

Notwithstanding anything contained to the contrary herein, these procedures are guidelines. The Executive Director may choose to vary from these procedural guidelines.

Anti-Discrimination and Harassment:

CC Prep does not tolerate discrimination or harassment in any form. Such conduct, if found to have occurred, will result in the imposition of discipline and corrective actions, up to and including dismissal. Filing a complaint or reporting racial or disability abuse or harassment will not jeopardize an employee's position with CC Prep, nor will it affect future employment, compensation, work assignment, or status. Any individual with a discrimination or harassment complaint should refer to the procedures used in the reporting, investigation and resolution of the Sexual Harassment Policy described below.

The right of confidentiality for any party involved in a discrimination or harassment incident, including the complainant and the accused, will be respected insofar as it does not interfere with CC Prep's obligation to investigate allegations of misconduct and to take corrective action(s) as appropriate.

CC Prep does not tolerate harassment or discrimination in any form. Such conduct will result in corrective action, up to and including dismissal. By policy and law, the unlawful harassment of students or of staff in the workplace is prohibited. Filing an honest complaint or honestly reporting harassment will not jeopardize an employee's position at CC Prep future employment, compensation, work assignment or status. CC Prep has established a policy specifically for Sexual Harassment as follows. As explained above, the policy also will apply to complaints of discrimination and/or harassment based on protected characteristics other than sex.

Community College Prep's Sexual Harassment Policy:

CC Prep is committed to maintaining an environment where the dignity of each member of the community is respected. A working and learning environment has been created that is free from unlawful sexual harassment. No employee or student shall be subjected to such unlawful harassment.

Sexual harassment, by, or of, either sex is prohibited by instructors, administrators, staff, students or other individuals who may be present on CC Prep's property or in any other location for a School-sponsored activity – to engage in any form of sexual harassment or to retaliate in any way against an individual who has initiated a sexual harassment complaint. CC Prep maintains a "zero-tolerance" stance toward sexual harassment and will address and investigate all complaints in a timely, comprehensive and equitable fashion, once provided with information to suggest that such harassment may have occurred. It shall be a violation of this policy for any member of the student body or staff to harass another student or staff member through conduct or communications of a sexual nature as defined under this policy. Violators of this policy will be subject to appropriate corrective and disciplinary action, up to and including expulsion or termination.

Academic and non-academic management and supervisory personnel, at all levels, are responsible for taking reasonable and necessary action to prevent sexual harassment. All members of the CC Prep community, instructors, administrators, staff, and students, are required to promptly report, pursuant to these policies and procedures, conduct that could be in violation of this policy.

Sexual harassment is defined, within the workplace for employees and/or within the academic experience for students, as any unwelcome sexual advances, demands, requests for sexual favors, innuendos or any other verbal or physical conduct of a sexual nature when:

- 1.Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or education experience;
- 2.Submission to or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting such individual.

Such conduct is sufficiently severe and pervasive to alter the conditions of, or have the purpose or effect of substantially interfering with, an individual's work or academic performance by creating an intimidating, hostile, or offensive working or educational environment.

Harassment does not include verbal expressions or written material that are relevant and appropriately related to course subject matter or curriculum.

CC Prep will:

- 1.Respond to every complaint of sexual harassment reported,
- 2.Take action to provide remedies when sexual harassment is discovered,
- 3.Impose appropriate sanctions on a case-by-case basis, and
- 4.Protect the privacy of all those involved in sexual harassment complaints to the extent possible.
- 5.

Reporting Suspected Sexual Harassment:

Any employee or student with a sexual harassment concern or question, prior to filing a formal complaint, may contact the Director of Operations for counsel and assistance. Any individual, employee or student, who believes that he or she may have experienced or subjected to sexual harassment, or who believes that he/she has observed sexual harassment taking place, must report this information immediately to one of the following reported officials: Director of Operations or Executive Director, or the complainant's supervisor, when the supervisor is not the accused.

Reports/complaints in which the accused is neither CC Prep employee nor a student (e.g., vendors, visitors, etc.) shall be processed consistent with any other complaint by notifying one of the reporting officials as noted above. CC Prep reserves the right to alter or modify the procedures outlined below, at its sole discretion, to effectively handle these complaints.

Investigation of Sexual Harassment Complaints:

Unless otherwise provided herein, responsibility for the investigation of sexual harassment complaints in which the accused is an employee (teacher, administrator, staff or student employee) shall reside with the Director of Operations. Responsibility for the processing of sexual harassment complaints in which the accused is a student shall be with the Civil Rights Administrators. Designees may be appointed as alternate investigators as circumstances warrant.

Complaints will be addressed as confidentially as possible and practicable. Consideration will be given to the specific circumstances of the allegations, to protect the rights of both the complainant and the person accused. The investigator may gather information from any sources deemed necessary to more fully investigate and resolve the complaint.

The investigator will interview the complainant and the alleged offender and may also, at his/her discretion, interview witnesses, supervisors, and/or any other persons who may have information about the alleged incident. The investigator may review personnel or other records relevant to the complaint. The complainant and the accused person shall be permitted to suggest witnesses and/or other evidence, which shall be considered by the investigator. A record shall be kept of all individual interviews.

Policy changes will be made to rectify gaps identified in the current prevention effort and to build on successful strategies. They will be further informed by whether or not CC Prep successfully meets or is on track to meet performance goals described in its “prevention goals” section.

Primary Prevention Strategies:

As an integral part of its guiding principles, CC Prep has established a culture of respect and safety. As part of this ongoing commitment to students and staff, CC Prep will incorporate bullying prevention messages and efforts into all aspects of its operations.

Additionally, messaging regarding respect for staff and students is embedded in the current staff and student manuals.

Code of Conduct DC Code (§ 2-1535.03(4)):

CC Prep expects everyone to behave in a way that supports CC Prep’s objective to provide a safe and welcoming environment for all students, staff, and community members. All who are part of CC Prep’s community are expected to:

1. Treat all members of the CC Prep community with respect;
2. Respect the property of the school, its staff, and others connected to the school;
3. Engage with and respond appropriately to all.

ADA Compliance:

CC Prep complies with the Americans with Disabilities Act of 1990, as amended (ADA) and the protections provided to individuals with disabilities found in the District of Columbia Fair Employment Act, not only in its hiring and employment practices, but also in other provisions of the Acts, including public access.

The ADA prohibits employment discrimination against “qualified individuals with disabilities.” CC Prep is committed to providing reasonable accommodations to employees and applicants for employment to ensure that individuals with disabilities enjoy full access to equal employment opportunity.

In accordance with the ADA and District of Columbia law, accommodations will be provided to qualified individuals with disabilities when such accommodations are directly related to performing the essential functions of a job, competing for a job, or to enjoy equal benefits and privileges of employment. This policy applies to all applicants and employees.

In implementing this policy, CC Prep will be guided by the applicable definitions stated in the ADA and the laws of the District of Columbia.

An individual who needs a modified work environment as the result of a disability is encouraged to request a reasonable accommodation orally or in writing from his or her Supervisor or from the Director of Operations. Employees requesting a reasonable accommodation will be required to submit medical verification for the need for the accommodation and may be required to sign an Authorization for Release of Medical Records to allow CC Prep to communicate directly with the employee's health care providers.

The Director of Operations is responsible for implementing this policy, including resolution of reasonable accommodation, safety, and undue hardship issues. The Director of Operations will review requests for accommodation. Some accommodations may only be provided on a temporary basis to determine whether they are reasonable and whether they create an undue hardship.

contracts, or leases, it is imperative that the employee disclose that relationship in writing to the Executive Director as soon as possible so that safeguards can be established to protect all parties. Failure to advise the School of such a potential conflict of interest may result in the imposition of discipline, including but not limited to termination.

a. Examples of the types of potential conflicts of interest that must be reported include cases where an employee or relative has a significant ownership in a firm with which the School does business, and when an employee or relative is offered a payment, substantial gift, or special consideration as a result of any transaction or business dealings involving the School.

Drug Free Workplace:

CC Prep is committed to maintaining a drug and alcohol-free work environment. The use and/or abuse of illicit drugs and alcohol directly interfere with the development and performance of the individual. The effects of that use/abuse diminish the working environment for all. It is a policy of CC Prep that drugs and alcohol in the workplace will not be tolerated. Employees must abide by the spirit and letter of this policy as a condition of employment. Employees are not permitted to consume alcoholic beverages or take controlled substances during or immediately before the workday or during school sponsored functions on the property. Such actions of intoxication, being under the influence of an alcohol and/or controlled substances, or having alcohol and/or a controlled substance in an employee's system while on school property will necessitate immediate and decisive disciplinary measures, up to and including discharge. In addition, any employee convicted of a drug offense must report such conviction to the Executive Director within five calendar days. In accordance with the Drug-Free Workplace Act, the Director of Operations is required to report all such convictions to the appropriate grantor agency, if applicable, and to impose appropriate sanctions against the convicted employee. Such sanctions will include corrective actions, up to and including discharge, and/or providing counseling and drug rehabilitation programs to the affected employee.

The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance is prohibited at CC Prep. Prohibited substances include but are not limited to, marijuana and other hallucinogens, opium and other narcotics, cocaine, amphetamines and their respective derivative forms not prescribed by a licensed physician for the treatment of a current medical disorder. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner for the employee and fellow employees. Violations of this policy, which includes unlawful conduct, will be subject to corrective action, up to and including termination for all classifications of employees, depending upon the severity and/or frequency of the violation.

1. Any use of alcohol on School premises requires the approval of the Executive Director. In addition, if alcohol has been authorized on site, the following condition must be met: Food and alcohol-free beverages also must be served.

Personal Appearance:

Discretion and good judgment on the part of employees in their style of dress and personal appearance are essential to the professional image and the safe operation of CC Prep. Employees are expected to dress in a professional manner appropriate to their working environment and to the type of work performed. CC Prep reserves the right to establish and enforce standards relating to acceptable dress and appearance. **NO JEANS**

General Appearance:

installation. No employee shall establish a password or encryption protection on a School computer without authorization from the School or without providing such password or the key to such encryption to the School.

5. Any employee who determines that there may be a purposeful or accidental violation of the above software policy within the School shall notify the Director of Operations or the Executive Director.

6. All software installed and/or used on School computers shall be properly licensed through appropriate procedures.

Telephone Usage:

School telephones are for school business use. Personal calls (incoming and outgoing) should be limited to essential matters and of short duration.

Employment Practices:

CC Prep strives to maintain a workplace accepting of the difference in employees' ethnicities, cultures, ages, genders, physical and mental disabilities and sexual orientation. CC Prep will not discriminate against any applicant or employee based on age, race, gender, color, religion, origin, disability, marital status, covered veteran status, sexual orientation, or any other protected characteristic under District of Columbia or federal law. CC Prep is committed to recruiting, hiring, training, and promoting qualified persons to all job titles without unlawful discrimination, and to administering personnel actions without any unlawful discrimination.

Disciplinary Action:

In response to the employee's failure to follow CC PREP policies and procedures, to meet job performance expectations, or due to the employee's misconduct, as outlined elsewhere in this Personnel Manual, the School may issue verbal and written warnings; place the employee on probation; on suspension without pay; or terminate the employee. In addition, the School may decide not to renew the employee's contract, to deny the employee a pay increase or bonus offered to other employees, or to reduce an employee's pay when the employee's annual contract is renewed.

Complaint Procedure:

A grievance is a complaint by an employee concerning the interpretation or application of personnel practices, work rules, working conditions, and/or alleged improper treatment which has not been resolved satisfactorily in an informal manner between the employee and immediate supervisor. An appeal may be filed by an employee who has been terminated. The same procedures apply to both current and terminated employees. For grievances relating to harassment and/or discrimination, please refer to the complaint procedures in the Policy Prohibiting Harassment and Discrimination (page 29).

Prior to initiating a formal grievance, the aggrieved employee should attempt to resolve the complaint informally with his/her supervisor and the Executive Director. If such efforts fail, all grievances shall be processed pursuant to the following procedures:

1. Within ten (10) working days from the occurrence of the matter on which a complaint is based, an employee may file a formal written grievance with the immediate supervisor.
2. Within ten (10) working days of receipt of the employee's grievance, the immediate supervisor shall render a decision in writing to the employee, setting forth the basis for the decision.
3. If not satisfied, within ten (10) working days from receipt of the decision resulting from the previous step, the employee may appeal to the Executive Director, who shall make a thorough

review of the grievance, meet with the parties involved, and render a written decision to the employee within ten (10) working days. This shall be the final level of appeal.

In all steps of the grievance procedure, failure of CC Prep to comply with the designated time frames specified will permit the employee to advance his/her grievance to the next level of review, if any. Failure of the employee to comply with the designated time frames will end the grievance process with no further CC Prep action required.

Employee Disciplinary Guidelines:

In the event that an allegation of serious misconduct of the degree that may lead to dismissal of an employee comes to the attention of the Executive Director, the Executive Director may, in his/her discretion, use the following process:

1. Allegations against the employee may be brought by a member of the leadership team, another staff member, or a student. The written account is to be delivered (on paper or electronically) to the Executive Director or Director of Operations. It is preferable that the allegations should be signed and dated by the individual submitting the written account, but circumstances may arise where obtaining signed allegations may not be possible.
2. An investigation will be led by the Executive Director and supported by other leadership team members as appointed by the Executive Director. The support team shall be comprised of an odd number of leadership team members, with a minimum of three (3) members. The investigation may include interviews of any parties with information regarding the allegations, records reviews, a review of surveillance recordings and other actions to inform the process as necessary and as circumstances require.
3. Depending on the nature of the allegations, the employee may be placed on administrative leave (with pay) until a final determination is made.
4. Legal advice may be sought to further inform the process and provide additional perspective.
5. A "Findings Report" will be drafted by the School Administrator to record the information gathered through the investigation process and to recommend a particular course of action to the Executive Director. Recommended actions might include: a written reprimand, suspension without pay for a stated period of time, termination of employment and/or contacting the authorities. To encourage consistency and fairness, the "Findings Report" will also include similar incidents and any actions taken against the affected employee. At all times the process will take all reasonable steps to protect the privacy of those involved and personnel records will not be shared with anyone other than the Executive Director and the Director of Operations.
6. The Executive Director will meet with the investigation team to discuss the "Findings Report" and to ask clarifying questions. The recommendation of the investigative team will be strongly considered.
7. The Executive Director (ED) will determine what (if any) disciplinary action should be taken based on the "Findings Report" and any other relevant information. The ED, in his or her discretion, has the responsibility to take whatever action s/he deems necessary given the report received and the nature of the circumstances.
8. The Executive Director and Director of Operations (or other witnesses) will meet with the employee to discuss the "Findings Report." The Executive Director will present the employee with a document stating the chosen disciplinary action; the employee will be asked to sign; a witness will sign; and a copy of the document will be placed in the employee's personnel file. If the employee refuses to sign the document, the refusal will be noted.



COMMUNITY COLLEGE PREPARATORY ACADEMY ANTI-FRAUD AND WHISTLEBLOWER POLICY

Fraud is defined as any unsafe, dishonest, or illegal act or the intentional, false representation or concealment of a material fact for the purpose of misleading another to act upon it to cause harm to Community College Preparatory Academy (the “Association” or “CC Prep”) or to Employees of the Association.

As stewards of the financial and other resources of CC PREP, each employee has the responsibility for preventing fraud and safeguarding those assets. It is the policy of CC PREP that each employee is responsible for the prevention, detection, and reporting of fraudulent or potentially fraudulent activities. Whistleblower protections are in place to maintain the confidentiality of the reporting employee and to guard against retaliation.

Fraud Prevention

The prevention of fraud requires each employee to be alert and vigilant in the performance of his or her job responsibilities. Each employee is expected to:

- ❖ Act with honesty, integrity and the promotion of ethical behavior.
- ❖ Believe that fraud is possible and that you can identify it.
- ❖ Become familiar with Association’s system of internal controls and the policies in place to ensure the safeguarding of assets and to understand your role, such as:
 - Signature authority limits, which relate to Requests for Proposals, contracts, purchase orders, invoices, expense reports, and any documents that obligate Association’s resources – both financial and human
 - Technology and Equipment Use Policy
 - Copyrights, Royalties, Patents Policy
 - Transportation Expenses and Travel Expenses Policy
 - Consulting Policy
 - Other policies in the Employee Handbook
- ❖ Identify assets for which you have responsibility including budgets, intellectual property, office supplies, computers, petty cash, amounts collected as revenue, inventoried items etc.
- ❖ Ask yourself questions, with regard to the following:
 - If these assets were to be misused or misappropriated, how would I know?
 - What controls exist to prevent or detect inappropriate use or loss?
 - What additional controls are necessary to safeguard these assets?



Ensure adherence to the background check (i.e. criminal, financial, and professional) and other hiring policies and procedures of CC PREP and support the Association's efforts to hire honest employees.

- ❖ Establish a positive control environment by ensuring that all employees are aware of your attention to potentially fraudulent activities and aware of their responsibilities to prevent fraud.
- ❖ Ensure that the following actions are taken:
 - Maintain a positive work environment, Report and account for all revenues generated and all expenditures incurred in the financial accounting system of Association.
 - Make no false or artificial entries in the accounting records for any reason.
 - Make no payments in the name of Association for any purpose other than that described by the documents supporting the payment.
 - Do not use Association funds or assets for any personal or unlawful purpose.
 - Do not use Association identification, stationery, supplies, equipment, etc. for personal or political matters.
 - Use good judgment when expending Association funds for reimbursable travel costs, etc. to ensure value received for each expenditure.
 - Do not engage in false advertising, deceptive marketing practices or other misleading representations.
 - Do not establish any bank or investment accounts in the name of Association without express permission from the Deputy Director and Executor Director.
 - Record all transactions for accurate financial statement preparation.

Fraud Detection

To detect fraud, each employee must be aware of actions constituting fraud, which may include, but are not limited to:

- ✓ Forgery or alteration of any document or account belonging to Association
- ✓ Dishonest reporting, on CC PREP timesheets, of CC PREP activities
- ✓ Forgery or alteration of a check, bank draft, or any other financial document
- ✓ Misappropriation of funds, securities, supplies or other assets for non-Association use or for personal use
- ✓ Impropriety in the handling or reporting of money or financial transactions, including the handling of customer credit card information, check copies, etc.
- ✓ Fraudulent financial reporting, billing for services not performed or for goods not delivered
- ✓ Participation in private inurement (using Association's name or resources for personal gain)
- ✓ Disclosing confidential and proprietary information to outside parties, Accepting or seeking anything of material value (i.e. in excess of \$100) from contractors, vendors, or persons providing services/materials to Association



- ✓ Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment without the appropriate permission
- ✓ Any similar or related inappropriate or dishonest conduct

If there is any question as to whether an action constitutes fraud, contact either the Deputy Director or Executive Director.

Honorariums:

CC PREP staff may accept honorariums for services provided external to CC PREP sanctioned activities. It is expected that all time spent on such activities shall not be charged to CC PREP, or CC PREP projects.

Fraud Reporting:

In the event of an alleged incident of fraud, each employee is responsible for acting as a whistleblower by immediately bringing the information to the following confidential resources:

1. his/her immediate supervisor or
2. Deputy Director or Executive Director or
3. the President or the Secretary/Treasurer of Association or
4. A suggestion box located at the receptionists' desk.

Employees must exercise caution and sound judgment to avoid baseless allegations, which are those made with reckless disregard for their truth or falsity. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination. In addition, Employees who are aware of fraud and fail to report it may face personal action up to and including dismissal.

The whistleblower should NOT contact the suspected individual in an effort to determine facts or demand restitution. The whistleblower should NOT discuss the case, facts, suspicions, or allegations with anyone, unless specifically asked to do so by the Executive Director. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

1. The party receiving the information will treat it as confidential, but will share it with the Executive Director, the President, or the Secretary-Treasurer to ensure prompt action. The following actions may then be taken by Association's management as the situation warrants: Notification to the Association's President, Treasurer and Finance/Audit Committee
2. Investigation by the Executive Director, the Deputy Executive Director, the Board President, and the Secretary-Treasurer



Based upon the results of the investigation, the Association may:

1. Contact legal counsel.
2. Undertake appropriate personnel action which may include restitution, suspension, or termination.
3. Implement/Enhance relevant control systems.
4. Conduct training of CC PREP staff as appropriate.

The member of Association's management performing the investigation shall have full access to:

- All company records and premises
- All or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use any such items or facilities

Dishonest actions will not be tolerated and violators may be discharged and/or referred to the appropriate authorities. Restitution may be required. This policy will be applied, as appropriate, to all Employees regardless of position/title, length of service, or relationship to Association.

Whistleblowers Protections

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, an Employee's identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

The Association will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as harassment, termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must file a written complaint with the Executive Director, the President or the Secretary-Treasurer immediately. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Contacts

Questions related to the interpretation of this policy should be directed to the Executive Director or the President of Association.