 - Governance development and management
 - Financial audit
 - Executive compensation
 - Annual review of all governance policies
 - Other activities as defined by the board

Executive Leadership Development, Evaluation and Compensation

The governance conducts an annual formal written review of the executive leadership's performance in relation to overall corporate performance versus target, individual performance versus target, and professional development, accomplishments and opportunities.

A formal succession plan for executive leadership has been developed by the organization's president. This succession plan is designed to ensure continuity of leadership due to planned or unplanned departure of the president. The president is responsible for annually presenting this plan to the board for their review.

A board endorsed compensation philosophy has provided a broad-based foundation for the design and implementation of an effective compensation and performance management plan for executive leadership. The Executive Compensation and Management Plan is broad enough to provide an enduring foundation, yet specific enough to allow the board to make annual compensation decisions based on an informed and reasonable basis.

Functional Industries utilized the services of outside consultants to develop an executive compensation plan that would attract and retain leadership talent, respond to market trends, reflect the value of the functional demands of executive work and reward performance results.