



**Attachment 12  
Management Plan**



**1650 Washington Street: West Newton Family Navigation Center  
Management Plan  
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## **A. Property Roles and Responsibilities**

A Management Agreement outlined in a Lease for 1650 Washington Street, Newton MA dated July 26, 2023, clearly defines the responsibility of both the Lessee, FamilyAid, and Owner. The Management Agreement incorporates, by reference, the Management Plan, and sets forth those responsibilities and obligations of both.

This Management Plan also identifies the obligations that FamilyAid must meet as established by the Executive Office of Housing and Livable Communities - which has funded the base annual operating costs and significant property renovations – and all other applicable regulatory, municipal, state or federal agencies, laws and statutes.

This Management Plan is also guided by FamilyAid's mission, organization policies, philosophies and goals at all times.

## **B. Personnel & Staffing**

FamilyAid shall ensure the minimum standards for onsite/on-call staffing, as outlined in section III of Executive Office of Housing and Livable Communities' annual Emergency Assistance Provider Scope of Services. FamilyAid also must notify the designated EOHLC Contract Manager if FamilyAid's program director, or their equivalent, will be away for one week or more and must provide the name and contact information of the person who will be acting in their place.

Staffing plans must:

1. Ensure intake staff are scheduled to work from Monday through Friday, 8:00 am to 6:00 pm (excluding State observed holidays?).
2. Designate staff to provide the EOHLC Centralized Placement Unit with a daily census report and/or update the Room/Unit Bed Register in ETO/ASIST.
3. Designate one staff to oversee FamilyAid's EA data in ETO/ASIST including managing the data quality.
4. Ensure that at least one staff person who is certified in first aid and CPR is always on duty. (FamilyAid should strive to certify all staff in basic first aid and CPR, including child and infant CPR).
5. Depending on program size, ensure that at least one staff person who is trained in working with survivors of domestic violence/sexual assault is on duty at all times.
6. Ensure that appropriately qualified staff are available to support families under the terms of this scope during nontraditional business hours (after 6:00pm and during weekends).
7. Establish Human Resources policies and procedures governing employee code of conduct, subject to EOHLC approval.
8. Reflect the linguistic, ethnic, racial, and cultural diversity of the families served by the EA program.
9. Include overnight and/or on-call staff schedules.
10. Include other staff positions proposed to be funded by EOHLC and other staff positions critical to the program that are not to be funded under this contract, if applicable.

### ***EQUAL EMPLOYMENT OPPORTUNITY / NON-DISCRIMINATION POLICY***

FamilyAid believes in the value of a diversified workforce. FamilyAid is committed to a policy of equal employment opportunity for all qualified employees and applicants for employment.

#### ***Non-Discrimination in Employment***

- FamilyAid prohibits discrimination in employment on the basis of:
- Age (40 and above);
- Physical, mental, or psychiatric disability,

- Genetics (results of genetic testing);
- Pregnancy;
- Marital status
- National origin or ancestry;
- Race or color;
- Religion or creed;
- Sex;
- Gender expression or identity;
- Sexual orientation;
- Active military, reserve, or veteran status; and
- Other status protected by law;

Unlawful discrimination of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment will not be tolerated by FamilyAid. Further, any retaliation against an individual who has formally or informally complained about discrimination or has cooperated with an investigation of a discrimination complaint is prohibited. To achieve our goal of providing a workplace free from discrimination, the conduct described in this policy will not be tolerated, and we will implement the procedure described below to address any potential inappropriate conduct.

FamilyAid commits itself and its employees, within the context of state and federal civil rights laws, to promote equitable participation of employees of all backgrounds in all of its daily operations. This policy applies to all employment practices and employment programs sponsored by FamilyAid. This policy shall apply, but not be limited to, the areas of:

- Recruitment;
- Selection;
- Compensation and benefits;
- Professional development and training;
- Reasonable accommodation for disabilities or religious practices;
- Promotion;
- Transfer;
- Termination;
- Layoff
- Other terms and conditions of employment

Because FamilyAid takes allegations of discrimination seriously, we respond promptly to complaints, and where it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose any necessary corrective action, including disciplinary action.

### ***Discriminatory Harassment***

FamilyAid's separate Harassment Policy, in a following section, details our commitment to a workplace free from any verbal or physical conduct which is unwelcome, severe or pervasive, and related to membership or perceived membership in a protected class.

## ***Reasonable Accommodation***

Employees seeking reasonable accommodations may submit their request in writing to the Human Resources department at 3815 Washington Street, Boston, MA 02130. More details about FamilyAid's Reasonable Accommodation Policy are in this Handbook.

## **GENERAL POLICY AGAINST DISCRIMINATION AND HARASSMENT**

### ***Introduction***

FamilyAid promotes a workplace that is free of discriminatory harassment ("harassment") of any type, including sexual harassment. Discriminatory harassment consists of unwelcome conduct, whether verbal or physical, that is based on a characteristic protected by law, such as sex, gender identity and expression, race, color, national origin, ancestry, religion or creed, age, physical, mental, or psychiatric disability, genetics (results of genetic testing), active military, reserve, or veteran status, sexual orientation, or participation in discrimination complaint-related activities (retaliation). FamilyAid will not tolerate harassing conduct that affects employment conditions; that interferes unreasonably with an individual's performance; or that creates an intimidating, hostile, or offensive work environment.

Harassment of employees occurring in the workplace, in connection with work-related travel, and/or work-sponsored events will not be tolerated. Further included in this policy is inappropriate employee conduct occurring off agency property and/or while not working that affects the employment or service experience of employees or those we serve.

Retaliation against any individual who has submitted a complaint of harassment or retaliation against individuals cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated.

Because FamilyAid takes allegations of harassment seriously, we will respond promptly to complaints of harassment. Where it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of harassment.

## **Definitions**

"Harassment" means unwelcome conduct, whether verbal or physical, that is based on a characteristic protected by law. Harassment includes, but is not limited to:

Display or circulation of written materials or pictures that are degrading to a person or group as previously described.

- Verbal abuse; slurs; derogatory comments; or insults about, directed at, or made in the presence of an individual or group as previously described.
- "Sexual harassment" means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:
- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The definition of sexual harassment is broad. In addition to the above examples, other unwelcome sexually oriented conduct, whether intended or not, that has the effect of creating a work environment that is hostile, offensive, intimidating or humiliating to workers of any gender may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances – whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct; gossip regarding one's sex life;
- Comment about an individual's body; comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.
- In addition to sexual harassment, harassment may occur related to any other protected status, including age, disability, gender, genetics, national origin, ancestry, race, color, religion or creed, sexual orientation, gender identity/expression, pregnancy, active military status, or retaliation. The following are examples of other forms of discriminatory harassment:
- Unwanted jokes regarding people of a particular religion or sexual orientation;

- Derogatory references to a subordinate's or coworker's disability or race, including email messages; and
- Insulting remarks directed at someone because she exercised her right to file an internal or external discrimination complaint.

All employees should take special note that, as stated above, retaliation against an individual who has complained about discriminatory harassment, and retaliation against individuals for cooperating with an investigation of a discriminatory harassment complaint is unlawful and will not be tolerated by FamilyAid.

### **Complaint Procedures**

All employees, managers, and supervisors of FamilyAid share responsibility for avoiding, discouraging, and reporting any form of discriminatory harassment. The primary responsibility for ensuring proper investigation and resolution of harassment complaints rests with the President of the agency or their designee, who will administer the policy and procedures described herein.

If any FamilyAid employee believes that they have been subjected to discriminatory harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally. In addition, clients, visitors, applicants, vendors, contractors, their agents and employees, or other third parties who believe they have been subjected to discriminatory harassment may also file a complaint with our organization using the procedures described herein. Furthermore, employees may also file a complaint if they have been subjected to harassment from residents, visitors, applicants, vendors, contractors, their agents and employees, or any other third parties in the workplace, while performing work-related duties or during other work-related activities.

Prompt reporting of harassment is in the best interest of our organization and is essential to a fair, timely, and thorough investigation. Accordingly, complaints should be filed as soon as possible following the incident(s) at issue. If you would like to file a complaint you may do so by contacting the Human Resources department or President's office at FamilyAid, 3815 Washington Street, Boston, MA 02130. These persons are available to discuss any concerns you may have and to provide information to you about our policy on harassment and our complaint process.



## ***Complaint Investigation***

When we receive the complaint, we will promptly investigate the allegation in a fair and expeditious manner to determine whether there has been a violation of our policy. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include private interviews with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed harassment. The complainant, the person alleged to have committed harassment, and all witnesses are required to fully cooperate with all aspects of an investigation. Attorneys are generally not permitted to be present or participate in the complaint investigation. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

Notwithstanding any provision of this policy, we reserve the right to investigate and take action on our own initiative in response to behavior and conduct which may constitute harassment or otherwise be inappropriate, regardless of whether an actual complaint has been filed. If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

## ***Disciplinary Action***

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

## ***State and Federal Remedies***

In addition to the above, if you believe you have been subjected to discriminatory harassment of any type, including sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies requires that claims be filed within 300 days from the alleged incident or from when the complainant became aware of the incident.

### **Federal Agency**

Equal Employment Opportunity Commission (EEOC)  
John F. Kennedy Federal Building  
475 Government Center  
Boston, MA 02203  
1-800-669-4000  
617-565-3196 – FAX

### **State Agency**

The Massachusetts Commission Against Discrimination ("MCAD")  
Boston Office:  
One Ashburton Place  
Sixth Floor, Room 601

Boston, MA 02108  
(617) 994-6000  
(617) 994-6024 – FAX

Springfield Office:  
436 Dwight Street  
2nd Floor, Room 220  
Springfield, MA 01103  
(413) 739- 2145  
(413) 784-1056 – FAX

Worcester Office:  
Worcester City Hall  
455 Main Street, Room 101  
Worcester, MA 01608  
(508) 799-8010  
(508) 799-8448 -- FAX

FamilyAid is committed to responding quickly and effectively to any report of harassment and hopes that all employees will feel comfortable coming forward and allowing us to pursue a resolution of the matter internally.

#### **REASONABLE ACCOMMODATION POLICY**

FamilyAid is committed to complying with the Americans with Disabilities Act and applicable state and local laws prohibiting discrimination in employment against qualified individuals with disabilities. FamilyAid will endeavor to provide reasonable accommodations requested by all employees with disabilities who are otherwise able to perform the essential functions of their job. An employee seeking an accommodation should contact the Human Resources department.

A reasonable accommodation may include any action which enables a qualified individual with a disability to perform the essential functions of their position, but which does not result in an undue hardship to FamilyAid or pose a threat to the health and safety of the employee, coworkers or our clientele. FamilyAid will engage in an interactive process with the employee and determine the feasibility of the requested accommodation, considering various factors including but not limited to the nature and cost of the accommodation, the availability of outside resources, the overall financial resources of the organization, and the accommodation's impact on the operation of the organization and those we serve.

FamilyAid may require that the individual requesting the accommodation provide adequate medical certification and a job-related functional assessment. It may, under certain circumstances, request and finance an independent medical examination. Also, in some instances, FamilyAid may not approve the accommodation requested by the employee but may provide an alternate accommodation.

**The employee will be informed of the decision on the accommodation request by the President, Human Resources, or their designee.**

## **STAFFING**

The Massachusetts Executive Office of Housing and Livable Communities (EOHLC) dictates staffing ratios for each type of shelter that they fund. The West Newton Family Navigation Center at 1650 Washington Street is a congregate shelter under EOHLC guidelines, defined as a shelter with multiple families that requires on-site 24/7 staffing and supervision. Case management, housing and direct care workers are on site. EOHLC mandates the following staffing pattern for congregate shelters:

- Direct care: 1 direct care worker per 5 families, 24/7 staffing on site
- Housing search: 1 housing search worker onsite per 15 families
- Case manager: 1 case manager onsite per 30 families
- Stabilization: 1 stabilization worker per 30 families
- System navigators: System Navigators (described in Component 3) are not required onsite at a specific facility but may cover FamilyAid's entire portfolio at a ratio of 1:50 families in shelter. Shelters with fewer than 20 families are encouraged to partner with a nearby shelter to share a System Navigator

Included in this section are job descriptions for these positions.

All newly hired persons at FamilyAid are subject to a 90-day probationary period. All full-time employees then become eligible to accrue 3 weeks paid vacation, 3 personal days and 12 days paid sick leave, should the employee need to use it. Full-time employees are also eligible for individual and family medical insurance (choice of plans), paid limited long-term disability insurance and life insurance and participation in our 401K plan.

FamilyAid staff will perform as much of the routine day-to-day services as possible. Whenever necessary, and in accordance with the operating budget, FamilyAid will contract for certain services including turnover and common area cleaning and painting. In addition, when a repair requires expertise beyond that of site staff, a contractor will be utilized.

The Director of the West Newton Family Navigation Center will report directly to the Director of Family Shelter Services and is responsible for the day-to-day administrative and operational activities. The Director is responsible for ensuring that any administrative and maintenance personnel perform their job-related tasks and that the residents comply with the terms of occupancy in an EOHLC licensed facility. The Director is the direct contact with the Owner on day-to-day activities. The Director of Family Shelter Services supervises the Director in their daily activities and is the direct contact with the Owner and Lenders for all issues.

## **Key Job Descriptions**

### **Director West Newton Family Navigation Center**

The Director, West Newton Family Navigation Center, will play a crucial role in overseeing the daily operations of the Center and will provide leadership and support to a team of case managers and direct care staff (RSAs). The Director will indirectly coordinate the work of facilities and housing placement professionals, service navigators, and external agencies working onsite with appropriate functional leaders.

The Director will play a pivotal role in fostering strong relationships between FamilyAid and various stakeholders, neighbors, community partners, volunteers, and city/state contacts. The Director will serve as the point of contact for these constituents, addressing their needs, inquiries, and concerns or connecting them with the appropriate individual(s) to do so.

#### Competencies

- Mission-driven
- Problem-solving
- Deals with uncertainty
- Initiative and results-driven
- Client orientation
- Cultural humility
- Workload and time management
- Organization and systems knowledge
- Critical thinking
- Expertise in area of focus (role)
- Adaptability
- Collaboration

#### Duties and Responsibilities:

- Implement and oversee the agency-approved operational process and plans in service to families under the obligation of the Executive Office of Housing and Livable Communities' (EOHLC) scope of service.
- Responsible for the oversight and implementation of service delivery for the purpose of meeting the physical, emotional, and social needs of clients.
- Maintains a Housing First framework while upholding the core values of self-sufficiency, harm reduction and client choice.
- Manages and coordinates West Newton, FNC volunteers and external service providers.
- Serves as the face of the organization related to the needs of neighbor abutters and community representatives.
- Builds and maintains a positive rapport with all within the community.
- Facilitates open lines of dialogue, ensuring a seamless exchange of information and

collaborative efforts with community partners, stakeholders, contractors, and vendors.

- Oversee a portfolio of more than 15 staff who provide compassionate, pragmatic educational, case management and direct care to families residing in the Center.
- Leads through matrix configuration, educational programs, facilities, housing placement and service navigation and external professionals serving families onsite at the Center.
- Ensures trauma-informed and 2-generation strategies are applied across all site operations and educational programming and that services exceed all contractual, funding, and regulatory requirements.
- Ensures departmental and staff adherence to child and family safety policies set forth by FamilyAid, EOHLC, DCF and other governing agencies.
- Participates with leadership as a liaison to the EOHLC, municipal, public health, licensing, and inspection authorities.
- Implements and ensures compliance with regulatory and contractual obligations.
- Provides programmatic supervision to program supervisors and select staff.
- Ensures that all residents abide by Center rules and that EOHLC processes are followed for non-compliances.
- In collaboration with Facilities Leadership, oversees facility maintenance and ensures a safe, clean, and welcoming environment for families and staff.
- Coordinates with the facilities department to ensure family safety and compliance throughout the facility and property.
- Prioritize FamilyAid's values and goals in all supervisory and staff work.
- Trains and supports supervisory staff to manage the operations of the Center to attain FamilyAid and contractual goals.
- Responsible for creating, overseeing, and participating in off hours on-call response process for emergent needs. fielding all emergency West Newton, FNC calls during business hours
- Ensure that program staff adhere to all recordkeeping and data entry requirements.
- Ensure that staff collaboratively develop educational, rehousing and service plans with families.
- Participate in weekly supervision and professional development.
- Ensure the confidentiality of all client files and information.
- Represent the agency, Center, staff, and clients at community events, public forums, and meetings to raise awareness and advocate for the needs of the families served.

- Participate in all staff, team, and clinical meetings.
- Remains knowledgeable on updated best practice service models for chronically homeless, shelters, and housing support.
- Provides guidance to staff to reduce length of shelter stay and future homelessness.
- Facilitate and conduct site-based orientations, meetings, and volunteer trainings throughout the year.
- Collaborates with state departments, healthcare and housing providers, schools, and local first responders to ensure the safety and well-being of residents at the Center. Participates in clinical conferences and staffing with clients when case escalation is required.
- Provides direct services to West Newton, FNC residents when leadership involvement is necessary.

#### Leadership:

- Possess strong core ethics, integrity, and accountability consistent with FamilyAid's mission, vision, and values.
- Provides visionary leadership, setting the tone for a compassionate and inclusive environment within the Family Navigation Center.
- Aligns and lead self and staff towards achievement of FamilyAid's mission, vision, values, strategic plan, and annual operational and financial plans.
- Identifies internal and external expectations and exceeds them.
- Works diplomatically, inclusive, transparent, communicative, open, and fair.
- Promotes a high-performance culture.
- Fosters a positive and collaborative work culture, encouraging professional growth and team cohesion among staff members.
- Serves as a reliable and upbeat colleague in collaborative efforts to achieve the agency's annual goals and objectives.
- Undertakes other duties/or assignments as assigned by the Director of Family Shelter Services, Vice President of Programs, Chief Operating Officer, or President.

#### Qualifications:

- Master's degree in social work, human services, or a related field
- 5-10 years of experience managing staff/human service or similar programming.
- Experience working with Newton-area regional resource providers that support homeless families and children's goals.

- Experience managing a sizeable congregate facility or program. Leadership in Massachusetts Emergency Assistance environment preferred.
- Experience leading in a Trauma Informed environment.
- Excellent leadership, individual, and group supervisory skills.
- Strong computer skills, including familiarity with management information systems and database programs.
- Experience leading staff in a matrix reporting environment.
- Must be able to work with diverse constituencies.
- Flexibility and compassion are essential.
- Bi-lingual capacity preferred.

Supervision: Director of Family Shelter Services

Location: This position requires full-time onsite presence and leadership at the West Newton Family Navigation Center during business hours and with some evening and weekend presence. The position will occasionally be required to respond in person to meet the program's or families' immediate needs during non-business hours.

**Program Manager  
West Newton Family Navigation Center**

Reporting to the Director of FamilyAid's West Newton Family Navigation Center, the Program Manager will provide leadership and supervision to a team of direct care staff to support the educational center that includes 42 units of temporary housing for 100 children and parents.

In addition to leading, hiring, supervising, developing, and evaluating a team of 24/7 staff, the Program Manager will work with program leadership to ensure the provision of high-quality services to the center's children and parents, that are aligned with the agency's program policies and practices.

Additionally, the Program Manager will play a crucial role in overseeing the daily operations of the Center ensuring families have access to support and supplies for day-to-day living needs. These may include coordination of access to onsite kitchen, laundry, and clothing needs. Further, the Program Manager will coordinate and support the scheduling and logistics of onsite engagements with internal and external service partners, vendors, volunteers, and others. The Program Manager will support the logistics, scheduling and coordination of onsite work by facilities and housing placement professionals, service navigators, and external agencies.

The Program Manager will serve as a support and backup to the Director in fostering strong relationships between FamilyAid and various stakeholders, neighbors, community partners, volunteers, and city/state contacts.

## Competencies

- Organizational and Systems Knowledge
- External Relationship Builder & Manager
- Decision Making
- Manages Data
- Project Management
- Strategic resource management
- Excellent Supervisory & Team building skills
- Gracefully navigates through uncertainty
- Adaptability & Flexibility
- Strategic Thinking
- Able to develop and motivate others

## Duties and Responsibilities:

- Manage direct and indirect reports of approximately 15 direct care staff.
- Coordinate scheduling for 24/7 direct care support staff with availability to provide on-site coverage during emergency situations
- Provide comprehensive programmatic supervision.
- Support supervisees in their efforts to identify, assist, and provide family supports, including problem solving and crisis intervention
- Ensure supervisees maintain a focus on safety for each family member
- Facilitate meetings and conferences as needed
- Participate in a leadership role in all staff and team meetings
- Respond to any crisis, and follow agency and partner protocols related to incident reporting and child safety
- Work with staff to ensure housing attainment and retention to meet program goals
- Support site leadership with administrative tasks as part of daily program operations
- Responsible for the provision of basic services to clients and for the safe day to day operations
- Management and coordination of volunteers serving families at the Center
- Coordinate scheduling and engagement with visiting external service providers .
- Identify service gaps and emerging needs within client group
- Implement any new policy changes or assignments/ tasks related the Center's operations
- Monitor program budget



- Assist the Director in writing, monthly, quarterly, and annual reports as needed
- Ensure program compliance and client confidentiality
- Ensure supervisees maintain accurate, clear and non-judgmental written records and documentation in accordance with programs standards, guidelines, and regulations
- In collaboration with the Director, oversee the agency-approved operational process and plans in service to families under the obligation of the Executive Office of Housing and Livable Communities' (EOHLC) scope of service
- Ensure supervisees fully collect and enter Effort to Outcomes record in compliance with program regulations
- Participate in all appropriate staff and team meetings including weekly supervision and professional development.

#### Leadership

- Possess strong core ethics, integrity, and accountability consistent with FamilyAid's mission, vision, and values.
- Align and lead self and staff towards achievement of FamilyAid's strategic plan and annual operational and financial goals
- Identify internal and external expectations and exceed them
- Work in a manner that is diplomatic, inclusive, transparent, communicative, open and fair
- Promote a culture of high-performance • Develop and model positive, trusting, supportive, safe, and nurturing relationships • Exhibit an emotionally warm, developmentally appropriate, listening, and engaging approach
- Serve as a reliable and upbeat colleague in collaborative efforts to achieve the agency's annual goals and objectives
- Work in sync with program leadership and staff to ensure client's satisfaction and safety.
- Undertake other duties as assigned by the Director, Director of Family Shelter Services, Vice President of Programs, Chief Operating Officer and/or President

#### Qualifications:

- Bachelor's degree in related field required. Master's degree in related field preferred.
- Five plus years supervisory/managerial experience in a social service setting
- Experience building strong and effective teams within a congregate facility or program required

- Demonstrated success in applying evidence-based practices including Trauma-Informed Care, de-escalation models and motivational interviewing
- Spanish or Haitian Creole bilingual strongly desired
- Comfort working with families with diverse cultural backgrounds
- Excellent organizational, written, verbal, and interpersonal communication skills
- Flexibility and compassion essential; Ability to remain calm in crisis situations
- Proven ability to manage competing priorities in fast paced setting
- Valid MA driver's license

Supervision: Reports to the Director, West Newton Family Navigation Center

Location: This position requires full-time onsite presence and leadership at the Newton Family Navigation Center during business hours with some evening and weekend presence to meet the program's or families' immediate needs.

Work Schedule: Full-time, 40 hours/week. Days and hours to be determined, with the flexibility to best meet client and program needs. Some evening availability may be required.

### **C. Administrative Policy and Procedures**

FamilyAid complies with all policies, procedures, rules and guidelines set forth in the EOHLIC Scope of Services and Additional Terms and Conditions document, published at [www.mass.gov/EOHLC](http://www.mass.gov/EOHLC).

Uniform Rules for Families: EOHLIC has issued Uniform Shelter Rules governing the behavior of sheltered families, which must be provided to all families upon intake orientation. The Uniform Shelter Rules and a shorter summary of the Rules are available on the EOHLIC website in English, Amharic, Arabic, Haitian, Portuguese, Somali and Spanish on the EOHLIC website.

EOHLIC's Uniform Shelter Rules utilize these guiding principles:

- Humane and dignified treatment of families, including maintaining some degree of privacy.
- Health and safety of guests, staff, and community.
- Preservation of families' autonomy and promotion of independent living/self-sufficiency.
- Successful shelter management and program administration.

Shelters may set additional rules for specific situations, including curfews, visitors, housekeeping, safe sleep practices, and parental supervision of children so long as those rules are not inconsistent with the Uniform Shelter Rules. Such additional rules are subject to EOHLIC approval, so all shelter rules must be submitted to and approved by the Contract Manager prior to implementation.

As described in EOHLIC's Uniform Shelter Rules, infraction of "house rules" of a shelter shall not be treated as rule violations leading to a possible noncompliance finding or termination of EA benefits.

### *Non-Compliance and EA Termination Procedures:*

The Office's objective is that the family will succeed in efforts to become self-sufficient and secure sustainable housing during their shelter stay. FamilyAid may increase case management services for families that are having particular trouble with shelter expectations, and/or engaging in behavior that may pose a threat to health and/or safety to the family, other shelter residents or staff, and/or failing to participate in the activities in their Rehousing and Stabilization Plan.

FamilyAid must make all efforts to connect the family to community resources for added supports. System Navigators may be particularly helpful in meeting any underlying needs that may be contributing to problematic behavior.

If there is a subsequent incident of the same violation, FamilyAid may submit Non-Compliance requests for continued disregard of certain shelter rules, behaviors that pose a threat to the health and safety of the family, other shelter guests and/or staff, and for failing to develop and/or participate in the required Re-Housing and Stabilization Plan.

Three substantiated Non-Compliances and/or certain Health and Safety and Criminal Activity violations may result in termination from EA shelter benefit.

If at any point during their shelter stay a member of an EA family makes a request for a reasonable accommodation related to any alleged infraction, noncompliance or termination, the EOHLC Central ADA Coordinator(s) shall be notified and FamilyAid shall act in accordance with EOHLC guidance regarding reasonable accommodations and ADA policies.

#### **Initial Incident:**

An "incident" is a situation where a family's actions or behavior may be determined to violate a reasonable shelter rule, pose a threat to health and/or safety (including use or possession of a controlled substance) or fail to comply with the activities in their Rehousing and Stabilization Plan. In the case of an incident that does not rise to the level of a "serious incident" FamilyAid must issue a warning notice to the family detailing the incident or behavior (Note: A shelter may not issue a termination of shelter letter to a family without authorization from EOHLC.). A copy of the "Notice of Infraction of Uniform Shelter Rules" must be placed into the family's record and a copy emailed to the EOHLC Non-Compliance Coordinator.

#### **Subsequent Incident:**

If there is a subsequent incident, FamilyAid may initiate the process for non-compliance consistent with EA regulations. When submitting Non-Compliance requests to EOHLC, FamilyAid must fax or email all documentation about the relevant incident(s), including answers to the basic questions of who, what, when, where, why and how, to the EOHLC Non-Compliance Coordinator.

Serious Incidents: Serious incidents involve serious misconduct, threatening behaviors, or actual harm involving or affecting an EA program, or any EA family members. Serious incidents can involve perpetrators that are EA family members, program staff, external community members or anyone else.

FamilyAid must maintain and update a log of serious incidents, including without limitation:

1. Detailed information about the incident (who, what, where, when).
2. Date, time, and location of all serious incidents.

3. Calls to emergency services (police, fire, ambulance).
4. Any violence, incidents, injuries or deaths.
5. Natural disasters.

FamilyAid MUST inform EOHLC immediately when allegations of serious incidents occur, regardless if such allegations would lead to a Notice of Noncompliance with respect to an EA family or not. Serious incidents include (but are not limited to):

1. Police, fire department, or ambulance involvement.
2. Accidents which require admission to hospital.
3. Media involvement.
4. Deaths.
5. Fire or natural disaster.
6. Bodily harm or threat of bodily harm to a family, resident or staff member.
7. Instances of activities that threaten the safety and well-being of a family, resident or staff member.
8. Instances of serious and highly contagious infectious diseases that EOHLC is required to report to the Department of Public Health (See DPH Guide to Surveillance, Reporting and Control at <https://www.mass.gov/handbook/guide-to-surveillance-reporting-and-control>)
9. Alleged criminal activity of any kind; including but not limited to sexual assault and domestic violence.
10. Other incidents which result in a major disruption of the EA program.
11. The Department seeks to ensure appropriate handling by FamilyAid of all serious incidents. FamilyAid shall cooperate with the Department in sharing information and responding to requests for further information timely.

In order to ensure that the appropriate EOHLC Contract Manager receives timely notice of the incident, the more detailed report in the form required by EOHLC (the Serious Incident Report (SIR), and any necessary follow-up, FamilyAid must report Serious Incidents as follows:

1. Develop internal protocols regarding serious incidents, including protocols for bringing allegations to the attention of FamilyAid's Executive Director immediately. FamilyAid's protocol must also specify which staff member(s) will be primarily responsible for reporting incidents to EOHLC if multiple staff members are aware of an incident; it is ultimately the responsibility of FamilyAid to assure that contact is made immediately.
2. Notify the EOHLC Contract Manager via email of the incident immediately, copying the DHS Director, Director of Homeless Contracts, Placement Director and Placement Assistant Manager, and Intensive Case Manager. FamilyAid must then perform a preliminary investigation as outlined in the SIR and provide a more detailed report within 24 hours for the EOHLC staff identified above.
3. Detail within the submitted SIR all investigation efforts as of the date of the notice. Investigation efforts must, without limitation, attempt to explain the cause of an incident, where the cause is not immediately apparent, all parties involved in the incident, actions taken or that need to be taken to assure the safety of EA families, staff and the community, and what/if any changes to FamilyAid's practices and protocols are warranted in light of the incident.
4. Detail all ongoing and up to date information from the start through the closing of the investigation, reporting back to the EOHLC Contract Manager, where further investigation (beyond the SIR submission) is warranted.

If there is a compelling reason why FamilyAid cannot complete the preliminary investigation within

24 hours from the occurrence of the incident (due to the need to consult external parties, for example) FamilyAid must seek approval from the EOHLIC Contract Manager for additional time needed (up to three days) to provide the final SIR.

Reasonable Accommodation Requests:

FamilyAid must keep a log of family requests for reasonable accommodations (changes in policies, practices, procedures or services) and/or reasonable physical modifications to facilities (referred to herein collectively as "reasonable accommodations") based on disability in accordance with EOHLIC guidance regarding reasonable accommodations and ADA policies. This log must note the date of each such request and FamilyAid must report any such request to the EOHLIC Central ADA Coordinator promptly in accordance with EOHLIC guidance regarding reasonable accommodations and ADA policies.

order to ensure that EOHLIC receives the request timely, FamilyAid must follow EOHLIC guidance regarding reasonable accommodations and ADA policies and EOHLIC's directives with respect to a family request for a reasonable accommodation. Only the EOHLIC Central ADA Coordinator shall have the authority to deny a request for reasonable accommodation.

#### **D. Resident Services**

Resident Services are developed with the greater goal of engaging members of the resident community. Ultimately our ideal is to develop programs that can be self-sustaining and that draw on the strengths and talents of the resident population. In addition, we work to build collaborative partnerships and to access community-based service agencies to provide ongoing supportive services to residents.

FamilyAid provides children and parents with a path to permanent housing via educational programs, housing search and placement support, and connections to vital resources they need to return to a home of their own. FamilyAid employs a two-generation educational model that focuses on both parents' and children's needs, teaching families how to overcome the barriers they face to return to stable housing quickly. The site will include a mix of educational space for parents and children to ensure they have the resources, training, education and life skills needed to achieve and maintain a high quality of life for generations to come, and temporary housing.

Social Services are coordinated with oversight by the Director as well as the Resident Services Program Manager, both of whom are Licensed, Independent Clinical Social Workers. Both provide ongoing consultation, supervision, and direct assistance as needed to all Resident Services Staff. In addition, The Director of Resident Services and Program Coordinator facilitate all in-house training and group consultation for Resident Services Staff. All RS staff attend a bi-monthly consultation group in order to address current challenging resident services issues. Maloney Properties maintains a Resident Service Operations Manual which outlines all policy and procedures related to Resident Services. This includes stringent reporting standards regarding elder abuse and abuse of persons with disabilities. The Director of Resident Services conducts audits of all Resident Services Programs for quality assurance purposes and to ensure compliance with Resident Service Standards. Currently, social workers on staff also supervise graduate and undergraduate interns from local colleges and universities placed at various FamilyAid-managed sites. Resident Services Staff are required to complete a standard monthly

report detailing programming, participation, individual needs/issues that were addressed, status of resident files, and tracking of continuing education credits to meet Resident Services Standards.

Examples of on-site programs and services include

- Job training and employment preparation
- Financial literacy classes
- Housing search and placement
- Technology education
- Tenancy skill development
- Parenting education
- Academic support for adults and youth (e.g., ESL, GED/HiSET, literacy skill development, and tutoring)
- Cooking and nutrition education
- Legal services
- Interpersonal skill development and conflict resolutions
- Health Screening & Wellness
- Multigenerational Arts and Cultural Programs
- GED Programs
- Job Skills Training & Placement
- After School & Summer Camp Programs
- Summer Jobs
- Academic Support and Tutoring
- Youth Enrichment Programs
- Youth Mentoring Programs
- Parenting Support

## **COMMUNITY POLICING**

Throughout our portfolio, FamilyAid has developed strong relationships with the Local Police Departments and has leveraged support and assistance through Community Policing efforts.

As it has in other communities where it has sites, FamilyAid will develop and maintain a strong working relationship with the Newton Police Department. On-site and executive office staff will continue to foster and expand this relationship to address any concerns.

## **E. Maintenance**

### **Maintenance Program**

The Executive Office of Housing and Livable Communities requires each Emergency Assistance facility to meet all state and local health, safety licensing and/or occupancy requirements, including valid occupancy permits, de-leading certificates and designated smoking areas where required by state or local ordinances. In addition, annual inspections by either a government oversight agency or a certified home inspection service must be conducted for congregate facilities. All permits and certificates must be kept up to date and available onsite or at the closest agency office. Independent of EOHLC inspections, FamilyAid must establish a schedule for shelter staff to complete routine walkthroughs of all shelter units to ensure the continued quality of shelter.

This schedule must ensure that families receive a written notice with at least 24-hour advance notification. The EOHLC Inspection team must approve the proposed schedule, with a copy to the Contract Manager, and the schedule must be available to participating families upon intake and be posted in common areas. Routine walkthroughs of shelter units must reference the EOHLC-issued "checklists", below, of unit readiness and conditions to ensure compliance with local, state and federal laws, regulations and policies.

For all its properties (apartments and temporary housing units), FamilyAid maintains a system of inspections, designed to eliminate emergency and/or unplanned maintenance and to help minimize property damage. This Preventive Maintenance Program generates a series of work orders that are incorporated into the regular flow of routine work orders of the maintenance delivery system.

The Facilities manager at 1650 Washington Street will perform the following inspections, generate the needed work orders and ensure timely and complete repairs:

## Family Aid Boston

### Apartment Preparation Procedure

Address \_\_\_\_\_ Date Entered \_\_\_\_\_

**Enter Apartment and evaluate condition. (Example) New, Good, Fair, Poor, Etc..**

Carpet \_\_\_\_\_ Vinyl \_\_\_\_\_ Hood Fan \_\_\_\_\_ Faucets \_\_\_\_\_ Drains \_\_\_\_\_ Countertops \_\_\_\_\_  
GFCI \_\_\_\_\_ Switch / Outlet Covers \_\_\_\_\_ Toilet \_\_\_\_\_ Stove \_\_\_\_\_ Mirrors \_\_\_\_\_ Screens \_\_\_\_\_  
Door Hardware \_\_\_\_\_ Light Fixtures \_\_\_\_\_ Exterior Condition of property \_\_\_\_\_

**\*House Keeping:** Apartments must be kept free of excess debris and trash during turnover at all times.

Initial

- \_\_\_ Remove all trash from apartment.
- \_\_\_ Remove all nails and adhesive from walls.
- \_\_\_ Vacuum Floors, Closets, Cabinets, Behind and under Refrigerator, Behind and under Stove.
- \_\_\_ Clean the hood fan and install a new filter if needed.
- \_\_\_ Clean the refrigerator inside and out top to bottom.
- \_\_\_ Clean the stove inside and out top to bottom.
- \_\_\_ Replace burner pans if needed.
- \_\_\_ Wash Floors clean carpet
- \_\_\_ Ensure all cabinet doors and drawers open and close properly. Repair as needed
- \_\_\_ Clean Countertop Backsplash and sink.
- \_\_\_ Caulk countertop and backsplash with appropriate color caulk if needed.
- \_\_\_ Clean all heaters. Ensure that thermostats are working properly.
- \_\_\_ Wash all walls and doors as needed.
- \_\_\_ Report Plumbing repairs needed to the Senior Property Coordinator and follow instructions given.
- \_\_\_ Clean Medicine Cabinet and report repairs needed to the Senior Property Coordinator.
- \_\_\_ Clean the tub and tiles. Report repairs needed to the Senior Property Coordinator.
- \_\_\_ Caulk the tub with White 100% silicone caulking if needed.



- \_\_\_ Clean the shower head or replace it with a 1.25 or 1.5 Gallon per minute head.
- \_\_\_ Replace Aerators with low flow .5 gallon per minute aerators if needed.
- \_\_\_ Clean all soap dishes and polish chrome.
- \_\_\_ Clean all windows and Glass doors.
- \_\_\_ Repair and or refinish doors as needed.
- \_\_\_ Clean outlets, switches and plates for both.
- \_\_\_ Remove and clean light fixture covers then reinstall.
- \_\_\_ Replace light bulbs with LED Bulbs.
- \_\_\_ Remove all trash and items not needed to complete the turnover.
- \_\_\_ Scrub clean the bathroom area.
- \_\_\_ Clean smoke detectors, carbon monoxide detectors, replace batteries and test.
- \_\_\_ Seek Permission from the senior property coordinator to begin painting. \_\_\_\_\_ Sr. Property Coordinator
- \_\_\_ Paint ceiling if needed. Touch up only \_\_\_\_\_ Sr. Property Coordinator
- \_\_\_ Cut in walls and corners.
- \_\_\_ Paint window Trim.
- \_\_\_ Paint closets.
- \_\_\_ Paint doors as needed.
- \_\_\_ Paint Walls.
- \_\_\_ Paint Heaters if needed.
- \_\_\_ Paint under Kitchen Sink with oil base high gloss paint.
- \_\_\_ Remove Painting Supplies.
- \_\_\_ Install Window treatments.
- \_\_\_ Install window guards.
- \_\_\_ Wipe down, dust and vacuum apartment.
- \_\_\_ Clean common space leading from apartment entry to building front door. (walls, floors and doors)
- \_\_\_ Clean from the back door of apartment to the rear entry of the building. (walls, floors and doors)
- \_\_\_ Deliver Apartment supplies to match family dynamics. Bedding, Kitchen supplies, Furniture
- \_\_\_ Install Mattress and box spring covers on all beds.
- \_\_\_ Change locks. Date. \_\_\_\_\_

## Apartment Supplies

Trash can  
Trash Bags  
Mop  
Floor cleaner  
Sponge  
All-purpose cleaner  
Toilet brush  
Mattress cover on each mattress  
2 sheets per mattress  
1 Blanket per mattress  
1 pillow per mattress  
1 pillow case per pillow  
Bath Towels (2 per household member)  
Plates (enough for family size)  
Silverware (enough for family size)  
Cookware  
Paper towels  
Toilet paper  
Fire extinguisher  
First aid kit

\* Additional Cleaning supplies may be requested through your case manager

Client Signature: \_\_\_\_\_ . Date: \_\_\_\_\_ .

## Apartment Turnover Capital Inventory

Item	Date replaced	Inventory #	Price
<u>Carpet</u>	_____	_____	_____
<u>Bathroom Flooring</u>	_____	_____	_____
<u>Kitchen Flooring</u>	_____	_____	_____
<u>Windows</u>	_____	_____	_____
<u>Counter Top</u>	_____	_____	_____
<u>Hood Fan</u>	_____	_____	_____
<u>Sink (bathroom)</u>	_____	_____	_____
<u>Sink (kitchen)</u>	_____	_____	_____
<u>Stove</u>	_____	_____	_____
<u>Refrigerator</u>	_____	_____	_____
<u>Hot Water Heater</u>	_____	_____	_____
<u>Boiler / Furnace</u>	_____	_____	_____
<u>Doors</u>	_____	_____	_____
<u>Toilet</u>	_____	_____	_____
<u>Tub / Tub Surround</u>	_____	_____	_____

### Apartment Turnover Costs

Under \$1,500

\$1,501-\$3,500

\$3,501-\$7,500

\$7,501-\$10,000

\$10,000-\$15,000

\$15,001-\$25,000

Over \$25,000

Initial \_\_\_\_\_

## Apartment Furniture Inventory

- Twin Bed \_\_\_\_\_ ( each)
- Full size bed \_\_\_\_\_ ( each)
- Dresser \_\_\_\_\_ ( each)
- Couch \_\_\_\_\_ ( each)
- Kitchen Table \_\_\_\_\_ ( each)
- Kitchen chairs \_\_\_\_\_ ( each)
- Lamps \_\_\_\_\_ ( each)
- Side table \_\_\_\_\_ ( each)
- Coffee table \_\_\_\_\_ ( each)
- Window Treatments \_\_\_\_\_ ( each)
- Crib or Pack and play \_\_\_\_\_ ( each)
- Window Guards \_\_\_\_\_ ( each)

### \*Sleeping Arrangements

Each family must be assigned its own bedroom(s) or scattered site apartment. Each adult (other than spouses) and all children over the age of five, Unless the same sex, must have a separate bed or cot available to them. Families may choose other sleeping arrangements

### Cribs

Children age three or under must have a non portable crib available to them. Families can request a portable crib if preferred. If the family does not want a crib or portable crib a waiver must be filled out along with a doctor's note.

Address: \_\_\_\_\_.

Client Signature \_\_\_\_\_ Date \_\_\_\_\_.

**Inspections:**

- Weekly walk-through of all units, common areas, looking for significant immediate-response required problems (i.e., trip hazards, safety issues, security concerns, etc.) The Program Manager conducts these inspections on a monthly basis, and more frequently if necessary. Items found are documented and addressed immediately.
- Monthly inspection of all maintenance and equipment rooms, including laundry areas
- Annual inspections of all building systems and all units.

Our system provides a written record of each inspection and resulting repair that can be tracked through our computerized and state-of-the-art maintenance delivery system.

Examples of items addressed through the Preventive Maintenance program include proper window/door and lock operation, proper smoke detection and carbon monoxide system operation, plumbing systems, appliance operation, etc.

**Move Out Procedures**

After permanent housing is identified for an enrolled family, Management will provide the family with written notice of the termination of their enrollment and the date to surrender their housing unit. FamilyAid staff will then work with the family to ensure a safe and orderly departure from 1650 Washington Street and a safe and orderly move to their permanent home. Upon the unit being vacated, the Program Manager and/or his or her designee will inspect the unit to determine the condition and the extent of the work necessary upon turnover.

When any Participant vacates any premises, The Program Manager or Facilities Manager or their designees shall:

- check all appliances and fixtures and either repair or have repaired any defect.  
This includes:
  - a. thermostat
  - b. baseboard heating elements
  - c. smoke detectors
  - d. light fixtures and electric outlets (replace bulbs)
  - e. intercom
  - f. doorknobs and locks
  - g. ventilator fans and motors
  - h. bathroom fixtures and plumbing

- i. kitchen sink and plumbing
  - j. windows, window locks, window guards
- repair any damage to walls, floors, windows, doors, closet shelves or poles, cabinets, flooring, windows, bathroom towel racks, toilet paper holder.
  - touch up paint, where required. Repainting the premises will not be routinely done at each turnover.
  - address any rodent/insect problems with appropriate exterminating procedures

## **F. Uniform Shelter Program Rules**

### **Uniform Shelter Program Rules:**

FamilyAid site directors, managers and supervisors meet regularly with Resident/Participants to foster open lines of communication and ensure compliance with state-regulated uniform program rules.

Shelter Program Rules are effective January 2, 2015. Shelters are to post copies of these Uniform Rules and the effective date. These Rules apply to both congregate and scattered site shelters, and hotel placements, except as noted. A single incident that could be considered as an infraction of two or more of the Uniform Shelter Rules, or of one or more Uniform Shelter Rules and a rehousing plan violation under 760 CMR 67.06 (5) (a) 3. or a threat to health and safety under 760 CMR 67.06 (5) (a) 3. or 760 CMR 67.06(6)(a)1, will be counted as only one infraction.

### **Guiding Principles**

- Humane and dignified treatment of families, including maintaining some degree of privacy
- Health and safety of guests, staff, and community
- Preservation of families' autonomy and promotion of independent living/self-sufficiency
- Successful shelter management and program administration

## **Access to Units/Searches**

Rooms and/or units in congregate shelters, scattered site shelters, and hotels may be checked for cleanliness and health or safety hazards with at least 24 hours written notice or on a regular basis, provided that written notice of the regular inspection schedule is provided to EA Households at least 24 hours in advance of the first regular inspection and that any such regular inspections be scheduled for a time before 8:00 p.m. Notice of inspections shall include a period not greater than 3-hours during which any such inspection shall be conducted. In addition, staff has immediate 24-hour access without prior notice to all EA units, including but not limited to hotel rooms, (1) in cases of emergencies; and (2) for purposes of inspections by government agencies charged with enforcing building codes, sanitary codes, fire codes, or health codes. Emergencies shall include, but not be limited to, health emergencies and facility-related emergencies such as fires, water leaks, and insect infestations.

EA units, including hotel rooms, shall be made available upon 24 hours' written notice for routine maintenance within a 3-hour window of time included in the notice, or at any other time mutually agreed to. In hotels, rooms shall be made available every day for regular housekeeping by hotel housekeeping staff during prescheduled daytime hours within a 3-hour window of time provided in writing in advance to the EA participants staying at the hotel and available at the hotel front desk, or at any other time mutually agreed to, except in cases where arrangements have been made for an EA Household to clean its own room due to disability and, in such cases, the room shall be made available upon 24 hours' written notice for inspection for cleanliness. Refusal of room cleaning due to an illness is also permissible, but not for more than three consecutive days.

In addition, shelter staff, hotel staff, EOHLC employees, and employees of EOHLC contractors and other state agencies working with EOHLC shall have immediate access to all shelter units, including hotel rooms in which EA participants are placed, in all cases in which (1) they have a reasonable, articulable suspicion that a member of an EA household is currently committing a crime; is currently smoking, cooking with an unauthorized appliance, or entertaining unauthorized visitors; or is currently involved in conduct that constitutes a disturbance to the quiet enjoyment of the other EA participants or hotel guests or a threat to the health or safety of the participant, members of his/her household, other EA participants in the shelter or hotel, residents of the building in which a scattered site unit is located, or guests/staff of the shelter or hotel, EOHLC employees, or employees of EOHLC contractors and other state agencies working with EOHLC, and (2) the suspected conduct cannot be remediated by a visit to the unit involving only a knock on the door and a request to talk to those inside.

In all cases where access, including immediate access and regular hotel housekeeping, is warranted, shelter staff, hotel staff, EOHLC employees, and employees of EOHLC contractors or other state or local agencies working with EOHLC shall knock on the entry door, announce their intent to enter, and give the resident an opportunity to open the door before entering. Except where immediate access is authorized by this rule, shelter staff, hotel staff, EOHLC employees, and employees of EOHLC contractors and other state agencies working with EOHLC shall have access to units only after 24-hours advance written notice of an intended visit within a 3-hour time frame.

Any doors within a hotel or shelter unit, including closet doors, may be opened during routine inspections and emergencies. Personal belongings in closets or drawers shall not be disturbed, except as permitted by this rule, and shall be left in an orderly state after any permitted



inspection. Personal belongings in closets or drawers may be inspected, but only upon reasonable, articulable suspicion of the presence of criminal activity, substances prohibited by these rules, or the use of prohibited heating or cooking equipment. Evidence obtained without a written reason for the searching of drawers provided to a member of the EA Household before the search may not be introduced into evidence in an EOHLC noncompliance or termination hearing. If a search of drawers is to be made upon reasonable suspicion and an EA Household member is present, the written reason for the search will be provided to the Household member before the search. If no EA Household member is present during such a search, the written reason will be left in the room.

Except to the extent provided in this rule, shelter staff are not permitted to search personal belongings of EA households. Shelter staff, may, however, call the police at their discretion if they have a reasonable and articulable suspicion that a member of an EA Household or a visitor is engaged in criminal activity, has a weapon on the premises, or otherwise poses a threat to the health or safety of shelter residents or staff. In the above circumstances, when shelter staff determines that an immediate threat to the health or safety of shelter residents or staff exists, or the destruction of evidence is imminent, the senior shelter staff person on the premises at the time may search the unit him/herself, if able to do so consistent with safety concerns, or may consent to the police conducting a search of any unit. Such senior shelter staff person may also consent to the search of a unit by police when such person has a reasonable suspicion that such a search will produce any item (1) that is likely to cause serious and immediate harm or to be used for criminal purposes (including, but not limited to, a firearm), and (2) which staff may not legally possess. In any circumstance outlined above, when shelter staff call the police, they may also restrict access to the unit by the EA Household until the police arrive and, after the arrival of the police, to the extent requested by police.

### **Babysitting/Child Care**

This rule applies only to on-site babysitting or childcare at shelter. Offsite babysitting or childcare is not covered by this rule and is permitted so long as it is not inconsistent with an EA Household's rehousing plan.

Within two (2) days of initial placement, each EA Household will be provided with a copy of the form to request babysitting.

An adult or a child who is age 16 or over and, in a hotel, is also resident in the same hotel, is permitted with authorization or good cause as determined by 760 CMR 67.06(6)(a)5 to provide childcare for children in another EA Household.

A child aged 14 or over may care for himself/herself or a younger member of the same EA household with authorization or good cause as determined by 760 CMR 67.06(6)(a)5. If the babysitter (or child authorized to care for him/herself) is less than 16 years old, any babysitting or self-care must take place in the unit assigned to the EA Household or when the babysitter is accompanying younger siblings to and from an on-site pick-up/drop-off location to meet transportation to school, school-related activities, medical appointments, authorized visitation with family members, or other appointments relating to health, safety, or welfare. If a babysitter or a child caring for him- or herself is under the age of 18, an adult member of the household for the children being cared for or caring for him- or herself shall be (i) on the premises and within the sound of the child's voice or (ii) promptly reachable by the babysitter or the children by



telephone and able to return promptly in case of emergency.

Approved arrangements may either be for a single occasion or for ongoing/long term arrangements. Babysitting overnight will not be allowed unless approved for the reasons that permit a late return to shelter after curfew or for good cause as determined by 760 CMR 67.06 (6) (a) 5.

In a shelter, the babysitter must be (i) approved by shelter staff and (ii) subject to the EOHLC Babysitting Guidelines, including a written babysitting agreement on a standard EOHLC form to be signed by the head of the EA Household, the babysitter, and shelter staff.

In hotels, families may complete the babysitting request form at the hotel front desk and the hotel will immediately fax the form to the appropriate designee of the Associate Director (and provide verification to the EA household of having done so) who shall approve babysitting/child care arrangements in the place of shelter staff. Information about who the Associate Director's designee is and how to contact him/her shall be available to all participants at the front desk of each hotel. The Associate Director's designee shall respond to the request of a participant placed in a hotel for approval of a babysitter within two business days of the request. If a response is not received within two business days or prior to the needed time for babysitting when the need arose in less than two business days prior to the time for the proposed babysitting, the proposed babysitting arrangement may proceed pending a response, but a request made with less than two business days' notice should include good reasons why the babysitting request was not made at least two days in advance and the request may be denied within two business days of the date of the request. Participants who proceed with babysitting without express advance approval do so with the understanding that the arrangement may not be approved. In considering babysitting requests, including in such cases of after the fact review, approval will not be denied without stated good reasons. Participants in hotels must use a babysitter who is also an EA participant placed in the same hotel as the EA Household receiving the babysitting services. The Associate Director's designee or shelter staff may deny permission for babysitting services for good reasons, taking into account the EA Household's needs, as determined by the Associate Director's designee or shelter staff, including the health, safety, welfare, and appropriate supervision of the children, and history of disturbance to other EA Households. The decision of the Associate Director's designee or shelter staff on this basis may be informed by past noncompliance with material rules. In any administrative appeal of a noncompliance or termination based on unauthorized babysitting or child care, EOHLC's failure to approve requested babysitting or child care can be reviewed for reasons stated in M.G.L. c. 30A, § 14 (7), including but not limited to, for abuse of discretion.

Except in cases of good cause, as determined in accordance with the good cause standards in 760 CMR 67.06(6)(a)5, babysitting is allowed only in accordance with this Rule and for the time approved. In determining whether good cause as determined in in 760 CMR 67.06(6)(a)5 exists, EOHLC will take into consideration all the circumstances including the age of the child(ren) and the length of time of unauthorized babysitting, the length of time that the babysitting exceeds the approved time period, and the extent to which the unauthorized babysitting threatens or adversely affects the health, safety, and welfare of the child(ren). Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time, location, age of the child and risk to the child, will not be counted toward a noncompliance or termination.

An approved babysitter is required to comply with all the regulations of the program and the Uniform Shelter Program and EOHLC-established hotel rules during the time that he or she is caring for the child(ren). The babysitter is subject to EA discipline to the same extent that the child(ren)'s parent would be if he or she fails appropriately to supervise or provide for the health and safety of the child(ren).

Any babysitting arrangement shall comply with the Rule on Curfew, except as otherwise approved or for good cause under the good cause standards in 760 CMR 67.06 (6) (a) 5. Absent approved special circumstances described in the Rule on Curfew applicable when a child's parent is authorized to return after curfew, or good cause as described above, a babysitter shall not care for a child after curfew or before 6:00 a.m. Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time, location, age of the child and risk to the child, will not be counted toward a noncompliance or termination. Approval for babysitting after curfew or before 6 a.m. should be specifically requested on the standard EOHLC form Babysitting Agreement indicating why post-curfew or pre-6 a.m. babysitting is necessary.

### **Care of Children**

The adult members of an EA Household and any teenage parent(s) of a child in an EA Household are responsible for providing for the health, safety, and welfare of any child/children in the EA unit (e.g. compliance with school attendance, ensuring children are properly fed and rested). This responsibility is in no way diminished when an EA Household is off-site, e.g. on an approved overnight, or because the EA Household complies with other shelter rules, such as curfews. Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time, location, age of the child and risk to the child, will not be counted toward a noncompliance or termination.

### **Child Left Unattended**

**Warning: The Department considers a child to be alone and unattended if a child is even briefly out of the sight, hearing, or immediate control of a caretaker adult or authorized babysitter.**

Children in the EA household shall not be left alone and unattended on shelter or hotel property, except if authorized to provide their own babysitting under the Rule on Babysitting or visiting in common areas to the extent permitted by the Rule on Visitors/Guests, or justified by good cause as determined under the good cause standards in 760 CMR 67.06(6)(a)5. A child authorized to provide his or her own babysitting shall be covered by the Rule on Babysitting/Childcare. In considering the good cause reasons raised by a participant for leaving a child unattended, EOHLC will take into consideration all the circumstances including the age of the child(ren) and the length of time that the child(ren) is (are) unattended. Unless a violation is repetitive, a *de minimis* (minor) violations of this Rule, as determined based on all the relevant circumstances, as to time, location, age of the child, and risk to the child, will not be counted toward a noncompliance or termination.

## Curfew

The EA household shall comply with any curfew imposed by the shelter or hotel, in which case the curfew for arrival on premises shall not be earlier than 9:00pm on weekdays (Sunday – Thursday evenings) and 11:00pm weekends (Friday & Saturday evenings) and shall not be later than 11:00pm (Sunday – Thursday evenings) and 1:00am (Friday & Saturday evenings). Shelters are not required to alter their program or meal schedules due to curfews.

A shelter or hotel may impose a quiet time to commence not more than one hour before the curfew time. A shelter or hotel may impose an in-room curfew for EA household members to remain in their assigned rooms, to commence one hour after the curfew for arrival on premises. Exceptions to the in-room curfew shall be made for reasonable health, safety, and welfare needs, if the EA participant provides a good reason to shelter or hotel staff for attending to such needs after in-room curfew hours, which shall include late return from work or education.

In-room curfew shall end at not later than 6:00am.

Any curfews must be adjusted on a case-by-case basis for the EA Household's work or school schedule, for other rehousing plan obligations, and to accommodate disabilities or other good cause reasons as determined by 760 CMR 67.06(6)(a)5.

Special exceptions to curfew requirements may be permitted by shelter or hotel staff or by the Associate Director's designee on a case-by-case basis, for good cause only, such as scheduled sports, school, church, medical appointments, and community activities or other similar good reasons.

A request for an adjustment to curfew may be made either to shelter staff or to the Associate Director's designee, whose contact information shall be available at each shelter and hotel. If a request for adjustment of curfew is made two business days prior to the date for which the adjustment is needed, the request will be deemed approved unless expressly denied.

Compliance with curfew times does not relieve EA Household members of responsibility for fulfilling their shelter assignments and providing for the health, safety, and welfare of children in the EA Household.

Arriving late for curfew without prior authorization may be justified by good cause as determined under the good cause standards in 760 CMR 67.06(6)(a)5. In considering the good cause reasons raised by a participant for arriving late for curfew, EOHLC will take into consideration all the circumstances, including the amount of lateness, any self-reporting of the lateness as an indication of responsibility, and the actual or potential effect of the late return on the health, safety, and welfare of the child(ren). Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time and location will not be counted toward a noncompliance or termination.

## **Damage to Property and Expenses**

The EA Household members may not damage shelter or hotel property or take shelter or hotel property, other than property meant for consumption, without good cause as determined in accordance with 760 CMR 67.06 (6) (a) 5. Normal wear and tear shall not be considered damage. Unless the damage is caused intentionally, recklessly or repeatedly, an EA Household that is in compliance with a reasonable payment plan to reimburse the cost of replacement or repair within one year shall have its noncompliance held in abeyance until repayment is made in full, provided that all payments are made timely. If repayment in full is made timely in accordance with the repayment plan, the noncompliance shall be rescinded.

The EA Household must pay all costs for extra items available and not included in the standard benefits for the shelter or hotel. This may include phone calls from shelter or hotel lines or movie rentals. EA residents shall not be charged for phone calls or other costs at a hotel if a self-paying guest would not be charged for such services. The shelter or hotel will tell the EA Household in advance in writing what activities will incur charges. Hotels and shelters will allow an EA Household who does not have access to a cell phone to use an office or other designated phone without charge to make phone calls in an emergency or other compelling circumstance, such as contacting a rehousing worker or inquiring about permission for overnights or babysitting authorization.

Absent good cause as set forth in 760 CMR 67.06(6)(a) 5, the EA Household must pay for any shelter or hotel property missing from a unit because of the conduct of the EA Household or any damage done by any member of an EA Household or its guests beyond normal wear and tear. This may include extra cleaning expenses if a unit is left in a particularly dirty or unsanitary condition. Payments must be made within a reasonable time after the EA Household is notified of the bill for such costs, but any repayment plan must be reasonable taking into account the Household's available income and expenses and shall be incorporated into the rehousing plans of the adult members of the EA Household. Disputed charges and the reasonableness of any repayment plan are subject to appeal to the EOHLC Division of Hearings in the context of an administrative appeal of a noncompliance or termination for a rule violation. Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time, location, or amount will not be counted toward a noncompliance or termination.

## **EOHLC Requirements Including Required Appointments**

The EA Household shall comply with all applicable EOHLC requirements, including those listed in the rehousing plan (i.e. savings, housing search, job search), or, in the absence of a rehousing plan, the minimum requirements of a rehousing plan as listed in 760 CMR 67.06(4)(b) after oral and written notice to the adult members of the EA Household as to what those requirements are and how they should be met by the EA Household.

An EA Household is expected to attend all meetings scheduled by shelter staff, EOHLC staff, and EOHLC contractors providing social welfare services to EA participants. At least two business days' advance written notice should be provided to the EA Household unless such meeting is part of a series of regularly scheduled meetings covered by a single notice, in which case two business days' notice of the first meeting is sufficient. The written notice will provide a telephone and facsimile number where the person requesting the meeting can be contacted by the EA

participant in case of emergency or other good cause reason. A participant who calls, texts or sends a facsimile requesting to reschedule at least two hours before the meeting, provided that the participant has been given the telephone number of the relevant case worker, shall not be found in violation of this Rule or in violation of the Regulation governing cooperation with rehousing plans. If the staff or provider who scheduled the meeting is more than 15 minutes late, the participant shall not be found in violation of this Rule or 760 CMR 67.06(5)(a)3 for not remaining.

An EA Household is expected to arrive at a reasonable hour at the shelter or hotel on the day that the EA Household is placed. If the EA Household agrees to be transported by EOHLC, the EA Household shall report when and where instructed to obtain transportation except for good cause reasons. If the EA Household requests to arrive at the placement by their own transportation, they shall arrive no later than 8 p.m. at a congregate shelter or hotel without authorization from the Regional Associate Director or his/her designee, and they shall arrive not later than 5 p.m. at the shelter provider's offices for a scattered site unit if the placement is provided to them before 2:00 p.m., unless the shelter provider informs of a different time or place or for good cause reasons. If the EA Household does not arrive at the shelter or hotel timely without good cause or authorization, the room may be cancelled. Placement notices shall provide a working contact number at the shelter or hotel or at EOHLC that a Household can call to report the need for a later arrival time for good cause reasons.

EA Households placed in hotels are expected to call the hotel or report in person to the front desk at 1 p.m. each afternoon to find out whether the EA Household will be moved to a shelter or to leave a phone number at the hotel where the EA Household can be reached to be informed of any transfer.

Good cause for noncompliance with this Rule will be determined subject to the good cause standards in 760 CMR 67.06(6)(a)5. Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time and location will not be counted toward a noncompliance or termination.

### **Disturbance of Quiet Enjoyment**

The EA Household members shall not engage in unreasonable conduct that has the effect of seriously and materially disturbing the quiet enjoyment of other EA participants, other residents in scattered site apartment buildings, or other hotel guests without good cause as determined in accordance with 760 CMR 67.06 (6) (a) 5. Conduct that is considered unreasonable shall not include activities of daily living, such as laughing, crying, conversing, listening to television, radio, or music, talking on the telephone, children engaging in ordinary play activities, or doing laundry during reasonable hours (if posted), unless the conduct continues to be engaged in at an exceptional volume level after clear notice that such conduct is disturbing another EA Household, resident, or guest. A serious and material disturbance of quiet enjoyment shall not include annoyances that are inherent in a congregate living setting. The availability of play space at or near a placement shall be considered in determining whether a child's conduct will be treated as a disturbance of quiet enjoyment.

## **Drug Testing**

Drug testing, including urine screens and blood and breathalyzer tests, shall not be conducted at random or across the board; however, the EA Household shall comply with any staff request for drug testing made after staff has formed an individualized and reasonable suspicion that an EA household member is abusing controlled substances. Any such testing shall be performed at the expense of the shelter.

## **Fire Safety & Smoking**

Smoking is prohibited inside any shelter unit or building.

Removal of smoke or carbon monoxide detectors, or the batteries within them, is prohibited.

Shelters shall designate and inform residents of unenclosed outdoor area(s) where smoking is permitted. Unless it is repetitive, a violation of this Rule in regard to the designated smoking area that is *de minimis* (minor), as determined based on all the relevant circumstances, as to location, will not be counted toward a noncompliance or termination.

All EA Household members shall maintain their living areas free from fire hazards. Apart from smoking in designated outdoor areas, use of any flames or flammable materials, including but not limited to lighters, matches, candles, incense, firecrackers, gas or charcoal grills, is prohibited anywhere on shelter property, except with the expressed consent of shelter staff (e.g. candles for birthday parties, shelter-provided outdoor grills, lighting the stove when pilots go out.)

In shelters, hot plates and other cooking appliances are permitted only in kitchens or shelter-designated cooking areas with the permission of the shelter. In hotels, hot plates and other cooking appliances are prohibited unless supplied by the hotel. Hot plates and other cooking appliances that are found in a placement contrary to this Rule may be confiscated, but may be the basis of discipline only if there is evidence that the appliance has been used at the hotel.

## **Harassing or Threatening Language**

No member of an EA Household may (1) verbally harass or (2) use threatening language towards other residents or guests, service providers, or EOHLC, hotel, or shelter staff. Good cause for violation of this Rule may be found to exist if a member of an EA household responded proportionately to unwarranted provocation by shelter or hotel staff.

## **Illegal Activity**

Any activity that is illegal under local, state, or federal law is prohibited on or in the immediate vicinity of shelter property.

## Legal Issues

A member of the EA Household may be cited for a rule violation if the individual has an outstanding default or arrest warrant whether issued within the Commonwealth or otherwise which the individual has been made aware of by EOHLC, which is required to be resolved as a term of a rehousing plan, and which has not been resolved within 30 days of such notice

Resolution of legal issues shall be incorporated into the rehousing plan. In support of this requirement, the EA Household shall provide the shelter staff and EOHLC staff with information regarding warrants, restraining orders – for which the individual is either a plaintiff or defendant – and any other court orders or pending legal matters such as probation, child support obligations, or court appearances. An EA Household member shall be considered to have good cause for failure to resolve an outstanding warrant if he or she provides a letter on attorney letterhead, signed by an attorney, including the attorney's Board of Bar Overseers number, indicating that it is the attorney's professional opinion as a matter of law that the EA Household should not resolve the outstanding warrants.

## Overnights

EA Households are expected to stay at the homeless shelter or hotel every night unless an overnight is authorized or there is a good cause reason. EA Households may take a **total** of four authorized nights (overnights) out of a homeless shelter or hotel per month, as an entire household. Individual household members may also take overnights away from placement as detailed below.

In a congregate or scattered site shelter, an EA Household's request for an overnight away from homeless shelter, whether for the entire household or an individual household member, should be made to the homeless shelter staff. In a hotel, a request for an overnight by an EA Household or an individual household member should be made through the hotel staff to the Associate Director's designee on a standard EOHLC form. Hotel staff shall promptly forward such request to the designee and provide confirmation of having done so to the EA household. Information about who is the Associate Director's designee and how to reach him/her shall be available to participants at the front desk of each hotel. An EA Household in a hotel that takes no more than 4 overnights per month after having requested authorization at least two business days in advance, or later for good cause reasons when the need for the overnight arose later, shall not be found to have violated this rule unless the household received notice from the Associate Director's designee prior to taking the overnight that the request for an overnight was denied.

Requests for overnights for which the need arises when the EA Household is away from the hotel or shelter may be made by calling shelter staff or hotel staff and providing a written explanation promptly upon return explaining why the request could not have been made earlier. In such cases, hotel staff will promptly send a written request to appropriate EOHLC personnel on behalf of the EA Household.

An overnight request should be made at least two business days in advance of the requested overnight. A request that is made but not responded to within 2 business days shall be deemed approved. An overnight request made for good reasons with less than two business days' notice should include the reasons why the overnight request was not made at least two days in advance and the request may be denied within two business days of the date of the request.

Participants who proceed with an overnight without express advance approval do so with the understanding that the overnight may not be approved. In considering overnight requests, including in such cases of after-the-fact review, approval will not be denied without stated good reasons. There shall be a presumption for approval for up to four overnights per month as allowed by these Rules. In any administrative appeal of a noncompliance or termination based on unauthorized household overnights, EOHLC's failure to approve a requested overnight can be reviewed for reasons stated in M.G.L. c. 30A, § 14 (7), including but not limited to, for abuse of discretion.

Absences by individual EA Household members from a homeless shelter or hotel for more than 2 consecutive nights are not permitted, except when explicitly allowed by EOHLC for good reasons (e.g., children attending summer camp, custody agreements, hospitalizations) or for good cause as determined under the good cause standards in 760 CMR 67.06(6)(a)5. In a shelter, such requests should be made to the Associate Director's designee through the shelter staff on a standard EOHLC form. In a hotel, such requests should be made either directly to the Associate Director's designee or through the hotel staff on a standard EOHLC form. A written request for approval that is made but not responded to within 2 business days shall be deemed approved. Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time and location will not be counted toward a noncompliance or termination.

In any administrative appeal of a noncompliance or termination based on unauthorized individual overnights, EOHLC's failure to approve a requested overnight can be reviewed for reasons stated in M.G.L. c. 30A, § 14 (7), including but not limited to, for abuse of discretion.

Congregate or scattered site shelters may withhold approval of overnights in connection with the EA Household's failure to observe program rules and requirements.

Requests by an entire household for five or more overnights in a row should be made on the Form TESI-1.

All requests to EOHLC for additional overnights pursuant to this rule should be directed to the applicable the Associate Director's designee. Hotel staff should assist families in sending such requests to the Associate Director's designee and contact information for the Associate Director's designee shall be available at the front desk of each hotel.

Unauthorized overnights shall not form the basis for a rule violation, noncompliance or termination if there was good cause for the absence pursuant to the good cause standards in 760 CMR 67.06(6)(a)5. In considering the good cause reasons raised by a participant for an unauthorized overnight, EOHLC will take into consideration all the circumstances, including documented efforts to obtain approval for an overnight, and the number of overnights during the relevant time period.

A family will not be locked out of a hotel or shelter for alleged abandonment unless the entire family is absent for at least 48 hours and two consecutive nights and has not called the hotel or shelter or the Associate Director's designee before curfew on the day after the absence began to explain any good cause reasons for being absent longer than two consecutive nights. The Department may



request timely verification of any asserted good cause reasons and issue a notice of termination if verification is not timely provided. In any case where a unit is no longer available to an EA Household because of unauthorized overnights, if the participant returns to the placement seeking reentry, the shelter or hotel management will inform the participant of the possibility of obtaining a new placement pending administrative appeal pursuant to 760 CMR 67.09 (2) (b) 3. by returning to a EOHLC office during business hours. In such cases, the shelter or hotel management shall notify EOHLC of the date and time that the participant returned.

### **Personal Belongings and Cleanliness of Room**

An EA Household may not bring more than the equivalent of two large (30-gallon) bags full of personal belongings per person with them into shelter, including scattered site and hotel settings. Households who arrive with more than the allowed amount of possessions, up to one more large (30-gallon) bag per person, and do not immediately have a place to store the excess items will be provided advice about possible storage options and given seven calendar days, or for good cause as determined in 760 CMR

67.06(6)(a)5 and upon receipt of express written permission from the Associate Director's designee, a longer reasonable period of time (taking into account all the circumstances) to move out the excessive items. If a hotel or shelter fails to provide sufficient storage units to store the permitted volumetric amount of personal belongings, the Household may provide its own storage unit(s) upon written authorization by the Associate Director's designee. Storage of any personal belongings or items, including storage units and excess personal belongings during the first seven days in shelter, is contingent upon compliance with all applicable state and local Sanitary and Fire Codes. Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to volumetric amount will not be counted toward a noncompliance or termination.

Participants are expected to keep their rooms in a clean, sanitary, and orderly manner, but an EA Household will not be cited for violating this Rule if inspection is not made pursuant to the Rule on Access or if the Household has good cause on the day of the inspection as determined by 760 CMR 67.06(6)(a)5, or if a family member is sick, in the process of doing or preparing to do laundry, or packing or unpacking belongings.

The EA Household is responsible for removing all belongings upon moving out of the shelter.

The EA Household that is transferring or moving out of shelter or hotel unit may leave at the shelter or hotel, at most, a few items of personal significance, cleanly packed, able to be readily stored in a small area outside the dwelling space to await the prompt return of the EA Household to move the items to their next residence.

After an EA Household has vacated the unit, any items not removed from congregate or scattered site locations will be bagged and held for 48 hours before they are donated or thrown away. Shelters and hotels may hold items for more than 48 hours at their discretion or upon agreement with the EA Household.

## **Pets**

Pets or animals of any kind are not permitted on shelter property at any time, except for documented service animals and other animals permitted pursuant to the Americans with Disabilities Act. This prohibition includes temporary care of and/or visiting pets. A family will not be cited for violating this rule unless and until an appropriate inquiry has been made as to whether the animal is an animal permitted as a disability accommodation. Where an animal is determined not to be allowed as an accommodation, EOHLC will provide a list of local animal rescue organizations and “no kill” shelters where a family might board the pet during shelter placement or take the pet for adoption.

## **Prescription Medication**

The EA Household is responsible for the storage and administration of prescribed medications, subject to good cause as determined under the good cause standards in 760 CMR 67.06(6)(a)5.

If a working safe is available in an EA Household's room in a hotel for storage of prescription medications, the EA Household shall store such medications in the safe. If no working safe for use in the EA Household's room is available, the adult household members shall make best efforts to ensure that prescription medications are out of the reach of children. In shelters, if there is not a safe and secure area, out of the reach of children, and away from cleaning fluids and toxic substances, then the EA Household may request assistance from shelter staff of congregate and scattered site locations with safe and secure storage.

Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time or location will not be counted toward a noncompliance or termination.

## **Sexual Harassment**

Sexual harassment of anyone on shelter property, including other residents, guests, service providers, or shelter staff, is prohibited.

## **Substance Abuse**

Use or possession of alcohol or any controlled substance(s) is prohibited on shelter property. Abuse of alcohol or controlled substances outside of the program, to the extent that it results in behavior that interferes with an EA Household member's rehousing plan, threatens the health or safety of anyone on shelter property, or creates a disruption to shelter management, is prohibited.

Misuse of prescription medication will be considered substance abuse.

## **Violent Behavior & Child Abuse and Neglect**

Behavior that poses a threat to the health and safety of self, members of the EA Household, other residents, guests, service providers, or EOHLC, hotel, or shelter staff is prohibited. This includes acts of physical and sexual violence, threatening conduct, or intimidation.

No form of child abuse or physical discipline will be tolerated on shelter property. Shelter staff, DCHD employees and other service providers must report all incidents of child abuse and neglect to the Department of Children and Families.

## **Visitors/Guests**

### *In Shelters:*

The EA Household may meet with visitors, for a reasonable and limited amount of time, in space(s) where the shelter deems appropriate, (e.g. areas where an individual would meet with a service provider). Shelters may determine appropriate visiting hours.

The EA Household is responsible for the conduct of its visitor(s), and therefore will be held accountable if its visitor(s) violate(s) any rules or requirements of the EA program or the shelter. No overnight visitors are permitted, except as provided in this Rule. If space is available in a shelter, shelter staff, with EOHLC authorization, may agree to overnight visits by children whose primary residence is not within the EA household, upon presentation of a custody agreement, an agreement or request by DCF, or a court order directed to an adult member of the EA household.

All requests to EOHLC for overnight visitors should be directed through the Associate Director's designee.

The EA Household must provide the name of the visitor at least 24 hours beforehand unless the shelter deems less notice appropriate, or in the case of emergencies.

Adult visitors must leave a photo ID, and sign in and out of the shelter. Visitors to scattered site units do not need to provide a photo ID unless shelter staff is available on the premises; however, the EA Household must still register all visitors to shelter staff.

Shelters may withhold approval of visitors in connection with the EA Household's failure to observe program rules and requirements.

Adult members of the EA household remain responsible for protecting the health and safety of the child(ren) in their household and must exercise good judgment about when it is safe to allow their child(ren) to visit with members of other EA households.

Visitors shall comply with Rule on Curfew by leaving before the established curfew time and not arriving before 8 a.m., except in cases of authorized babysitting or good cause pursuant to the good cause standards in 760 CMR 67.06(6)(a)5.

### *Good Cause:*

Entertaining unauthorized visitors may be justified by good cause as determined under the good cause standards in 760 CMR 67.06(6)(a)5. In considering the good cause reasons raised by a participant for entertaining an unauthorized visitor, EOHLC will take into consideration all the circumstances, including documented efforts to obtain authorization for the visitor, and any need for the visitor to assist the EA Household with essential tasks that an EA Household member cannot perform on his or her own. Unless it is repetitive, a violation of this Rule that is *de minimis* (minor), as determined based on all the relevant circumstances, as to time and location, will not be counted toward a noncompliance or termination.

## **Weapons**

Possession or storage of weapons of any kind is prohibited on shelter property.

## **Important:**

### *House Rules:*

Nothing in these Uniform Rules prohibits shelters or hotels from adopting House Rules regarding day- to-day activities in shelter, such as cleaning rotations, cooking duties, noise levels, television viewing hours, dress codes, laundry hours, or parking requirements, so long as the House Rules do not contradict these Uniform Rules, EA statutes or regulations, or other legal requirements. Infractions of House Rules of either a shelter or hotel, however, shall not be treated as rule violations leading to a possible noncompliance finding or termination of EA benefits pursuant to 760 CMR 67.06(5)(a)4. Infractions of House Rules may lead to a transfer, internal warnings, or loss of house privileges, such as television time, and repeated infractions may lead to modification of an EA Household's Rehousing Plan to require compliance with specific House Rules. House Rules remain subject to EOHLC review and approval.

### *Rules Violations Not Counted towards Discipline:*

As stated in greater detail in 760 CMR 67.05 (e), alleged Rules violations, and alleged failures to comply with or cooperate in developing the terms of a rehousing plan, shall be vacated after six (6) months from the date of their occurrence if, within the six-month period, no noncompliance or termination has been issued for other violations of any such Rules or rehousing plan requirements and no conduct that constitutes a threat to health or safety or conduct warranting immediate termination has been committed and resulted in a noncompliance or termination notice. Rules violations that are found by the EOHLC Hearing Officer on appeal not to have occurred shall not be included as violations in subsequent noncompliance or termination notices and shall not toll the aforementioned six-month period.

### *Use of Forms:*

**Homeless coordinators should provide EA Households with a copy of the Uniform Shelter Program Rules to take with them at the time the EA Household is approved for placement.** Shelters are to use the USR-1 Form, Infraction of Uniform Shelter Rules, to report on infractions of the Uniform Shelter Rules. Hotels are to use the HM-IR1 form to report infractions of the Uniform Shelter Rules. The infraction numbers on the forms are for guidance only and are not determinative of the actual number of rule infractions. When a single incident involves violations of several rules, shelter and hotel staff should use one form to report the incident and check all possibly applicable rule infractions on the USR-1 form, in a shelter, and the HM-IR-1, in a hotel.

### *General Provisions:*

1. Copies of these Rules, the EA Babysitting Form and Guidelines, TESI-1s, the ADA Reasonable Accommodation Request form, and the EA Overnight Request Form shall be available at the front desk in hotels and in the management office in shelters in English and translated into those languages required by law. The front desk in hotels and the management office in shelters shall also include information about to whom to submit Babysitting and Overnight Forms and other requests, how to contact that person, and how to inquire about the status of a request. Hotels shall provide fax transmission services

- to EA participants free of charge for communication with EOHLC, other state agencies, social service and medical providers, and legal services.
2. Failure of the hotel or shelter to maintain and make available to participants a copy of these Rules and forms in languages required by law may constitute a defense to a rule violation if a participant did not receive a copy of the Rules in the language required by law upon entry into the EA program or have access to the such a translation at a placement prior to the alleged violation.
  3. If a participant demonstrates that the conduct or omission of an EA household member over whose conduct the participant had no control causes a violation of these Rules or the EA regulations, discipline may be withheld, provided that the participant:
    - a. promptly removes such household member from the household composition; and
    - b. the participant and any other adult household members amend their rehousing plans to require them to take reasonable steps to prevent the former household member from returning to any shelter or hotel premises where EA families are placed, which may include, if necessary to prevent a return, serving and actively enforcing on his or her own behalf an abuse prevention order pursuant to M.G.L. c. 209A or cooperating with efforts by the shelter or hotel management to serve and actively enforce against such household member a “no trespass” notice pursuant to M.G.L. c. 266, § 120 or an anti-harassment order pursuant to M.G.L. c. 258E.
  4. The term “good cause,” as used in these rules, shall mean good cause as determined by 760 CMR 67.06(6)(a)5 unless other grounds for good cause are specifically stated.
  5. EOHLC will provide language assistance as required by law for all communications with EA applicants and participants. Any translation from English shall indicate that in case of conflict between an English-language version of a document and a translation, the English language version shall control, provided that an EA Household will not be held responsible for conduct taken in reliance on an inaccurate translation.
  6. EOHLC and EA shelter providers, including hotels, are covered by the Americans with Disabilities Act (ADA) and related laws that prevent discrimination against and require certain reasonable accommodations or modifications for qualified persons with disabilities. If you have difficulty complying with any of these Rules because of a disability, you may request a reasonable accommodation or modification by completing a EOHLC ADA Reasonable Accommodation request form and sending it and supporting medical documentation to EOHLC.

## G. Information Security

### FamilyAid Written Information Security Program

#### PURPOSE AND SCOPE:

In accordance with the responsibility of FamilyAid (FA) to provide and maintain a workplace that is free of threats to those the organization serves, those that are employed, and those that are supporters or partners in our work, FamilyAid has adopted this Written Information Security Program (WISP). FamilyAid processes confidential and proprietary information as well as the Personal Information (PI) of employees, customers, website visitors, and others. FamilyAid's WISP is designed to safeguard Personal Information in FamilyAid's possession by establishing policies, practices, and procedures, including implementation of technical, administrative, and physical measures to protect such information.

Additionally, this Program intends to comply with FamilyAid obligations under state regulation, MA 201 CMR 17.00 (the "Regulations"). The WISP sets forth FamilyAid's procedure for evaluating and addressing our electronic, administrative, and physical methods of accessing, collecting, storing, using, transmitting, and protecting residents' personal information.

This policy intends not to impose restrictions contrary to FamilyAid's established culture of openness, trust, and integrity. FamilyAid leadership, staff, and technology team are dedicated and committed to protecting FamilyAid's employees, partners, vendors, volunteers, clients, and FamilyAid's reputation from illegal or damaging known or unknown threats.

In formulating and consistently implementing the WISP, FamilyAid has addressed and incorporated the following protocols:

- a) Assign responsibility for WISP implementation and oversight
- b) Identify reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of the electronic, paper, or other PI records.
- c) Assess the likelihood and potential damage of these risks and the sensitivity of PI.
- d) Evaluate the sufficiency of existing policies, procedures, customer information systems, and other safeguards to mitigate and control risks.
- e) Implement regular monitoring of safeguards' effectiveness.
- f) Enhance and augment the protections as the landscape and risks change.

#### TERMS AND DEFINITIONS:

- a) "Employee" means any individual who has any employment relationship with FamilyAid, including but not limited to contract, part-time, and short-term employees, interns, and volunteers.
- b) "Confidential Information" means non-public information that FamilyAid processes, including Personal Information, information about corporate entities that are not explicitly protected by the laws and regulations regarding personal privacy, and FamilyAid's own confidential and proprietary information.
- c) "Personal Information" (PI) is defined as an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such person: (a) Social Security number; (b) driver's license number or state-issued identification card number; or (c) financial account number, or credit or debit card number,

with or without any required security code, access code, personal identification number or password, that would permit access to a such person's financial account. "Personal Information" does not include information that is lawfully obtained from publicly available information or federal, state or local government records that are lawfully made available to the public.

- d) "Process" means to perform any operation(s) (automated or manual) on Confidential Information, such as collection, recording, organization, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, blocking, erasure, or destruction.
- e) "Security Incident" is any known successful or unsuccessful attempt by an authorized or unauthorized individual to inappropriately use, disclose, modify, access, destroy or otherwise jeopardize the integrity or availability of Personal and/or Confidential information. This includes attempted or actual interference with system operations and actions that breach procedures and policies on this document or other FamilyAid policies

## **INFORMATION SECURITY OFFICER: SECURITY SYSTEMS ADMINISTRATOR (SSA)**

FamilyAid will designate a Security System Administrator (SSA) who reports to the CEO and whose responsibilities include:

- a) Implementing and overseeing the WISP.
- b) Evaluating the sufficiency of existing policies, procedures, customer information systems, and other safeguards to control risks and detect and prevent security system failures and proposing changes where appropriate.
- c) Administering ongoing testing of the safeguards implemented under this WISP and maintaining related documentation.
- d) Conducting regular ongoing information and technology security training for all employees, which includes an annual training session for all returning employees, or new employees including temporary and contract employees who may have access to PI and retaining training and acknowledgment records of same.
- e) Reviewing the scope of the security measures in this WISP annually, or whenever there is a material change in FamilyAid's practices that may compromise the security or integrity of Personal and/or Confidential Information.
- f) Overseeing the information security practices of FamilyAid's service providers that receive, store, maintain, process, or otherwise access personal information access or maintain Personal Information on behalf of FamilyAid.
- g) Identify foreseeable internal and external risks to the confidentiality, integrity, and availability of any electronic, paper, or other confidential information records. Assess the likelihood and potential damage of these risks.
- h) Periodically but no less than every twelve months, evaluating employee compliance with this Program and any policies and procedures implemented under this Program.
- i) Monitoring the effectiveness of those safeguards regularly to ensure the Program is operating in a manner calculated to prevent unauthorized access to or unauthorized use of PI.
- j) Designing and implementing additional policies and procedures under this Program that may be required from time to time as necessary safeguards to limit those risks.

## **INFORMATION MANAGEMENT**

To guard against internal, external, and cyber risks to the security, confidentiality, and integrity of any electronic, paper, or other PI records, FamilyAid constantly evaluates and improves the

effectiveness of the current safeguards, including:

- a) Implementing and maintaining measures to ensure that the amount of PI it collects is limited to the amount necessary to accomplish FamilyAid's mission and organizational goals and to ensure FamilyAid complies with federal or state regulations.
- b) Implementing and maintaining measures to ensure that access to PI is limited to those who need such information to perform their job duties.
- c) Ensuring that access to PI is restricted to active users and active user accounts only.
- d) Implementing and maintaining rules that ensure reasonable restrictions upon physical access to PI are in place; and that such records and data are stored in locked facilities, storage areas, or containers.
- e) Implementing processes to ensure paper or electronic records (including records stored on hard drives or other electronic media) containing PI are disposed of in compliance with federal and state laws and regulations.
- f) Maintaining an Information Technology Policy governing storing, accessing, and transporting personal information records outside business premises.

## **HUMAN RESOURCES SECURITY**

In accordance with FamilyAid's Information Technology Policy, the following requirements and processes enable FamilyAid to ensure that its human resources and its use of FamilyAid technology related to PI are structured to ensure the protection of PI.

- a) FamilyAid will make a copy of this WISP available to all employees. All employees are required to acknowledge receipt and understanding of the Program.
- b) FamilyAid conducts a criminal history check of all candidates prior to employing them or engaging in a consulting agreement. Any candidate with an unacceptable criminal history will not be employed by FamilyAid.
- c) FamilyAid trains all employees upon hire and annually on the proper use of computer and physical security, the WISP, and the importance of personal information security. Through the WISP training program, employees are encouraged and invited to inform the Security Systems Administrator (SSA) of any risks or processes that need improvement.
- d) FamilyAid may take disciplinary action [in accordance with The Progressive Disciplinary Policy] should employees violate the WISP or the Information Technology Policy.
- e) The Security Systems Administrator (SSA) will ensure that access to PI is restricted to approved and active user accounts. Additionally, access to this information will be secured through the following steps:
  1. Accounts will require unique and least privileged credentials.
  2. Accounts will not be shared.
  3. Multi-Factor Authentication (MFA) is required to be utilized if offered.
  4. MFA will be triggered once per day for Microsoft's login account.
- f) Current employees' user IDs and passwords will conform to accepted security standards as detailed in the Information Technology Policy. If Multi-Factor Authentication is not available, all passwords will be changed at least every 60 days or more often, as needed, and new passwords cannot be the same as any previous password and employees will be cautioned not use passwords that they use for personal accounts and devices.
- g) Multi-Factor Authentication (MFA) is mandatory for all applications where it is available. If MFA is not offered, the password policy will be more stringent, with a 30 to 60 day password change required.
- h) Passwords must meet minimum security requirements for all systems, including:



1. Current employees' user credentials and passwords will conform to accepted security standards.
2. Passwords must be at a minimum (if MFA is not available):
  - i. At least Ten (10) characters in length and:
    - Contains both uppercase and lowercase letters.
    - Includes numbers and special characters.
    - Does not repeat any previous password.
    - Not easy to guess words, the same character, strings, or personal information. <https://nordpass.com/most-common-passwords-list/>.
  3. Lockout must occur after five failed attempts.
  4. Password resets will only be allowed every 48 hours on platforms that FamilyAid is able to control.
- i) Employees must report suspicious or unauthorized use of PI to their supervisor immediately. Employees are required to report policy violators or unauthorized use of systems to their supervisors. The supervisor will report the issue immediately to the Security Systems Administrator (SSA).
- j) Each Employee is assigned a unique email address and confidential password to access FamilyAid systems. It is mandated that credentials and passwords are not shared with any other person or device. If you have found that your credentials may have been compromised, contact the Security Systems Administrator/help desk for changes immediately.
- k) Employees are allowed to use their personal smartphones or tablets for work purposes. The following processes are required when using such devices for FamilyAid purposes:
  1. All smartphones and tablets must be approved by the Security Systems Administrator (SSA) for FamilyAid use.
  2. All such devices will only be equipped to access FA guest networks. Employees must contact the SSA if they are unable to locate the guest network credentials at any FA locations
  3. All personal smartphones or tablets should never be physically plugged into FamilyAid's network.
  4. Restrictions on authorized use: Employees are expected to adhere to information technology, harassment, discrimination, retaliation, confidentiality, and all other employee policies while using personal devices for work purposes.
  5. FamilyAid has the right, at any time, to monitor and preserve any communications using FamilyAid's networks in any way, including data, voicemail, telephone logs, internet use, and network traffic.
- l) FamilyAid has implemented policies and procedures such as the Offboarding Documentation Guide to ensure terminated employees cannot access systems or PI. Terminated employees must return all FamilyAid records and computer equipment at the time of termination.
- m) A terminated employee's physical and electronic access is eliminated at the time of termination.
- n) Employees' personal devices used for work purposes, including personal devices, mobile phones, or tablets, will have all FamilyAid's data redacted from them.
- o) Terminated employees will be restricted from accessing all FamilyAid records, voicemails, cloud/network, emails, all proprietary documentation, and work products.
- p) A terminated employee will return all FamilyAid owned badges, keys, keycards, devices, FamilyAid IDs, logo clothing, and business cards at the time of termination. Any access codes will immediately be changed.

## COMPUTER SYSTEM SECURITY REQUIREMENTS

FamilyAid maintains the following measures to the extent technically feasible:

- a) All systems processing PI will have up-to-date firewall protection and operating system security patches, well designed to maintain the integrity of the PI.
- b) Up-to-date versions of system security agent software which must include malware protection and up-to-date virus definitions, or a version of such software that is current and supported with up-to-date patches and virus definitions. All applications are set to receive the most recent security updates regularly, installed on all systems.
- c) Encryption is required of all transmitted records and files containing PI traveling across public networks and encryption of all data containing PI transmitted wirelessly. To activate encryption:
  1. Subject Line Encryption: To securely encrypt outgoing email messages, users must add the keyword "[encrypt]" in the message's subject line.
    - i. Ex. Subject Line: "[encrypt] Whomever covid vaccines."
  2. Manual Encryption: In Outlook, go to options>Encryption
  3. SharePoint links: Copy/Deposit files into your SharePoint location, then send the recipient a link to the file. The user retrieves the file.
- d) FamilyAid will monitor all computer systems for unauthorized use or access to PI.
- e) Encryption of all PI stored on laptops or other portable devices is required.
- f) Systems must maintain secure unique user authentication protocols, including: (1) for control of user IDs and other identifiers; (2) a reasonably secure method of assigning and selecting passwords or use of unique identifier technologies, such as biometrics or token devices; (3) control of data security passwords to ensure that such passwords are kept in a location and format that does not compromise the security of the data they protect.
- g) Systems will block access after multiple (five) unsuccessful attempts to gain access.
- h) Systems are configured to restrict access to records and files containing PI to those who need such information to perform their job duties.

## EXTERNAL RISK MITIGATION POLICIES

FamilyAid maintains the following measures to mitigate any external risk to FamilyAid PI:

- a) Disabling or tampering with any systems is not allowed pursuant to the Information Technology Policy, and users who do so will be subject to disciplinary action in alignment with The Progressive Disciplinary Action Policy.
- b) Firewall protection, operating system security patches, and all software products will be up-to-date and installed on any computer that stores or processes personal information.
- c) PI will not be removed in physical or written form from the business premises absent legitimate organizational needs and the use of reasonable security measures, as described in this policy.
- d) PI will not be removed electronically from any business "systems" or from personal devices authorized for FamilyAid use absent legitimate organizational needs and the use of reasonable security measures, as described in this policy.
- e) All system security protection, including anti-virus, anti-malware, and internet security, will be up-to-date and installed on any computer that stores or processes personal information.
- f) Domain Name Services (DNS) protection is employed on all devices.
- g) All secure user authentication protocols will:
  1. Control user ID and other identifiers.

2. Assign passwords in a manner that conforms to accepted security standards or applies the use of unique identifier technologies; and
3. Control passwords to ensure that password information is secure.
4. Multi-Factor Authentication (MFA) is employed where available and requires a secondary device.

## ACCESS CONTROL PROTOCOL

FamilyAid understands control of access to PI is a strong piece of its protection and thereby maintains the following protocols and processes to limit access to PI.

- a) FamilyAid prohibits the unauthorized use of all software and hardware. In addition, employees are prohibited from making copies of or using unauthorized copies of software programs. Any programs required for FamilyAid work must go through an approval process with your supervisor.
- b) All hardware or devices that are not authorized, set up, and maintained by the Security Systems Administrator (SSA)/IT are not permitted on the company's internal (non-guest) networks. *(Unauthorized personal devices are to be on the guest network.)* Any hardware/software not set up or authorized by the Security Systems Administrator (SSA)/IT is not allowed for usage for FamilyAid purposes. Employees using unauthorized devices are subject to disciplinary action in accordance with The Progressive Disciplinary Policy.
- c) Portable devices such as USB thumb drives, smartphones, iPads, and tablets cannot be connected to any computer or through wireless internal networking. A device not authorized for FamilyAid use will only be connected to a power outlet and the wireless **guest** network
- d) All FamilyAid computers will only permit access to employees with authorized and unique user IDs as assigned by the Security Systems Administrator (SSA).
- e) All computers inactive for 20 or more minutes will require re-login.
- f) After five unsuccessful login attempts, a user ID will be blocked from accessing any computer and file(s) until privileges are re-established by the Security Systems Administrator (SSA).
- g) Access to electronically stored records containing PI will be limited to those employees having an authorized and unique login ID, as assigned by the Security Systems Administrator (SSA)
- h) All computers with internet connections or any computer storing or processing PI must have up-to-date versions of the virus, anti-spyware, domain name services (DNS) protections, and anti-malware protection installed and active.
- i) An inventory of all company computers and related systems authorized for personal information storage is contained in the internal Computer and Handheld Inventory. The Inventory will be managed by the Security Systems Administrator (SSA), and access to the devices will be assigned to users on an as-needed basis.

## VISITORS

FamilyAid may, at any given time, have visitors on site at FamilyAid locations. Visitors may include partners, volunteers, donors, trainers, auditors, or others who may need to be onsite to conduct or assist FamilyAid in conducting its work. The WISP requires the following to protect PI during occasions when visitors are onsite at a FamilyAid location.

- a) Visitors expected on any FamilyAid property must be granted prior permission by a FamilyAid employee.

- b) Visitors must preregister through FamilyAid's public health technology platform or through an alternative preregistration process when technology is unavailable.
- c) All visitors should be escorted by a FamilyAid employee while on FamilyAid premises.
- d) If a visitor requires broader access to FamilyAid locations, for example, printers and scanners (i.e.: auditors working in multiple offices, contractors conducting work in multiple physical spaces), the FamilyAid Employee hosting the visitor must request and document such access.
- e) All visitors must follow all relevant FamilyAid policies (Safeguarding Children, Code of Conduct Confidentiality). The FamilyAid employee hosting the visitor is responsible for communicating policy requirements to the visitor.
- f) Delivery Vendors (FedEx, Office Supplies, Printing Suppliers, UPS, USPO) who are onsite briefly and in limited physical areas for deliveries are not required to sign in or receive permission when only delivering or dropping off items/packages. However, a FamilyAid employee must escort a delivery vendor upon entry and exit from the office.

### **PHYSICAL WORKSPACE**

- a) Documents with PI should only be printed or maintained in hardcopy when absolutely necessary to do so.
- b) If such documentation is required, it must be maintained and saved in a private area that allows access only to individuals who need to access PI documentation.
- c) Documents with PI are stored and locked when not in use. No information should be left on desks or work areas when unattended.
- d) When users depart the workspace, all technology must be logged out and turned off.
- e) These same protocols and requirements are maintained in remote workspaces.

### **THIRD-PARTY SERVICE PROVIDER PROTOCOL**

Third-Party Service Providers may be organizations operating in Massachusetts which provide off-site backup storage of electronic data, paper record copying or storage service providers, or contractors/vendors working with FamilyAid that have been granted access to PI. FamilyAid will implement and maintain the following measures to mitigate any external risk to PI in the custody of or accessed by Third-Party Service Providers:

- a) Any Third-Party Service Provider or individual that receives, stores, maintains, processes or is otherwise permitted access to any FamilyAid PI ("Third Party Service Provider") is required to meet the following standards and any standards of 201 CMR 17.00.
- b) The Security Systems Administrator (SSA) will be responsible for obtaining confirmation that any Third-Party Service Provider is capable of meeting security standards consistent with 201 CMR 17.00. This includes requiring such third-party service providers by contract to implement and maintain appropriate security measures for personal information as required by 201 CMR 17.00. Any existing contract with a Third-Party Service will be reviewed by the Security Systems Administrator (SSA).
- c) Reasonable steps will be taken to select and retain third-party service providers capable of maintaining appropriate security measures to protect such PI consistent with any applicable state or federal regulations.
- a) Third-Party Service Providers are required to:
  1. Implement and maintain appropriate security measures.
  2. Maintain a disaster recovery plan covering FamilyAid's information.
  3. Document that FamilyAid's data is in the United States. Including backups.

## SECURITY INCIDENT/MANDATORY REPORTING

A security incident is any known successful or unsuccessful attempt by an authorized or unauthorized individual to inappropriately use, disclose, modify, access, destroy, or otherwise jeopardize the integrity or availability of Personal and/or Confidential information. This includes attempted or actual interference with system operations and actions that breach procedures and policies on this document or other FamilyAid policies as well as when an individual or an application illegitimately enters a private, confidential, or unauthorized logical IT perimeter. FamilyAid's perimeter includes local computers, phones, cloud applications, accounting, databases, and any other related systems. This includes personally-owned devices that have been authorized to access or utilize any FamilyAid system.

- a) Any employee who suspects or becomes aware of a security breach must immediately notify the Security Systems Administrator (SSA) and appropriate personnel at FamilyAid's technology consultancy.
- b) In any instance where a user feels PI has been compromised (compromised may include calling a phone # from a pop-up or device accessed by an untrusted device or individual):
  1. Disconnect any device from the network immediately.
    1. Includes both wired and wireless.
    2. Call IT support - immediately. Follow the prompts for the critical ticket generation.
    3. Immediately following, call supervisor and SSA.
- c) FamilyAid will document responsive actions taken in connection with any security incident in accordance with its Incident Response Plan. FamilyAid will conduct a post-incident review of events and determine whether any changes should be made to this Program due to the incident.

Documentation immediate after the breach is critical, and FamilyAid will ensure individuals with the most direct knowledge provide a written summary which includes:

- Chronology of what occurred;
  - Summary of internet sites, files, folders, or documents opened at the time of breach;
  - Where applicable, screenshots or what occurred;
  - A detailed description of the nature and circumstances of the security breach or unauthorized acquisition or use of personal information;
  - The number of Massachusetts residents affected at the time the notification was submitted; The steps are already taken relative to the incident;
  - Any measures intended to be taken relative to the incident after the filing of the notification;
  - Review and identify any gaps and next steps for continued mitigation.
- d) Users are required to respect and cooperate with investigations, including any federal or state investigations.
  - e) The Security Systems Administrator (SSA) will facilitate a mandatory post-incident review of any events and actions taken to determine and implement functional alterations to security practice(s) as necessary to safeguard personal information better.
  - f) If needed, critical and security updates to hardware and applications will be implemented within 24 hours. Users must immediately follow directions and practices from the post-incident review.

As needed, FamilyAid will consult with and report to its legal counsel and law enforcement officials, including the Massachusetts Office of Consumer Affairs and Business Regulation and the Massachusetts Attorney General's office.

## **I. Financial Reporting Procedures**

Quarterly financial reports are completed by our in-house finance team. The reports are prepared by the CFO after all the accounts are reconciled by the accounting manager and staff accountants.

The following is a listing of all reports contained in the quarterly report.

- Comparative balance sheet.
- Statement of Operations for the month and year-to-date comparison to budget.
- Income and expense statement – actual-to-budget comparison; Monthly basis; Year-to-date basis.

(The above income statements are produced on an accrual basis. This information is provided in summary and detail format.)

All additional schedules are reviewed with the CEO and COO

- Schedule of cash accounts.
- Schedule of all escrow accounts.
- Accounts receivable summary.
- summary aged accounts receivable.
- Summary of accounts payable.
- Quarterly reports to the development department and lenders as requested.
- Reconciliation of all temporarily restricted net assets, updates provided as needed.

Once completed, the reports are reviewed and analyzed by the CEO, CDO and COO and provided to senior management. The quarterly financial reports are reviewed by the CEO, Chair of the Finance Committee and presented at the finance committee and board of directors.

The budget process begins in January with meetings with all departments, including HR and Development. The current year actuals are used to start projecting the current year results and educate increased and decrease to the next year's budget. After the end of the 3<sup>rd</sup> quarter, the finance staff compare all actual revenue and expenditures to the budget and make projections for the last quarter to provide the CEO, finance committee and Board with a forecast for the year. The final budget for the next year is reviewed by the CEO and management team and presented to the finance committee and Board of directors for approval prior to the end of the prior fiscal year. The budgets are then broken into twelve-monthly budgets, weighted for the seasons and timing of payments. Each month this budget is then compared to actual expenses.

The Financials are annually audited by an outside CPA firm. The audits are done in accordance with applicable regulations, most commonly Government Auditing Standards and Generally Accepted Accounting Standards. The finance team prepares work papers in preparation of interim audits, year-end audits, tax returns and UFR.