



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: February 6, 2026

Subject: **TWC & Associated Monitoring**

Summary: Quality Assurance (QA) briefing on the Texas Workforce Commission (TWC) Annual Monitoring and related monitoring activities, including TWC's Equal Opportunity (EO) review. The item does not require Board action.

Strategic Goals: The agenda item mainly aligns with the following goal in the Strategic Plan: Goal 2: Service Optimizers Enhance the efficiency, quality, and accessibility of workforce services delivered by TWC, ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis: TWC Annual Monitoring: TWC completed its annual review of WSA from August 14, 2025, through October 23, 2025. We have not received any additional information to report, and continue to wait for the Final Report (if there are findings) or Letter (if there are no findings).

TWC's Exit Conference Report included five issues, which their Final Report may or may not include (or it may include items that were not in the exit report).

1. **Procurement:** Contract with Legal Counsel Services did not align with the solicitation document.
2. **Property:** Three *Notification of Property Acquisition* forms (Form 7200) were not submitted timely.
3. **Fiscal:** Single Audits were not completed by the Board's external monitor for two subrecipients within six months of the subrecipients' single audit publications.
4. **Operations/Center Walkthroughs:** TWC tested four locations for PII, Priority of Service, and Cash Equivalents: Floresville, Pleasanton, San Antonio Food Bank (Workforce One Bus), and O'Connor. TWC reported an issue at a single location in Floresville.
5. **Reemployment Services and Eligibility Assessment (RESEA):** This is the first year TWC has tested RESEA services. TWC identified six potential issues.

Equal Opportunity (EO) Monitoring: With its EO monitoring, TWC tests whether WSA complies with equal opportunity laws (29 CFR §38.31(b)), to (a) assure all customers equal



access to every program and (b) protect the civil rights of customers, employees, and the public.

TWC completed the review and issued WSA a letter (attached) on December 9, 2025, stating that the monitors identified no findings or issues requiring a corrective plan. WSA's EO Officer, Ms. Rebecca Balencia, coordinated the audit.

Alternatives: Federal and state laws, rules, and regulations require Boards to implement regular oversight and monitoring of contractors, subrecipients, and service providers that receive public and other funds administered by the Board. To that purpose, TWC and entities associated with its funding, including other federal and state agencies, monitor WSA's oversight and monitoring systems.

Fiscal Impact:

- TWC's Exit Report did not identify any potentially questioned costs.
- WSA received a clean EO Monitoring report with no questioned costs.

Recommendation: Staff from the associated departments are developing *action plans* to address TWC's Annual Report potential findings and other items that TWC may have 'flagged' but not reported, including some that staff resolved during the monitoring. The action plans include, at a minimum, four elements:

- An examination of the root causes,
- A review of existing (or the development of) procedures,
- Staff training, and
- Additional internal controls (to monitor and test progress for each item).

Staff will consolidate and prepare the documentation of the actions in anticipation of TWC's audit resolution, which QA will help coordinate.

Next Steps: TWC Annual Monitoring

TWC's 'Embargoed' Report: TWC will issue an informational (non-public) copy of the report to the CEO five business days before issuing the final report (around April 2026).

Monitoring Letter: If there are no issues, TWC will issue a letter (otherwise, they will issue a report).

Monitoring Report: If there are findings, TWC will issue a final report via e-mail to the Board Chair, Board Executive Director, designated representatives of the US Dept of Health and Human Services, Dept of Labor, TWC, and other TWC executive staff.

Audit Resolution: Findings from the report will go to TWC's Audit Resolution department, with whom WSA will coordinate to resolve the issues within 45 days.

Attachments:

- TWC Equal Opportunity monitoring letter.

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MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: February 6, 2026

Subject: **Two SNAP E&T and One Migrant Seasonal Farm Worker Reviews**

Summary: Quality Assurance (QA) briefing on two SNAP E&T and one Migrant Seasonal Farm Worker (MSFW) monitoring reviews. The item does not require Board action.

Strategic Goals: The item mainly aligns with the following goal in the Strategic Plan: Goal 2: Service Optimizers Enhance the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis: Health and Human Services Commission (HHSC) Quality Improvement Support (QIS) On January 15, 2026, TWC informed WSA that the HHSC QIS team scheduled a Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) programmatic review. The monitoring will test WSA's SNAP E&T policies and procedures, as well as the reporting and tracking of ABAWD and General Population participation. The scope of the review is July 2025 to December 2025.

The QIS department is part of the Access and Eligibility Services (AES) division and is responsible for connecting individuals to services and supports to reduce institutionalization and promote self-sufficiency. Their role involves consultative services and technical assistance, focusing on planning, developing, and implementing HHSC training to improve quality and efficiency and positively impact Texans' lives.

Estimated Timeline:

- Entrance Conference: February 9, 2026.
- On-site Reviews:
 - February 12, 2026: South Flores Career Center
 - February 13, 2026: San Antonio Food Bank Career Center (Third Party Partnership 2026).
- Exit Conference: February 25, 2026.

United States Department of Agriculture (USDA) Food and Nutrition Service (FNS)

On January 15, 2026, TWC informed WSA that the FNS Southwest Region Office (SWRO)

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will conduct a SNAP E&T Validation Review on February 3, 2026, from 1- 4 pm at the San Antonio Port Authority Workforce Center. FNS, Board, and Contractor staff will be in attendance.

FNS's monitoring/validating activities focus on:

- a) program integrity by implementing measures to prevent fraud and abuse,
- b) evaluations and compliance checks to assess the effectiveness of the program, including state agencies' adherence to federal guidelines and ensuring that benefits are distributed appropriately to eligible participants,
- c) improving program delivery by strengthening program integrity, and
- d) collaborating with TWC and HHSC to implement monitoring strategies while adapting to local needs to ensure effective program delivery.

For this review, FNS plans to visit the HHSC eligibility office and WSA.

TWC Migrant Seasonal Farm Worker (MSFW) Monitoring

TWC issued a letter to WSA on January 7, 2026, announcing an on-site review by the State Monitor Advocate Program Specialist from February 2 - 6, 2026. The review may include an additional desk review, which could extend the engagement through February 20, 2026, unless written notice indicates an earlier closing date. This is the first time that WSA has been monitored for this purpose. MSFWs are essential to our state's agricultural (Ag) industry, and our Workforce Solutions offices are dedicated to supporting Ag employers and workers seeking opportunities in the Ag sector. The Wagner-Peyser Act (as amended by Title III of WIOA) provides the foundation for Ag worker safeguards through the Employment Service (ES) program available through our Workforce Solutions Offices. To that purpose, the State Monitor Advocate System was established to ensure MSFWs are treated fairly and afforded the same opportunities for employment and career growth as other workers. The system includes State- and Regional-level monitor advocates, all working together under guidance from a National Monitor Advocate. The engagement aims to evaluate compliance with service delivery regulations and provide technical assistance.

The review period (scope) is July 1, 2024, to June 30, 2025. The State Monitor Advocate Program Specialist will monitor:

- Program Design,
- Service Strategy,
- Outreach,
- Policy,
- Financial Management,
- Employer/Business Services for the Agricultural Recruitment System (ARS),
- TWC Employment Services Staffing, and
- The Wagner-Peyser Complaint System.

Alternatives: Federal and state laws, rules, and regulations require Boards to implement

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regular oversight and monitoring of contractors, subrecipients, and service providers that receive public and other funds administered by the Board. To that purpose, TWC and entities associated with its funding, including other federal and state agencies, monitor WSA's oversight and monitoring systems.

Fiscal Impact: The engagements are not yet complete; no fiscal impact is reportable.

Recommendation: WSA and TWC staff will be available to address any concerns the monitors may have. Some of these reviews are new, while others include technical assistance. Staff will use the engagements as a learning opportunity to drive continuous improvement and enhance WSA's effectiveness and efficiency in serving job seekers and employers in our region.

Next Steps: WSA and TWC Staff are coordinating the preparation and submission of documents and information as requested by the monitors, and providing technical assistance to Center Staff, including walkthroughs, planning, logistics, reporting, and documentation.

Attachments: None.

Texas Workforce Commission

A Member of Texas Workforce Solutions

Joe Esparza, Chairman
Commissioner Representing
Employers

Alberto Treviño III
Commissioner Representing
Labor

Brent Connett
Commissioner Representing
the Public

Randy Townsend
Interim Executive Director

Report 26.20.0201

December 9, 2025

VIA Email: alopez@wsalamo.org

Mr. Adrian Lopez, Chief Executive Director
Workforce Solutions Alamo
100 North Santa Rosa St., Suite 120
San Antonio, TX 78207

Dear Mr. Lopez:

The Texas Workforce Commission (TWC) is required to monitor whether our grant subrecipients are complying with the equal opportunity laws (29 CFR § 38.31(b)). Equal Opportunity is a critical subject because (a) these rules assure all customers full access to every program, and also (b) these rules protect the civil rights of customers, employees and the public.

TWC's Equal Opportunity Compliance Department (EOCD) has completed our FY 2026 review for the Workforce Solutions Alamo. This letter is our report. The EOCD has no findings and there are no issues which necessitate a corrective action plan.

Thank you again for your cooperation with this important task. We appreciate the assistance of Ms. Rebecca Espino Balencia, your local EO officer, and Marty Pena, 504 Coordinator. Should you have any further questions concerning the EOCD review, please call the EO Compliance Department at 512-463-2400.

Sincerely,

Jon Pokorney

Jon Pokorney
State of Texas Equal Opportunity Officer

cc: Leslie Cantu, Board Chair, Workforce Solutions Alamo
Frank Stluka, Acting Regional Administrator, ETA, USDOL
Joe Esparza, Chairman, Commissioner Representing Employers, TWC
Alberto Treviño, III, Commissioner Representing Labor, TWC
Brent Connett, Commissioner Representing the Public, TWC
Randy Townsend, Interim Executive Director, TWC
Mary York, Division Director, Workforce Development, TWC
Jason A. Stalinsky, Division Director, Fraud Deterrence and Compliance Monitoring, TWC

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Relay Texas: 800-735-2989 (TTY) and 711 (Voice).





MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: February 6, 2026

Subject: **Quality Assurance Briefing**

Summary: Quality Assurance (QA) briefing on WSA monitoring activities. The item does not require Board action.

Strategic Goals: This item mainly aligns with the following goal in the Strategic Plan: Goal 2: Service Optimizers Enhance the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis: External Program Monitoring (Ms. Christine Nguyen, CPA) Program Year 2024-2025

- **Temporary Assistance for Needy Families (TANF) – C2 GPS:** 100% complete, with an overall 92.31% accuracy rate, which exceeded the 90% threshold. The testing identified two (2) attributes for continuous improvement:
 - Closing Choices applications on the last day of the month in which the penalty was initiated (25% accuracy).
 - Timely follow-up with HHSC regarding non-imposed penalties (0% accuracy).
 - *Note: Applicable instances occur very rarely for this attribute, as HHSC imposes most penalties in a timely fashion. Of the 30 files tested, only one had this attribute applicable.*
- **WIOA Youth – SERCO:** 100% complete, with an overall 90.52% accuracy rate, which did meet the 90% threshold. The testing identified five (5) attributes for continuous improvement:
 - Recording the need for support services in the service plan (88.24% accuracy).
 - Documenting support services (82.35% accuracy).
 - Accurately reporting Measurable Skills Gains (MSGs) (29.41% accuracy).
 - Accurately reporting Credential/Outcome entries (27.27% accuracy).
 - Maintaining documentation for MSGs and Credentials (76.47% accuracy).
- **Ready to Work (RtW) – Multiple partners:** 100% complete. For RtW, we follow a 'quality control' approach (as opposed to 'quality assurance'). Our consultant conducts tests, and we send the information to staff for action as needed. The process helps ensure we meet City standards, and the monitors identified no issues.

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External Program Monitoring (Ms. Christine Nguyen, CPA) Program Year 2025 – 2026

- **Child Care Quality Improvement Activities (CCQIA) – COSA:** Testing is 32% complete.

Internal QA Program Monitoring Program Year 2025 – 2026

- **Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Follow Up – C2 GPS:** 100% complete. Currently working on the Final Report.
- **Informal Reviews – all contractors:** Follow-up on attributes scoring <90% accuracy on the most recent program annual review are 34% complete.

Other QA Activities

Some of the additional activities performed by QA include, but are not limited to, the following:

- **Program Monitoring RFP:** Development of RFP for program monitoring.
- **Subrecipient Profits (C2GPS and SERCO):** Completed estimating contractor profits for 2024-2025 and are in the process of coordinating invoicing and payment for close-outs.
- **Policies & Procedures:** Reviewing and providing guidance on varied policy- and procedural-related items.
- **Staff Training:** Dr. Ricardo is getting ready to restart the WSA staff training.

Alternatives: Federal and state laws, rules, and regulations require Boards to implement regular oversight and monitoring of contractors, subrecipients, and service providers that receive public and other funds administered by the Board. To that purpose, TWC and entities associated with its funding, including other federal and state agencies, monitor WSA's oversight and monitoring systems.

Fiscal Impact: WSA's External Program Monitoring contract with Ms. Christine Nguyen, CPA: \$225,000.

Recommendation: QA will continue performing informal testing as staff transition the system into formal Follow-Up reviews. Informal reviews serve as quality control to track the progress of attributes with <90% accuracy, while formal Follow-Up reviews aim to determine whether these attributes have been resolved and which further help fulfill TWC requirements. To that purpose:

- QA has been coordinating meetings with our subrecipients to provide technical assistance tied to their internal and ongoing testing of items with <90% accuracy, and critical items, including repeat findings.

Next Steps: QA will continue to implement the estimated engagement timeline as presented in a separate agenda item.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: February 6, 2026

Subject: **Strategy – Internal and External Monitoring and Training Schedule**

Summary: Quality Assurance (QA) briefing on the monitoring and training schedule. The item does not require Board action.

Strategic Goals: This item mainly aligns with the following goal in the Strategic Plan: Goal 2: Service Optimizers: Enhance the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis: Monitoring plays an integral role in the internal controls of the workforce system. It helps ensure that programs achieve intended results, that resources are protected from waste, fraud, and abuse, and that these are used efficiently and effectively for authorized purposes. The monitoring also helps ensure that staff capture and report reliable, timely information to support improved decision-making. QA reports the following estimated and actual program timelines and the WSA staff training schedule for 2025-2026.



Estimated Timeline – External Program Monitoring Activities 2025-2026

Initial Estimated Timeline				Actual Timeline						
<i>External Program Monitoring</i>	<i>Duration</i> ⁺⁺	<i>Start</i>	<i>Finish</i>	<i>Duration</i> ⁺⁺	<i>Effort</i>	<i>Variance</i>	<i>Start</i>	<i>Finish</i>	<i>% Complete</i>	<i>Comments</i>
Estimated Timeline: 2025-2026	218	1/12/2026	11/11/2026				1/12/2026		32%	
COSA - CC QIA	37	1/12/2026	3/3/2026				1/12/2026		32%	
C2GPS - WIOA Adult	46	3/26/2026	5/28/2026							
C2GPS - WIOA Dislocated Worker	46	3/26/2026	5/28/2026							
Equus - Child Care Services	41	5/13/2026	7/8/2026							
C2GPS - NCP	39	6/4/2026	7/28/2026							
SERCO - WIOA Youth	40	7/7/2026	8/31/2026							
C2GPS - TANF/Choices	42	9/3/2026	10/30/2026							
CONSORTIUM - Ready to Work	27	10/6/2026	11/11/2026							

Avg Duration or Effort (days) → 40

Multi-tasking (% days overlapping projects) → 31.4%

Duration : total days from start to finish to complete project (includes some holidays); **Effort (or Work)** : actual number of days spent on each project.

Notes

⁺⁺ The Duration is not equal to the time that the contractors are actively involved in the project - it includes additional internal QA work (e.g., desk and policy review, tool development, etc.).



Training Schedule

Est. Dates	Num	Topic
Part 1: Workforce Development & Local Boards		
Completed	1	Workforce Development System
July-Aug	2	Local Workforce Development Boards
Part 2: Board Agreements and Contracts		
Feb-Mar	3	Local Plan
	4	High Performing Board
Part 3: Labor Market Assessment & Planning		
Apr-May	5	Employment-Related Measures I
	6	Employment-Related Measures II
Part 4: Contracts		
Jun-Jul	7	TWC Agreements and Grants
	8	WSA Contracts
Part 5: Workforce Policies		
Aug-Sept	9	Federal & State Guidance
	10	Local Policies
Part 6: Performance		
Oct-Nov	11	TWC-Contracted Performance
	12	Locally-Developed Performance
Part 7: Internal Controls		
Dec-Jan	13	Risk Assessment
	14	Quality Assurance & Quality Control

Alternatives:

- The monitoring plan helps retain QA's certification in preventing waste, fraud, and abuse and ensuring resources are efficiently and effectively invested in productive and allowable activities.
- The training plan helps staff gain a greater understanding of the workforce development mission and environment as one of the 28 workforce boards in Texas serving job seekers and employers.

Fiscal Impact:

- External Program Monitoring contract with Ms. Christine Nguyen, CPA: \$225,000.
- Staff Training: No reportable costs.

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Recommendation:

- **Program Monitoring Timeline:** QA will continue transitioning the informal reviews to the formal Follow-Up reports and will provide updates to the Board.
- **Training Schedule:** Dr. Ricardo will continue scheduling the training not only for WSA directors and managers but also for all staff. The training topics and schedule will be adjusted as may be needed.

Next Steps: QA will:

- Continue implementing the monitoring timeline, make any necessary adjustments as they arise, and report the outcomes of the engagements to the Board.
- Provide the staff training as planned, gather feedback from the Board, CEO, and staff, and continue instilling a workforce development-oriented culture framed within WSA's goals and mission.

ATTACHMENTS: None.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Dr. Ricardo Ramirez, Director of Quality Assurance

Date: February 6, 2026

Subject: **ADM 65, C2 – Monitoring Policy and Procedures Update**

Summary: Quality Assurance (QA) is requesting the Board's approval of WSA's Monitoring Policy update. This item does require Board approval.

Strategic Goals: The agenda item mainly aligns with the following goal in the Strategic Plan: Goal 2: Service Optimizers -Enhance the efficiency, quality, and accessibility of workforce services delivered by TWC, ensuring Texans experience seamless access to job training, unemployment benefits, and career support.

Analysis: QA is updating WSA's Monitoring policy with the following changes. Some changes involve clarity and editing, and more specific updates are included in the following sections:

- **Scope & Purpose:** Eliminated some unnecessary information (e.g., dates of when an organizational change occurred, splitting fiscal and QA's monitoring responsibilities).
- **Controls Over Monitoring:** Added reporting to the Executive Committee and the Full Board.
- **Reporting and Resolution Requirements:** Added elements needed for the resolution of identified issues.
- **Exceptions and Responsiveness:** Added a new section granting QA the flexibility needed to adjust processes for responsiveness to meet unforeseen federal and state monitoring requirements.
- **Attachments:** Deleted two attachments, which were procedural in nature and, thus, not applicable for policy-making decisions.

Alternatives: The policy fully incorporates federal and state monitoring requirements for WSA.

Fiscal Impact: No reportable fiscal impact.

Recommendation: Updating the policy helps strengthen WSA's monitoring activities to meet federal and state standards and achieve the agency's continuous quality improvement and internal control goals.



Next Steps: If approved, implement the policy update and provide associated technical assistance to staff.

Attachments: ADM 65, C2 – Monitoring Policy.

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MEMORANDUM

To: Oversight Committee
From: Adrian Lopez, CEO
Presented By: Victoria Rodriguez, Director of Workforce Services
Date: February 6, 2026
Subject: **Program Briefing**

Summary: Workforce Solutions Alamo (WSA) continues to advance its mission through multiple TWC-funded initiatives that expand access to education, training, and employment opportunities across the region. These efforts strengthen connections between schools, employers, and the workforce system, support individuals transitioning back into the community, and create meaningful career pathways for youth and individuals with disabilities.

Strategic Goals: This agenda item aligns with the following goal(s) in the Strategic Plan: Goal 1: Texas Talent Experts -Build a statewide network of Texas Talent Experts to support workforce development by identifying skill gaps, advising employers and jobseekers, and promoting talent recruitment and retention across Texas.

Analysis: Below is a summary of key updates on current projects.

Externship for Teachers: Workforce Solutions Alamo (WSA) was recently awarded the Externship for Teachers grant, which will run through the summer until August. This grant supports collaboration with Independent School Districts (ISDs) and strengthens educators’ understanding of workforce development and regional career pathways. Through their externships, participating teachers will gain hands-on industry experience and incorporate those insights into their lesson plans to better prepare students for future careers. A key change in this year’s award is that the required externship duration has increased from five to ten days, without an increase in funding. WSA committed to serving 100 educators, who will each receive a \$500 stipend upon completion, along with an additional \$50 stipend for classroom materials. WSA staff have now completed the 2025 Externship for Teachers program, with 96 educators successfully finishing the program.

Partners for Reentry Opportunities in Workforce Development (PROWD): Implement evidence-based, dedicated services that will improve the outcomes for individuals



currently in or recently released from the custody of the Federal Bureau of Prisons (FBOP).

Total Participants: 204
Received Training: 160
Completed Training: 156
Received Mentoring: 16
Job Placement: 140
Credential Attainment: 147
MSG – Skills Progression: 147
Total Exits: 138

Student HireAbility Navigators (SHN): On February 12, 2025, Workforce Solutions Alamo will host the Alamo Helping Hands Career & College Expo at the WSA O’Connor Career Center, which is currently under development in collaboration with neighboring workforce boards. Additionally, WSA is leading the planning and coordination of a Self-Advocacy and Disability Virtual Event for Youth in Transition. Looking ahead, on April 22, 2026, Navigator Onyejiako will host the second Reverse Job Fair for approximately 25 Project SEARCH participants at the Datapoint Career Center, in partnership with Serco and C2 BSR, with support from Industry Recruitment and a VR Employee Specialist.

Alternatives: These items reflect WSA’s ongoing work across various services and TWC-funded grants and will require updates as they progress through their respective timelines.

Fiscal Impact: These grants total approximately \$2.2 million and have demonstrated a strong return on investment through their positive impact on both employers and job seekers.

Recommendation: Staff recommend continuing to support these initiatives by pursuing reapplications and seeking similar funding opportunities to sustain and expand these activities.

Next Steps: Staff will continue to update the board on the progress of these projects.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Victoria Rodriguez, Director of Workforce Services

Date: February 6, 2026

Subject: Performance

Summary: There are fifteen siloed measures tracked across all WIOA programs (Adult, Dislocated Worker, and Youth) in the Monthly Performance Report (MPR) by TWC. These measures include Claimant Re-Employment within 10 Weeks, Employers Receiving Workforce Assistance from Boards or Self-Services, Choices Full Engagement Rate, and the Average Number of Children Served per Day Combined. Each measure has a specific definition outlined in the presentation. Performance targets vary by measure, with some requiring 90% of the target performance to be met and others 95%. WIOA measures have start periods that run either from July to June or January to December, with the End of Year Report concluding in August. Meanwhile, Claimant Re-Employment within 10 Weeks, Employers Receiving Workforce Assistance, Choices Full Engagement Rate, and the Average Number of Children Served per Day Combined follow a rolling start period from the previous month to the current year, with their End of Year Report concluding in September.

Strategic Goals: This agenda item aligns with the following goal(s) in the Strategic Plan: Goal 1: Texas Talent Experts: Build a statewide network of Texas Talent Experts to support workforce development by identifying skill gaps, advising employers and jobseekers, and promoting talent recruitment and retention across Texas.

Analysis: For the October and November Monthly Performance Reports (MPRs), WSA did not meet the Adult, Dislocated Worker, and Youth Measurable Skills Gains (MSG), Dislocated Worker Credential and Training (C&T), Credential Rate, and Claimant Reemployment Rate measures. The MSG measure operates on an academic timeline that does not align with the monthly reporting cycle; as a result, improvements are typically observed in the spring when participants receive progress updates from their training or educational providers. Performance on both C&T measures is also expected to improve as cohorts complete their programs and obtain industry-recognized credentials. Additionally, the Claimant Reemployment Rate has shown significant



improvement due to enhanced collaboration between state merit staff and contractor staff.

TWC-Contracted Performance	Oct25	Nov25
Employed Q2 Post Exit – Adult (DOL)	12	12
Employed Q4 Post Exit – Adult (DOL)	3	3
Median Earnings Q2 Post Exit – Adult (DOL)	\$3.32	\$3.32
Credential Rate – Adult (DOL)	3	3
Measurable Skills Gains - Adult (DOL)	-8	-6
Employed Q2 Post Exit – DW (DOL)	6	6
Employed Q4 Post Exit – DW (DOL)	10	10
Median Earnings Q2 Post Exit – DW (DOL)	\$872.37	\$872.37
Credential Rate – DW (DOL)	-3	-3
Measurable Skills Gains - DW (DOL)	-6	-1
Employed/Enrolled Q2 Post Exit – Youth (DOL)	8	8
Employed/Enrolled Q4 Post Exit – Youth (DOL)	5	5
Credential Rate – Youth (DOL)	3	3
Measurable Skills Gains - Youth (DOL)	-5	-6
Employed/Enrolled Q2 Post Exit – C&T Participants	N/A	N/A
Employed/Enrolled Q2-Q4 Post Exit – C&T Participant	N/A	N/A
Credential Rate – C&T Participants	-2	-2
Claimant Reemployment within 10 Weeks	18	-19

Alternatives: These items reflect WSA’s ongoing work across various services and TWC-funded grants and will require updates as they progress through their respective timelines.

Fiscal Impact: If TWC decides to impose disciplinary action on the Board, it could have significant consequences on the Board’s ability to secure future grant funding. Such actions may result in reduced eligibility for certain funding opportunities, restrictions on grant allocations, or increased oversight in financial and programmatic operations

Recommendation: Board staff will work closely with contractors to assess current performance levels and identify key areas for improvement. This collaboration will involve analyzing data, reviewing service delivery methods, and implementing strategic adjustments to enhance overall effectiveness.

Next Steps: Staff will continue to closely monitor performance. Contractors and WSA staff will use predictive reports to identify and implement actions needed to improve the measures that are currently unmet.



MEMORANDUM

To: Oversight Committee
From: Eric Vryn, Chief Process Officer
Date: February 6, 2026
Subject: **Update: Enterprise Risk Management (ERM) Tool**

Purpose:

This memo provides an update on WSA's ERM tool development, summarizes the material changes from the prior version to the current release candidate, and outlines an implementation approach designed to support consistent risk intake, documentation, and leadership decision-making across divisions.

*The project aligns with **Supporting Texas Talent and Economic Growth - Goal 2, Service Optimizers**, in our strategic plan. Enhance the efficiency, quality, and accessibility of workforce services delivered by the Texas Workforce Commission (TWC), ensuring Texans experience seamless access to job training, unemployment benefits, and career support.*

Summary:

Since the last committee update, the ERM tool has progressed from an early-stage, category-weighted intake concept to a more mature, exportable risk assessment tool suitable for enterprise use. The initial version relied on a 13-question, weighted-category approach that produced a directional score but limited the ability to document risk logic, evidence, and decision gates consistently across departments

The current version is a shareable HTML-based tool generated through Python-coded logic, designed to be simple for staff to access and use (drag-and-drop to a desktop). It captures risk assessments through 32 structured sections combining free-text fields and weighted/scored fields. Once completed, the output can be exported to Word, Excel, or PDF for review within the originating department and for escalation to agency leadership when warranted.

Separately, the tool was applied as a practical test case to support risk evaluation for an upcoming procurement action. Consistent with FMGC expectations and the integrity of the pending solicitation, this memo does not describe the procurement or its contents. The limited point is methodological: using a real-world, time-bound decision context surfaced where the tool needed

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tighter definitions, stronger prompts, and clearer gating outputs to be operationally useful and defensible.

Evolution from Prior Version to Current Version:

- **Prior version (baseline):**
 - Structure: 13 questions across weighted categories
 - Primary strength: fast, directional scoring and prioritization
 - Primary limitation: insufficient structure for consistent risk statements, controls, evidence expectations, and approval “gates” across divisions; outputs were harder to translate into committee-ready documentation
- **Current version (release candidate):**
 - Structure: 32 sections with a mix of free-text narrative fields and weighted/scored fields
 - Primary strength: produces a standardized, discussion-ready output that supports (a) clear risk articulation, (b) documented controls/mitigations, (c) open items and decision conditions, and (d) consistent escalation to leadership
 - Usability: HTML format that staff can open locally via simple drag-and-drop; tool logic is maintained in Python, but the user experience is intentionally low-friction
 - Outputs: export to Word/Excel/PDF, enabling consistent review workflows and documentation retention.

Risk Analysis Framework:

The tool is designed to support a universal ERM intake across WSA divisions while preserving the operational context that makes risks actionable. The scoring framework remains a means to structure attention—not a substitute for management judgment.

- i. Inherent risk scoring: the tool supports standardized scoring to compare and triage risks across initiatives.
- ii. Risk Snapshot: a summary view derived from the highest scoring risks, intended to provide leadership an “at-a-glance” risk posture and highlight where governance attention is required.
- iii. Residual risk: explicitly treated as dependent on the existence and quality of controls and evidence; where controls are planned but not implemented (or not evidenced), residual risk may remain unknown and should be documented as such.

Implementation Approach:

The practical use of the tool in a real decision environment (including a procurement-adjacent test case) clarified what is required for enterprise deployment: consistency, documentation discipline,



and governance gates. The following implementation approach reflects those lessons without referencing protected procurement details.

i. Standard-setting before scale

- Before broad rollout, WSA should establish a minimum enterprise standard for:
- what constitutes an acceptable risk statement (clear event + impact, no ambiguity)
- definitions for scoring levels to reduce inter-department scoring drift what qualifies as a “control in place” vs. a “planned mitigation”
- documentation expectations (what evidence closes an item; what is acceptable as interim evidence)

ii. Pilot with calibration and governance focus

- A controlled pilot should be executed in a small number of high-leverage areas (commonly Programs and Procurement/Contracts), not to “prove” the tool, but to calibrate how staff apply scoring and how leadership uses outputs. The procurement-adjacent test case demonstrated that the tool is most valuable when it forces clarity around:
 - what is known vs. unknown at the decision point
 - which items are true “gates” (must be closed before release/approval)
 - what evidence is required to reduce likelihood or consequence credibly

iii. Convert outputs into operating cadence

The tool should feed a repeatable governance rhythm: department review → cross-functional risk review (as needed) → executive/committee reporting when thresholds are met. The goal is not additional paperwork; it is consistent, defensible decision support.

iv. Training and adoption controls

Deployment should include short, role-based training (authors, reviewers, approvers) and a basic quality control step (spot-checks for scoring rationale, completeness, and evidence alignment). The tool’s value is degraded if narrative quality and evidence expectations vary widely by team.

Next Steps:

i. Near-term (0–30 days)

- Finalize tool definitions (scoring anchors, required fields, minimum quality standards).
- Deployment to board staff
- Define approval gates: who can proceed with open items, and under what documented conditions.
- Run a pilot cycle and produce a short calibration brief (common scoring variances; recurring unknowns; output usability for decision-making).



ii. **Mid-term (30–90 days)**

- Establish enterprise reporting thresholds (what triggers escalation to executives/committee).
- Formalize record retention practices for outputs (Word/Excel/PDF) to support audit defensibility.
- Expand rollout by division with periodic recalibration to prevent scoring drift.

Fiscal Impact

No Fiscal Impact. The tool is intended as a low-barrier, early-stage risk forecasting aid—deployable with existing staff capacity through simple local distribution (HTML file). Any fiscal impact is more likely to stem from the mitigations it drives—added monitoring, documentation controls, data validation, or operational changes—rather than from the tool itself. The level of effort should be measured during early deployment and reported as a planned implementation output.

Attachments: None.



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Kristen Rodriguez, Director Procurement and Contracts Management

Date: February 6, 2026

Subject: **Facility Management Process and Strategy**

Summary: This memo is provided as a briefing on ongoing actions currently underway to improve efficiency within the Facilities Department by increasing visibility, strengthening tracking, and improving the use of available resources related to facilities issues and incidents across centers.

No action is required at this time.

This memo aligns with Supporting Texas Talent and Economic Growth - Goal 2, Service Optimizers, in our strategic plan.

Analysis: Historically, facilities-related issues, maintenance requests, and incidents across centers have been communicated primarily through email. While this approach allowed issue notification, it did not provide a reliable method to track issues from report to resolution, analyze trends, or consistently document outcomes to support oversight and reporting.

To address these gaps, standardized tools and reporting systems are being implemented using Monday.com to support centralized oversight of facilities-related activity. These efforts include:

- **Standardized Forms and Checklists**- Creation of uniform forms and checklists to consistently capture facility issues, maintenance needs, and incidents across centers, ensuring required information is collected and documented.

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- **Facility Issue and Incident Tracking**- Establishment of workflows that allow reported issues and incidents to be logged, assigned, and tracked through resolution, providing visibility into status, response time, and completion.
- **Dashboards and Reporting**- Development of dashboards to support aggregate-level reporting on facility issues, recurring concerns, response timelines, and workload trends. These dashboards are intended to support leadership and oversight review.
- **Automated Status Notifications**- Use of system automations to provide requestors with updates as their requests move through the process. These notifications improve transparency, reduce follow-up inquiries, and ensure stakeholders are informed as items are received, assigned, and resolved.
- **Improved Documentation and Accountability**- Moving away from email-only processes improves documentation, reduces the risk of missed or unresolved issues, and supports consistent recordkeeping over time.

At the same time, opportunities have been identified to improve how existing resources are leveraged by:

- Utilizing software tools to reduce manual tracking and follow-up
- Supporting clearer visibility into how facilities-related work is distributed at the contract level, in-house teams and specialized contractors.

The anticipated outcomes of these improvements include:

- Increased efficiency and consistency in facilities oversight
- Improved ability to monitor response timelines and resolution
- Better identification of recurring facility issues
- Reliable reporting to support decision-making
- Ensure that facilities are maintained to consistent standards and presented uniformly across all centers

Fiscal Impact: While these improvements are primarily operational, they also support improved financial management by:



- Providing data that supports more accurate forecasting of facilities needs and related costs
- Improving visibility into trends, recurring issues, and contractor utilization to inform budgeting decisions

Alternatives: None

Next Steps: Next steps include finalizing the tools and workflows, conducting testing to validate functionality, making any necessary modifications, developing standard operating procedures (SOPs), and implementing the finalized processes across centers.

Attachment: N/A



MEMORANDUM

To: Oversight Committee

From: Adrian Lopez, CEO

Presented By: Maria Martinez, Director of Human Resources

Date: February 6, 2026

Subject: Employee Handbook Update

Summary: This memorandum provides an update on proposed revisions to the 2025 Employee Handbook in accordance with current human resources policies and guidelines. The Employee Handbook is a key governing document that outlines employee rights, responsibilities, and organizational policies. Periodic updates are necessary to ensure alignment with evolving laws, regulations, and internal practices.

These updates are necessary as the Employee Handbook directly impacts all employees and must remain consistent with organizational goals and applicable legal standards. The attached matrixes include previous and the updated matrix that outlines the sections proposed for update. The Employee Handbook is reviewed at least every five years, or more frequently as required due to significant changes in employment laws or organizational operations.

Analysis The proposed updates include key revisions identified in the revision matrix. All changes align with organizational goals, enhance policy clarity, and support a positive employee experience. The updates are intended to ensure continued compliance with applicable employment laws, address operational needs, and incorporate employee feedback where appropriate.

Alternatives: N/A

Fiscal Impact: There is no financial impact associated with the proposed updates.

Recommendation: Staff recommend approval of the proposed updates to the 2025 Employee Handbook, with the start of the fiscal year of October 1, 2025. These revisions align with current human resources laws and internal policies and ensure the organization remains compliant, consistent, and responsive to employee needs.

Next Steps: Upon approval, Human Resources will finalize, distribute, and communicate the updated Employee Handbook to all employees.

Attachment: 2025 Employee Handbook and Matrixes

Employee Handbook Updates

Fiscal Year 2026

NEW	REASON
7.23 – Video Surveillance in the Workplace	To notify WSA employees of WSA's reserved right to monitor Agency property for business purposes.

SUBSTANTIVE REVISIONS		REASON
FROM 2025	TO 2025	
1.3 – Harassment & Sexual Harassment	1.3 – Harassment & Sexual Harassment	Provides updated hotline contact information to ensure employees have current resources available when reporting complaints.
4.3 – Paid Time Off	4.3 – Paid Time Off	PTO accrual is based on years of service and the number of paid hours for each pay period excluding overtime. PTO does not accrue during unpaid leave, or unpaid status. Includes PTO accrual schedule with carryover limits.
4.3 – Paid Time Off	4.3 – Paid Time Off	Number of hours eligible for sell-back while maintaining minimum balance at the time of sell-back. Includes sell-back schedule.
6.1 – Bereavement	6.1 – Bereavement	Outlines the definition of immediate family for bereavement leave purposes to include: spouse, children, parents, siblings, grandparents, grandchildren, and also the immediate family member of the employee's spouse.
6.3 – Jury Duty	6.3 – Jury Duty	Grants employees leave with pay when summoned to serve on Jury Duty.

7.7 – Drugs and Alcohol	7.7 – Drugs and Alcohol	Identifies circumstances under which WSA may be required to notify the Texas Workforce Commission (TWC) of a conviction.
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REMOVED	REASON
3.6 Travel Expenses	To be addressed with fiscal for specific circumstances.
6.3.4 – Not Time Worked/Non-Accrual	Not applicable. Reference in section 4.3

Employee Handbook Update 2025

NEW	REASON
1.4 - Reasonable Accommodations, p.10	To add accommodations for pregnancy and religion
1.6 - Whistleblower Policy, p.12	To comply with law
2.4 - Long-Distance Remote Work	New policy previously adopted by the Board
3.3 –Timekeeping	Consolidated from other policies to follow best practices
4.6 - Personal Day	To address current practice
6.7 - Emergency Evacuation Leave, p.44	To comply with Texas law
7.2.4 – Lactation Breaks, p.46	Added to comply with federal law (PUMP Act)
7.14 – Prohibited Technologies, p.61	Added to comply with the state and federal law and TWC regulations
7.16 –References	To follow best practices

SUBSTANTIVE REVISIONS		REASON
FROM 2021	TO 2025	
1.3 – Equal Employment Opportunity	1.2 – Equal Employment Opportunity	List of protected classes updated
1.4 – Harassment & Sexual Harassment	1.4 – Harassment & Sexual Harassment	Hotline contacts added
1.5 – Drugs and Alcohol	7.7 – Drugs and Alcohol	Language added to identify the occasions when WSA may test for drugs and alcohol
1.8 - Customer Relations	1.9 – Partner Relations	Renamed and rewritten for accuracy
2.2 - Application for Employment and Background Investigation	2.2 – Job Application and Assessment Process	Background Investigations are a standard procedure rather than policy; revised to reflect actual practice

2.3.4 – Interim Appointments	2.2.10 – Interim Appointments	Individuals may or may not receive a wage adjustment when appointed on interim basis
3.6 – Pay Deductions	3.2 – Pay Deductions	Revised to include permissible deductions for exempt employees in accordance with federal law
4.3 – Paid Time Off	4.3 – Paid Time Off	Revised to provide PTO only to full-time employees (and not part-time employees)
4.3 – Paid Time Off	4.3 – Paid Time Off	Black-out dates for consecutive leave during critical operations
4.3 – Paid Time Off	4.3 – Paid Time Off	Provided payout of accrued, unused PTO for death of an employee
4.3 – Paid Time Off	4.3 – Paid Time Off	For employees who resign to be entitled to payout of accrued, unused PTO, they must work during the notice period to ensure a smooth transition
4.7 – Emergency Leave Pool	4.5 – Leave Sharing for Medical Emergencies	Renamed & updated with best practices
5.4 – Security of Personal Property	7.7 – Security of Personal Property	Updated to state that employees do not have a right of privacy in WSA desks and work areas
7.3.7 – Attendance and Tardies	7.3.5 – Consequences of Excessive Absences	Voluntary resignation changed from 3 days to 2 days for no-call, no-show
7.8 – Non-Smoking Policy	7.6 – Non-Smoking/No-Vaping Policy	Vaping added to prohibited activity
7.9 – Political Activities	7.8 – Political Activities	Updated for best practices
7.10 – Social Media Policy	7.9 Social Media and Blogging Policy	Updated to prohibit the use of TikTok and for best practices
7.13 – Use of Computer Resources	7.13 – Use of Computer Resources	Expanded to reflect best practices, i.e., prohibiting conduct violating fair employment laws
7.20 – Weapons Policy	5.3 – Weapons Policy	Updated to comply with Texas law on keeping firearms in parking areas
7.21 – Use of Agency-Owned or Leased Vehicles and Driving for Agency Business	7.20 – Use of Agency-Owned or Leased Vehicles and Driving for Agency Business	Updated for best practices

8.1 – Standards of Conduct and Disciplinary Process	8.3 – Disciplinary Process	Section added to make individuals currently subject to discipline ineligible for pay increases or bonuses for specified period of time
8.2 - Grievance	1.7 - Workforce Innovation and Opportunity Act Grievance Procedure	Revised to comply with state and federal regulations

REMOVED	REASON
1.1 - Definitions	Definitions inserted into relevant sections
1.10 – Equal Opportunity Officer	Unrelated to employment policies
2.6 - Promotions	To increase CEO flexibility to fill positions
2.7 - Transfers	To increase CEO flexibility to fill positions
2.8 - Demotions	To increase CEO flexibility to fill positions
2.11 – Supervisory Policy	Represents a standard of procedure rather than a policy
4.1 - Medical and Health Insurance	Consolidated with other benefits and reference to plan documents
4.2 - Life and Disability Insurance	Consolidated with other benefits and reference to plan documents
4.3 - Retirement – Defined Contribution Plan	Consolidated with other benefits and reference to plan documents
4.10 – Worker’s Compensation Insurance	Limited applicability
4.11 - Consolidated Omnibus Budget Reconciliation Act (COBRA)	Limited applicability
4.14 - Direct Deposit	Incorporated into Payroll Schedule
4.15 – Alternative Work Schedules	Replaced with Telecommuting and Long-Distance Remote Work policies
6.3 – Jury/Witness Duty	Witness duty removed

7.17 – Employees with Serious Diseases	Limited applicability
7.19 – Agency-Issued Cellular Phone Usage	Incorporated into other policies
9.2 – Reduction in Force	Limited applicability
9.3 – Exit Interviews	Represents a standard of procedure rather than a policy

MOVED TO NEW SECTIONS		REASON
FROM 2021	TO 2025	
1.5 - Drugs and Alcohol	7.7 - Drugs and Alcohol	Moved to General Work Rules
1.6 - Confidential Information	7.11 - Confidential Information	Moved to General Work Rules
1.11 – Violence in the Workplace	5.2 - Violence in the Workplace	Moved to Safety and Security
2.4 – Expectations for Employee Behavior	8.1 – Expectations for Employee Behavior	Moved to Rules of Conduct
2.9 - Immigration Law Compliance	1.2.2 – Immigration Law Compliance	Moved to General Provisions/Equal Employment Opportunity
3.7 – Final Wage Payments	9.2 – Final Wage Payments	Moved to Separation of Employment
4.5 – Travel Expenses	3.6 – Travel Expenses	Moved to Compensation where reimbursements are addressed
4.8 – Administrative Leave	6.4 – Administrative Leave	Moved to Leaves of Absence
7.4 – Telecommuting	2.3 - Telecommuting	Moved to Employment
7.7 – Security of Personal Property	5.4 – Security of Personal Property	Moved to Safety and Security
7.11 – Personal Behavior Expectations	8.1 – Expectations for Employee Behavior	Moved to Rules of Conduct
7.20 – Weapons Policy	5.3 – Weapons Policy	Moved to Safety and Security



EMPLOYEE HANDBOOK

WELCOME NEW EMPLOYEES!

On behalf of your colleagues, I welcome you to Workforce Solutions Alamo (“WSA” or the “Agency”) and wish you every success here.

We believe that each employee contributes directly to WSA’s growth and success, and we hope you will take pride in being a member of our team.

This Employee Handbook was developed to outline current policies, programs, and benefits available to eligible employees. This Handbook applies to both new and current employees. Employees should familiarize themselves with the contents of the Handbook as soon as possible, for it will answer many questions about employment with WSA.

We hope that your experience here will be challenging, enjoyable, and rewarding. Again, welcome!

Adrian Lopez
CEO

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INTRODUCTION STATEMENT

This Handbook is designed to acquaint employees with Workforce Solutions Alamo (“WSA” or the “Agency”) and its employment policies. Employees are required to read, understand, and follow all Handbook provisions. WSA complies with all federal and state employment laws, and this Handbook reflects compliance with those laws.

This Handbook supersedes previous handbooks or policy statements dealing with the subjects discussed herein. This Handbook is not and in no way creates an employment contract for any duration of time. Except for the at-will employment policies, all policies are subject to change at WSA’s sole discretion with or without notice. Employees will be notified of such changes to the Handbook as they occur. After publication of changes, the employee’s continued employment will signify the employee’s acceptance of the policy change(s). Please understand that no Employee Handbook may address every situation in the workplace.

ABOUT US

IDENTITY

WSA serves as the governing board for the regional workforce system, a network of service providers and contractors that brings people and jobs together. WSA represents the taxpayers of the 13-county Alamo region that includes Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, McMullen, Medina, and Wilson counties. WSA executives, staff, and board members reflect the diverse constituencies of the regional community: business, economic development, labor, community organizations, and government.

MISSION

Strengthen the Alamo regional economy by growing and connecting talent pipeline to employers.

VISION

To lead the most integrated community workforce network in the nation.

CORE VALUES

WSA embraces the values of accountability, collaboration, excellence, innovation, and integrity.



SECTION I – GENERAL PROVISIONS

1.1 EMPLOYMENT AT-WILL

All employees, except for the CEO, are employed on an at-will basis. This means that the employee or WSA may terminate the employee's employment relationship at any time, with or without notice, subject to the employee's notice requirement for resignation, with or without cause, for no reason or any reason.

Nothing contained in this Handbook, or any other document provided to the employee, is intended to be, nor should it be, construed as a contract that employment or any benefit will be continued for any period of time. In addition, no Agency representative is authorized to modify this policy for any employee or to enter into any agreement, oral or written, that changes the at-will relationship, except a written individual employment agreement signed by the CEO of the WSA.

1.2 EQUAL EMPLOYMENT OPPORTUNITY

WSA is an equal employment opportunity employer and complies with all applicable federal, state, and local fair employment practices laws. The Agency strictly prohibits and does not tolerate discrimination against employees, applicants, or any other covered persons because of race, color, national origin, religion, sex, age (over 40), disability, genetic information, citizenship and immigration status, service members (past, present, and future service) including veterans, and protected hairstyle (including hair texture and natural hair types historically associated with race including but not limited to braids, locks, and twists), or any other characteristic protected under applicable federal, state, or local law.

All WSA employees, contractors, and representatives are prohibited from engaging in unlawful discrimination. This policy applies to all terms and conditions of employment, including, but not limited to, recruitment, hiring, training, promotion, transfer, discipline, compensation, benefits, and termination of employment.

1.2.1 Americans with Disabilities Act: WSA is committed to providing equal employment opportunities to qualified individuals with disabilities, and to provide accommodations in accordance with the Americans with Disabilities Act ("ADA"), the Pregnant Workers Fairness Act ("PWFA"), the Texas Commission on Human Rights Act ("TCHRA"), and all applicable federal, state, and local fair employment practices laws. WSA will not discriminate with regard to application procedures, hiring, advanced, discharge, compensation, training, or other terms, conditions, or privileges of employment.

1.2.2 Immigration Law Compliance: WSA is committed to employing only individuals who are legally authorized to work in the United States and does not unlawfully discriminate based on citizenship status or national origin.



1.2.3 Complaint Procedure: Any employee subjected to conduct that the employee believes violates this policy must promptly speak to, write, or otherwise contact a direct supervisor, Human Resources, or any member of management, including any supervisor, manager, director, or executive as soon as possible after the offending conduct. Any member of management who observes discriminatory conduct must report the conduct to Human Resources or the CEO. If a satisfactory response is not received within five days after reporting any incident perceived as discriminatory conduct, immediately contact the CEO. Anonymous reporting also is available. See Complaint Procedure, Section 1.3.3.

1.2.4 No Retaliation: No one will be subject to and WSA prohibits any form of discipline, reprisal, intimidation, or retaliation for good faith reports or complaints of incidents of discrimination of any kind, pursuing any discrimination claim, or cooperating in related investigations.

1.2.5 Violations of this Policy: Any employee, regardless of position or title, whom WSA determines has subjected an individual to discrimination or retaliation in violation of this policy will be subject to discipline, up to and including termination of employment.

1.2.6 Questions: Questions regarding this policy or questions about discrimination, accommodation, or retaliation in employment that are not addressed in this policy should be addressed to Human Resources. (Questions regarding discrimination and accommodations related to WSA partners and service providers should be addressed to the EO Officer.)

1.3 HARASSMENT AND SEXUAL HARASSMENT

WSA strictly prohibits and does not tolerate unlawful harassment against employees or any other covered persons because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy and sexual orientation), gender (including gender nonconformity, gender identity, and status as a transgender individual), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, protected hairstyle (including hair texture and natural hair types historically associated with race including but not limited to braids, locks, and twists), prior civil rights activity, or any other characteristic protected under applicable federal, state, or local law.

1.3.1 Sexual Harassment: All WSA employees, contractors, representatives, and third parties (including but not limited to vendors, partners, and visitors) are prohibited from harassing employees and other covered persons based on that individual's sex or gender (including pregnancy, sexual orientation, and gender identity) and regardless of the harasser's sex or gender.

Sexual harassment means any harassment based on someone's sex or gender. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:



- Submission to such conduct is either an expressed or implied term or condition of employment.
- Submission to or rejection of such conduct is used as the basis for an employment decision affecting the harassed person.
- The conduct has the purpose or effect of unreasonably interfering with an affected person's work performance or creating an intimidating, hostile, or offensive work environment.

1.3.2 Other Types of Harassment: WSA will not tolerate any form of harassment or sexual harassment, regardless of whether it is verbal (for example, epithets, derogatory statements, slurs, sexually related comments or jokes, unwelcome sexual advances, or requests for sexual favors); physical (for example, assault or inappropriate physical contact); visual (for example, displaying sexually suggestive posters, cartoons, or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures); or online (for example, derogatory statements or sexually suggestive postings in any social media platform including but not limited to Facebook, Twitter, Instagram, Snapchat).

In all types of harassment and sexual harassment, the above lists are illustrative only, and not exhaustive. No form of harassment or sexual harassment will be tolerated.

1.3.3 Complaint Procedure: Any employee subjected to conduct that the employee believes violates this policy or employees who witness any such conduct must speak to, write, or otherwise contact their direct supervisor, Human Resources, or any member of management as soon as possible after the offending conduct. WSA also provides an anonymous reporting service to report concerns. The complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. A prompt investigation will be conducted. Following the investigation, the Agency will take prompt corrective action, if appropriate. Anonymous reporting is available to employees via multiple communication channels:

- Website: <https://report.syntrio.com/wsalamo>
- Anonymous Reporting App:
 - Keyword: wsalamo
 - If employee's cellphone is an iPhone, scan this code:



- If employee's cellphone is not an iPhone, scan this code:





- Toll-Free Telephone:
 - English-speaking: 833-480-0010
 - Spanish-speaking: 800-216-1288
 - Spanish-speaking Mexico: 800-681-5340
 - Contact Lighthouse Services if another toll-free number is needed for callers speaking languages other than English or Spanish
- E-mail: standard-reports@mitratech.com (must include Agency name with report)
- Fax: 215-689-3885 (must include Agency name with report)

If a satisfactory response is not received within five days after reporting any incident perceived as discriminatory conduct, please immediately contact the CEO.

Additionally, any manager or supervisor who observes harassment or sexual harassment must report the conduct to Human Resources or the CEO so that an investigation may be conducted, and corrective action taken, if appropriate.

1.3.4 No Retaliation: No one will be subject to and WSA prohibits any form of discipline, reprisal, intimidation, or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim, or cooperating in related investigations.

1.3.5 Violations of This Policy: Any employee, regardless of position or title, whom WSA determines has subjected an individual to harassment or retaliation in violation of this policy, will be subject to discipline, up to and including termination of employment.

1.3.6 Questions: Employees with questions regarding this policy or questions about harassment that are not addressed in this policy should contact Human Resources.

1.4 REASONABLE ACCOMMODATIONS

WSA complies with the Americans with Disabilities Act (“ADA”), the Texas Commission on Human Rights Act, and all applicable federal, state, and local laws. Consistent with those requirements, the Agency will reasonably accommodate qualified individuals with a disability if such accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship. If an employee believes an accommodation is needed, refer any such request to Human Resources.



1.4.1 Reasonable Accommodations for Individuals with Disabilities: The Agency will provide reasonable accommodations to qualified individuals as long as the accommodation does not pose an undue hardship on WSA or pose a direct threat to the individual or to others in the workplace.

- Employees must comply with safety standards. Any employee who would pose a direct threat to themselves or others in the workplace will be placed on appropriate leave until an Agency decision is made regarding the immediate employment situation.
- If applicants pose a direct threat to the health, safety, and well-being of themselves or others in the workplace even with a reasonable accommodation, then the request for an accommodation will be denied if it cannot eliminate the threat and, if pertaining to an applicant, the applicant will not be hired.
- The use of illegal drugs is not a reasonable accommodation under this policy.

1.4.2 Requesting a Reasonable Accommodation: Employees who believe an accommodation is needed because of a disability or pregnancy (see Section 1.4.5 below) must contact Human Resources. Upon receipt of an accommodation request, Human Resources will meet with the employee to discuss and identify the precise limitations resulting from the disability or pregnancy and the potential reasonable accommodations that could overcome those limitations.

1.4.3 Determination: The Agency makes determinations on reasonable accommodation on a case-by-case basis considering various factors permitted by law and based on an individualized assessment in each situation. The Agency is not required to provide the specific accommodation requested and may provide an alternative, effective accommodation, to the extent any reasonable accommodation may be made without imposing an undue hardship on the Agency. The Agency strives to make determinations on reasonable accommodation requests expeditiously and will inform the individual once a determination has been made. Any questions about a reasonable accommodation should be directed to Human Resources.

1.4.4 Medical Information: If a disability or need for accommodation is not obvious, WSA may ask for supporting documents showing the employee has a disability within the meaning of the ADA and other applicable federal, state or local laws, and that the disability necessitates a reasonable accommodation.

- If the information provided in response to this request is insufficient, the Agency may require that the employee see a healthcare professional of the Agency's choosing at the Agency's expense. In those cases, failure to provide the requested information or see the designated healthcare professional may result in a denial of the request for accommodation.



- The Agency keeps confidential medical information obtained in connection with this policy in compliance with the law.

1.4.5 Reasonable Accommodation for Pregnant Workers: WSA provides reasonable accommodation for qualified employees with known limitations related to pregnancy, childbirth, or related medical conditions, regardless of whether those conditions rise to the level of a disability, unless the accommodation imposes an undue hardship on the employer. All questions should be directed to Human Resources for more information.

1.4.6 Reasonable Accommodation for Religion: WSA will provide a reasonable accommodation of an applicant's or employee's sincerely held religious belief if the accommodation would resolve a conflict between the individual's religious beliefs or practices and a work requirement, unless doing so would create an undue hardship for the Agency.

- Requests for a religious accommodation must be made orally or in writing to Human Resources. Include the following relevant information: a description of the accommodation being requested, the reason for the accommodation, and how the accommodation will help resolve the conflict between the employee's religious beliefs or practices or lack thereof and one or more of the employee's work requirements.
- After receiving the employee's oral or written request, WSA will engage in a dialogue with the employee to explore potential accommodation that could resolve the conflict between the employee's religious beliefs and one or more of the employee's work requirements. WSA encourages employees to suggest specific reasonable accommodations that may resolve any such conflict. However, WSA is not required to make the specific accommodation requested and may provide an alternative, effective accommodation, to the extent any accommodation can be made without imposing an undue hardship on the Agency.
- WSA may ask for additional information about the religious practices or beliefs and the accommodation requested. Failure to provide the requested information may result in the accommodation being denied.
- WSA makes determinations about religious accommodations on a case-by-case basis considering various factors and based on an individualized assessment in each situation. WSA strives to make determinations on religious accommodation requests expeditiously and will inform the individual once a determination has been made.

1.4.7 No Retaliation: Individuals will not be retaliated against for requesting an accommodation in good faith. WSA expressly prohibits any form of discipline, reprisal, intimidation, or retaliation against any individual for requesting an accommodation in good faith.

1.4.8 Reporting Violations: If employees or applicants feel that they, another employee, or others may have been subjected to conduct that violates this policy, it should be reported immediately to Human Resources.



1.5 OPEN COMMUNICATION

WSA strives to maintain candid and open communication with employees. The following principles apply:

- Employees are encouraged to discuss work-related concerns with a supervisor, manager, or Human Resources.
- From time to time, a member of management may initiate discussions about work-related issues or business matters in individual or group settings.
- Staff members may discuss their concerns without fear of retaliation.

1.6 WHISTLEBLOWER POLICY

A whistleblower is an employee who reports an activity that the employee considers to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

1.6.1 Whistleblower Protections: Whistleblower protections are provided in two important areas—confidentiality and against retaliation. To the extent possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.

1.6.2 Making a Report: If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact the employee's immediate supervisor, Human Resources, or the CEO. In addition, employees may contact the Agency's Fraud, Waste, and Program Abuse Hotline at (800) 252-3642. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

1.6.3 No Retaliation: WSA will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, and threats of physical harm. Employees who believe they are being retaliated against must contact Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.



1.7 WORKFORCE INNOVATION AND OPPORTUNITY ACT GRIEVANCE PROCEDURES

WSA provides a procedure to settle grievances about possible violations of the Workforce Innovation and Opportunity Act (“WIOA”).

1.7.1 Prohibited Discrimination: Under WIOA, WSA is prohibited from discriminating against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual’s citizenship status or participation in any WIOA Title I-financially assisted program or activity.

The recipient must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIOA Title I-financially assisted program or activity;
- providing opportunities in, or treating any person with regard to, such a program or activity; or
- making employment decisions in the administration of, or in connection with, such a program or activity.

1.7.2 Submission: Applicants and employees may file a written grievance within 180 days of the alleged act of discrimination in employment practices and/or wage-related complaints to Human Resources:

- Name, position, date of hire, and date of grievance
- Date the incident occurred
- A brief summary of the incident including the reason why the grievance is being filed, people directly involved in the incident, and witnesses
- Written or electronic signature

Grievances will be processed in accordance with WIOA rules.

1.8 ETHICS AND CONFLICTS OF INTEREST

Employees are required to use good judgment, adhere to the highest ethical standards in all dealings that involve the Agency, and refrain from activities that conflict or appear to conflict with WSA or its mission. Business decisions and actions must be based on the best interests of the Agency and must not be motivated by personal considerations or relationships, including with Family Members and Third Parties. This policy is in addition to applicable state and federal laws governing Conflicts of Interest.

1.8.1 Definitions:



- A **Conflict of Interest** exists when an officer, director, or employee may benefit financially from a decision made in that individual's capacity, including direct or indirect benefits to Family Members or closely associated businesses. A potential Conflict of Interest exists when an officer, director, or employee is in a position to influence a decision that may result in a personal gain for the individual or the individual's Family Member as a result of the Agency's business dealings.
- **Family Member(s)** include a spouse; domestic partner; parent; son or daughter; brother or sister; grandparent or grandchild; aunt or uncle; niece or nephew; cousin; guardian or ward; step, half, or in-law relation; a person living in one's household; and any other person with such a close bond as to suggest conflict in the employment relationship (for example, a fiancé or individuals in a dating relationship).
- **Third Party** includes prospective or existing suppliers, vendors, contractors, service providers, distributors, business associates, lenders, financial institutions, competitors, lessors, lessees, or other entities with whom the Agency contracts or does business.

1.8.2 Rules:

- Employees are prohibited from engaging in any activity, practice, or act which conflicts with, or appears to conflict with the interests of WSA or the employee's work-related duties. Such activity is influenced by considerations of one or more of the following: gain or potential gain to the employee, entity, or organization in which the employee; or a Family Member has employment interest, substantial financial interest, or other interest that influences the employee's ability to perform the employee's job duties and responsibilities.
- Employees and their immediate families are prohibited from accepting gifts, except those of nominal value (\$40.00 or less), money, or any other item of value from any person or group doing or seeking to do business with WSA.
- Employees must not give, offer, or promise, directly or indirectly, anything of value, including services outside the ordinary course of business, to any customer, vendor, relative, potential customer, or any other person or entity.
- WSA's operational strategies and business decisions are confidential unless previously officially disclosed by the Agency to the public. Employees may not divulge confidential information about WSA's operational strategies and business decisions without authorization from the CEO.
- Employees are not to hold any positions with any entity doing business or seeking to do business with WSA without prior written permission from the CEO.
- Under no circumstances should employees conduct any outside business, self-employment, or any activities that may create a conflict of interest with WSA.

1.8.3 Favors and Gifts: Employees should make business decisions in the best interests of WSA. WSA prohibits employees from seeking or accepting any gifts, favors, entertainment, payment, or loans for themselves or their Family Members from any client, customer, vendor, supplier, or contractor or other party doing business with WSA except for gifts of less than \$40.00 or tickets or admittance to an event if prior approval is obtained from the employee's director. Cash should never be accepted. WSA also prohibits employees from giving any gifts or favors to



any party doing business with WSA without prior approval from a director. Cash gifts should never be made.

1.8.4 Reporting: Employees with questions or concerns about the interpretation or applicability of any of these policies must contact Human Resources. Employees must disclose to Human Resources or the employee's direct supervisor any situation that is or appears to be a Conflict of Interest. An employee who fails to disclose an actual or possible Conflict of Interest will be given the opportunity to explain the failure to disclose, and the Agency may conduct an investigation.

Employees with information tending to show a violation of the requirements and intent of this policy are required to report that information to Human Resources. If the perceived violation involves the CEO, the report should be made to the President of the Board or to the General Counsel.

1.8.5 Disciplinary Action: WSA has sole discretion to determine whether a Conflict of Interest exists. An Agency determination of violation of this policy may result in disciplinary action up to and including termination of employment.

1.8.6 No Retaliation: WSA prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting an actual or potential conflict of interest, a violation of this policy, or cooperating in related investigations.

1.9 PARTNER RELATIONS

Partners are among WSA's most valuable assets. Employees are expected to be courteous, friendly, helpful, and prompt in the attention given to all partners, in person, on the telephone, and in any communication sent to partners.



SECTION II – EMPLOYMENT

2.1 CLASSIFICATION AND CATEGORIES OF EMPLOYEES

Employees of WSA are classified as either exempt or non-exempt according to the provisions of applicable federal and state law.

2.1.1 Non-exempt employees are paid hourly and are entitled to pay for overtime work at a rate of 1.5 times their regular rate of pay for all hours worked over 40 in a workweek as required by applicable federal, state, and local law.

2.1.2 Exempt employees are salaried and are not entitled to overtime pay. Specific rules apply to exempt employee salary deductions. For more information, please see Pay Deductions, Section 3.2.

2.1.3 Changes from Non-exempt to Exempt Status: Reassignment from a non-exempt to an exempt position, or vice versa, is considered on a case-by-case basis as required by law.

2.1.4 Other Categories: WSA employees are also grouped by the following categories:

- **Full-time Employees** have successfully completed an introductory period of employment and are normally scheduled to work 32 hours or more per week, except for approved time off.
- **Part-time Employees** have successfully completed an introductory period and are normally scheduled to work at least 20 but less than 32 hours per week.
- **Temporary Employees:** Occasionally an employee will be hired for a short time to complete a project or to work part-time hours. Temporary employees are not eligible for most employee benefits.

2.1.5 Introductory Period of Employment: WSA requires a 90-day introductory period for all new employees and employees who are new to a position to give the Agency and the employee the opportunity to determine whether the work is suitable, and for supervisors to evaluate performance, behavior, and attendance. The introductory period may be extended for any reason at the sole discretion of the Agency. The introductory period does not change the at-will status of all employees.

2.1.6 Independent Contractors: From time to time, WSA may engage an independent third party to provide services for a project and/or for a limited period. These independent third parties are self-employed; are responsible for their own taxes and expenses; are not subject to an employer's direction and control; have the opportunity for profit and loss; and are not WSA employees for any purpose. Consequently, such independent contractors are not eligible to receive and do not receive any of WSA's employment benefits.



2.2 JOB APPLICATION AND ASSESSMENT PROCESS

WSA requires that any person interested in being employed by this Agency must first complete an application for employment and all supplemental documents, as required.

2.2.1 New Positions: New positions are created through the following procedure: Directors who require the creation of a new job are to discuss the need for the job and its related duties and responsibilities with the leadership team. Only the CEO may approve new job positions. The CEO may create interim positions, reclassify a position, or demote a position when in the best interest of the Agency.

2.2.2 Job Postings: Human Resources assists with the development of job descriptions and posts appropriate job openings both internally and externally.

2.2.3 Vacancy Requirements: Applications are accepted only for current positions available. An employment application must be submitted for each vacancy. The application must be complete, and all the questions must be answered. Any skills, education, licenses, etc. required for the position must also be included with the application to ensure that the applicant meets minimum qualifications for the position. Human Resources and the hiring managers will screen applications to ensure that applicants meet the minimum qualifications for the open position. WSA will not consider applications submitted after a vacancy is filled.

2.2.4 Legal Eligibility: All WSA employees must be legally authorized or eligible to work in the United States, and to have a valid Social Security number.

2.2.5 Internal Hires: Any WSA employee may apply for any open position if the employee is not in an introductory period or on performance improvement plan, suspension, or subject to a disciplinary action.

2.2.6 Application and Screening: All applicants, both internal and external, must complete an application for employment. In its initial screening process, Human Resources will review applications to ensure applicants meet minimum qualifications. Only applicants meeting the minimum requirements of the position will be considered.

2.2.7 Background Check: WSA performs background checks in conformance with applicable law.

2.2.8 Interview and Selection: After the screening process, the interview process will be initiated. Candidates, either internal or external, must be interviewed before being offered a position. Candidates are selected for employment based on WSA's assessment of which candidate best meets the needs of the organization for the position, utilizing such factors as: merit, qualifications, potential for career growth, adaptability, ability to learn or perform the essential functions of the job, and/or other factors WSA deems appropriate.



2.2.9 Misrepresentations and Omissions: In making its hiring decisions, WSA relies on the qualifications, work history, experience, achievements, attributes, and other information described and provided (directly or indirectly) to WSA, its recruiters, interviewers, or others during the application and hiring process (e.g., resume, application form, interviews, correspondence, and other materials and information). Therefore, if at any time WSA discovers a misrepresentation, omission, misstatement, or other inaccuracy, intentional or unintentional, in any of the information provided, employees will be subject to immediate termination if WSA, in its sole discretion, determines the misrepresentation, omission, misstatement, or inaccuracy was not negligible.

2.2.10 Interim Appointments: WSA may appoint an interim employee to immediately fill a vacated position when in the best interest of WSA.

- The word Interim will be added to the beginning title of the position.
- The interim position is temporary. An employee placed in an interim position will not automatically assume the position on a full-time permanent basis.
- Filling an interim position may or may not include a wage adjustment. Wages for employees who have had a wage adjustment while filling an interim position will be adjusted to their original amount when the employee returns to the original position.
- At the successful completion of the initial 90 days of the interim appointment, the interim employee's performance will be reviewed by the employee's supervisor, the CEO, and the Director. If the employee placed in the interim position has performed the duties of the position in an above average manner, the employee is eligible to be considered to for the position.

2.3 TELECOMMUTING

WSA may authorize a regular full-time employee to telecommute off-premises from the regularly assigned place of work when it is in the best interests of the Agency. The decision to authorize telecommuting is at the sole discretion of the CEO. Participation does not alter an employee's at-will relationship with the Agency. All Agency rules, policies, and procedures apply to the telecommuting employee, as do existing terms and conditions of employment.

2.3.1 Telecommuting Agreement: A telecommuting agreement must be approved by the employee's director, and completed and signed by the employee, employee's supervisor, the employee's Director, the appropriate Executive, and the CEO prior to initiating a telecommuting arrangement.

2.3.2 Ineligible Employees and Revocation of Agreement: Some positions may not be suited to telecommuting, including but not limited to positions that require regular face-to-face contact with a supervisor, other employees, members of the Agency community or the public, or that require daily access to secure information or materials that is determined to be inappropriate for telecommuting by the CEO.

2.3.3 Telecommuting Rules of Conduct: While telecommuting, employees must observe the following:



- Maintain a secure and safe work environment at the remote work site.
- Non-work-related events and activities may not disrupt or interfere with the employee’s work.
- All Agency confidential information must be protected and secure.
- Agency-approved protective software and other security technology must be installed and used on all equipment.

2.3.4 Regularly Assigned Place of Employment: Employees participating in telecommuting must report to the regularly assigned place of employment as agreed upon with the supervisor and as indicated in the agreement. Additionally, when operational needs require, an employee must report to the regularly assigned place of employment upon the supervisor’s request. Employees will be given as much advance notice as feasible under the circumstances presented.

2.3.5 Equipment and Supplies: WSA will provide necessary equipment and supplies. WSA equipment and supplies may not be used for personal use or use by anyone other than WSA employees or contractors and should not be synced with personal backup accounts or devices.

2.3.6 Software: Only Agency-approved software may be used for connecting with the Agency’s network from the remote work site. Employees who are participating in telecommuting shall always run agency prescribed anti-virus software and follow all Agency information security rules, copyright laws, and manufacturers’ licensing agreements.

2.3.7 Financial Responsibility for Losses: Participating employees are responsible for any equipment and software that is used at the remote work site and accept financial responsibility for any equipment that is lost, stolen or damaged because of the employee's negligence, misuse, or abuse.

Participating employees must cooperate with law enforcement to make police reports and insurance company requests about missing, stolen, or damaged equipment and supplies.

2.4 LONG-DISTANCE REMOTE WORK

WSA may hire an applicant or enter a Long-Distance Remote Work arrangement with eligible employees who reside more than 100 miles away from an Agency office but within the state of Texas as a fully remote employee (“Long-Distance Remote Work”).

2.4.1 All Policies Apply: All Agency policies apply to all Long-Distance Remote Work arrangements, including but not limited to the policies in this Handbook, including but not limited to Telecommuting Policy 7.4. In the case of a conflict between this Long-Distance Remote Work Policy and the Telecommuting Policy, this Long-Distance Remote Work Policy controls.

2.4.2 Eligibility: Employees may be eligible to be considered for Long-Distance Remote Work if the remote work arrangement is in the best interest of the Agency and the work can be performed remotely. Employees subject to a Performance Improvement Plan (“PIP”) or any



disciplinary action within the last six months are not eligible. Long-Distance Remote Work is at the Agency's sole discretion and may be withdrawn at any time.

2.4.3 Reporting to Agency Offices or Events: The Agency may require employees working in Long-Distance arrangements to report to work at Agency's offices or Agency-sponsored events from time to time.

2.4.4 Trial Period: Long-Distance Remote Work includes a trial period of 30 days and may be extended for any reason at the Agency's discretion.

2.5 OUTSIDE EMPLOYMENT

WSA does not prohibit employees from Outside Employment, as defined below, but has adopted the following rules and guidelines to protect the Agency's business interests:

2.5.1 Outside Employment means having another employer, contractual arrangements, consulting engagements, self-employment, and volunteer activities.

2.5.2 Prohibitions:

- Performing Outside Employment is prohibited during an employee's regular hours at WSA.
- Outside Employment must not interfere with an employee's job duties or performance.
- Employees must comply with WSA's policies on conflict of interest, confidentiality, and protection of WSA's non-public business information.
- WSA prohibits the use of its premises and/or property to be used in connection with any Outside Employment.
- Outside Employment is prohibited while on any kind of leave of absence, except as required by a military commitment, and could result in discipline, up to and including termination.

2.5.3 Advance Notice: Before beginning Outside Employment, employees must provide advance written notice to Human Resources and approval by the CEO.

2.5.4 Question: Employees with questions or concerns regarding outside employment may contact Human Resources.

2.5.5 Disciplinary Action: Employees in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

2.6 NEPOTISM

WSA ensures that all employees are hired, promoted, or transferred based on individual merit. Realizing that supervisory positions have a certain amount of influence that might lead to accusations of favoritism or discrimination, the Agency has adopted the following rules and



guidelines related to the employment of certain individuals, and referrals made by another employee. This policy applies to all WSA employees, regardless of position or title.

2.6.1 Prohibited Employment Relationships:

- WSA may not employ anyone who is related to a Board member or to the CEO by marriage or within a third-degree relationship.
- The hiring of family members, individuals in a close relationship with an employee, or a referred individual is prohibited if the employment of such an individual would result in the creation of a supervisor/subordinate relationship between the applicant and an employee.
- Additionally, no actual conflict of interest or the appearance of a conflict of interest will be permitted. Generally, this bars the hiring or employment of an employee's family members, others in a close relationship, or referred individuals within the same department.

2.6.2 Family Member: For purposes of this policy, a family member is defined broadly as spouse; domestic partner; parent; son or daughter; brother or sister; grandparent or grandchild; aunt or uncle; niece or nephew; cousin; guardian or ward; step, half, or in-law relation; a person living in one's household; and any other person with such a close bond as to suggest conflict in the employment relationship (for example, a fiancé or individuals in a dating relationship).

2.6.3 Marriages or Relationships Between Employees: If a situation that runs contrary to this policy is created due to a promotion, transfer, or marriage, the affected individuals will have a period of three months to settle the issue voluntarily. In such situations, one of the affected employees should request a transfer or resign. There is no guarantee, however, that a transfer will be an option in every case. If the individuals are unable to resolve the issue on their own, the department manager will decide, with the assistance from Human Resources and CEO, which employee is to be transferred or terminated to achieve compliance with the policy.

2.7 PERFORMANCE EVALUATION

WSA expects its employees to perform their job functions to a satisfactory level and conducts performance reviews of all employees to ensure that employees meet reasonable workplace standards and goals and are provided with assessments. Supervisors will assess employee achievement and areas needing improvement as well as work together with the employee to set goals for the next review period and identify training and development that can be used to help the employee to improve performance. Employees will have the opportunity to provide personal commentary and will be asked to sign and date the review along with the supervisor.

Discussions about employee performance or manager's expectations may occur informally at any time, in addition to a formal performance evaluation.



2.8 PERFORMANCE IMPROVEMENT PLANS

If necessary, WSA may implement a performance improvement plan (PIP) to address an employee's failure to meet specific job performance issues or behavioral concerns.

PIPs place the employee on a probationary status. PIPs may result in improvement in overall performance, or other possible employment actions including but not limited to transfer, demotion, or termination of employment. WSA may also, in its sole discretion, terminate employment instead of placing the employee on a PIP. Nothing in this section is intended to alter the at-will employment relationship.

Progress toward satisfactory performance of job duties is required for continued employment. If at any time during the period of the PIP, the Director determines that the employee is not making satisfactory progress, employment may be terminated. Directors are expected to meet at least bi-weekly with the employee to discuss the employee's progress and to monitor resources provided.

If the employee is on a PIP at the time the annual evaluation is due or if the employee is placed on a PIP as a result of the annual evaluation, the employee will not receive a pay increase until the employee has successfully completed the PIP. The pay raise is not retroactive and will not be effective for six months from the successful completion of the PIP.



SECTION III - COMPENSATION

3.1 PAYROLL SCHEDULE

WSA payroll schedule is biweekly. Should payday fall on a scheduled bank holiday, employees will be paid the day before the holiday.

3.1.1 Failure to Receive Pay: If an employee does not receive a direct deposit or paycheck, notify Payroll Administrator immediately.

3.1.2 Reporting Errors: Employees must review paychecks for errors. If an employee finds a possible error, report it to the Payroll Administrator immediately.

3.2 PAY DEDUCTIONS

WSA is required by law to make certain deductions from employees' paychecks, including for federal and state income taxes, Social Security (FICA) taxes, deductions related to wage garnishment, child support, or other legal orders or notices. WSA also must deduct any employee-authorized contributions such as insurance premiums or retirement plans.

3.2.1 Other Deductions:

- Other deductions from non-exempt employees' pay may be permitted under applicable federal, state, or local law.
- Other permissible deductions for exempt employees may include, but are not limited to, deductions for full-day absences for personal reasons other than sickness or disability, unpaid full-day disciplinary suspensions imposed in good faith for workplace conduct rule infractions, or a proportionate amount of the employee's full salary for time not worked in the employee's first or last week of employment.
- WSA prohibits deductions from employee pay except as required or permitted by applicable law.

Questions or concerns about deductions may be directed to the Payroll Administrator.

3.3 TIMEKEEPING

Recording time may be required for all employees. Non-exempt employees are required to provide accurate information concerning hours worked and to notify their supervisor of any deviation from scheduled hours. Exempt employees may be required to input hours worked for grant requirements.



3.3.1 Deadline to Complete Time Records: Time records must be accurate and complete and approved by a direct supervisor no later than 10:00 a.m. on Monday morning prior to a payday.

3.3.2 Program Codes: Employees must post their hours worked to the codes assigned to the various Agency programs.

3.3.3 Permissible Changes to Another Employee's Time Record: Only the Payroll Administrator or the employee's supervisor may record or correct another employee's time record after verifying the correct hours with the employee.

3.3.4 Fraudulent Recording of Employee's Time: Falsifying time entries, including working "off the clock," or recording time for another employee is strictly prohibited and will result in disciplinary action, up to and including termination of employment.

3.3.5 Reporting Requirement: Employees are required to report any falsification of time entries to Human Resources.

3.4 OVERTIME

WSA employees may occasionally be required to work more than 40 hours in a workweek.

3.4.1 Payment of Overtime: Non-exempt employees will be paid overtime compensation in accordance with applicable federal law at a rate of 1.5 times the regular rate of pay for all hours worked, over 40 in any workweek. Overtime pay is based on actual hours worked. For example, hours attributable to paid time off, holidays, and leave are not included in calculating hours of overtime.

3.4.2 Pre-Approval Required: Non-exempt employee overtime must be pre-approved in writing by an employee's supervisor.

3.4.3 Exempt Employees: Exempt employees do not receive overtime pay.

3.5 TRAVEL TIME

WSA may require employees to travel within the scope of their job duties.

3.5.1 Compensation: Non-exempt employees may be entitled compensation for time spent traveling based on the type of travel and whether the travel time takes place during normal work hours, as follows:

- An employee is not entitled to paid travel time during normal travel to and from home to work. However, travel time to and from a work site other than the employee's assigned work location will be considered as time worked.



- If the employee is required to travel between work sites, that time will be regarded as time worked.
- If the employee travels to a work commitment out of the area, the travel time will be counted as hours worked.
- Compensable travel time that results in overtime will be paid as overtime hours based on the applicable federal law at a rate of 1.5 times the regular rate.



SECTION IV - EMPLOYEE BENEFITS

4.1 OVERVIEW

WSA may offer regular full-time employees health insurance, retirement, and other benefits, including but not limited to short and long-term disability. The Agency may review, change, or eliminate these programs without notice at its sole discretion. The information contained in this Employee Handbook is not a contract to provide benefits to any employee.

4.1.1 Eligibility: The eligibility requirements of each benefit program offered are described in the applicable plan document or summary plan descriptions.

4.1.2 Plan Documents Govern: If there is a conflict between the information in this Employee Handbook and the actual plan document or policies, the plan documents or policies will always govern.

4.2 TRAINING AND DEVELOPMENT

WSA supports the continuing professional development of its employees and encourages employees to request to attend job-related workshops, seminars, and conferences. Such requests are subject to the approval of WSA, based on such factors as workload requirements, schedules, and budgetary resources. Departments may provide employees with a written training program annually.

Employees are expected to share relevant information upon return from seminars or conferences.

4.2.1 Process:

- Approval should be sought from the employee's Director.
- If the program/seminar is to be held outside the Alamo region, provide the Director with supporting information such as the training/conference agenda, meeting logistics, and any special travel needs.
- The employee then should prepare and submit the Travel Authorization Form to the Fiscal Department for the CEO's approval. When approved, the Fiscal Department arranges for payment of fees and notifies the employee of the per diem rates for the area.
- The employee will arrange for lodging and transportation.

4.2.2 Learning Management System (LMS): WSA provides an LMS with a myriad of learning paths and standalone courses. Employees may pursue any course of interest and may also periodically be assigned learning paths and courses by department leadership and/or by the CEO or others.



4.3 PAID TIME OFF (“PTO”)

WSA provides PTO to eligible full-time employees. PTO may be used for any reason, including vacation, appointments, personal time, or sick leave. Employees are encouraged to use PTO for planned rest and recreation and are expected to monitor PTO to be maintained for other uses.

4.3.1 Accrual: Eligible employees will accrue PTO hours with each pay period from the date of hire and be eligible to use PTO hours after the successful completion of the 90-day introductory period. The PTO accrual year runs from October 1 to September 30 of each year.

4.3.2 Eligibility and Accrual Rates: All full-time employees earn PTO hours each pay period based on years of service and the number of paid hours in a pay period, excluding overtime.

Months of Service	Days (Exempt) / Hours (Non-exempt) Accrued Per Employment Year	Biweekly Accrual Rate	Max Carryover Hours
0-24 (before 2nd anniversary)	18 days / 144 hours	5.54 hours	216 hours
25-48 (before 4th anniversary)	24 days / 192 hours	7.39 hours	288 hours
49-108 (between 4th and 9th anniversary)	28 days / 224 hours	8.62 hours	336 hours
109+ (after 9th anniversary)	31 days / 248 hours	9.54 hours	372 hours

Accrual example: 24 days x 8 hours = 192 divided by 26 pay periods = 7.39 hours

PTO accrued in one PTO accrual year may be carried over into the next fiscal year up to a maximum of one-and-a-half year’s total PTO for each respective employee. Prior written approval from the CEO is required in order to carry over more than one and half-year’s PTO accrual. PTO in excess of one-and-a-half year will be forfeited. Employees are responsible for ensuring that they use PTO to avoid forfeiting PTO at year’s end.

4.3.3 Non-Accrual: PTO does not accrue while employee is away from work on any type of unpaid leave, or unpaid status.

4.3.4 Use During First 90 Days: For personal illness only or to care for a dependent family member (a family member who lives in the employee’s home and is a dependent for income tax purposes), employees may be permitted to use PTO time as it accrues during the first 90 days of employment. For each occurrence of absence during the first 90 days of employment, documentation from a licensed medical provider is required when using PTO for personal illness or to care for a family member.



4.3.5 Approval Required: PTO must be scheduled in advance and approved by the employee's direct supervisor, except in cases of illness or emergency. Employees must submit a Leave Request for Time Off to Human Resources, including a description of the time off, dates, type of leave (PTO), time requested (full, multiple, or partial day), and number of hours. Questions about PTO should be referred to the Fiscal Department or to Human Resources.

4.3.6 Using PTO Benefits: PTO is available in increments of an hour. Employees must submit requests for PTO from a direct supervisor as far in advance as possible. WSA generally will grant requests for PTO when possible, taking staffing and business needs into consideration. PTO must be requested and authorized at least two weeks in advance, except in cases of illness, injury, or unanticipated emergencies.

4.3.7 PTO Blackout Dates: Consecutive PTO is not available from mid-September through the end of October and at times designated by the CEO.

4.3.8 Questions: Employees with questions about submitting PTO requests may seek assistance from the Payroll Administrator. Supervisors will respond to PTO requests promptly and will grant PTO when possible, taking staffing needs of the department into consideration. When multiple employees request the same time off, their length of employment and seniority will determine priority in scheduling PTO.

4.3.9 Recording PTO: Employees are required to record their own time used for PTO.

4.3.10 Exempt Employees: Exempt employees must request and record time away from work for PTO. These requests should be occasional, preapproved by the employee's Director, and should not occur weekly or on a regular basis. Deductions from an exempt employee's salary may be made for one or more full days for illness/disability when the employee has exhausted PTO but may not be made for partial days when PTO is exhausted.

4.3.11 Planned Absences: A planned absence is an absence from work that is requested and authorized at least two weeks in advance.

Employees are responsible for anticipating the amount of PTO that may be needed to cover future absences for vacation, sick time, and personal and family matters. Employees are encouraged to use PTO for planned rest and recreation. WSA believes that planned, regular breaks in the work routine promote wellness and contribute to optimum performance on the job.

4.3.12 Unplanned Absences: An unplanned absence is an absence from work that was not requested at least two weeks in advance but is authorized due to an illness, injury or other emergency that prevents the employee from working. In case of unplanned absences, employees are required to call their supervisors and Human Resources at the earliest opportunity and no later than one hour after the employee's normal reporting time.

An occurrence of unplanned absence is a period of one or more consecutive days of absence, regardless of the total length of the absence.



Unplanned absences compromise the quality of WSA operations, services, costs, and morale. An excessive number of unplanned PTO days are cause for progressive disciplinary action up to and including termination. Supervisors may request medical provider documentation for any medical use of PTO when such absences are frequent.

Regardless of the reason, should an employee’s unscheduled absences occur with such frequency to adversely affect operations and prevent the employee from meeting their employment obligations, WSA may take disciplinary action up to and including termination.

4.3.13 Medical Leave: Employees who are absent for medical reasons, for a period in excess of three days must provide physician documentation of visit upon return to work.

A medical leave of absence is a period of greater than five working days in succession, as documented by a licensed healthcare provider. An employee may remain on active employment status for up to six months while on leave. However, the employee must plan for the payment of all required premiums, employee and WSA contributions, should PTO accrual be exhausted during the medical leave.

In the event of illness or emergency that prevents the employee from reporting to work for periods exceeding one day, the employee must contact their supervisor, or HR, if the supervisor is not available, each subsequent day, no later than an hour after the start of the scheduled shift. Staff who do not adhere to this policy or who are directed to report to work and fail to do so will not be paid and may be subject to disciplinary action up to and including termination.

4.3.14 PTO Sell-Back: Employees may elect to sell back a portion of eligible accrued unused PTO one time each fiscal year (October 1 through September 30). Subject to maintaining a certain amount of PTO, employees may convert between 40-100 hours each fiscal year to cash, less taxes and 401(k) contributions. These sell-back hours will be cashed in at 100 percent of the employee’s regular rate of pay. To calculate eligible PTO balance for sell-back, consult the schedule below.

Months of Service	Days Accrued Per Year	Biweekly Accrual Rate	Hours Accrued Per Fiscal Year	Max Sell Back Hours (50%)	Hours That Must Remain at the Time of Sell Back (25%)
0 – 24 (before 2nd anniv.)	18 days	5.54 hours	144 hours	40	56
25 – 48 (before 4th anniv.)	24 days	7.39 hours	192 hours	40	56
49 – 108 (4th – 9th anniv.)	28 days	8.62 hours	224 hours	70	56
109+ (after 9th anniv.)	31 days	9.54 hours	248 hours	100	56



4.3.15 PTO Payout at Separation: Employees in good standing who have retired or resigned from their employment after successfully completing their initial 90-day introductory period, after giving at least two weeks' written notice for staff and four weeks' written notice for all levels of management, will be paid for any accrued unused PTO at the employee's regular rate of pay. To ensure a smooth transition, employees may not use PTO during the notice period.

An employee's estate will be paid final wages and accrued unused PTO at the employee's regular rate of pay when an employee dies while an active employee with the Agency.

Employees who are terminated forfeit accrued unused PTO.

4.4 LEAVE SHARING FOR MEDICAL EMERGENCIES

WSA has established leave sharing for medical expenses to provide employees who have exhausted all other accrued paid leave the ability to remain in paid status for the employee's or a family member's catastrophic illness or injury.

4.4.1 Definitions:

- **Immediate Family Member:** individuals who live in the same household as the employee and are related by kinship, adoption, or marriage; or are foster children certified by Applicable Law. If not in the same household, immediate family is strictly limited to the employee's spouse, child, or parent.
- **Licensed Physician:** a relevant licensed physician.
- **Catastrophic Illness or Injury:** a condition or combination of conditions affecting the mental or physical health of the employee or member of the employee's immediate family that requires the services of a licensed practitioner for a prolonged period and that forces the employee to exhaust all leave time earned.
- **Condition or Combination of Conditions:** an illness or injury that may result in death if not treated; requires hospitalization for more than 72 consecutive hours; requires prolonged convalescence at home or a rehabilitation facility; or causes a person to be legally declared a danger to him/herself or others. For purposes of this policy, pregnancy and elective surgery are not considered severe conditions, except when life-threatening complications arise from them.

4.4.2 Eligibility: To be eligible to receive donated PTO, an employee must meet the following criteria:

- Completed at least one year of continuous, satisfactory employment.
- Is not on any type of disciplinary action at the time of application or at any time during the preceding six months.
- Has exhausted all available PTO time.
- The employee's condition is not an on-the-job injury covered by Workers' Compensation Insurance.



- The employee is not on short-term or long-term disability.
- The employee or employee's immediate family member has a severe condition or combination of conditions requiring the services of a licensed practitioner. The employee must provide certification of the condition by a licensed practitioner.
- A deceased employee's estate is not entitled to payment for any unused Emergency Leave Pool time credited to the employee.

4.4.3 Application and Award Process: The employee or the employee's personal representative may request an award of donated PTO by submitting a completed application to Human Resources. The application should be submitted as soon as possible after the need arises. Employees who have exhausted all accrued paid leave will be placed on leave without pay status pending a decision of their application for donated PTO.

4.4.4 Decisions: Decisions regarding granting donated PTO is at the sole discretion of the Agency. If an employee has been placed on leave without pay status pending a decision on the application, the employee's status will become "pay with leave" and donated PTO applied retroactively if the application is approved.

4.4.5 Award Limit: The amount of time approved for an award may not exceed the maximum of 240 hours per calendar year. WSA reserves the right to alter the maximum award based on circumstances at the sole discretion of the CEO. The availability of donated PTO is subject to the number of hours available in the Pool, number of competing applications, and other factors as determined by WSA.

4.4.6 Use and Modification of Donated PTO: Donated PTO may be used only for the reason requested. Employees must immediately notify Human Resources if there is a change that modifies the need for donated PTO. Awarded donated PTO that are no longer in conformance with the employee's application may be cancelled and returned to the Pool.

4.4.7 Return to Work Certification: Prior to returning to work, the employee must submit a written statement to Human Resources from the employee's licensed practitioner that the employee is able to return to work. The statement must also specify what, if any, limitations or restrictions exist on the employee's ability to perform job duties.

4.4.8 Contributions by Donors to Donated PTO

- Employees are not required to contribute to donated PTO.
- Employees may make voluntary contributions of PTO hours by submitting a Leave Pool Transfer Form to Human Resources.
- Employees may contribute an unlimited number of hours so long as the employee's balance of accrued unused PTO does not drop below 80 hours.
- Once a contribution is made to the Emergency Leave Pool, the donor may not request a return of the hours donated.



4.5 PERSONAL DAY

Eligible full and part-time employees will receive a day off with pay in celebration of the employee's birthday. If the birthday falls on a day other than on a scheduled workday or if the employee desires a different day off, the employee may arrange a different day off. The birthday/alternate day must be approved at least 24 hours in advance by a direct supervisor and entered into the electronic time and attendance system.

4.6 HOLIDAY OBSERVANCES

WSA provides paid holidays to all employees and part-time employees. Holidays are designated by the CEO and will be announced at the beginning of each calendar year. Typical holidays observed each year are as follows:

NEW YEAR'S DAY	LABOR DAY
MARTIN LUTHER KING, JR. DAY	COLUMBUS DAY
PRESIDENT'S DAY	VETERANS DAY
BATTLE OF FLOWERS	THANKSGIVING DAY
MEMORIAL DAY	THANKSGIVING HOLIDAY
INDEPENDENCE DAY	CHRISTMAS DAY
	CHRISTMAS HOLIDAY

Holidays falling on a Saturday are normally observed on the preceding Friday. Holidays falling on a Sunday are normally observed on the following Monday.

If an employee is required to work on a holiday, the employee may choose another day off before the end of the current month.

4.7 TUITION REIMBURSEMENT PROGRAM

WSA encourages eligible full-time employees, who have successfully completed the 90-day introductory period, to further their education and professional development. Education expenses are not taxable as income to the employee if the courses taken maintain or improve skills required for the employee's present job.

4.7.1 Amount of Reimbursement: WSA will assist by providing employees approved for inclusion in the program, a maximum reimbursement benefit of \$2,000 per calendar year. Employees may use this reimbursement benefit to defray the cost of pre-approved courses taken at accredited colleges, universities or recognized technical schools, and related college fees. Textbooks and materials are not covered under this policy.



4.7.2 Courses: Courses must be related to the employee’s present job, a position the employee could reasonably progress to, or those that are determined to benefit WSA.

4.7.3 Conditions for Participation:

- Courses must be reviewed for eligibility by Human Resources and approved by the CEO.
- Courses taken must not interfere with operational needs of WSA and reimbursement is limited to a maximum of six hours per semester or 18 hours per calendar year.
- This program does not cover College Level Examination Program (“CLEP”) examinations nor courses taken for audit.
- Courses that may be required leading to a certification or licensure related to the employees’ current job.

4.7.4 Limitations: WSA will reimburse only the cost of semester-hour tuition and fees up to \$2,000.00 charged by the institution of higher learning for the semester expenses incurred. Employees are responsible for the remainder of the cost. WSA educational assistance will be secondary to other sources of financial assistance such as a GI Bill, scholarships, or Pell grants. Reimbursement may or may not be taxable depending upon tax laws in effect. Employees are responsible for the tax consequences of tuition reimbursement.

4.7.5 Grade Requirements: WSA will reimburse costs as follows:

100%	=	Grade A
75%	=	Grade B
50%	=	Grade C

For courses that are not graded (i.e. Pass/Fail), proof of course completion, by certificate or license, must be provided for reimbursement to be paid.

4.7.6 Approved Expenses: WSA employees may use this benefit to pay for mandatory fees incurred by the student such as exam, registration, lab, general, library use, insurance, graduation, parking.

4.7.7 Work Commitment: Participating employees will incur a one-year (12-month) retention commitment based on the last date of the reimbursement payment. If the employee voluntarily leaves WSA within 12 months of receiving reimbursement, a pro-ration (by month) of the cost will be deducted from final payment of salary, wages, and unused PTO, not to take the employee’s wage below minimum wage.

Example: If the employee is reimbursed in December and terminates employment during the following March, the employee will be responsible for reimbursing 9/12s of the total reimbursement for the prior twelve months.



If the employee is involuntarily terminated due to department realignment or organization, the WSA share of the cost for tuition reimbursement will not be deducted from the final paycheck.

4.7.8 Eligible Schools: Courses must be taken in a bona fide educational institution.

4.7.9 Requests for Reimbursement: After completion of the course the employee will bring a verifiable copy of course completion and grade(s) to Human Resources, who will then send the complete education assistance package to the Fiscal Department for reimbursement.

Requests for reimbursement will not be honored after the course is completed if an application was not pre-approved or if the employee terminates employment prior to course completion.

Requests for graduate program consideration must be reviewed by the CEO for approval.

4.8 EMPLOYEE ASSISTANCE PROGRAM (“EAP”)

WSA recognizes that certain issues may arise that could adversely affect an employee's health, safety, or job performance. To support employee well-being and resiliency, WSA offers an Employee Assistance Program (“EAP”) at no cost that provides counseling and referral services to assist employees and their family members in addressing a variety of issues, including for example emotional well-being. Human Resources will provide contact information an employee will need to access the services.

4.8.1 Eligibility: EAP services are available to employees on the first of the month following 90 days of employment. Employees and members of their immediate households may voluntarily use this program. Managers or supervisors may require employees to consult the program under some circumstances.

4.8.2 Confidentiality: An employee’s use of EAP will remain confidential. Information under this program will not be shared with other individuals without a participant’s informed and voluntary written consent.

4.8.3 Effect on Disciplinary Action: The employee’s decision to seek such assistance will not be considered as a factor in disciplinary action, nor will it be used against the employee in any disciplinary proceeding. However, participation in such programs will not protect the employee from discipline for violation of WSA policies.



SECTION V – SAFETY AND SECURITY

5.1 SAFETY

WSA complies with all applicable federal, state, and local health and safety regulations and is committed to maintaining a safe work environment. Employees are expected to comply with all safety and health requirements whether established by WSA or by federal, state, or local law.

5.1.1 Scope: This policy is applicable any time employees are on the premises, engaged in work or conducting business on behalf of WSA, and when participating in sanctioned events during business hours, on or off site. WSA encourages its employees to bring any concerns or suggestions for improved safety in the workplace to a supervisor or Human Resources. In addition, employees must keep work areas organized and free of any potential hazards. Employees who fail to follow WSA’s safety rules and guidelines or fail to report hazardous or dangerous conditions will be subject to disciplinary action, up to and including termination of employment.

5.1.2 Signing In: In order to account for all employees in the event of an emergency, all employees must sign out at the front desk when leaving the premises on Agency business.

5.1.3 Safety Rules: WSA safety rules include, but are not limited to, the following:

- Do not engage in horseplay.
- Do not engage in any physical or verbal acts and/or threats of violence, whether made in jest or seriously, by any person(s) while on Agency premises or while conducting business on behalf of WSA.
- Do not use equipment unless trained and authorized.
- Keep passageways to fire extinguishers, aisles, and doorways clear.
- Know where fire extinguishers are located.
- Use proper lifting techniques.
- Store flammable and hazardous waste materials in proper containers.
- Turn off equipment not in use.
- Know first aid kit locations and how to use them.
- Report unsafe conditions to a supervisor immediately.
- Know the most direct and safe exit route in case of fire.

The above list of rules is not exhaustive, but highlights practices that employees are expected to follow.

5.1.4 Reporting Required: Any injuries must be reported to Human Resources immediately.

Employees who witness any unsafe conditions, potential hazards, or accidents, no matter how minor, must report to a supervisor or Human Resources immediately. For more information about the reporting procedure employees must follow, and other safety requirements see WSA’s Safety Program manual, and the Violence in the Workplace, Section 5.2.



5.2 VIOLENCE IN THE WORKPLACE

WSA seeks to provide a safe, respectful, and productive work environment. To this end, WSA will not tolerate any form of violence including threats by an employee, supervisor, contractors, or third party, including vendors, clients, and visitors both at the workplace, while engaged in work for the Agency on or off premises, and at Agency-sponsored events.

Each department supervisor, manager, and employee is responsible for keeping the workplace free of harassment, intimidation, and/or violence.

5.2.1 Definition of Workplace Violence: For purposes of this policy, workplace violence includes but is not limited to threatening written or verbal remarks; aggressive or hostile acts such as shouting, using profanity, throwing objects at another person, fighting, or intentionally damaging Agency or another person's property; bullying, intimidating, or harassing another person; behavior that causes another person emotional distress or creates a reasonable fear of injury, such as stalking; assault; or behavior, words, or other conduct that is self-destructive or potentially harmful to the employee. Threatening behavior includes physical actions without physical contact or injury, and general or implied threats to people or property. Violent behavior includes any physical assault with or without weapons, throwing objects, destroying property, specific or expressed threats to inflict harm to people or destruction of property, and other conduct which appears to pose a threat of injury to persons or property.

This list is illustrative only and not exhaustive. No form of workplace violence will be tolerated.

5.2.2 Requirement to Report: Any employee who experiences, observes, or has knowledge of actual or threatened workplace must report the situation to a member of management or to Human Resources as soon as possible. Reports of workplace violence will be investigated promptly and will be kept confidential to the extent possible.

5.2.3 No Retaliation: WSA prohibits any form of retaliation against employees for making bona fide reports of workplace violence, pursuing a workplace violence complaint, or cooperating in related investigations.

5.2.4 Employee Assistance Plan: Employees who are victims or potential victims of domestic or non-work-related violence and fear it may enter the workplace, are encouraged to promptly notify Human Resources and may also contact WSA's Employee Assistance Plan ("EAP") to obtain advice in dealing with the situation.

5.2.5 Disciplinary Action: Violations of this policy will lead to corrective action, up to and including termination of employment. WSA reserves the right to contact law enforcement, if appropriate.



5.3 WEAPONS POLICY

WSA prohibits all employees from possessing weapons of any kind on Agency premises, while working or traveling to and from work-related locations, and at Agency-sponsored events. The only exception to this prohibition of weapons is that employees may store or transport legally owned firearms or ammunition that are lawfully possessed and locked in the employee's own private vehicle in Agency parking areas.

Refusal to cooperate in a search, inspection, or investigation may result in disciplinary action up to and including termination.

5.4 SECURITY OF PERSONAL PROPERTY

WSA assigns desks and work areas to its employees and maintains the right to examine the contents of desks and offices at any time, without notice. Employees do not have a right of privacy in items brought on premises except in places where employees have a reasonable expectation of privacy, such as bathrooms. For security reasons, personal effects should not be left unattended or stored in WSA offices.

WSA assumes no responsibility or liability for the damage, loss, or theft of personal property.



SECTION VI - LEAVES OF ABSENCE

6.1 BEREAVEMENT LEAVE

Full-time employees are provided paid leave for death of an immediate family member or a miscarriage/stillbirth. For the purposes of this policy the immediate family includes the employee's spouse; parents; siblings; grandparents; grandchildren; and the immediate family member of the employee's spouse.

6.1.1 Available Paid Leave: Employees receive up to three days for the death of immediate family up to 100 miles from Bexar County and five days for the death of immediate family more than 100 miles from Bexar County. Employees may qualify for one paid day of leave for the death of a family member who is not an immediate family above.

6.1.2 Verification of Death: The Agency may require verification of death, including for example a death certificate or obituary.

6.1.3 Use of Accrued PTO: Employees may use accrued unused PTO for additional time off if desired.

6.1.4 Requests for Bereavement Leave: An employee must inform the employee's director before commencing bereavement leave. Requests for bereavement leave should be submitted through the timesheet platform and Human Resources.

6.2 MILITARY LEAVE

WSA provides employees (including those in their introductory period) military leaves of absence for service in a *uniformed service*, in compliance with the Uniformed Services Employment and Reemployment Rights Act ("USERRA") and applicable Texas law.

6.2.1 Notice Required: To be granted military leave, an employee should provide advance notice to a direct supervisor or Human Resources. When possible, the employee should give at least 30 days' notice of a request for leave. If 30 days' notice is not possible because of military necessity or for other reasons, the employee should give as much advance notice to WSA as possible.

Written notice is preferred but not required. Where possible, please submit a copy of military orders, training notice, or order to active duty to a direct supervisor or Human Resources.

6.2.2 Pay During Leave: Employees also may use any or all accrued but unused PTO during military service leave.

In no case will the use of PTO result in an employee's receipt of more than 100 percent of salary.



6.2.3 Benefits During Leave: During military service leave, all benefits provided under an employee benefit plan are governed by the terms and conditions of the applicable employee benefit plan documents in accordance with applicable law. All other benefits are the same as for other leaves of absence.

6.2.4 Reemployment: Employees may be eligible for reemployment after their military service leave. Nothing in this policy requires WSA to reemploy individuals who are not eligible for reemployment rights under applicable law. For information on reemployment guidelines, contact Human Resources.

6.2.5 No Discrimination: WSA prohibits and will not tolerate discrimination or retaliation against any employee or applicant because of that person's membership in or obligation to perform service for any branch of the US or state military. Specifically, no one will be denied employment, reemployment, promotion, or any other benefit of employment, or be subjected to any adverse employment action based on that person's membership in or service for any branch of the US or state military. In addition, no one will be disciplined, intimidated, or otherwise retaliated against because that person exercised rights under this policy or applicable law.

6.3 JURY DUTY

WSA grants paid leave to employees who are summoned to serve on jury duty.

6.3.1 Proof of Service: Employees must notify a direct supervisor or manager immediately and submit a copy of the jury summons or subpoena as soon as possible but at least three days prior to the date of appearance so arrangements may be made to accommodate the employee's absence. Employees may be asked to provide proof of service of jury duty.

6.3.2 Jury Fees: If an employee receives fees when called for jury duty, the employee is authorized to retain such fees to help defray daily expenses.

6.3.3 Report to Work: Employees are expected to notify their supervisors of the end of the court commitment if it falls within the workday, so that the supervisor may determine if the employee should return to work for the remainder of the day.

6.4 ADMINISTRATIVE LEAVE

The CEO may allow Administrative Leave with or without pay for situations such as:

- Inclement weather or local emergencies. See Inclement Weather and Emergencies, Section 7.4.
- Early dismissal.
- Situations for which the CEO feels appropriate in the conduct of Agency business.



Administrative Leave is not time worked for purposes of calculating overtime for non-exempt employees.

6.5 UNPAID LEAVE OF ABSENCE (“LOA”)

WSA provides unpaid Leave of Absence to eligible and approved full-time and part-time employees. The granting of LOA is at the sole discretion of the Agency.

6.5.1 Eligibility: Employees are eligible after being employed continuously for 12 months or more and have provided at least 1,250 hours of service during the previous 12 months. LOA is for a minimum of five consecutive workdays, and a maximum of 12 weeks in any 12-month rolling period.

6.5.2 No Accrual: Paid Time Off will not accrue during LOA.

6.5.3 Availability: Unpaid LOA is available under the following conditions:

- “Family Leave” will be granted under this policy to eligible employees for the birth of an employee’s child or placement of a child with the employee for adoption or foster care.
- “Medical Leave” will be granted to eligible employees to care for the employee’s child, spouse, or parent who has a serious health condition or when the employee must be absent due to the employee’s serious health condition. A medical leave of absence must be documented by a licensed healthcare provider. An employee may remain on active employment status for up to six months while on leave. Employees are required to provide documentation from a relevant health care provider ordering leave for a medical condition. To be released to full duty after Medical Leave, the employee must submit a relevant healthcare provider’s release, certifying the employee’s ability to perform the essential functions of the job, with or without reasonable accommodation.
- “Personal Leave” may be granted for reasons other than those listed above.

6.5.4 Amount of Leave: An eligible employee may be granted leave up to 12 work weeks (480 hours) during any 12-month period, counted from the first day LOA is taken. The next 12-month period and its 12-week (480 hour) eligibility begins with the first day of a subsequent LOA.

6.5.5 General Rules:

- PTO will run concurrently with unpaid LOA.
- WSA may fill the empty position during the employee’s absence. Upon return from LOA, if the employee’s position is no longer available, WSA will attempt but is not required to find an equivalent job for the employee.
- Any request for LOA must be submitted seven days in advance to Human Resources, if practicable.
- Employees are required to report every 30 calendar days to Human Resources on their leave status and intent to return to work.



- Employees are responsible for paying all benefit plan premiums (employee and employer contributions) and will coordinate continuation of all insurance coverage with Human Resources and the Fiscal Department. Failure to pay premiums will result in a loss of benefit coverage or repayment of the amount due.

Employees requesting LOA must contact Human Resources for further information.

6.6 VOTING LEAVE

WSA encourages employees to fulfill civic responsibilities by exercising the privilege of voting. Employees are encouraged to vote either before or after regular work hours during early or regular voting periods.

If an employee is unable to vote during non-work hours because of the employee's work schedule, WSA will excuse employees for up to two hours, to vote in an election.

Employees must request time off to vote at least two working days before voting in order to give the manager time to adjust the department workload if needed.

WSA expressly prohibits any form of discipline, reprisal, intimidation, or retaliation against any individual for requesting or taking Voting Leave.

6.7 EMERGENCY EVACUATION LEAVE

Employees are allowed to participate in general public evacuations in response to Emergency Evacuation Orders without retaliation or discrimination. An "Emergency Evacuation Order" means an official statement issued by the governing body of this state or a political subdivision of this state recommending the evacuation of all or part of the population of an area stricken or threatened with a disaster.



SECTION VII - GENERAL WORK RULES

7.1 WORK HOURS

WSA determines employees' working hours as required by the needs of business operations.

7.1.1 Workweek: WSA's workweek begins on Saturday at midnight and ends on Friday at 11:59 p.m.

7.1.2 Business Hours: Normal business hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday. Full-time employees are expected to work normal business hours each workday, five days each workweek, during normal business hours.

7.1.3 Changes to Work Hours: Although every attempt will be made to adhere to these business hours, the nature of Agency business may necessitate changes to the hours worked. If changes are necessary, WSA will attempt to give as much notice as the circumstances permit. Employee flexibility and adaptability with respect to changes in assigned work hours are deemed crucial requirements of every employee's job.

Exempt employees, whose salaries take into account work outside of regularly scheduled work hours, may be required to work additional hours including weekends.

7.1.4 Overtime: Non-exempt employees may be required to work overtime hours from time to time depending on various factors, such as workloads, staffing needs, and special projects. Examples include but are not limited to working overnight to deploy software or on a Saturday for a WSA-sanctioned event. Non-exempt employees may not work overtime without the prior approval of their manager.

Paid time away from the workplace to participate in workshops, panels, staff development activities, or conferences, or to provide testimony on behalf of the Agency is considered time worked in calculating overtime for non-exempt employees.

7.2 LUNCH PERIODS AND BREAKS

Except for lactation breaks, work breaks including lunch periods are subject to the type and timing of the duties being performed and subject to being rescheduled by an employee's supervisor with little or no notice.

7.2.1 Breaks for Non-Exempt Employees: In general, non-exempt employees are allowed a break in the morning and a break in the afternoon to be determined by a direct supervisor. Authorized breaks may last no longer than fifteen minutes. Any extension of a break without prior manager approval is against Agency policy and will be subject to discipline up to and including termination.



7.2.2 Lunch Breaks for Non-Exempt Employees: Non-exempt employee lunches are non-compensable and must be entered on the employee time sheet. If a non-exempt employee performs work during the lunch break, the employee is required to record the time as time worked.

7.2.3 Lunch Breaks: Employees may not elect to use working during a lunch period as reason to leave in advance of their normally scheduled workday unless directed or approved in advance by their Director.

7.2.4 Lactation Breaks: All employees who are nursing are eligible to take reasonable breaks to express breast milk for up to one year after the birth of the employee's child unless doing so would cause an undue hardship for WSA. WSA encourages all eligible employees who intend to take lactation breaks to notify Human Resources of their intent, for example when they are discussing their return-to-work following leave relating to childbirth. Eligible employees should notify their direct manager of the frequency, timing, and duration of lactation breaks they need to take. Please contact Human Resources for information about the designated location for lactation breaks.

Lactation breaks under this policy are unpaid. Non-exempt employees must accurately record the start and end of lactation breaks on their time sheets/clock in and out for their lactation breaks in accordance with WSA's timekeeping policy. Uninterrupted lactation breaks do not count as hours worked for purposes of calculating overtime.

Employees may begin work before the regularly scheduled start of their shift or continue working past the regularly scheduled end of their shift to make up any time used for lactation breaks. Employees who choose to do this should speak with their direct manager in advance to make appropriate arrangements.

7.3 ATTENDANCE AND TARDINESS

WSA requires employees to be punctual in working WSA's normal work hours. Employees must report to work as scheduled (start and end time) and maintain a satisfactory record of attendance.

7.3.1 Call-In Procedure: If an employee is late for work or absent from work as scheduled, the employee must speak directly to the employee's supervisor at least one hour in advance of the absent or tardy. Leaving a voicemail or message with anyone other than the employee's supervisor is not sufficient. The employee must speak with the supervisor about the absence or tardy.

7.3.2 Leaving Work: Leaving work without proper notification is subject to disciplinary action, up to and including termination.

7.3.3 Use of PTO: Employees are required to use their accrued PTO for absences, tardies, and leaving early, except for special leaves, such as administrative leave, bereavement, jury duty,



etc. Managers are responsible for ensuring that short absences do not become repetitive in nature and disruptive to the work.

7.3.4. Unexcused Absences: PTO hours will not be granted for unexcused absences. An unexcused absence is an absence from work that is not authorized. Unexcused absences may be incurred if the employee fails to report to work for a scheduled shift, fails to report to work when time off has been requested but not authorized, or incurs an unplanned absence that is not a bona fide emergency.

7.3.5 Consequences of Excessive Absences: Employees who miss work (“no call, no show”) without notice for two consecutive workdays are considered to have voluntarily resigned from employment. Employees who fail to return to work promptly from an approved PTO or leave of absence are considered to have voluntarily resigned from employment. Poor attendance, excessive tardiness, and leaving before scheduled hours have ended are disruptive. Either may lead to disciplinary action, up to and including termination of employment.

7.3.6 Exceptions: Exceptions to this policy require approval by the CEO or the CEO’s designee.

7.4 INCLEMENT WEATHER AND EMERGENCIES

Because the safety of WSA employees is of the utmost importance, WSA has developed contingencies in case of inclement weather or other emergencies.

7.4.1 CEO Authority: The CEO has the authority to officially close the office and grant paid leave due to impending inclement weather or workplace, city, or national emergency.

7.4.2 Notification and Work from Home: In the event that inclement weather or workplace, city, or national emergency arises during the workday creating safety concerns, employees will be notified and should work from home.

- If offices are closed before the start of the workday, efforts will be made to reach employees to notify them to work from home.
- Employees must keep contact information up-to-date with their managers.
- Employees who have not heard from WSA regarding whether they should report to work are encouraged to call their manager for the latest information.

7.5 DRESS CODE

While traditional business attire is standard for situations involving face-to-face interactions with the public, WSA permits business casual attire Monday through Friday when appropriate.



7.5.1 Business Casual Attire Guidelines: Acceptable options include collared casual shirts, business casual crewneck tops, blouses, and polo shirts. Inappropriate shirts include T-shirts of any kind, clothing displaying profanity, inappropriate slogans, or graphics, tank tops, halter tops, crop tops, low-cut shirts or blouses, spaghetti strap dresses or tops, sheer attire, or camouflage clothing.

Casual slacks, trousers, and khakis are acceptable. Shorts, leggings, or pants worn below the waist or hip line are not permitted.

Employees are expected to maintain a well-fitting, professional, clean, and pressed appearance at all times. Decisions regarding appropriate attire are at the discretion of the direct supervisor and Human Resources. Clothing intended for exercise, leisure activities, or athletic wear is not permitted in the workplace. Violations of the dress code policy may result in disciplinary action.

7.5.2 Blue Jeans: Employees may wear jeans during the workweek, provided they meet the following conditions. Jeans must maintain a neat and professional appearance, free of frays, holes, stains, or tears, and must be paired with a WSA-branded shirt that is tucked in at all times. Employees attending Board Committee meetings, grand openings, or similar events must adhere to business casual attire guidelines.

7.5.3 Footwear: Employees must wear shoes that are clean, well-maintained, in neutral colors such as white, black, or navy, or a color that complements their attire that presents a professional appearance. Examples of shoes that are not appropriate include but are not limited to: sports shoes such as high-top basketball shoes, Crocs, and flip-flops.

7.5.4 Virtual Attendance: Employees appearing virtually in meetings on behalf of WSA, whether with employees, contractors, the public, or partners, must follow this policy. Backgrounds should not depict inappropriate content and must comply with all WSA policies.

7.5.5 Use of PTO to Change: Employees required to leave the workplace to change into appropriate clothes will have the time deducted from PTO.

7.5.6 Volunteer Days: The CEO will determine the appropriate attire for Volunteer Days.

7.6 NON-SMOKING/NO-VAPING POLICY

WSA maintains a smoke-free, vape-free workplace. The Agency prohibits smoking and vaping in all indoor facilities, including WSA vehicles and all offsite WSA worksites and events, whether indoors or outdoors. Smoking, including use of smokeless tobacco products and vaping, is prohibited in WSA facilities. This policy applies to all employees, vendors, clients, and visitors.

For purposes of this policy, smoking includes lighting, smoking, or carrying a lighted cigarette, cigar, or pipe, the use of any electronic smoking device, and the use of tobacco. This list is illustrative only and not exhaustive.



Employees may smoke outside of WSA premises only off Agency time although employees may use Paid Time Off for smoking breaks. Please dispose of cigarettes and matches in a proper container.

7.7 DRUGS AND ALCOHOL

WSA is committed to providing a safe, healthy, and productive workplace that is free from alcohol and unlawful drugs as classified under local, state, or federal laws, including marijuana (except for limited medical use under the guidance of a healthcare provider). Alcohol and drug misuse poses serious health and safety risks to WSA and is not tolerated. Consistent with this commitment, the Agency is committed to the elimination of alcohol and drug misuse in the workplace in compliance with the Drug-Free Workplace Act.

7.7.1 Assistance Available: WSA will assist and support employees who voluntarily seek help for drug or alcohol addiction before becoming subject to discipline or termination under this or other WSA policies. Employees voluntarily seeking help under this policy will be allowed to use accrued unused paid time off, be placed on a leave of absence, referred to treatment providers, and otherwise accommodated as required by law.

7.7.2 Follow-up: Employees may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests if holding positions that are safety-sensitive or require driving, or if they have violated this policy previously.

7.7.3 Voluntarily Seeking Help: If a drug test has been initiated under this policy before an employee voluntarily seeks help for addiction, unless otherwise required by law, the employee will have forfeited the opportunity to be granted a leave of absence for treatment, and will face possible discipline, up to and including discharge.

7.7.4 Fitness for Duty Required: Employees must report to work fit for duty and free of any adverse effects of illegal drugs or alcohol. This policy does not prohibit the lawful use and possession of prescribed medications. Employees must, however, consult with their doctors regarding any medications' effect on fitness for duty and ability to work safely, and must promptly disclose any work restrictions to Human Resources.

7.7.5 Workplace Rules: Employees who are working, operating the WSA Vehicle, on WSA premises, or conducting Agency-related work offsite, are prohibited from:

- Using, possessing, buying, selling, manufacturing, or dispensing an illegal drug (to include possession of drug paraphernalia).
- Being under the influence of alcohol or an illegal drug as defined in this policy.
- Possessing or consuming alcohol.



The presence of any detectable amount of any illegal drug, illegal controlled substance, or alcohol in an employee's body system, while performing Agency business or while in a WSA facility, is prohibited.

Employees are not allowed to perform job duties while taking prescribed drugs that adversely affect the ability to perform job duties safely and effectively. Employees taking prescribed medication must carry it in a container labeled by a licensed pharmacist or be prepared to produce the container if asked.

7.7.6 Notification to Law Enforcement: Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

7.7.7 Drug and Alcohol Testing: Job applicants and current employees may be requested or required to submit to drug and alcohol testing.

- **Pre-Employment Testing:** All job applicants receiving an offer of employment are subject to drug and alcohol testing. All offers of employment with WSA are conditioned on the applicant submitting to and successfully completing and passing a drug and alcohol test as described in this policy. Refusal to submit to testing will result in disqualification of further employment consideration.
- **Reasonable Suspicion:** Employees are subject to testing based on, but not limited to, observations of apparent workplace use, possession, or impairment by at least two members of management. Human Resources will be consulted before sending an employee for testing. Members of management must document specific observations and behaviors that create a reasonable suspicion that an employee is under the influence of illegal drugs or alcohol, including for example: odors (smell of alcohol, body odor, or urine), movements (unsteady, fidgety, dizzy), eyes (dilated, constricted or watery eyes, or involuntary eye movements), face (flushed, sweating, confused, or blank look), speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts), emotions (argumentative, agitated, irritable, drowsy), actions (yawning, twitching), and/or inactions (sleeping, unconscious, no reaction to questions).
 - When reasonable suspicion testing is warranted, both management and Human Resources will meet with the employee to explain the observations and will be required to undergo a drug and/or alcohol test within two hours. Refusal by an employee will be treated as a positive drug test result and will result in immediate termination of employment.
 - Under no circumstances will the employee be allowed to drive to the testing facility. Human Resources or a member of management will arrange for transportation.
- **Post-Accident Testing:** Employees are subject to testing when they cause or contribute to accidents that seriously damage WSA property, including but not limited to any work-related accident or injury when an employee is operating a motorized vehicle, or that result in an injury to themselves or anyone else that requires offsite medical attention. Testing by the Agency must occur within two hours or sooner. Refusal by an employee will be treated as a positive test result and will result in immediate termination of employment.



- Under no circumstances will the employee be allowed to drive to the testing facility. Human Resources or a member of management will arrange for transportation.
- **Random Testing:** The Agency reserves the right to conduct random drug testing.

7.7.8 Testing Procedures: All drug and alcohol testing under this policy will be conducted by an independent WSA-designated state-licensed testing facility that will use federally approved alcohol testing procedures. The individual will be asked to provide written consent prior to testing. Refusal to submit to drug testing will result in immediate termination of employment.

- Any employee who is seriously injured and cannot provide a specimen at the time of an accident must provide the necessary authorization for obtaining hospital records and other documents that would indicate whether there were controlled substances in the employee's system. Failure to provide the necessary authorization may result in discipline, up to and including termination.
- WSA will pay the full cost of the test under this policy.
- Employees will be paid the employee's regular rate of pay for time spent in alcohol or drug testing. Employees suspected of working while under the influence of illegal drugs or alcohol will be suspended without pay until the Agency receives the test results and any other information the Agency may require in order to make an appropriate determination. A date and time will be scheduled to discuss the results of the test with a member of management and Human Resources. Should the results prove to be negative, the employee will receive back pay for the times/days of suspension.
- Individuals receiving positive results will be given a reasonable opportunity to rebut or explain the results and may request to have a split specimen sent to another federally certified laboratory to be tested at the applicant's or employee's own expense. Such requests must be made within 72 hours of notice of test results.

7.7.9 Consequences:

- Employees who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture, or dispense alcohol or an illegal drug in violation of this policy will be terminated.
- Employees testing positive will be subject to discipline, up to and including immediate termination of employment.
- Depending on the circumstances, including the employee's work history/record, and any state law requirements, the Agency may offer an employee who violates this policy or tests positive the opportunity to return to work on a last-chance basis pursuant to mutually agreeable terms. The Agency may institute follow-up drug testing at times and frequencies determined by the Agency for a minimum of one year but not more than two years as well as a waiver of the right to contest any termination resulting from a subsequent positive test. If the employee does not complete the rehabilitation program or tests positive after completing the rehabilitation program, the employee will be immediately terminated.



- Employees who refuse to submit to required testing will be subject to discipline, up to and including immediate termination of employment.

7.7.10 Confidentiality: Information and records relating to positive tests results, drug and alcohol dependencies, and medical examinations will be kept confidential to the extent required by law and maintained in secure files separate from personnel files. Such records and information may be disclosed among members of management on a need-to-know basis and may also be disclosed when relevant to a grievance, charge, claim, or other legal proceeding initiated by or on behalf of an employee or applicant. Law enforcement may be notified if criminal activity is suspected. As may be required, WSA will notify the Texas Workforce Commission of a conviction.

7.7.11 Inspections: WSA reserves the right to inspect all premises for substances or materials in violation of this policy. All employees, contractors, and visitors may be asked to cooperate in inspections of their persons, work areas, and property (including, but not limited to clothing, desks, file drawers, bookcases, lunch boxes, bags, and vehicles). Employees have no expectation of privacy while on WSA premises, except in restrooms or other such locations with an expectation of privacy. Employees who possess anything in violation of this policy or who refuse to cooperate in an inspection are subject to discipline, up to and including termination.

7.7.12 Crimes Involving Drugs: WSA does not desire to intrude into the private lives of employees but since employees' off-the-job involvement with drugs and alcohol may have an impact on the workplace, the Agency reserves the right to take appropriate disciplinary action for drug use, sale, or distribution while off Agency premises. All employees who are convicted of, plead guilty to, or are sentenced for a crime involving illegal drugs must report the conviction, plea, or sentence to Human Resources within five days. Failure to comply will result in automatic termination. Cooperation in complying may result in suspension without pay to allow management to review the nature of the charges and the employee's past record with WSA. As may be required, WSA will notify the Texas Workforce Commission of a conviction.

7.8 POLITICAL ACTIVITIES

Employees engaging in political activities agree to do so solely on their own behalf and not on WSA's behalf or time, or with the use of any of the Agency's funds, assets, or other company resources. Employees may not use any of the Agency's funds, assets, or other Agency resources to directly or indirectly support political candidates, parties, lobbyists, political action committees ("PACs"), or 527 organizations.

7.8.1 No Use of Agency Resources: Employees may make personal political contributions and participate in political activities of their own choosing during non-work hours, provided that such contributions and activities only occur in an individual and private capacity and not on WSA's behalf or time, or while using any other Agency resources. WSA will not reimburse any employee in any way for time or funds used for personal political contributions or activities.



Employees may not represent WSA on policy issues except when it is part of their jobs to do so. Accordingly, if an employee personally participates in the political process, that employee may not implicitly or explicitly suggest or give the appearance in any way that the employee's personal view or position is one that is held or supported by the Agency including but not limited to:

- Using WSA's stationery, email, telephones, computers, printers, or copiers in connection with an employee's personal political activities.
- Providing political candidates or organizations with access to WSA's mailing lists, customer lists, employee lists, office space, telephones, computers, printers, copiers, or other Agency resources.
- Posting a hyperlink to a political candidate's or an organization's website, social media, or email account on a website, social media, or email account owned or operated by the Agency.

Employees may not allow the employee's employment by WSA to be used in support of or against any political candidate, issue, or cause.

7.8.2 No Impact on Employment Decisions: An employee's personal, lawful political contributions, and decisions not to make political contributions will not influence an employee's compensation, job security, or opportunities for advancement at WSA.

7.9 SOCIAL MEDIA AND BLOGGING POLICY

In general, WSA views websites, blogs, and other information published on mediums accessible by the public by its employees positively, and it respects the right of employees to use them as a medium of self-expression. All WSA equipment, including computers and electronic systems, is subject to this policy.

7.9.1 Guidelines: If employees choose to identify themselves as a WSA employee or to discuss matters related to WSA, they should bear in mind that although the information they publish will generally be viewed as a medium of personal expression, some readers may nonetheless view the employee as a spokesperson for the WSA. In light of this possibility the following guidelines must be followed:

- Comply with WSA's policies when engaging in online activity, including but not limited to WSA's anti-harassment and anti-discrimination policies. All WSA policies remain in full force and effect when employees choose to publish on social media. If the employee's social media activity violates any of the Agency's policies in another forum, it will also violate them in an online forum. For example, employees are prohibited from using social media to violate WSA's policies, including but not limited to technology use, communications systems, confidentiality and proprietary rights, ethics and standards of conduct, harassment, discrimination, privacy, or other laws or ethical standards.
- The state of Texas and federal government prohibits all WSA employees from using the video-sharing application TikTok on devices used for Agency-related business. For more information on prohibited technologies, see the Prohibited Technologies, Section 7.15.



- Personal social media activity is not permitted during work hours except during nonworking time such as rests and meal breaks unless otherwise protected or required by law. See Lunch Periods and Breaks, Section 7.2.
- Information and communications that an employee publishes on personal online sites should never be attributed to WSA or appear to be endorsed by, or to have originated from, WSA.
- Employees are never to identify a client in an online posting, unless approved by executive management as part of the employee's job duties. Employees are to respect the privacy of WSA's clients. In no case is any personally identifiable information ("PII") to be published online. See the Personally Identifiable Information, Section 7.21.
- Employees are prohibited from using WSA-owned equipment or systems for personal social media activity.
- Employees are prohibited from making defamatory, libelous, slanderous, obscene, threatening, or harassing comments when discussing the WSA, supervisors, co-workers, partners, and clients.
- Employees are prohibited from providing references or recommendations for WSA partners, contractors, Board members, officers or clients on social or professional networking sites in any way that represents or appears to represent WSA's opinion.
- Employees are personally responsible and liable for the employee's personal social media communications. Employees must make it clear in personal social media activity that the employee is speaking on the employee's own behalf. If the employee discloses an affiliation as an employee of WSA, the employee must include a clear and conspicuous disclosure about the employee's relationship with WSA and a disclaimer that the employee's views do not represent those of WSA. For example, consider such language as "the views in this posting reflect my personal views and do not represent the views of my employer."
- Since the information employees publish is accessible by the general public, the WSA hopes their comments will be truthful to and about the WSA, its employees, clients, partners, affiliates, and others as the WSA itself endeavors to be.
- WSA restricts employees' use and disclosure of the Agency's trade secrets, confidential information, and intellectual property. See the Confidential Information, Section 7.11. Do not do anything to jeopardize or unwittingly disclose sensitive materials through social media. Respect laws regarding copyrights, trademarks, and other third-party rights, terms of use on social media sites.
- Supervisors must not seek out social media communication by direct reports. No employee is required to accept any social media requests from anyone at WSA.

7.9.2 Business Use of Social Media: Employees who are required to use social media as part of the employee's job duties for WSA's marketing, public relations, recruitment, communications, or other business purposes, should consult with a direct supervisor regarding business use of social media. Note that WSA owns all social media accounts used on behalf of the Agency or otherwise for business purposes, including all log-in information, passwords, and content associated with each account, such as followers and contacts. The Agency owns all such information and content regardless of the employee that opens the account or uses it and will retain all such information and content regardless of separation of any employee from employment with WSA. Use good judgment about posting on social media and strive for accurate communications.



Any employee, whether or not authorized for business use of social media, contacted for comment about WSA for publication, including in any social media outlet, is required to direct the inquiry to the Director of Public and Government Relations and may not respond without written approval.

7.9.3 Employee Liability: The employee is personally liable for all communications and information the employee publishes online using WSA property. The use of the WSA assets, an Agency e-mail address or any e-mail address that can be traced back to WSA's domain, which generally is any internet address affiliated with the Agency, to communicate via social media could have legal consequences for the employee or the Board. Using the employee's name or title or a WSA e-mail address may imply that the employee is acting on the Agency's behalf. Because social media and networking activities are public, the employee's work e-mail address and the Agency's assets should be used only to perform job-related activities, which may include professional networking, but do not include personal social networking.

7.9.4 No Expectation of Privacy: WSA has a right to monitor an employee's activities using the organization's resources. An employee will have no expectation of privacy when using Agency resources.

7.9.5 Disciplinary Action: Breach of this and other related policies may result in disciplinary action, up to and including termination of employment.

This policy is not intended to restrict communications or actions protected or required by state or federal law.

7.10 MEETINGS AND OPEN WORKSPACE AREAS

7.10.1 Attendance at Meetings: Employees are required to attend all mandatory staff development sessions, including training sessions, staff meetings, or other assigned meetings.

For all virtual meetings, employees are expected to have their video cameras turned on. This requirement supports team engagement, professionalism, and effective communication.

7.10.2 Open Workspace Areas: Special considerations for employees working in open workspace areas:

- When possible, use headphones rather than speakerphones.
- Keep meetings with visitors brief and to a minimum.
- Utilize the conference room, team room, or a vacant office for longer meetings with two or more attendees.

7.11 CONFIDENTIAL INFORMATION



WSA is committed to conducting its business in an open and forthright manner. As part of this commitment, we regularly inform our customers, the community, and other concerned groups about certain aspects of our operations. At the same time, we are entrusted with maintaining the confidentiality of important information about Agency customers, contractors, our employees, and proprietary information about Agency plans, procurements, and systems.

7.11.1 Employee Obligations: While employed at WSA, employees may have access to information about customers, operations, plans, or other employees. Employees must be alert to the sensitivity of this information and protect against its unauthorized or inappropriate disclosure, both on and off the job and during and after employment with WSA. A seemingly innocent remark or a careless action may cause WSA to suffer a loss in employee and public confidence and may also have legal implications. Employees are prohibited from making copies of non-public Agency documents, records, or files without authorization from the employee's Director.

7.11.2 Definition of Confidential Information: WSA's confidential information includes, but is not limited to, the following: all non-public electronic data, contacts information (including but not limited to Board Member and Officer contact information), and employee personal identifying information, client lists and client personal identifying information, and non-public information that includes any information that has not previously been released to the public by WSA through a press release.

7.11.3 Required Procedures: Employees must be knowledgeable of and carefully follow all procedures related to:

- Use of computer hardware and software and the safeguarding of computer information.
- Proper storage, reproduction, distribution, and disposal of WSA information.
- The appropriate release of privileged information about WSA and its customers.
- Encryption of documents sent via email containing personal identity data, such as Social Security numbers, addresses, phone numbers, and dates of birth.

7.11.4 CEO Approval Required: The CEO must authorize/approve all communication of Confidential Information in advance, whether oral or written.

7.11.5 Disciplinary Action: Employees violating this policy are subject to disciplinary action, up to and including termination of employment.

This policy is not intended to restrict employees' communications or actions that are protected or required by state or federal law.

7.12 AGENCY EQUIPMENT AND RESOURCES

WSA provides resources for performing the Agency's work. These resources include but are not limited to office furnishings and supplies, e-mail, voicemail, mail and printing services, and technology such as telephones, fax machines, copiers, cell phones, and computers.



Theft, attempted theft, defacement, destruction, and unauthorized use of WSA's resources for personal use are prohibited. Agency resources and assets may not be removed from the workplace unless authorized as part of an employee's job functions.

Employees must handle all WSA property with care. Employees are responsible for WSA resources issued during employment. This includes, but is not limited to, building keys, laptops, credit cards, phones, calling cards, and any other Agency property.

False or misleading entries and alterations to WSA's resources including but not limited to books and documents are strictly prohibited.

At termination of employment, employees are required to return all Agency property in the employee's possession. If the employee fails to return Agency property at the time of termination, the employee will be required to reimburse WSA for the reasonable value of the property.

7.13 USE OF COMPUTER RESOURCES

Computer resources and data used in performing job tasks include computer hardware and software, information about customers and employees, and competitive and strategic data. All employees must handle these resources and data with respect and care.

7.13.1 WSA follows all state and local agency policies governing the use of its computer systems and networks. Employees are expected to read, understand, and follow all policies posted on the shared drive, including but not limited to:

- ADM 32, C1, Fraud Policy, ADM 33, Remote Desktop Support Policy;
- ADM 37, Information Technology and Security Acceptable Usage Policy;
- MIS 02 and MIS 02, Change 2, Access and Security in the Workforce Information System of Texas (TWIST), Work In Texas, and other State and/or Local Network Systems;
- MR 306, Security of Personal Identity Data;
- Memorandum of Record #334, Prevention and Detection of Fraud, Waste, Theft, and Program Abuse; and
- MIS 03, Monitoring the Use of Encrypting Documents.

7.13.2 Information System Security Agreement: Upon hire and annually, managers will present the TWC Information System Security Agreement to employees, who are required to review and agree to the provisions in a timely manner.

7.13.3 Employee Responsibilities: Each employee with access to computer resources and data is responsible for protecting them. Employees must have knowledge of and carefully follow procedures related to the proper use, including, but not limited to, the following:



- Employees may not add software, hardware, and computer configurations, or attempt to repair computers or the computer network without express permission of the IT Director.
- Computer resources and data entrusted to employees are to be used only for their intended business purpose and may not be used for personal or non-Agency purposes.
- Employees must understand the classification(s) of information used in performing the employee's job and take appropriate steps to safeguard that information in all forms and at all times.
- Employees must keep computer usernames and passwords confidential and in a secure place. Do not share usernames or passwords with others, other than upon request by IT or the employee's supervisor. Change the password and notify IT immediately if security is breached.
- Entering or maintaining personal information in the WSA computer system is prohibited.
- USB devices (thumb drives) may not be used on any WSA hardware absent express permission by the IT Director.
- When establishing passwords, employees must provide those passwords to their direct supervisor to access in the employee's absence.

7.13.4 WSA Right to Access Information: WSA may monitor all use of its technology for a variety of reasons, including the need to retrieve business information, route messages, troubleshoot hardware and software problems, prevent system misuse, assure compliance with software distribution policies, comply with legal and regulatory requests for information, and protect trade secrets.

Anything an employee does on a WSA computer is subject to monitoring or review. Employees have no expectation of privacy in any computer-related activities, and WSA conducts periodic reviews of computer activities, including email and files stored on the system.

All technology hardware, software, and the computer network system are WSA property and are to be used in accordance with WSA policy. Although employees who use WSA's technology ("Users") have their own individual access codes to these systems, these systems are accessible at all times by the System Administrator. Passwords do not ensure privacy.

By placing information on these systems, Users grant WSA the right to edit, delete, copy, republish, and distribute such information. Data created or stored on the WSA system is not the private property of any User. Please note that even when the User or recipient erases data, it may be possible to recover the data.

Users have no expectation of privacy with respect to any information residing on WSA hardware, software, or other WSA property. At all times, the WSA retains the right in its sole discretion to access and search all directories, indexes, files, databases, e-mail messages, electronic transmissions, or any other electronically stored information contained in, stored in, or disseminated by WSA-owned computers, or other electronic systems, devices or storage media, or systems and devices designated for the Agency, without prior notice, for the purpose of ensuring compliance with all WSA policies including this policy. This right applies both during the employee's employment or User's relationship with the WSA and after the termination of employment or relationship.



7.13.5 Restrictions on Use of Technology: WSA technology is to be used primarily for business use and to communicate WSA announcements and information. Any conduct prohibited by WSA policy is prohibited when using WSA technology.

Users are prohibited from using WSA technology, including accessing the internet through WSA's computer network, in any way that may be disruptive or offensive to others, including, but not limited to, the transmission, receipt, or viewing of sexually explicit messages, cartoons, images, or sounds; profanity; ethnic or racial slurs; comments that ridicule a person because of their race, color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy and sexual orientation), gender (including gender nonconformity, gender identity, and status as a transgender individual), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, protected hairstyle (including hair texture and natural hair types historically associated with race including but not limited to braids, locks, and twists), prior civil rights activity, or any other characteristic protected under applicable federal, state, or local law or anything else that may be construed as unlawful harassment or disparagement of others.

7.13.6 Protection of Confidential Information: Individuals must take all reasonable precautions to prevent unauthorized access to User accounts or any confidential or proprietary WSA, partner, or client information by others who do not have a right to know such information as a part of their job functions, both inside and outside of the WSA. Users should use complex passwords and change them frequently and must not disclose their passwords or other access codes for any reason except to authorized WSA personnel. Users should also be aware that any communication via e-mail that is delivered over the internet is not encrypted and may be intercepted, copied, and/or modified during transmission by a third party. As such, Users should not transmit any confidential or sensitive WSA and/or client information over the e-mail system if the transmission utilizes the Internet for delivery to the recipient.

Except for the WSA's right to retrieve and read any/all electronic mail messages, such communications should be treated as confidential by other Users and accessed only by the intended recipient. Users are not authorized to retrieve or read any e-mail or voicemail messages that are not sent to them, or to use unauthorized accounts, files, software, or other computer resources. Any exception to these guidelines must be approved by the User whose messages are being retrieved or read, the CEO, IT, or Human Resources.

Users must not use a code, access a file, or retrieve any stored information unless authorized to do so. Users should not attempt to gain access to another User's messages or files without permission from the CEO, IT, or Human Resources.

Users must not take any actions that would infect or harm WSA and/or client resources such as knowingly disseminating a computer virus.

7.13.7 Email Use: Email is WSA's property and may only be used for Agency purposes. The following rules apply:



- WSA expressly prohibits the use of email to transmit, receive, or forward lewd, offensive, discriminatory, inappropriate, or harassing messages.
- WSA reserves the right to monitor, review, and read any email at any time. Employees do not have a right of privacy in any work-related email whether created, received, or sent.
- For inter-office communications, employees are encouraged to use the shared drive as a means of sharing Agency documents, rather than sending the documents as email attachments.
- Employees are discouraged from using the “Reply to All” feature when answering emails.
- Chain letters, broadcasting messages to a large number of individuals or lists of users, and other large distribution of personal messages interfere with the use of technology by other Users and are not allowed.
- The electronic mail system must not be used to send or receive copyrighted materials, trade secrets, proprietary information, or similar material without appropriate authorization.
- No e-mail or other electronic communications may be sent that hide the identity of the sender or represent the sender as someone else.

7.13.8 Internet Use: The following rules apply:

- Internet access is granted to employees by WSA and must be used to conduct Agency business only.
- Adjustments to the technical configuration of the Internet workstation are strictly prohibited.
- Any illegal activities—including piracy, cracking, extortion, blackmail, copyright infringement, and unauthorized access to any computers on the Internet or e-mail—are forbidden.
- Employees are prohibited from accessing websites for gaming or that contain offensive, obscene, sexually oriented, or discriminatory images, graphics, or other such materials.
- Users must not attempt to modify system configurations, account restrictions, or attempt to breach the computer security systems.
- Computer games may not be played on WSA systems at any time or on personal equipment during work hours or in work areas.
- If Internet usage problems arise, notify a director or IT for assistance.

7.13.9 Software Use: The following rules apply:

- Employees must use software in accordance with the license agreement. Information is available from the IT Department.
- Computer resources must be used within the restrictions of software access, license, and usage agreements. Users must not make or distribute unauthorized copies of copyrighted software. Users are not permitted to execute or install any software without prior authorization by IT.
- Employees who become aware of software/product misuse must notify the Director.



7.14 CELL PHONES

WSA provides cell phones and cell service to employees to assist in the performance of their jobs on an as-needed basis. Cell phones are intended for official use. The following guidelines apply to the use of Agency-issued cell phones:

- Phone plans are purchased for the benefit of the Agency and are not intended for regular personal use by the employee.
- Occasional personal use of cell phones is permitted, but excessive unauthorized personal use may result in disciplinary action.
- WSA reserves the right to audit for personal usage outside of cellphone plans and seek reimbursement. Employees have no expectation of privacy when using WSA-provided cell phones and service.
- Regardless of whether the cell phone is Agency-issued or personal, use of any type of cameras on premises or on Agency business without the express consent of management is prohibited.
- Failure to follow this policy may result in loss of phone privileges and may include disciplinary action up to and including termination of employment.

7.15 PROHIBITED TECHNOLOGIES

The Agency prohibits employees from using software and hardware products with security concerns as directed by the state (“Prohibited Technologies”) and may be required to remove additional Prohibited Technologies added to the Texas Department of Information Resources (DIR) Prohibited Technology list.

In addition, the federal government has determined that due to an “unacceptable level of risk” to national security, the presence or use of the social networking service TikTok on any information technology (IT) used in the performance of a government contract is prohibited. This prohibition also applies to any “successor application” developed by TikTok owner and operator ByteDance. WSA prohibits the installation or use of TikTok or ByteDance applications on any IT system or device used for any work purpose. Such use includes, but is not limited to, e-mail, phone calls and virtual meetings.

Prohibited Technologies have been removed any prohibited applications from Agency equipment and blocked the future download of these applications. Should an employee discover the presence of a prohibited application on WSA property, the employee should immediately notify the IT department.

All Agency employees are responsible for complying with the terms and conditions of this policy. This policy also applies to all visitors to the Agency.

Except where exceptions approved by the CEO apply, the installation, access, use, or download of Prohibited Technologies, including but not limited to applications or websites, is prohibited on all state-owned devices, including but not limited to cell phones, tablets, desktop and laptop



computers, and other internet capable devices. Employees may not access “app stores” or non-authorized software repositories and may not install unauthorized applications.

All employees must sign a document annually confirming their understanding of this policy.

Compliance with this policy will be verified through various methods, including but not limited to, IT/security system reports and feedback to Agency leadership.

Exceptions to this policy must be approved by the CEO and will only be considered when the use of Prohibited Technologies is required for a specific business need, such as enabling criminal or civil investigations or for sharing of information to the public during an emergency. For personal devices used for state business, exceptions will be limited to extenuating circumstances and only granted for a pre-defined period of time. To the extent practicable, exception-based use will only be performed on devices that are not used for other state business and on non-state networks. Cameras and microphones must be disabled on devices for exception-based use.

An employee found to have violated this policy may be subject to disciplinary action, including termination of employment.

Employees with questions about Prohibited Technologies must consult with IT.

7.15.1 Sensitive Locations: Agency-designated “Sensitive Locations” are designated for employees who need to discuss confidential or sensitive information, including information technology configurations, criminal justice information, financial data, personally identifiable data, sensitive personal information, or any data protected by federal or state law.

7.15.2 Personal Devices: This policy includes personal devices that are used by employees performing services in connection with a federal contract. These employees must delete all TikTok applications from their personal devices if the devices are in any way used in the performance of work on a government contract. Should evidence of the presence or use of TikTok or ByteDance applications be discovered on a personal device the employee uses for work on a government contract, the employee will be required to delete the application(s) immediately. Continued violations of this policy will result in disciplinary action.

Personal devices such as personal cell phones, tablets, or laptops may not enter Sensitive Locations, including any electronic meeting labeled as a Sensitive Location. Personal devices may be used in areas not designated as Sensitive Locations. Public meetings and public areas are not designated as Sensitive Locations.

Employees are prohibited from using personal devices to conduct business related to TWC programs, including accessing any state or board-owned data, applications, nonpublic facing communications, and email accounts. State business includes accessing any state-owned data, applications, email accounts, non-public facing communications, state email, VoIP, SMS, video conferencing, CAPPS, Texas.gov, state technology infrastructure, and any other state databases or applications.



7.16 PERSONNEL INFORMATION

To ensure that personnel files are kept current at all times, employees must provide Human Resources with any changes, in writing, regarding their name, home address, telephone number, cell phone number, marital status, and changes in beneficiary designations.

7.17 REFERENCES

Only Human Resources may provide references for employees. All requests for employee information or references must be referred to Human Resources. Information provided for references will be limited to dates of employment and position(s) held while employed.

7.18 PERSONAL TELEPHONE CALLS

WSA allows its employees the privilege of making and receiving limited necessary personal phone calls while on Agency time. When necessary for employees to make or receive personal phone calls at work, the calls should be reasonable in length and of reasonable frequency.

7.19 VISITORS IN THE WORKPLACE

To maintain security and reduce unnecessary interruptions in the workplace, WSA prohibits personal visits without permission. If a family member, vendor, friend, or business associate needs to briefly visit the work area, arrange prior approval from a supervisor and avoid staff interruptions. Children are not permitted in WSA offices or worksites. Do not allow visitors to wander freely around the department or workplace.

All visitors must be accompanied by staff while in WSA offices. All visitors must sign in with the receptionist and wear a visitor badge. All visitors are subject to WSA's Solicitation and Distribution Policy.

7.20 SOLICITATION AND DISTRIBUTION

In order to maintain and promote safe and efficient operations, employee discipline, and an attractive clutter-free workplace, and to minimize non-work-related activities that could interfere with customer satisfaction, product quality, and teamwork. WSA prohibits solicitation and distribution of literature during employees' working time. Working time includes any time in which employees are engaged in or required to perform work tasks. Working time excludes times when employees are not properly engaged in performing work tasks, including break periods and mealtimes.



Employees may not solicit other employees during working time; distribute literature during working time; distribute literature at any time in working areas; use Agency property such as telephones, computers, smartphones, email systems, and intranets to solicit other employees; use Agency property such as scanners, printers, copy machines to produce literature or inter-departmental mail, mailboxes, working area bulletin boards to distribute literature. Working areas include areas controlled by WSA where employees are performing work, excluding, for example, cafeterias, break rooms, and parking lots.

The sole exceptions to this policy are for solicitations and distributions related to charitable activities approved by the CEO.

Solicitation means, for example, approaching someone in person or through employer-owned property such as computers, smartphones, email systems, and intranets for offering anything for sale, asking for donations, collecting funds or pledges, seeking to promote, encourage or discourage participation in or support for any organization, activity or event, or membership in any organization, or distributing or delivering membership cards or applications for any organization.

Distribution means, for example, disseminating or delivering in person or through Agency property such as bulletin boards, computers, smartphones, emails, and intranets any literature or other materials including circulars, notices, papers, leaflets or other printed, written or electronic matter.

Employees who violate any provision of this policy may be subject to discipline, up to and including termination of employment.

This policy is not intended to restrict communications or actions protected or required by state or federal law.

7.21 USE OF AGENCY-OWNED OR LEASED VEHICLES AND DRIVING FOR AGENCY BUSINESS

WSA may provide a vehicle, owned or leased, for Agency business ("Vehicle"). Only full-time employees are permitted to drive the Vehicle. Temporary employees are prohibited from driving the Agency Vehicle, except with express prior permission from the CEO.

7.21.1 Use of Agency Vehicle: Employees driving the Vehicle must adhere to this policy, including the following:

- Employees must present valid Texas drivers' licenses and proof of liability insurance to Fiscal or Fiscal's designee and be free of any issues with driver's license, driving record, and auto insurance at the time of checkout.
- See Reporting Requirements, Section 7.20.5, for reporting any conditions that affect an employee's ability to drive the Vehicle.
- Employees who drive on behalf of the Agency are subject to a satisfactory annual Motor Vehicle Records check.
- Personal use of Vehicles is strictly prohibited.



- Bona fide Agency guests may be passengers in the Vehicle. No family members may drive or be passengers in the Vehicle.
- WSA may provide a credit card to be used for payment of gas and emergency services only. Use of the credit card for other purposes will result in disciplinary action, up to and including termination.
- Employees are required to fill the gas tank on the Vehicle using the WSA credit card, if the reading is below half a tank when returning the Vehicle. Employees are permitted to use the credit card for a car wash for the Vehicle if necessary.
- Employees may not take the Vehicle home overnight.
- When returning the Vehicle to the garage, employees must note the garage level to which the car is being returned and whether the location is on the ascending or descending level on the log form.

7.21.2 Rather than using a personal vehicle, employees must first check the availability of the Vehicle before planning travel and are expected to use a Vehicle when it is available. Failure to use the Vehicle when it is available may result in non-reimbursement for business travel. Requests for exceptions to this policy to use a personal vehicle when the Vehicle is available must be made in writing to the CEO or the CEO's designee prior to travel.

7.21.3 Employees traveling outside Bexar County or when conducting investigations, such as for the Fraud Investigator, will be given priority use of Vehicles.

7.21.4 Driver's Responsibilities: When an employee drives a vehicle for Agency business, whether personal, the Agency Vehicle, or a leased/rented vehicle, the employee is responsible for complying with the following:

- Drive in a safe, courteous, and defensive manner. Hands-free operation of cell phones, when driving, is allowed only when in compliance with applicable law. Texting, tweeting, gaming, and accessing social media while driving is prohibited. Putting on makeup and other personal tasks also are prohibited while driving.
- Take reasonable precautions to ensure that the vehicle is accounted for and protected from damage, loss, unreasonable deterioration, and theft. Walk around the vehicle before and after the trip to note and report any changes to the exterior appearance of the vehicle and to tire condition. Report warning lights that come on during the trip or any changes in how the vehicle operates.
- At all times, use seatbelts or other available restraints and require occupants to do so, in accordance with Texas law. The number of passengers may not exceed the number of seatbelts in the vehicle.
- Smoking is prohibited in an Agency vehicle (owned, leased, or rented) and is also prohibited in personal vehicles if Agency employees or guests are present.
- Eating and drinking beverages is not allowed in an Agency vehicle. Employees must park in a safe place to eat. Alcoholic beverages are never permitted in the Agency vehicle. Employees must dispose of all accumulated trash and ensure the Vehicle is in the same condition when it was checked out before returning the car.



- Drive the vehicle at legal speeds, appropriate for traffic, weather, road conditions, and in accordance with any signage.
- Employees are responsible for all fines or traffic violations arising from the use of a vehicle while on Agency business.
- Take the most direct and practical route to and from the intended destination while conducting Agency business.
- Immediately report any accident, even if it is minor, that occurs while on Agency business or in an Agency Vehicle to a direct supervisor; call the police on all accidents and obtain a copy of the police report.
- Illegal substances, alcohol, weapons, and other contraband are prohibited from being stored, transported, placed, or used in a vehicle while on Agency business.
- Employees will not permit unauthorized individuals to ride in or operate the Agency Vehicle at any time and leased/rented vehicles on Agency business.

7.21.5 Reporting Requirements: Employees must immediately report any problems with the employee’s driving record, insurance, or license to Human Resources before driving on Agency business. Employees must immediately report the following:

- Revocation or suspension of driving license, or other conditions on the employee’s ability to drive.
- Termination, expiration, or suspension of auto insurance.
- Arrest or conviction (including deferred adjudication) related to operating a vehicle while under the influence of alcohol, an illegal substance, or controlled substance.

7.22 PERSONALLY IDENTIFIABLE INFORMATION (PII)

As a workforce entity, WSA and state and local partners handle a vast amount of information about clients that can be damaging if disclosed to the wrong individual or misused by staff. Personally Identifiable Information or Sensitive Personal Information (PII) is any information pertaining to an individual that can be used to distinguish or trace a person’s identity, on its own, or in combination with other information that is linkable to an individual. PII is collected on current and prospective registrants and participants, past participants, employees, and Board members. Prospective and current participants in WSA youth programs also require additional consideration and special handling.

The table below provides examples of different types of PII. Please note that the list is not exhaustive and is not intended to cover every possible example.

Examples of PII that may require legal notification of breach	Examples of Other Protected PII that is considered Sensitive / Confidential	Examples of Other PII with the potential for misuse
Social Security Numbers	Educational records	Date of birth



Driver's license numbers	Grades, transcripts, schedules	User credentials
Financial account information	Personal financial information (not including account information)	Last 4 of SSN
Credit card number	Employment records	Student ID numbers

WSA and its partners may collect PII in paper, electronic records, and in oral communications, as well as aggregated in an electronic format (i.e. databases, spreadsheets, tables, SharePoint). When PII is collected, the following considerations must be made:

- In general, WSA requires that all legal requirements be followed in collection, use, disclosure, transmission, storage, and disposal of PII.
- Appropriate safeguards must exist to protect against inappropriate access, use, disclosure, or transmission of PII. These safeguards include, but are not limited to, storing paper records in a secured location, keeping laptops secured when away from a desk (WSA), and encrypting data prior to transmission via e-mail. WSA will monitor initiatives, subgrantees, and vendors to ensure that appropriate safeguards are in place.
- Collection of PII should be conducted in such a way as to minimize the potential for exposure. Collected PII should be appropriate for the intended purposes. PII should not be aggregated, unless necessary and then only for the business purposes needed.
- Access to PII is based on the principle of "need to know." Individuals accessing PII must be permitted to do so by law or regulation and must have a legitimate "need to know" the information. The authorization to access PII is specific to that need. In other words, an intake specialist may need to know an individual's date of birth in order to determine program eligibility and can access the information that enables the specialist to know that specific information.
- Disclosure to third parties may only occur as required law or regulation. WSA has established that access to PII is limited to such information as may be needed to fulfill the request.
- All staff will be trained in PII disclosure.

WSA must ensure that these guidelines are followed by all employees, contractors, vendors, and volunteers.

Any breaches, real or potential, must be reported immediately. Examples of data breach include misplacing a participant file, loss of a laptop, mobile device, or removable media (i.e. flash drive), accidental e-mail of PII, virus, or malware attack on a computer containing PII.

WSA will conduct a thorough investigation of a breach.

Employees who are found to be in violation of this policy may be subject to disciplinary action as deemed appropriate based on the facts and circumstances of the violation.



7.23 VIDEO SURVEILLANCE IN THE WORKPLACE

In addition to other policies related to monitoring of Agency property, the Agency maintains audio and/or video cameras and reserves the right to install audio and/or video cameras in work areas for specific business reasons, such as security, theft protection, and the protection of proprietary information where legally permitted.



SECTION VIII - RULES OF CONDUCT AND DISCIPLINARY PROCESS

8.1 EXPECTATIONS FOR EMPLOYEE BEHAVIOR

WSA maintains rules regarding employee behavior that are necessary for the efficient operation of the Agency and for the benefit and safety of all employees. Using WSA's resources inappropriately, impeding the providing of Agency services, or interfering with operations will not be tolerated.

Each employee must maintain the highest standards of performance and conduct. When dealing with clients, business contacts, other employees, contractors, vendors and suppliers, Agency employees must comply with the highest ethical, regulatory, and business standards. Employees with questions about this policy must discuss the matter with a manager or Human Resources.

8.1.1 Compliance with Professional and Regulatory Standards: Employees are hired with the expectations that they are not only qualified for their positions but that they will undertake the initiative and effort to maintain the necessary skills and qualifications for the position.

8.1.2 Employee Responsibilities: Each employee has the following responsibilities:

- Adherence to the highest professional and ethical standards.
- Acquiring and maintaining any required licenses, continuing education, and certifications.
- Learning, understanding, and applying any current or new standards, rules, regulations, or laws applicable to the position.
- Although WSA may from time-to-time conduct staff and informational meetings, employees are responsible for and will be held accountable for knowing and complying with all applicable standards and requirements applicable to their jobs.

8.1.3 Expected Conduct: Employees are expected to conduct themselves in a manner that promotes the Agency's mission. Such conduct includes but is not limited to:

- Report to work punctually as scheduled and being at the proper work location, ready for work, at the beginning of the scheduled workday.
- Give proper advance notice when unable to work or report on time.
- Comply with all WSA safety and security regulations.
- Wear clothing appropriate for the work being performed.
- Maintain the workplace and work area in a clean and orderly manner to foster workplace safety.
- Exhibit a professional manner both within the Agency and to the general public.
- Refrain from behavior or conduct in violation of harassment or workplace violence policies, including but not limited to name calling; demeaning jokes; taking credit for another's work or ideas; refusing to communicate or speak with another co-worker; offensive verbal, visual, or physical contact; invading another's privacy or personal space; blaming others for the employee's mistakes; gossiping; and bullying.



- Perform assigned tasks efficiently and in accordance with quality standards set by WSA.
- Report to management suspicious, unethical, or illegal conduct of fellow employees, customers, or visitors.

8.2 STANDARDS OF CONDUCT

These standards of conduct are necessary to protect the health and safety of employees and others, to maintain operational efficiency, and to protect WSA's goodwill, reputation, and property.

8.2.1 Examples of Misconduct: No list of infractions is exhaustive. However, the following list includes examples of behavior that are disruptive to the workplace and are grounds for disciplinary action. WSA reserves the right to interpret and apply these rules and guidelines and to determine, at its sole discretion, the degree of discipline to be issued to the employee for violating any rule or engaging in any other misconduct. WSA may consider the circumstances involved, the employee's overall work record with the Agency, and other pertinent factors.

Misconduct on Agency premises or on Agency business that will lead to disciplinary action, up to and including termination of employment include, but are not limited to, the following:

- Unauthorized removal, disclosure, or use of non-public information related to WSA's business, employees, clients, or partners.
- Excessive tardiness or absenteeism.
- The unlawful manufacture, distribution, possession, sale, or use of alcohol or a controlled substance(s) during working hours, on Agency premises, or on any work-related jobsite.
- Reporting to work under the influence of alcohol, drugs, or controlled substances without medical authorization.
- Threats of or theft, abuse, neglect, waste, defacement, or destruction of equipment, supplies, goods, or property belonging to WSA, a fellow employee, or others.
- Leaving an assigned work area or WSA premises during working hours without permission of a direct supervisor.
- Creating or contributing to unhealthy, unsanitary, or hazardous conditions which could cause harm to the employee, fellow employees, or others.
- Possession of firearms, explosives, knives, or other illegal weapons, or using an item as a weapon.
- Gambling in any form, including lotteries and games of chance.
- Violating safety rules or safety practices.
- Abusive conduct or language to fellow employees, supervisors, customers, or others.
- Fighting, threatening, intimidating, or endangering a fellow employee, supervisor, or others.
- Insubordination without good reason such as refusing to follow a supervisor's instructions, to work overtime when required, to render assistance, including but not limited to providing an insolent response to a supervisor's instructions or delaying carrying out an assignment.
- Dishonesty or violation of business or ethical standards.
- Inability or unwillingness to perform essential duties of the job, with or without reasonable accommodation, as outlined in the job description.



- p. Carelessness, negligence, or other conduct which creates the risk of, or which causes injury to persons or to the property of the WSA, its clients, partners, employees, or others.
- q. Making false or malicious statements.
- r. Engaging in any form of harassment or intimidating conduct or behavior.
- s. Falsifying or altering any WSA record or report, including but not limited to an application for employment, time record, expense report, or providing misleading or fraudulent information to management orally or in written form.
- t. Illegal or unauthorized entrance onto WSA premises.
- u. Behavior, regardless of whether on the premises or elsewhere that, in the judgment of WSA, is indecent, immoral, or defames WSA.
- v. Sleeping on the job or not using work time productively.
- w. Abuse of lunch or other authorized breaks.
- x. Utilization of any of WSA's supplies, facilities, copiers, faxes, equipment, books, computers, or other assets for personal use.
- y. Making false or misleading entries into any of WSA's computers, records, books, files, employment documents, time records, payroll records, reimbursement forms, or other business-related papers.
- z. Making or receiving excessive personal telephone calls.
- aa. Engaging in any activity or business, which creates an actual or potential conflict of interest.
- bb. Failure to report to appropriate management any suspicious, unethical, or illegal conduct.
- cc. Breach of confidentiality policies.
- dd. Smoking or vaping in unauthorized locations.

8.3 DISCIPLINARY PROCESS

WSA disciplinary process is designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable employee behavior. Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between WSA and the employee. At its sole discretion, WSA reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling, or training; the employee's work record; and the impact of the conduct has on the organization.

When issuing a written or final warning or during termination, supervisors will have a third person present, either Human Resources or another supervisor.

8.3.1 Investigatory Administrative Leave: An employee may be placed on paid or unpaid administrative leave during an investigation, depending on the circumstances, and at the sole discretion of WSA. The employee may elect to use PTO during this period. Pending the result of the investigation, the employee under investigation may be terminated.

8.3.2 Steps for Disciplinary Action: The steps for disciplinary action for infractions may include one or more, or a combination of, the following:



Documented Oral Warning (Counseling): Used when the supervisor identifies a behavioral issue and discusses it with the employee. The purpose of this step is to resolve problems quickly so further action is not necessary.

Written Warning: Used when an employee has committed an act or a series of acts that may lead to further disciplinary action.

Suspension and/or Final Warning: Used when conduct is serious or an employee has committed multiple or a series of acts subject to disciplinary action. When conduct is so problematic or harmful to the workplace, the most effective action may be the temporary removal of the employee from the workplace pending the results of an investigation. Depending on the seriousness of the infraction, the employee may be suspended with or without pay in full-day increments, in the Agency's sole discretion. Non-exempt employees may not use accrued unused leave in lieu of an unpaid suspension.

Termination: Generally, WSA will try to use the steps above before proceeding to termination. However, WSA may combine or skip steps and proceed with immediate termination depending on the circumstances, such as when an employee has engaged in misconduct, illegal behavior, acts of violence, repeated violations of policy or procedure, or failure to perform job duties.

8.3.3 Ineligibility for Pay Increases and Bonuses: When an employee is subject to administrative leave, suspension, or written warning, suspension, or final warning, the employee will be ineligible for pay increases or bonuses until either (1) the next review period, or (2) for six months of satisfactory improvement in the sole discretion of the employee's supervisor, whichever is longer.



SECTION IX – EMPLOYEE SEPARATION

9.1 SEPARATION OF EMPLOYMENT

9.1.1 Resignation: Resignation is a voluntary separation from employment initiated by the employee. In order to leave the Agency in good standing, employees must submit a resignation in writing to a direct supervisor or to Human Resources. Staff are asked to give at least two weeks' notice, and management-level employees are asked to give four weeks' notice.

9.1.2 Termination: Termination is an involuntary separation of the employee initiated by the Agency.

9.1.3 Eligibility for Rehire: Non-management employees who resign with at least two weeks' written notice, management employees who resign with at least four weeks' written notice, or employees who were released by WSA under favorable conditions are eligible for rehire.

9.1.4 Reinstatement of PTO upon Rehire: Employees who have voluntarily separated and are rehired within six months are entitled to reinstatement of accrued, unused PTO.

9.1.5 Return of Company Property: In all cases of employee separation, all Agency equipment, keys, or other items must be returned and any issues with Agency equipment or special expenditures on the employee's behalf will be discussed.

9.1.6 Contact Information: Employees are responsible for keeping WSA advised of a current mailing address for post-separation mailings.

9.2 FINAL WAGE PAYMENTS

An employee who leaves employment with WSA will be paid in full for all wages earned as of the date of separation. Deductions will be made for items or amounts that the employee has previously authorized in writing.

9.2.1 Resignation: Final pay will be provided on the next scheduled pay day and can be directly picked up at WSA or mailed to a specified address.

9.2.2 Termination: Final pay will be provided in accordance with the Texas Payday Law within six days of termination.

9.2.3 Payment for Accrued Unused PTO: Final wages will include accrued unused PTO only as follows:



- Employees who resign with two weeks' written notice for staff or four weeks' written notice for management and have been employed for at least three months with WSA will be paid accrued unused PTO.
- Termination by the Agency will result in forfeiture of accrued, unused PTO.

EMPLOYEE ACKNOWLEDGMENT FORM

The Employee Handbook describes important information about WSA. I understand that I should consult with Human Resources regarding any questions I have about this Handbook. I have received this Handbook or have been given access to an electronic copy. I understand that it is my responsibility to read and comply with the policies and procedures contained in this Handbook and any revisions made to it.

Since all the information, policies, procedures, and benefits described here are subject to change, I acknowledge that revisions to this Handbook, and all WSA's underlying information, policies, procedures, and benefits may occur. I understand that revised information, policies, procedures, and benefits may supersede, modify, or eliminate existing information, policies, procedures, and benefits, with or without prior notice. I understand that any delay or failure by WSA to enforce any rule, regulation, or procedure contained in the Handbook will not constitute a waiver of WSA's right to do so in the future.

Furthermore, I acknowledge that this Handbook is not a contract of employment for any duration of time. Employment with WSA is at-will and may be terminated by either the employee or WSA at any time, with or without cause. No statement or representation by a manager, employee, recruiter, representative, supervisor, agent, officer, or director of the WSA, whether oral or written, may change the at-will nature of employment with WSA.

Except for the at-will employment policy, I understand that revised information may supersede, modify, or eliminate existing provisions in this Employee Handbook, including any attachments referenced therein.

In the event any policy or guideline contained within this Handbook conflicts with local, state or federal law or regulations, such law or regulations will prevail.

Employee's Name (printed): _____

Employee Signature: _____

Date: _____

