



## University District Development Association (UDDA)

### Board of Directors' Meeting Agenda

Wednesday, March 4, 2026

4:00-4:45 PM Joint UDDA/UDPDA; 4:50-5:30 PM UDDA Business Meeting

Catalyst Building, Room 309, and via Zoom

<https://us02web.zoom.us/j/86750387107?pwd=WnRDckJrS2FGZUllbzNIWWliYTJ1dz09>

Meeting ID: 867 5038 7107; Passcode: 941652; Phone: +1 253 205 0468 US

*(Joint discussion: UDPDA and UDDA Board Members – Public Meeting)*

**4:00 February EAC Highlights – Bollenback**

**4:05 Next Generation Plan 2065 Updates – Sinisterra**

- 201 W Main
- UD Gateway Commons (400 Block)

**4:15 Scorecard: Review, Comments, etc. – Sinisterra**

**4:20 Presentation: UD Development Incentives – Kara and Mark Odegard, MeasureMeant**

**4:45 *Public Comment and Adjourn UDPDA Meeting* – Bollenback**

**4:50 Call to Order, Welcome, Administrative Actions – Bollenback**

- **Proposed MOTION – Consent Agenda Approvals**
  - Draft February 4, 2026, UDDA board meeting minutes
  - UDDA Financials as of January 31, 2026

**4:55 Presentation and MOTION: Adopt UDDA Fiscal Policies & Procedures Manual – Hulsey**

**5:05 Presentation and MOTION: Adopt UDDA HR Employee Manual – Tellefson**

**5:15 30-Second Updates**

**5:30 Adjourn, next meeting May 6 – Bollenback**

**2026 UD Board Meetings (3:30 PM at Catalyst Building, Room 309)**

- May 6
- June 3 board retreat, 9 AM – 1 PM, location TBD
- Sept 2 annual meeting
- Oct 14
- Dec 2 – holiday event and Impact Award presentation, location TBD



## University District Development Association (UDDA) Meeting Minutes - DRAFT

**Wednesday, February 4, 2026, 3:35-4:48 PM, Catalyst Building Room 309 and Via Zoom**

Board [slide deck](#), Zoom recording [link](#)

**Board Members Present:** Karlee Agee (Zoom), Ryan Arnold (Zoom), LaVerne Biel (Zoom, joint only), Lois Bollenback (chair), Kevin Brockbank, Mayor Lisa Brown (Zoom), Pat Castaneda (Zoom), Megan Hulsey (Zoom), Alex Jackson, Marvo Reguindin (Zoom), Rob Sauders, Angela Swenseid, Adam Swinyard (joint only), Jonathan Teeters (Zoom), Dennis Wagner (Zoom), County Commissioner Amber Waldref, Erin Williams-Hueter

**Board Members Absent:** Catherine Brazil, Emilie Cameron, Colleen Fuchs, Brooke Kiener, Stacia Rasmussen, John Sklut, Thomas Tellefson, Council President Betsy Wilkerson

**Others Present:** Juliet Sinisterra, Alden Jones, Amanda Beck, and presenters

### *JOINT PRESENTATION/DISCUSSION: UDPDA and UDDA Board Members*

Wagner provided the following **EAC Highlights**:

- Job posting for Marketing and Communications Manager garnered 77 applications. Staff is reviewing and will narrow down to approximately 24 candidates. Three board members have volunteered to conduct interviews in March, with May as a likely start date for the position.
- Presentation by the Biohabitats team on guidelines for resilient infrastructure design.
- Presentation by Seve7n Design & Illustration on the storytelling focus of the planned revamp (2027) of the UD website.
- Sinisterra shared Scorecard and noted that Bouten has offered to reinstall gratis windstorm-damaged UD banners along MLK Jr. Way.

### **Next Generation Plan 2065 Updates**

- **201 West Main** - The City Council approved the Amendment of Covenants on January 26. Property sale expected to close this month. Millennium Northwest LLC intends to combine the property with the Cruz Boots parcel and build 143 units of market-rate housing.
- **400-Block** – Sinisterra is preparing an MOU for Avista Development Corporation’s (ADC) review around the release of a shared RFP for the UD Gateway Commons (new moniker for the 400-Block). She mentioned different possible ownership structures that incorporate a P3 partner and feature a program focused on community health, education, and innovation, workforce and small business development, and neighborhood services (childcare, food security). A New Market Tax Credit (NMTTC) consultant will be hired to facilitate a successful application to interested CDE’s in a highly competitive, national funding process. Because successful projects are usually “shovel-ready” and have a well-documented financing stack, funding would likely be 2-3 years out.

### **Presentations**

- **Pacific Avenue Greenway Update** – Jonathan Adams provided a status update on the City’s Pacific Avenue project with a focus on ped/bike safety and landscape/streetscape improvements. Construction starts early this summer. See [this link](#) for more information.
- **The Community School (TCS)** – Cindy McMahon spoke about her professional journey in pursuit of a more progressive high school teaching and learning model. She provided an overview of TCS’s (soon to be located in the UD) mission and unique attributes that help prepare students for the real world. Student Emmeline Hirt shared the benefits of her TCS education. See [this link](#) for more information.
- **Innovation High School (IHS)** – Located in the UD, Sara Kennedy provided an overview of IHS’s mission, values, and curriculum pathways, all with a focus on the arts. See [this link](#) for more information.

Bollenback asked for, but did not hear any public comments, and adjourned the meeting at 5:08 PM.



***END JOINT PRESENTATION/DISCUSSION: UDPDA and UDDA Board Members***

**Call to Order, Welcome, and Administrative Actions**

Chair Bollenback called the UDDA business meeting to order at 5:08 PM and asked for a **MOTION to approve the January 7, 2026, UDDA meeting minutes and the UDDA Treasurer’s Report—which included the financials** as of December 31, 2025—(Swenseid) and seconded (Waldref), and passed unanimously.

After around-the-room 30-second updates, Bollenback adjourned the meeting at 5:28 PM.

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Dennis Wagner, Vice Chair and Secretary



## UDDA – Financial/Treasurer’s Report

As of January 31, 2026

Accrual Basis

	(Current Month)	(Previous Month)
<b>CURRENT ASSETS</b>		
Total Checking/Money Market	247,154	268,946
Accounts Receivable	5,000	5,000
Other Assets - QBO Tax Holding	3,943	3,235
<b>Total Assets</b>	<b>256,097</b>	<b>277,181</b>
<b>LIABILITIES</b>		
Accounts Payable	0	0
Credit Card Payable	5,471	4,278
Payroll Liabilities ( <i>includes VL accrual</i> )	11,281	8,499
<b>Total Liabilities</b>	<b>16,752</b>	<b>12,777</b>

### NOTES:

- January Proforma vs Actual net revenue was (\$25,058) due primarily to Jeffrey’s \$21K unbudgeted severance payment and legal consultation services for severance agreement. This variance will diminish if anticipated increased contributions are secured.
- On the revenue and accounts receivable side, Flores refunded a 2025 FSA account advance of \$2,865.30. Also, 2026 budgeted annual contributions (\$102K) will be invoiced in February.

Approved:



Juliet Sinisterra, CEO

Megan Hulsey, Treasurer

# UNIVERSITY DISTRICT DEVELOPMENT ASSOCIATION

## Statement of Financial Position

As of January 31, 2026

	TOTAL
<b>ASSETS</b>	
Current Assets	
Bank Accounts	
10126 UDDA NUM Checking	78,845.21
10127 UDDA NUM MM	168,308.97
<b>Total Bank Accounts</b>	<b>\$247,154.18</b>
Accounts Receivable	
12100 Accounts Receivable	5,000.00
12101 Other Receivable	0.00
<b>Total Accounts Receivable</b>	<b>\$5,000.00</b>
Other Current Assets	
12000 Undeposited Funds	0.00
12001 *Undeposited Funds	0.00
13100 Prepaid Insurance	0.00
QuickBooks Tax Holding Account	3,943.13
<b>Total Other Current Assets</b>	<b>\$3,943.13</b>
<b>Total Current Assets</b>	<b>\$256,097.31</b>
<b>TOTAL ASSETS</b>	<b>\$256,097.31</b>
<b>LIABILITIES AND EQUITY</b>	
Liabilities	
Current Liabilities	
Accounts Payable	\$0.00
Credit Cards	\$5,470.52
Other Current Liabilities	
21000 Other Current Liability	0.00
21100 Direct Deposit Liabilities	0.00
24000 Payroll Liabilities	977.77
24110 Federal Income Tax Withheld	2,689.50
24125 FICA & Med Payable	0.00
24160 State Unemployment Payable	-450.18
24161 State Fam Med Lv EE pd by Co	0.00
24162 FSA Contrib EE	164.99
24163 FSA Contrib ER	189.99
24170 Federal Unemployment	126.00
24220 Industrial Insurance	718.00
24225 Simple IRA EE	0.00
24226 Simple IRA ER	893.60
24227 Accrued Vacation Leave	5,271.81
ID Income Tax	759.00
WA Cares Fund	-58.96

# UNIVERSITY DISTRICT DEVELOPMENT ASSOCIATION

## Statement of Financial Position

As of January 31, 2026

	TOTAL
<b>Total 24000 Payroll Liabilities</b>	<b>11,281.52</b>
Direct Deposit Payable	0.00
FSA Contrib ER	0.00
<b>Total Other Current Liabilities</b>	<b>\$11,281.52</b>
<b>Total Current Liabilities</b>	<b>\$16,752.04</b>
<b>Total Liabilities</b>	<b>\$16,752.04</b>
Equity	
30000 Opening Balance Equity	2,143.63
30001 Reserve	78,842.62
32000 Unrestricted Net Assets	183,417.36
Net Revenue	-25,058.34
<b>Total Equity</b>	<b>\$239,345.27</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>\$256,097.31</b>

# UNIVERSITY DISTRICT DEVELOPMENT ASSOCIATION

## Budget vs. Actuals: Budget\_FY26\_P&L - FY26 P&L

January 2026

	TOTAL	
	ACTUAL	BUDGET
<b>Revenue</b>		
43210 Interest Income	212.73	83.37
43400 Direct Public Support		0.00
43410 Institutional/Corp contrib		0.00
<b>Total 43400 Direct Public Support</b>		<b>0.00</b>
46500 Grant Income		0.00
46510 Grant - Restricted		0.00
<b>Total 46500 Grant Income</b>		<b>0.00</b>
46700 Other Income		0.00
47005 UDRA Management Proceeds	28,775.41	28,775.41
<b>Total 46700 Other Income</b>	<b>28,775.41</b>	<b>28,775.41</b>
47200 Program Income		0.00
47240 Programs, Event Sponsorships		0.00
<b>Total 47200 Program Income</b>		<b>0.00</b>
<b>Total Revenue</b>	<b>\$28,988.14</b>	<b>\$28,858.78</b>
<b>GROSS PROFIT</b>	<b>\$28,988.14</b>	<b>\$28,858.78</b>
<b>Expenditures</b>		
60100 Payroll Expenses		0.00
60101 Salaries, Wages	40,459.36	19,300.00
60105 Vacation Leave Accrual	1,107.90	750.00
60110 Payroll Taxes	3,565.71	1,890.00
<b>Total 60100 Payroll Expenses</b>	<b>45,132.97</b>	<b>21,940.00</b>
60200 Personal Services Contracts		0.00
60202 Financial, Prof Services	1,172.80	100.00
60203 Management & Organization Svcs	589.14	2,025.00
60205 Legal Fees	2,685.00	250.00
60231 Marketing/Advertising	2,174.32	1,458.37
60232 Graphic Design, Web	850.85	3,533.37
<b>Total 60200 Personal Services Contracts</b>	<b>7,472.11</b>	<b>7,366.74</b>
60300 Other Contractual Services		0.00
60303 Cell Phone Charges	150.00	150.00
60314 Internet IT Svcs Domain Reg	133.98	425.00
60324 Insurance D&O, etc.		0.00
60325 Insurance Other	50.00	0.00
60329 Licenses and Permits	60.00	0.00
60330 Memberships, Dues		207.99
60333 Ed Events, Scholarships		0.00
60334 Reg, Conferences, Sponsorships	440.73	93.75
60336 Subscriptions, Periodicals	167.77	58.37
60353 Postage, Mailing Services		0.00
60358 Printing & Reproduction	41.39	0.00
60377 Catering, Meals	26.57	0.00

# UNIVERSITY DISTRICT DEVELOPMENT ASSOCIATION

## Budget vs. Actuals: Budget\_FY26\_P&L - FY26 P&L

January 2026

	TOTAL	
	ACTUAL	BUDGET
60380 Leased Buildings, Space	805.50	805.50
60381 Rentals, Copier Lease		0.00
60389 Rentals, Other Events, Park		0.00
<b>Total 60300 Other Contractual Services</b>	<b>1,875.94</b>	<b>1,740.61</b>
60400 Travel		0.00
60410 In-state Per Diem		0.00
60411 In-state Air Fare		0.00
60412 Private Auto Mileage		0.00
60416 Other Travel - bus, etc.	13.08	10.00
60420 Out of state Per Diem		0.00
60421 Out of state Air Fare		0.00
<b>Total 60400 Travel</b>	<b>13.08</b>	<b>10.00</b>
60500 Supplies & Materials		0.00
60501 Food		0.00
60525 Recognition and Awards		0.00
60540 Non-cap Equip Furn <\$5K		0.00
60545 Prewritten SW (MSFT Zoom)	71.28	100.00
60564 Office Supplies		0.00
<b>Total 60500 Supplies &amp; Materials</b>	<b>71.28</b>	<b>100.00</b>
60700 Retirement & Benefits		0.00
60702 PFML	556.51	556.00
60705 Retirement Employer Contrib	446.80	445.00
60707 Life Insurance Employer Paid		0.00
60709 Disability Insurance	388.57	370.00
60710 Health Insurance Plans	571.20	571.00
60711 FSA Employer Contrib	-2,481.98	767.00
60712 FSA Employee Contrib		0.00
<b>Total 60700 Retirement &amp; Benefits</b>	<b>-518.90</b>	<b>2,709.00</b>
<b>Total Expenditures</b>	<b>\$54,046.48</b>	<b>\$33,866.35</b>
NET OPERATING REVENUE	<b>\$ -25,058.34</b>	<b>\$ -5,007.57</b>
NET REVENUE	<b>\$ -25,058.34</b>	<b>\$ -5,007.57</b>



Date: February 11, 2026  
To: EAC  
Fr: Juliet Sinisterra  
Re: **UDDA and UDPDA Fiscal Policies and Procedures Manuals**

### **Introduction**

With the UDDA and UDPDA applying for more state and federal grants and those contractual grant relationships often requiring specific fiscal policies and procedures, staff have been working on updates to the current fiscal policy documents to better meet compliance requirements. Also, after an SAO Accountability Audit of the UDPDA in early 2026, more robust notations around purchasing, procurement, banking, and fraud were incorporated.

### **Document Review and Comments**

Drafts of the fiscal policies and procedures manuals were reviewed by past board member and treasurer Chuck Murphy, who provided valuable input and suggestions (see below).

1. Roles and responsibilities – Noted the discrepancy between the bylaws' description of the Treasurer (has “custody of all monies and securities and keeps the books of account”) vs the reality. This may be something to address if/when we revise bylaws.
2. Fraud and Embezzlement – Recommended more detail around the fraud reporting process. Included this and a link to the SAO’s website with detailed fraud reporting steps.
3. FDIC-insured Funds – Suggested adding language around law limits and moving funds as needed. Added it’s \$250K *per depositor*, not per account (e.g., each individual checking or money market account). Also, moving UDPDA money market funds to SCIP.
4. Purchasing Levels – Noted different purchasing thresholds between the UDPDA and UDDA. This is intentional. The UDPDA requirements are more prescribed per state law.

### **Other Key Features**

The updated manuals provide more detail around:

- Roles and responsibilities
- Internal controls and fraud prevention
  - Vendor Policy and Form
  - Internal Funds Transfer Policy and Form
  - Payment Request Form
- Basis of accounting
- Integration of QBO
- Federal grant administration
- Audits
- References to human resources policies in Employee Manual
- Risk management
- Procurement levels, process, and approval pathways for each entity

# FISCAL POLICIES & PROCEDURES MANUAL



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Adopted by the  
University District Development Association

(Date TBD)  
V 1.0

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**Revision History**

This is a living document and will be reviewed and updated every two years or as needed.

<b>Revision</b>	<b>Date</b>	<b>Change</b>
1.0		Adopted by UDDA Board

# I. ACCOUNTING OPERATIONS

The University District Development Association (UDDA) is incorporated as a Washington nonprofit organization and is exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code (IRC). As such, the UDDA must comply with all IRS regulations and restrictions to retain its tax-exempt status.

## Roles & Responsibilities

### a. Board of Directors (BOD)

The BOD reviews and adopts the organization's standard financial operating procedures (SOPs). The BOD also reviews and approves the Annual Work Plan and Budget, and once adopted, delegates the administration of both to the Chief Executive Officer, including contract execution.

Additionally, per the [UDDA Bylaws](#), “the Board Chair shall preside at all meetings of the Corporation, shall have general supervision of the affairs of the Corporation, and shall perform such other duties as are incident to the office or are properly required of the Chair by the Corporation.”

Additionally, per the UDDA Bylaws, “the Board Treasurer shall have the custody of all monies and securities of the Corporation and shall keep regular books of account. The Treasurer shall oversee the disbursement of funds of the Corporation in payment of the just demands against the Corporation or as may be ordered by the Corporation (taking proper vouchers for such disbursements) and shall render to the Corporation from time to time as may be required, an account of all transactions undertaken as Treasurer and of the financial condition of the Corporation. The Treasurer shall perform such other duties as are incident to the office or are directed by the Chair or by the Corporation.”

### b. Executive Advisory Committee (EAC)

The EAC (a joint UDPDA/UDDA committee whose members include the board chair, vice chair/secretary, treasurer, and three or more board members) helps inform the annual budget and yearly work plan; selects the annual Nominating Committee members; reviews and approves the Nominating Committee’s slate of officers and new members before being presenting at the Annual Meeting for BOD vote; reviews and selects the annual Impact Award recipient for BOD approval; and reviews and makes adjustments to the CEO’s compensation.

### c. Chief Executive Officer (CEO)

The CEO directs the overall operations and management of the organization. The CEO acts as the primary fiscal agent, implementing all financial policies and procedures. The CEO is responsible for managing the organization's financial risks, as well as for financial and strategic planning, budgeting, forecasting, and financial reporting to the BOD, as requested. The CEO leads the finance staff, delegating tasks, providing oversight, and training as necessary. The CEO is the lead contact for financial-, audit-, and grant-related activities and ensures that the UDDA responds to such requests in a timely and accurate manner and provides progress updates to the BOD.

### d. Finance Staff (FS)

The Finance Staff (FS), whether internal or outsourced, is primarily responsible for ensuring that the daily, monthly, annual, and periodic accounting tasks are completed accurately and promptly with the support and direction of the CEO as needed. The FS works closely with the CEO to ensure the completion of reconciliations, the accuracy of financial statements, alignment with records retention practices, and other tasks related to UDDA policies and GAAP compliance.

## Basis of Accounting

### a. Accrual Basis

The organization uses the accrual basis of accounting, as preferred by Generally Accepted Accounting Principles (GAAP). The accrual basis recognizes revenue when it is earned, not when it is received, and expenses when generated, not when the money is spent.

## Fund Accounting

In light of potential limitations and restrictions on the use of available resources, the organization's accounts are maintained in accordance with the principles of fund accounting. Under these procedures, resources are classified for various purposes and maintained for each fund for accounting purposes.

## Records Retention

The following fiscal and personnel records shall be retained in office files for a minimum of seven (7) years following the end of a fiscal year (December 31st) unless otherwise required by funding sources or government entities:

- Check registers, warrants, or vouchers to ensure accurate accounting of payments and expenses. Supporting documentation, including original invoices and receipts
- Cash reconciliations for bank accounts from the bank statement to the general ledger
- Investment reports, if any
- Personnel files, including required proof of citizenship or resident status, IRS withholding forms, and emergency contact information
- Travel and other authorized expenses
- Payroll records
- Monthly and YTD budget, expense, and revenue reports
- Copies of bank deposit slips with copies of checks
- Monthly expense reports and copies of invoices submitted to funders
- Accounts payable and accounts receivable, including aging reports
- Capital equipment (if any), inventory, and depreciation schedules
- Contracts specifying services, duration, and rate of compensation
- Annual Audited Financial Statements
- Annual 990 tax return

## Internal Controls

### a. Lines of Authority

The CEO is responsible for the day-to-day financial management of the organization. The CEO is also responsible for regularly reporting the organization's financial status to the EAC (which includes the Board treasurer). The EAC monitors and stewards the organization's ongoing financial activities. The BOD authorizes the CEO to hire and supervise staff and independent consultants, enter into contracts, pay bills, receive funds, and maintain bank accounts. In the absence of the CEO, the Board Chair and Treasurer are authorized to act on the BOD's behalf on approved financial matters when action is required in advance of a meeting of the BOD.

### b. Segregation of Duties

No single person should control all aspects of an accounting transaction. The CEO will ensure that:

- A person who receives expense requests is not the one to approve that expense.
- A person who approves an expense should not be the one who maintains the accounting records.
- A person who receives expense requests or invoice payments or opens the mail is permitted to make deposits and maintain accounting records with the CEO's oversight.

### c. Monitoring, Reporting, and Review

Risk management is understood as a continuous stewardship practice that protects people, public trust, and long-term system resilience. Risks are actively monitored through periodic reassessments, and internal and external reviews, with transparent reporting to management and governing bodies. Triggered reviews—such as major incidents, policy or funding changes, or the introduction of new programs and technologies—ensure timely adaptation. This ongoing process produces transparent risk reporting, updated and continuous improvement actions that strengthen accountability, learning, and the durability of the UDDA.

d. Documentation and Transparency

All documentation is to be transparent, accountable, and auditable decision-making that clearly documents how risks are identified, weighed, and addressed in service of the UDDA mission. This includes maintaining clear risk assessments, documented rationales for tradeoffs, evidence of appropriate review and approval, and demonstrated alignment with adopted strategies, budgets, and publicly stated outcomes—ensuring decisions are both responsible and trust-building over time.

### Grant Contingencies

Grants often require the fulfillment of specific conditions as outlined in the related grant agreement. Failure to fulfill these conditions could result in the return of funds to the grantors. It is the CEO's responsibility to oversee the fulfillment of grant conditions. IRS regulations shall appropriately acknowledge all grants, and all grantors shall be adequately recognized.

### Confidentiality

Some financial records are restricted materials with limited access. Only the CEO and the FS, and the Board Chair and Treasurer (or others authorized by the BOD) shall have access to financial records (vendor files, checks, journals, payroll, etc.). All payments, transactions, and invoices must be accompanied by supporting documentation. The files will be kept confidential.

## II. FINANCIAL PLANNING & REPORTING

### 1. Journal Entries

The FS will prepare, and the CEO will review and sign off on any month- and year-end journal entries. They will be printed and filed for audit trail purposes.

### 2. Month-End Close

At the end of each month and the fiscal year, the CEO will review all balance sheet accounts, including verifying the following balances: cash accounts to ensure they match bank statement reconciliations; accounts receivable to confirm outstanding amounts due; and accounts payable to confirm outstanding amounts owed.

### 3. Financial Statements

Presentation of the Financial Statements shall describe net assets and revenues, expenses, gains, and losses, classified based on the existence or absence of donor-imposed restrictions. Accordingly, the net assets and changes shall be classified as either net assets with restrictions or unrestricted net assets.

#### a. Restrictions

Net assets without restrictions include amounts that are not subject to donor-imposed stipulations and are used to account for resources available to carry out the organization's purposes, as limited by its charter and bylaws. The principal sources of unrestricted funds are grants, service fees, contributions, and investment income.

Restricted net assets with donor restrictions refer to resources available for use in program services, as the donor implied. They are expendable only for purposes specified by the donor or grantor and may or will be met by the actions of the organization and/or the passage of time. Such resources originate from grants and contributions restricted for specific purposes or a specific future period. When a donor or grantor restriction expires, restricted net assets are reclassified to unrestricted net assets and reported in the statement of activities as net assets released from restrictions.

### 4. Internal Financial Reports

Financial Statements shall be prepared monthly by the FS. The Financial Statements include information about all funds and cash positions as of the end of each month and may be depicted in a summary or "dashboard" format. The CEO and Treasurer will review the monthly Financial Statements before presenting them to the BOD for review and approval.

### 5. Fraud and Embezzlement

The CEO will notify the BOD Chair, Treasurer, and any required funding sources within one working day of the date on which any alleged fraud activity comes to the CEO's attention. Staff will document the case and notify the proper authorities (such as legal counsel, the bank of record, IT, and insurance service providers). Additionally, if the fraud or loss includes public funds, the UDDA will report the incident to the Washington State Auditor's Office (SAO) within one working day and follow the [SAO's required steps to address the fraud](#). If fraud or embezzlement is identified during a financial audit and the CEO is implicated, the auditor shall inform the BOD Chair and Treasurer immediately. If deemed appropriate, after the investigation and resolution of the issue, the organization will implement internal control changes to address the concerns of all parties.

### 6. Cost Allocation

The organization's cost allocation method treats all costs as direct costs, except for general administration, general facility, general expenses, and capital expenditures.

Costs not directly attributable to a specific program and funding source are initially posted to a common cost center, which is then distributed proportionately to the various cost centers at the end of the month. These include, but are not limited to, costs shared by all programs in the organization, such as rent, auditing services, professional fees, administrative support staff, telecommunications, maintenance, utility fees, and licenses.

Cost allocation is based on labor. Labor percentages are derived from the relative number of direct hours worked and documented on staff monthly timesheets for each program or initiative. Most common costs, such as printing and postage, office supplies, telecommunications, bookkeeping, and fiscal audits, are distributed to programs based on the hours worked in each program or initiative, as a percentage of the allocation criteria evaluated regularly (annually, unless significant changes to programs or initiatives occur more frequently).

Pure administrative costs are tracked separately and include expenses that are not directly attributable to the organization's programs or activities. They may consist of board meeting expenses, administrative staff costs, and other expenses related to maintaining the organization.

Indirect administration is allocated to programs or initiatives based on the direct program hours worked in each program, up to the full allowable percentage per program or initiative. Since some funding sources restrict the level of reimbursable administrative overhead, the "excess" administration will be charged to other sources of funding or to "no source" if no other funding sources are available, leaving the administrative costs creating a deficit to the agency, which other unrestricted revenues or the investment income/corpus may support.

## 7. Budgeting Process

The EAC and CEO shall plan for the organization's long-term financial stability in accordance with UDDA's strategic goals. The CEO is responsible for preparing and presenting a draft annual operating budget to the EAC for review and to the BOD for approval before the beginning of the fiscal year (January). Additionally, approximately mid-year, the CEO will present any budget revisions/adjustments for EAC and BOD approval.

## 8. Donated Materials and Services

Donated materials and equipment, if any, shall be reflected in the Financial Statements at their fair market values measured on the date of receipt. If a packing slip is available, that will be used as documentation of receipt. If the packing slip is unavailable, the FS will sign a document acknowledging receipt of the goods. If the donor does not specify the value of the item(s), the finance team will research and record the dollar amounts for each donated item.

The FS reviews and documents several comparable items along with stated resale values to determine valuation. The proposed valuation is then reviewed and approved by the CEO. Market values are periodically reassessed to ensure the pricing accuracy of the goods on hand.

The organization maintains documentation of donated goods and services received during the year, including the name of the donor, the date and location of the donation, a description of the donated items or services, and the donor's estimated fair market value if known.

Donated goods and services are recorded as in-kind revenue, with a corresponding debit to the expense account that reflects the type of donation (e.g., materials, professional services). The determination of expense versus asset status is based on the materiality of donation activity in the year. For donations of

\$50,000 or more, the finance team will determine materiality. If donated goods are not immediately expensed, they are classified as an asset and recognized as inventory.

## 9. Audit

When required by a funding source, an annual audit may be necessary. Additionally, a non-Federal entity that expends \$1,000,000 or more in Federal awards during its fiscal year must have a single or program-specific audit conducted for that year, as required by 2 CFR 200.201.

The CEO shall recommend to the EAC, for approval, the selection of a firm to conduct the annual UDDA audit. In addition, the CEO shall assist, when necessary, in audit preparation and report the results to the EAC and the BOD. A representative from the audit firm will be invited to attend the board meeting after the audit is finalized to present and answer any questions from the BOD.

All reports resulting from reviews of audits of the accounting and other financial systems will be routed immediately to the CEO, who will then share this information with the EAC. The CEO will be responsible for preparing any necessary written responses and providing any required corrective actions in response to the review or audit recommendations. The auditor or other reviewing agency will be notified within three months of the issuance of the recommendations, including the actions the organization will take and the projected timetable for those actions.

## 10. Sub-recipient Management & Monitoring

The CEO is responsible for monitoring the programmatic and financial activities of award sub-recipients to ensure proper stewardship of federal and state funds. The following policies, roles, and procedures outline responsibilities to ensure that, in addition to achieving performance goals, sub-recipients comply with applicable federal laws and regulations, as well as the provisions of the grant award's special conditions.

### **Federal Grant Administration**

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) Uniform Guidance, specifically 200.331, requires pass-through entities to evaluate each sub-recipient's risk of noncompliance to determine the appropriate monitoring level, monitor the activities of sub-recipient organizations to ensure that the sub award complies with applicable Federal statutes and regulations and terms of the sub award, and verify that sub-recipients are audited as required by Subpart F of the Uniform Guidance. The direct recipient of the federal award is required to provide evidence of due diligence in reviewing the ability of a sub-recipient to adequately meet the objectives of the sub-award and account for the use of the grantor's funds.

#### a. Subawards

Subawards will comply with all applicable Federal, State, and/or sponsor-specific policies. The CEO will ensure that subawards are approved by the Federal sponsor prior to subawards. The organization follows the guidelines of the Federal government's differentiation of a Subrecipient and a contractor based upon the following determinations:

##### 1. Subrecipient

- A Third-party, non-federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program but does not include an individual who is a beneficiary of such a program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.
- Determines who is eligible to receive what Federal assistance.
- Its performance is measured by whether the objectives of a Federal program were met.

- Has responsibility for programmatic decision-making.
- Is responsible for adherence to applicable Federal program requirements specified in the Federal award.
- In accordance with its agreement, it uses the Federal funds to carry out a program for public purposes specified in the authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.
- Provides a detailed budget, which must abide by the cost principles (2 CFR 200 Subpart E).
- Bound by terms and conditions contained within the prime award.
- Adheres to salary limitations contained within the prime award.

## 2. Contractor

- A third-party entity that receives a contract where a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.
- Provides the goods or services within normal business operations.
- Provides similar goods or services to many different purchasers.
- Normally operates in a competitive environment.
- Provides goods or services that are ancillary to the operation of the Federal program.
- Is not subject to compliance requirements of the Federal program as a result of the agreement, but similar requirements may apply for other reasons.
- Provides an hourly, daily, or deliverable rate. Typically, contracts are based upon milestones or deliverables.
- Indirect costs are not applicable.
- Not bound by the terms and conditions of the prime award.
- Not bound by salary limitations contained within the prime award.

## 3. Pre-award Roles & Responsibilities

When applying for a federal or state grant where a sub-recipient is identified, the CEO will:

1. Collaborate with the sub-recipient regarding the sub-recipient's application narrative, the goals of the sub-award, and the sub-recipient's grant budget.
2. Collaborate to establish a draft scope of work.
3. Notify the sub-recipient of the grant award approval or denial.

## 4. Post-award Roles & Responsibilities

After the Grantor has approved and awarded the grant, the CEO and FS will:

1. Monitor and approve quarterly programmatic progress and the ability of the sub-recipient to meet the objectives of the sub-award.
2. Participate in sub-recipient monitoring training, when available, in coordination with Financial Management and the sub-recipient, if necessary.
3. Participate in annual sub-recipient monitoring site visits if requested.
4. Complete *Sub-award Monitoring Form*. This identifies the federal award information for the sub-recipient, which includes the following:
  - a. Federal award number and name of federal grant
  - b. Sub-recipient name and DUNS number
  - c. Federal award date
  - d. Sub-award period of performance start and end date
  - e. Amount of federal funds obligated to the sub-recipient
  - f. Total amount of federal award to the prime grantee
  - g. Federal award project description

- h. Name of federal awarding agency, prime grant recipient, contact information of the awarding official
  - i. CFDA number
  - j. All requirements imposed by the prime grantee on the sub-recipient, so that federal statutes, regulations, and the terms and conditions of the grant award are used in the federal award.
  - k. Indirect cost rate, if applicable
  - l. Access to the sub-recipient's financial records to meet the requirements of 2 CFR 200.
  - m. Appropriate terms and conditions concerning closeout of the sub-award
5. Complete the sub-recipient risk assessment and assign a risk rating.
  6. Review and approval of sub-recipient invoices.
  7. Coordinate programmatic progress reporting of sub-recipients.

#### 5. Sub-recipient Monitoring Procedures

##### **Annual Risk Assessment at Award Stage**

The CEO and FS will continuously analyze the administrative and programmatic performance of the sub-recipient through the following methods:

1. Perform a search on SAM.gov to determine if the organization has been debarred or excluded from doing business with the federal government. Print the screenshot of the SAM.gov search for the grant/sub-recipient file.
2. Review the sub-recipient's single audit report (CAFR), if applicable.
3. Ensure applicable federal special conditions of the grant award are passed down to the sub-recipient by requesting the sub-recipient to sign a document acknowledging receipt of and compliance with grant award special conditions.
4. Complete *the Award Stage Assessment of Sub-recipient Checklist* and keep it in the Grant/Sub-recipient file.
5. Provide the *Requirements of Sub-award Documentation* to be submitted by the sub-recipient to the Prime Grantee before any expenditures are made.
6. Complete the *Subrecipient Monitoring Form*.

##### **Continuous analysis during the grant award period**

The CEO and FS will continuously analyze the administrative and programmatic performance of the sub-recipient through the following methods:

1. Internal Controls (2CFR 200.303) – Ensure the sub-recipient provides reasonable assurance of sub-recipient compliance with federal statutes, regulations, and the terms and conditions of the federal award:
  - a. The sub-recipient must return a signed acknowledgment of the terms and conditions of the sub-award to the prime grantee, if applicable.
  - b. The sub-recipient must agree to evaluation and monitoring of their compliance with statutes, regulations, and terms and conditions of the sub-award by allowing access to sub-recipient records and financial statements and the performance of on-site reviews of the sub-recipient's program operations.
  - c. The sub-recipient must take prompt action when instances of noncompliance are identified
  - d. The sub-recipient must take reasonable measures to safeguard sensitive information consistent with applicable federal, state, and local laws.
  - e. The sub-recipient must participate in programmatic reporting training when available
2. Regular communication with sub-recipient stakeholders.

3. Invoice review – Ensure invoices are timely, accurate, and contain the appropriate supporting documentation to substantiate the expense. For any questionable expense(s), request additional backup from the sub-recipient specific to the charge(s) before payment.
4. Request financial reports from the sub-recipient that show:
  - a. Sub-award amount
  - b. Invoice(s) submitted for reimbursement by sub-award budget category
  - c. Remaining sub-award amount after expenses
  - d. Ensure that cumulative expenses do not exceed the total approved sub-award amount and that the rate of spending is consistent with the project timeline.
5. Review of any other financial or non-financial reports required by the sub-award, such as the sub-recipient’s list of supplies and equipment purchased with grant funds.
6. Coordination of sub-recipient budget revision requests, process, submission, and grantor approval.
7. Follow up with the sub-recipient regarding findings during the annual sub-recipient site visit and request the sub-recipient’s resolution of site visit findings.
8. For high-risk sub-awards, the following additional steps are required:
  - a. Request additional supporting details for all financial invoices and expenses by the sub-award terms and conditions
  - b. Document and retain communications regarding project performance
  - c. Further action could include withholding payments, performing additional site visits, or termination of the sub-award

### **Subaward Closeout**

At 120 days before the grant end date, the CEO will authorize the FS to notify the sub-recipient that they have 90 days after the grant end date to liquidate their encumbrance(s). At 120 days before the grant end date, the sub-recipient will be requested to confirm via email that it will spend the entire subaward and liquidate all encumbrances within 90 days after the grant end date. All final invoices must be submitted to the CEO and FS, along with a final financial report that details the subaward amount, all invoices reimbursed by the grant, and the remaining balance in the subaward. The final programmatic report is due at the end of the grant period.

The following documents are typically required from the sub-recipient for closeout by the date specified by the prime grantee:

1. Final invoice(s)
2. Final Financial Report/Project Ledger
3. Final Programmatic Responses
4. Final Supplies and Equipment Report

The FS will conduct a final audit of the final invoices, financial reports, and programmatic responses, and, if necessary, may request additional supporting documentation.

### III. CASH MANAGEMENT & OPERATIONS

Cash and cash equivalents include all cash balances and highly liquid investments with a maturity of six months or less. The EAC shall review organizational investments (if any). The EAC shall use due diligence in overseeing the organization's investment funds by establishing and monitoring an investment strategy that properly balances risk and return. As needed, the EAC reviews the investment strategy and objectives annually and modifies them by a vote of the BOD.

The BOD intends to ensure that cash, investments, and cash held in escrow accounts remain FDIC-insured or insured to the limit of the total amount held. FDIC insurance is generally limited to \$250,000 per depositor, per insured bank, per account ownership category, not just per individual account. The CEO and FS are responsible for ensuring that depositor accounts do not exceed \$250,000 for more than 45 business days, if possible. At times, the actual depositor balance may exceed \$250,000 due to outstanding checks that have not been cleared. All efforts will be made to move the cash as quickly as possible, within 45 business days.

The UDDA strives to maintain a bank balance of at least three months' average operating expense, not exceeding the FDIC limit. The bank account is reviewed regularly by the CEO and FS to ensure that the balance is adequate.

#### Funds & Banking

a. Internal Fund Transfers Policy

The CEO or their designee has permission to make interorganizational fund transfers between existing accounts to support the UDDA's cash flow management. See Exhibit 4 for more information.

b. Investments

Investments, if any, are reported with the monthly financial statements at the market value. The EAC evaluates the organization's general investment strategy annually to ensure the portfolio is properly diversified, secure, and delivers a return on investment. A summary of the strategy and results is presented to the BOD annually for review and possible revision.

c. Signature Authorization

The CEO, Board Chair, and Treasurer are authorized to sign checks, drafts, or orders for payment of money issued in the name of the organization and have signed the required documents with the appropriate financial institution. All contracts, commitments, and other legal obligations shall be signed by the CEO unless otherwise delegated by the CEO or Board Chair. **Refer to Exhibit 1 for details on procurement levels, the contract process, and the expenditure approval pathway.**

d. Deposits

Deposits will be recorded and remitted to the bank within two working days of any monetary contribution, donation, or other receivable. A receipt of deposit will be kept, along with a copy of the deposit backup, for auditing purposes. Cash and/or checks will be stored securely in a locked room or drawer until a deposit is made.

e. Bank Reconciliation

The FS shall complete monthly bank reconciliations. Additionally, the FS reconciles Bank Statements, Credit Card Statements, and other required reports every month, and stores documents on the shared drive. These monthly checking account statement reconciliations are reviewed by the CEO and serve as an internal control to ensure that all entries have been posted to the general ledger system correctly and to detect any bank errors or theft.

A check outstanding for more than six (6) months will be voided, with a possible stop-payment request to the bank upon the CEO's approval. Additionally, vendor checks may be voided and reissued if reported as lost. All voided checks will be kept on file whenever possible.

## Revenue Recognition

### a. Contributions & Exchanges

All contributions and exchange transactions shall be recorded in accordance with GAAP, with particular attention to ASC 958-605-25 and ASC 606. Contributions are recorded as pledged or received by ASC 958-605-25, and exchange transactions are considered by ASC 606 guidance as they pertain to the timing of recognition. Revenue must be credited to the appropriate income lines as presented in the annual budget and coded with the proper account number as designated in the Chart of Accounts.

### b. Interest Earned

Interest earned by funds held in restricted accounts will be recognized as earnings to remain in those restricted accounts. Interest earned on funds with specific requirements for those earnings will be managed in accordance with those requirements.

## Receipts to Donors

Per IRS regulations, the organization must provide a written disclosure to a donor who receives goods or services in exchange for a single payment of \$75 or more. Additionally, the UDDA is required to provide a receipt for any donations worth \$250 or more at the time of donation. The receipt must include:

1. The donor's name.
2. The amount of money or a description of the item or items donated.
3. A statement indicating whether goods or services were provided in return for the gift.
4. A good-faith estimate of the value of goods or services provided.

Staff, volunteers, and board members will not place a value on what is donated. This value is the donor's responsibility. The organization will not state that a contribution is deductible; instead, it will note that contributions may be deductible and advise the donor to consult a tax professional for further guidance.

## 4. Gift Acceptance

The organization may solicit and accept gifts that are consistent with its mission and objectives. Donations will generally be accepted from individuals, partnerships, corporations, foundations, government agencies, or other entities without limitations. During its regular fundraising activities, the organization will accept donations of money, real property, personal property, stock, and in-kind services. Certain types of gifts require review before acceptance due to the special liabilities they may pose. Examples of gifts that will be subject to review include real property, personal property, and securities.

## 5. Cash Disbursements

### a. Approval Process

The BOD shall authorize the CEO to make all necessary purchases for the day-to-day operation of the UDDA, in accordance with the approved annual budget. All authorized expenditures shall be coded by account number using the Chart of Accounts and recorded in the QuickBooks Online (QBO) platform.

**Refer to Exhibit 1 for details on procurement levels, the contract process, and the expenditure approval pathway.**

Invoices shall be received by the FS for review and then forwarded to the CEO for approval before payment processing. New vendors will be required to complete a New Vendor Form and a W9.

Following CEO review and approval, the FS will enter the bill into the QBO platform, schedule payment (electronic or paper check), and forward it to the CEO for signature confirmation or electronic transfer confirmation. Upon payment of a bill, a hard copy of the paid invoice is kept in the monthly reconciliation portfolio. These portfolios also contain monthly financial reports and provide support during audits. Voided checks shall be marked "VOID" boldly written in ink across the face of the check and filed in the portfolio.

b. Reimbursements

Expenses pre-approved and directly related to business activities (e.g., mileage, meals, hotel, supplies) will be reimbursed to employees upon submission of an Expense Reimbursement Form (see Exhibit 5) accompanied by receipts. The CEO will review and approve. The FS will authorize reimbursements to the CEO.

## 6. Petty Cash

The organization does not maintain petty cash funds.

## 7. Operating Reserve

The organization currently has no operating reserve requirements. Non-essential funds will be placed in an interest-bearing account.

## 8. Invoice Preparation

The FS will prepare operational and grant-related invoices no later than 15 days after recognition of the accounts receivable on an accrual basis. The CEO will review and approve operational and grant-related invoices. Invoices billed on a reimbursable basis will include an accounting report of expenses incurred, along with copies of invoices paid that are being requested for reimbursement. Other invoices billed will be generated based on the payee's requirements. If no requirements are set, the accounting system will generate invoices. The CEO will approve all invoices before the finance team sends them to the payee.

## IV. EXPENSE MANAGEMENT & OPERATIONS

### 1. Compensation and Employee Expense Allocation

The organization's primary objective is to offer a competitive compensation package to employees, consistent with market-based compensation practices, for individuals possessing the necessary experience and skills to fulfill the organization's mission. For more information on employee compensation, see the Employee Manual.

All compensation costs charged to a sponsored project must be reasonable for the work performed, necessary for the project's completion, allowable according to the sponsor's and institutional policies, and allocable to the project. Total salaries and wages charged to sponsored projects must be based on records that accurately reflect the work performed. According to 2 CFR 200.430(h)(viii)(C), this policy addresses the after-the-fact review requirements to ensure that the final amount charged to all sponsored projects governed under 2 CFR 200.430 is accurate.

### 2. Allowable Costs

Allowable costs are necessary and reasonable for the performance of a grant award and may be charged directly or indirectly to it. These costs must also comply with any limitations or exclusions specified in the regulations or the award itself. Each awarding agency has the right to establish its terms and conditions for its awards. Specific award terms and conditions take precedence over the provisions of the Uniform Guidance, as described below. Policies and procedures will apply if the sponsored award agreement or the CFRs do not specifically address the cost. In general, an expense is allowable when it meets the following tests:

1. The cost is necessary, reasonable, and allocable for the performance of the award.
2. The cost is consistent with policies and procedures that apply uniformly to both federally financed and other activities.
3. Is by generally accepted accounting principles (GAAP).
4. Is not included or used as a cost share or match for any other federally financed program.

### 3. Reasonable Costs

The cost is reasonable if it reflects what a prudent person might pay. When determining a reasonable price, considerations must be given to:

1. Whether the cost would be recognized as ordinary and necessary for the Federal award.
2. Factors such as sound business practices, arm's length bargaining, other laws and regulations, and the terms and conditions of the award.
3. Market prices for comparable goods or services in the geographic area.
4. Whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the non-Federal entity, its employees, where applicable, its members, the public at large, and the Federal Government.
5. Deviation from established policies and practices.

### 4. Purchases & Procurement

**Refer to Exhibit 1 for details on procurement levels, process, and the notification and approval pathway.**

As required, the organization follows the Federal procurement standards as outlined in 2 CFR 200.317-200.327 for the procurement of supplies, equipment, construction, and services relating to grants, ensuring that these are obtained as economically as possible through an open and competitive process. Contracts are managed with good administrative practices and sound business judgment.

Per 2 CFR 200.218(c)(2), if the organization has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, that non-federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest occur when, due to relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be biased in conducting a procurement action involving a related organization.

## 5. Independent Contractors

The CEO will consider all relevant facts and circumstances regarding the relationship between the organization and an individual in classifying workers as independent contractors or employees. This determination is based on the degree of control and independence associated with the relationship between the organization and the individual. Other considerations would include the ability to provide liability insurance coverage.

If an individual qualifies for independent contractor status, they will be sent a Form 1099 if, on a cash basis, the total compensation paid to them for any calendar year exceeds \$600. The amount reported on a Form 1099 equals the compensation paid to that person during a calendar year (on a cash basis). Excluded from “compensation” are reimbursements of business expenses that the contractor has accounted for by supplying receipts and business explanations.

## 6. Invoice Approval & Processing

The CEO reviews all payment requests and:

1. Verifies the expenditure and amount align with the annual budget
2. Reviews and approves new Vendor Form (see Exhibit 3 for more information).
3. Provides or verifies appropriate allocation information, ensuring compliance with funding requirements.
4. As needed, provides the date of payment considering cash flow projections.
5. Submits to the FS for processing.

The FS processes all payments approved by the CEO and will:

1. Enter them into the QBO platform.
2. Prepare and submit checks, with attached backup documentation, to the CEO for approval and signature.
3. Mail checks or pay electronically.
4. File backup documentation in the appropriate file.
5. Run an accounts payable aging at the end of each month and submit it to the CEO to ensure the timely payment of all invoices.

## 7. Prepaid Expenses

Prepaid expenses, if any, are expensed over the period they apply unless the prepayment is for benefits to be received in the current accounting period or is immaterial. The threshold for immateriality of prepaid expenses is \$5,000 or less. The FS will manage a prepaid schedule and reconcile it with the general ledger monthly.

## 8. Travel Expenses

Please refer to Exhibit 2 for information on travel policies.

## 9. Credit Cards

The CEO will approve organizational credit card requests. Staff members authorized to have a credit card will be held personally responsible for any charges deemed personal or unauthorized. Unauthorized use of the credit card includes personal expenditures of any kind; expenditures that have not been

adequately authorized; meals, entertainment, gifts, or other spending prohibited by budgets, laws, and regulations; and the entities from which funds are received.

The FS will collect receipts for credit card charges at the end of the month, along with the necessary documentation. The FS will verify all credit card charges with the monthly statements. A record of all charges will be provided to the CEO for review, approval, and allocation of information, enabling the FS to record details accurately.

## 10. Capitalization

### a. Capital Assets

A “Capital Asset” is defined as a unit of property that (1) has an economic useful life that extends beyond 12 months and (2) was acquired or produced for a cost of greater than \$10,000. Capital Assets must be capitalized and depreciated for financial statement purposes. \$10,000 is the minimum capitalization threshold (per 2 CFR §200.313). Any items costing below this amount should be expensed in the financial statements.

All Capital Assets are recorded at historical cost as of the date acquired. Tangible assets below the threshold are recorded as an expense in the annual financial statements. Alternatively, assets with a useful life of 12 months must be expensed for financial statement purposes, regardless of the acquisition or production cost.

<b>Capital Asset Description</b>	<b>Estimated Useful Life</b>
Computer and network equipment, autos, light trucks	5 years
Office furniture and fixtures	7 years
Land improvements, tenant improvements	15 years
Nonresidential real property	39 years

The invoice substantiating the acquisition cost of each unit of property shall be retained for a minimum of seven years.

### b. Property Disposals

The organization may dispose of property held through sale or other means, such as donation, and it reserves the right to set the terms of disposal, including timing, price, and recipients. Property disposed of is relinquished ‘as is.’ The organization will not be held liable for any support, maintenance, or asset improvements, including IT assistance or the replacement or updating of the property. Items such as computer equipment will be wiped by IT before disposal. The CEO will approve all property disposals. The BOD must approve items costing more than \$5,000 before disposal.

## 11. Employee Retirement Accounts

Please refer to the *UDDA Employee Manual* for details on retirement accounts.

## V. OTHER POLICIES & RISK MANAGEMENT

### 1. General Employment Policies

Please refer to the UDDA Employee Manual for information related to general employment policies.

### 2. Information Technology Policies

Please refer to the UDDA Employee Manual for information relating to data protection.

### 3. Employee Safety and Security Policies

Please refer to the UDDA Employee Manual for information relating to employee safety and security.

### 4. Employee Ethics Policies

Please refer to the UDDA Employee Manual for information related to employee ethics policies, including conflicts of interest, confidentiality, and whistleblower protection.

### 5. Asset and Risk Management

The organization will carry appropriate insurance policies for business operations. Coverage will include general liability insurance, D&O insurance, property and rent insurance (as needed), cyber and crime insurance, travel insurance, and other relevant insurance. As assets are acquired and/or staff changes occur, the CEO will determine the necessary coverage.

# VI. EXHIBIT 1: PROCUREMENT LEVELS, PROCESS, AND APPROVAL PATHWAY

The following tables outline the procurement levels, processes, and approval pathways for the UDDA. As needed, the UDDA (and its subcontractors) will follow government procurement requirements and procedures (vs the tables below) as directed.

Occasions may arise when services are legitimately limited to a single source of supply or involve special facilities or market conditions, and competition among vendors is not possible. In this instance, for contracts over \$100K, the UD shall document a sole-source justification (see Exhibit 6), specify the necessary procurement, and its costs. In some cases, a published “intent to award sole source” notification may be required.

**Regarding Approvals:** \*\* If the proposed procurement is *not included* in the Board-approved Annual Budget—or if it is a budget reallocation—and the amount is equal to or less than \$50K, the Executive Advisory Committee (EAC) will approve. If the procurement exceeds \$50K, the Board will also approve.  
**Regarding Contract Amendments:** Per RCW 53.19.060, if there are no substantial changes in the scope of work specified in the original contract, and the value of the proposed amendment does not exceed 50% of the original contract value, a contract amendment may be executed.

Purchases of Goods, Supplies, and Materials	UDDA Process	EAC/Board Approval
\$25,000 or less	<ul style="list-style-type: none"> <li>• Competition not required</li> <li>• No sole source documentation needed</li> </ul>	
\$25,001-\$50,000	<ul style="list-style-type: none"> <li>• Three written or oral quotes, if possible</li> </ul>	
\$50,001-\$300,000	<ul style="list-style-type: none"> <li>• Formal or Informal RFP recommended</li> <li>• Three written or oral quotes if possible</li> <li>• Sole source documentation over \$100K</li> </ul>	see ** above
\$300,001+	<ul style="list-style-type: none"> <li>• Formal RFP</li> <li>• Advertised</li> </ul>	see ** above

Personal Services Contracts	UDDA Process	EAC/Board Approval
\$25,000 or less	<ul style="list-style-type: none"> <li>• Competition not required</li> <li>• No sole source documentation needed</li> </ul>	
\$25,001-\$50,000	<ul style="list-style-type: none"> <li>• Three written or oral quotes if possible</li> </ul>	
\$50,001-\$300,000	<ul style="list-style-type: none"> <li>• Formal or Informal RFP recommended</li> <li>• Three written or oral quotes if possible</li> <li>• Sole source documentation over \$100K</li> </ul>	see ** above
\$300,001+	<ul style="list-style-type: none"> <li>• Formal RFP</li> <li>• Advertised</li> </ul>	see ** above

Professional Architectural and/or Engineering Svcs (per RCW 39.80 and 39.80.020(5))	UDDA Process	EAC/Board Approval

only if public funds are involved)		
	Includes services such as Design, Planning, Management, financial, legal, environmental, IT, and personnel consulting. Price is not allowed as a consideration in the initial selection process for A&E services.	
<b>\$25,000 or less</b>	<ul style="list-style-type: none"> <li>If no public funds are involved, no competition needed</li> </ul>	
<b>\$25,001-\$150,000</b>	<ul style="list-style-type: none"> <li>Review qualifications of three candidates; OR</li> <li>Formal RFP and three proposals recommended</li> <li>Sole source documentation over \$100K</li> </ul>	see ** above
<b>\$150,001-\$300,000</b>	<ul style="list-style-type: none"> <li>MRSC Roster recommended</li> <li>Formal RFP to all qualified on the Roster; OR</li> <li>Formal RFQ to selected vendors</li> </ul>	see ** above
<b>\$300,001+</b>	<ul style="list-style-type: none"> <li>Advertised Formal RFQ</li> </ul>	see ** above

**PROJECTS USING FEDERAL FUNDS MAY NOT ALWAYS ALLOW USE OF THE MRSC ROSTER PROCESS FOR CONSULTANT SELECTIONS.** Roster selection processes require a rotation of selected consultants. **Alternatively,** RFQs may be issued to consultants in the selected category.

Public Works /Ordinary Maintenance (per RCW 39.80 and 39.80.020(5) if public funds are involved)	UDDA Process	EAC/Board Approval
<b>&lt;\$25,000</b>	<ul style="list-style-type: none"> <li>If no public funds are involved: competition is not required</li> <li>Neither sole source documentation nor MRSC Roster needed</li> </ul>	
<b>\$25,001-\$150,000</b>	<ul style="list-style-type: none"> <li>Review qualifications of three candidates; OR</li> <li>Formal RFP and three proposals</li> <li>Sole source documentation over \$100K</li> </ul>	see ** above
<b>\$150,001-\$300,000</b>	<ul style="list-style-type: none"> <li>MRSC Roster recommended</li> <li>Formal RFP to all qualified on the Roster; OR</li> <li>Formal RFQ to selected vendors</li> </ul>	see ** above
<b>\$300,001+</b>	<ul style="list-style-type: none"> <li>Formal Sealed Bid</li> <li>Will be advertised</li> </ul>	see ** above

Real Estate Documents (leases, use agreements, deeds, easements)	UDDA Process	EAC/L/Board Approval
<b>&lt;\$25,000</b>		
<b>\$25,001-\$50,000</b>	<ul style="list-style-type: none"> <li>Consult legal counsel</li> </ul>	
<b>\$50,001+</b>	<ul style="list-style-type: none"> <li>Consult legal counsel</li> </ul>	see ** above

## VII. EXHIBIT 2: TRAVEL POLICIES

The purpose of this policy is to guide the approval and reimbursement of travel expenses. Travel expenses include amounts paid for using personal vehicles, other transportation, and actual expenses or reimbursement for meals, lodging, and related items, rather than the actual costs. Abuse of this policy, including falsifying expense reports to reflect costs not incurred by the employee, shall be grounds for disciplinary action, up to and including termination of employment.

### **Travel Arrangements**

Travel arrangements should be made in advance to secure the most cost-effective travel options and accommodations. Under normal circumstances, the Administrator will arrange travel. However, travel arrangements can be made through a travel agency or an internet travel site. If an employee books his/her reservation, an inquiry about government, conference, or special rates should be made.

### **Cancellations**

Travel should be planned carefully, as cancellations incur additional administrative costs and may result in the forfeiture of amounts paid for registration and tickets. If cancellations are not for legitimate reasons, the employee may be liable for travel arrangements and/or for any costs incurred.

### **Schedules for Employees Traveling on UD Business**

If travel to a destination for an employee's convenience is in advance of the necessary time for arrival, or an employee remains at the destination following an official meeting or other work assignments for the employee's convenience, no reimbursement for additional meals or lodging costs shall be paid to the employee for extra travel time incurred.

If an employee combines personal travel with UD business travel, the UD will pay expenses equal to what would have been paid had the travel been solely for business purposes. The following conditions must exist:

- The primary purpose of the trip is to do official UD business.
- The employee uses, where necessary, their approved leave for the personal part of the trip.
- The UD does not incur any extra expenses beyond what it would typically incur had the trip occurred without any personal use, coupled with the trip.

### **Lodging Accommodations**

Reimbursable lodging expenses include the essential commercial lodging cost and any applicable sales taxes and/or hotel/motel taxes on that amount. A standard single-occupancy rate will be authorized, except when spouses are required to accompany UD personnel. A paid receipt for lodging must be submitted with any reimbursement claim.

### **Exceptions to Lodging Rates**

When meeting room facilities are necessary, and it is more economical for the employee to acquire special lodging accommodations, such as a suite rather than a single room, employees are authorized to reserve additional lodging beyond the standard single room.

Employees may elect to use their recreational vehicle instead of public lodging when it is beneficial to the UD. When using a recreational vehicle instead of commercial lodging, reimbursement is limited to the actual space rental cost for the employee's convenience. Rental or lease costs of the recreational vehicle will not be reimbursed.

## **50-Mile Rule**

Reimbursement for reasonable lodging expenses will be made when the travel destination is greater than 50 miles from the employee's official residence or station, whichever is closer. Under one of the following conditions, reimbursement for lodging expenses is allowed when the travel destination is located within fifty (50) miles (most direct route) of the closest of either the employee's official residence or official station:

- Overnight stays in a commercial lodging facility to avoid having an employee drive back and forth for back-to-back late-night/early-morning official UD business.
- Inclement weather and other situations that threaten the health and safety of UD personnel.
- When it can be demonstrated that staying overnight is more economical for the UD.

## **Travel Status**

An employee may be reimbursed for meal expenses after being in travel status for two hours beyond their regularly scheduled working hours on any given day. The two hours may occur before, after, or in combination before and after the employees' regularly scheduled working hours, 8 AM to 5 PM. Employees may not stop for a meal to meet the two-hour rule. Under IRS regulations, reimbursing a non-business-related meal to an employee who is not traveling overnight is a taxable fringe benefit.

## **Meal Expenses**

Generally, employees are expected to use moderation in their restaurant selections. For proper accounting and documentation, detailed meal receipts must be attached to the appropriate expense form (credit card or expense reimbursement form). If an officer or employee is filing a claim on behalf of others, they must prepare a detailed account that includes:

- Names of the others who traveled, partook of meals, or incurred expenses.
- Whether they were UD employees and, if not, who they were and their connection with UD business.
- A detailed breakdown of amounts. Alcohol expenditures will not be reimbursed.
- Some statements are sufficiently explicit to show what UD business was being carried out when the expenses were incurred.
- Where identifiable costs of meals are included in the lodging rate or registration fee of a meeting, conference, convention, or formal training session, meal costs will not be paid.

## **Tipping**

It is appropriate for employees to pay customary tips for services rendered. Meal tips are authorized for reimbursement at a reasonable and customary rate and should be recorded as part of the meal cost. Tips of a nominal amount are appropriate for taxi drivers, bellhops, and parking attendants. Other than for meals, all tips are to be accounted for as miscellaneous expenses. Receipts, if available, should be attached to the appropriate documentation.

## **Transportation Costs**

Reimbursable transportation costs include all necessary official UD business travel on railroads, airlines, ships, buses, private motor vehicles, and other usual means of conveyance. The starting and ending locations of official travel are closer to the employee's official residence or station.

## **Rental Vehicles**

UD officials or employees may rent a car upon arrival at a destination if the rental is expected to be less expensive than paying for a taxi and/or shuttle bus service. A vehicle in the economy rate category should be requested if a car rental is warranted. If four or more people travel together or transport bulky items, a full-size vehicle is appropriate. When rental cars are used, a copy of the rental contract must be submitted with a reimbursement request. The authorized business expense of rental vehicles may include the cost of rental, mileage, loss damage or collision damage waiver, and/or the price of gasoline, if applicable.

## **Private Vehicles**

UD officials and employees may use private vehicles. Drivers must have a valid operator's license and be insured according to the state's minimum liability standards. When private vehicles are used, UD officials or employees shall be reimbursed at the Internal Revenue Service-established rate. Point-to-point mileage may be determined based on the distances shown on the latest Department of Transportation official state highway maps or other mileage guides available on the Internet. Vicinity or local miles may be reimbursed based on actual odometer readings if such mileage is directly related to official UD business.

Reimbursement for using a privately owned vehicle is payable to only one employee when two or more employees travel in the same vehicle on the same trip. Suppose a private car is used instead of air transportation. In that case, the total amount of reimbursement shall not exceed the lowest cost airfare to and from the same destination, plus the necessary auto rental or airporter service at the destination.

Except for bus transit and building parking passes, transportation costs between the employee's residence and work are the employee's personal obligation and are not reimbursable by the UD. Working during hours or days the employee is not typically scheduled to work does not entitle the employee to reimbursement for transportation mileage expenses incurred between their residence and the station.

## **Air Travel**

Using the local airport is assumed to result in the least expensive travel costs. A "local airport" is the airport that offers regularly scheduled air service that is closest to the point from which travel begins. In most situations, it would be the airport nearest the employee's residence. The closest airport offering direct out-of-state flights may be considered the local airport for those destinations. The employee is required to provide documentation supporting a decision to use an airport other than the regional airport and may incur any additional costs that exceed the most economical costs.

Air travel arrangements will be coach class or equivalent. However, a class change may be authorized for business, first class, or equivalent under the following conditions:

- When time is of the essence, and no coach class or equivalent rate or space is available.
- When a unique circumstance exists, such as a physical condition, security requirements, or carry-on requirements, which can't be accommodated by coach class or equivalent travel.
- When traveling on international flights.

Travel awards, such as frequent-flyer miles and certificates for travel when bumped from a flight, will be considered a personal benefit to the employee. In no instance should the acquisition of such awards cause the UD to incur additional expenses or impact on an employee's work schedule.

## **Miscellaneous Transportation Expenses**

Reimbursement will be made for taxi, Uber, bus, toll, and parking fees incurred in connection with official UD business travel. These costs shall be reasonable, considering the official's or employee's travel schedules and other requirements. The price shall be substantiated by receipts whenever available. Other evidence/explanations will be considered when receipts under \$50 are unavailable.

## **Miscellaneous Reimbursable Travel Expenses**

Miscellaneous travel expenses that are reasonable and necessary to the transaction of official UD business are reimbursable to the employee. Reimbursable expenses include, but are not limited to:

- Taxi, shuttle, or limousine fares (including a customary tip or gratuity), motor vehicle rentals, parking fees, and ferry and bridge tolls.
- Registration fees for attendance at approved conventions, conferences, and meetings are required.

- Rental of a room in a hotel or other location used for conducting official UD business. The room rental is reimbursable as a separate item from lodging, provided it is authorized and documented.
- Charges for necessary express mail, internet service, etc.
- The cost of laundry and/or dry-cleaning, as evidenced by a receipt, for employees in continuous travel status for three (3) or more days. The use of a coin-operated laundromat is allowable.
- Lodging facilities charge mandatory fees for items such as room safes or exercise facilities.
- Hotel charges for telephone calls to the employee's place of work or office. Calls to family, friends, or others are reimbursable only if brief and reasonable.
- Travel agent fees associated with air travel.
- Foreign transaction fees on credit cards for approved transactions related to international travel.
- Required travel visa or passport fees associated with UD business travel.
- Other similar or approved expenses.

### **Non-Reimbursable Travel Expenses**

Personal travel expenses are not necessary for conducting official UD business. Employees will be held accountable for all personal travel-related costs and will promptly reimburse any inappropriate expenditures. Such non-reimbursable personal expenses include, but are not limited to:

- Personal entertainment expenses and other items of a similar nature.
- Taxi fares, motor vehicle rental, and other transportation costs to or from places of entertainment and other non-UD business locations.
- Costs of personal trip insurance (such as personal accident insurance, personal effects insurance, and extended liability insurance) and medical and hospital services.
- Any tips or gratuities associated with personal expenses.
- Out-of-pocket charges for vehicle service calls caused by the employee's negligence, such as service charges for the delivery of fuel, etc., and fines for parking or traffic violations.
- Unless required, no reimbursement will be made for additional costs incurred for the lodging or conference fees of spouses or others who may be accompanying the employee.
- Additional room charges that are not lodging, such as movies, hotel room refreshments, etc.
- Mileage if traveling as a passenger in a privately owned vehicle.
- Other similar or unapproved expenses include..

### **Reporting of Travel Expenses**

Employees shall be reimbursed for all actual, necessary, and reasonable expenses incurred on official UD business, subject to the requirements and restrictions of this policy and any applicable resolution or law. Claims for reimbursement of travel and business expenses over \$15.00, other than mileage, shall be accompanied by detailed receipts or other valid evidence of the expenditure.

### **Travel with Others**

If an officer or employee is filing a claim on behalf of others, they must prepare a detailed account that includes:

- Names of the others who traveled, partook in meals, or otherwise incurred expenses
- Whether they were UD employees and, if not, who they were and what connection they had with the business
- Who provided the lodging, meals, or other services in question, and the dates and times
- A detailed breakdown of amounts
- Some statement sufficiently explicit to show what district business was being carried out when the expenses were incurred

### **Local Business Meals - Meals Not in Travel Status**

Local business meals are acceptable if they directly benefit the UD business, are not for social purposes, and can be justified as supporting UD's development. Routine meals with consultants, agency members, or staff are not allowed. Employees should strive to minimize the frequency of local business meals and conduct business during regular business hours. However, the UD recognizes that achieving its mission and vision is built firmly on relationships and that local business meals are occasionally appropriate.

#### **Reimbursable Meals Expenses**

- Meals and tips at a customary rate for a meeting to conduct official UD business
- Meals that are an integral part of the business meeting or training

#### **Non-Reimbursable Meal Expenses**

- Meals taken by two or more employees without a clear business purpose
- Meals that ordinarily could be conducted during regular business hours
- Meals for anniversaries and receptions for new, existing, or retiring employees, unless approved by CEO
- Meals for election celebrations
- Unless pre-approved by the CEO for board- or stakeholder-related events, alcoholic beverage expenses will not be reimbursed.

#### **Documentation Required**

- Names of employees and, if not, who they were, and some statement sufficiently explicit to show what UD business was being carried out when the expenses were incurred.
- Detailed breakdown of amounts (attach itemized receipts)

#### **Light Refreshment**

The UD may serve coffee, water, light refreshments, or full meals at meetings when the purpose of the meeting is to conduct UD business or provide formal training that benefits the UD. This is not intended for the UD's daily business but rather for special situations. This may include board and committee meetings, community outreach events, and recognition of organizational or employee accomplishments. Employees should provide documentation for the request and approval of these expenditures. Documentation should include the names of the person(s) attending and the purpose of the meeting or spending.

## **VIII. ADDITIONAL EXHIBITS**

EXHIBIT 3 - UDDA/UDPDA Vendor Policy and Form

EXHIBIT 4 – Internal Bank Transfer Request Policy and Form

EXHIBIT 5 - Payment Request Form

EXHIBIT 6 – Sole Source Justification Form



## New Vendor Setup and Vendor Updates Policy

### 1. Purpose

To establish consistent, transparent, and compliant procedures for setting up new vendors and updating existing vendor information to ensure accuracy, accountability, and prevent fraud.

### 2. Scope

This policy applies to staff responsible for vendor setup, vendor information updates, and accounts payable processing.

### 3. Responsibilities

- Finance Staff (FS): Collect vendor documents, enter data, and maintain records.
- CEO: Final approval for new vendor setup and updates.

### 4. Procedure

#### A. New Vendor Setup and Verification

- Form sent to vendor.
- Completed form and ancillary documents submitted to FS along with W9.
- FS confirms vendor is not a duplicate in the accounting system.
- FS confirms Tax ID match.
- FS confirms vendor is not on exclusion or sanction list (if applicable to grants).
- Verified paperwork reviewed/approved by CEO.
- Vendor is entered into the accounting system after approval.
- Vendor forms and documents are stored in the vendor contract file (electronic and paper).

#### B. Updating Vendor Information

- Form sent to vendor.
- Completed form and ancillary documents submitted to FS along with W9. *Note: Bank account change requires both past and current bank account information.*
- FS confirms vendor is not a duplicate in the accounting system.
- Verified paperwork reviewed/approved by CEO.
- Updated information is entered into the accounting system after approval.
- Vendor forms and documents are stored in the vendor contract file (electronic and paper).

#### C. Internal Controls

- No single individual may approve and enter vendor changes.
- Vendor-related documents must be securely stored and accessible only to FS and the CEO.



## New Vendor and Existing Vendor Request Form

Instructions: Please complete this form if you are a new vendor or if there are any changes to your vendor information. Submit with supporting documentation to [ajones@spokaneudistrict.org](mailto:ajones@spokaneudistrict.org).

### Section 1: Vendor Information

Vendor Name Per W9:	
Tax ID / EIN Per W9:	

### Section 2: Update Type (check all that apply)

- New Vendor Add** (Please complete Contact Info and Banking Information)  
 **Existing Vendor Change** (Please complete Contact Info and Banking Information)

#### Contact Information – New or Revised

Vendor Name:	
Phone:	
Email:	
Address:	

#### Banking Information – New or Updated (*circle one, unless bank info has not changed*)

Bank Name:	
Account Number:	
Routing Number:	
<input type="checkbox"/> <b>Please Attach Voided Check or Bank Letter for Account</b>	

#### Banking Information - Previous (*only required if a revision to the existing bank account*)

Bank Name:	
Account Number:	
Routing Number:	

### Section 3: Vendor Authorization

I hereby certify that the information provided above is true and correct, and I authorize the UD to add/update information.

**Authorized Vendor Signature:**

**Name/Title:**

**Date:**

### Section 4: Internal Use Only

Verified By:

Date:

Approved By:

Date:



## Internal Bank Transfer Policy and Procedure

### Purpose

This policy establishes guidelines and procedures for initiating, approving, and documenting internal bank transfers to ensure accuracy, security, and accountability in the management of UDDA/UDPDA's financial resources.

### Scope

This policy applies to all employees and officers of the organization who initiate, review, and approve internal bank transfers between bank accounts.

### Policy

1. Authorization Levels
  - Transfers of \$50,000 and above require approval by the CEO.
  - All transfers must have a completed Internal Bank Transfer Request Form before processing.
2. Segregation of Duties
  - The staff member initiating the transfer request cannot be the same individual who approves it.
  - The Finance Department is responsible for maintaining all supporting documentation.
3. Documentation and Recordkeeping
  - Each transfer must be supported by a completed request form, approval signatures, and bank confirmation.
  - Records must be retained for at least 7 years in accordance with nonprofit financial recordkeeping requirements.
4. Monitoring and Reporting
  - Monthly reconciliations must include a review of internal bank transfers.

### Procedure

1. Request Initiation
  - Staff member completes the Internal Bank Transfer Request Form and submits it to the CEO.
2. Review & Approval
  - CEO signs off for final approval.
3. Processing Transfer
  - Finance staff processes the transfer using the organization's online banking system or by direct instruction to the bank.
  - Transfer confirmation/receipt is attached to the request form.
4. Filing & Reporting
  - Completed request forms with supporting documents are filed in the Finance Department.
  - Included in the monthly bank reconciliation and quarterly reporting.



## Internal Bank Transfer Request Form

### Section 1: Transfer Details

From Bank Account:

To Bank Account:

Transfer Amount: \$

Purpose of Transfer:

### Section 2: Prepared By

Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Title: \_\_\_\_\_ Date: \_\_\_\_\_

### Section 3: Approval(s)

CEO (Required for transfers \$50,000 and above)

Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### Section 4: Transfer Processing

Processed By (Finance Staff):

Date Processed:

*Please attach copy of bank transfer confirmation to this form*



## PAYMENT REQUEST FORM

Request Date: \_\_\_\_\_

Payee: \_\_\_\_\_

Payee is: (Please check one) Employee <input type="checkbox"/> Vendor <input type="checkbox"/> Contractor <input type="checkbox"/> Other <input type="checkbox"/>	Transaction Type Reimbursement <input type="checkbox"/> Stipend <input type="checkbox"/> Product <input type="checkbox"/> Other _____ Service <input type="checkbox"/> Refund <input type="checkbox"/>
---	--

<i>Please attached your receipt and/or invoice to this form</i>				
Item Description	Expense Category	Class (Funding Source)	Project (if applicable)	Amount
TOTAL			\$	-

Requested By: \_\_\_\_\_ Date: \_\_\_\_\_

Approved By: \_\_\_\_\_ Date: \_\_\_\_\_

# **University District Public Development Authority (UDPDA)**

## **Sole Source Justification Form**

**Procurement Need:**

**Contract Amount:**

- **Describe the unique features, qualifications, abilities, or expertise of the contractor proposed for this sole-source contract.**
- **What kind of research did the UDPDA conduct to conclude that alternative sources were inappropriate or unavailable?**
- **Provide a detailed and compelling description of the costs and risks mitigated by contracting with this contractor (i.e., learning curve, follow-up nature).**
- **Is the UDPDA proposing this sole-source contract because of exceptional circumstances such as confidential investigations, copyright restrictions, etc.? If so, please describe.**
- **Is the UDPDA proposing this sole-source contract because of unavoidable, critical time delays or issues that prevented the agency from completing this acquisition using a competitive process? If so, please describe.**
- **Is the UDPDA proposing this sole-source contract because of a geographic limitation? If the proposed contractor is the only source available in the geographical area, state the basis for this conclusion and the rationale for limiting the size of the geographical area selected.**
- **What are the consequences of not having this sole-source filing approved? Describe in detail the impact on the UD and the services it provides if this sole source filing is not approved.**
- **What considerations were given to providing opportunities in this contract for small businesses, including but not limited to unbundling the goods and/or services acquired?**



Date: February 11, 2026  
To: EAC  
Fr: Juliet Sinisterra  
Re: **UDDA HR Employee Manual Summary**

### **Introduction**

With the UDDA and UDPDA applying for more grants and those contractual grant relationships often requiring specific employment and fiscal policies and procedures to be in place, staff have been working on updated human resources-related documents to better meet compliance requirements. Also, in an increasingly competitive labor market, a more advantageous leave-and-benefits structure and more detailed processes around goal-setting/performance evaluation/compensation adjustment are included.

### **Document Review and Comments**

A draft of the employee manual was reviewed by Witherspoon Brajich McPhee PLLC's labor attorney, Kammi Smith, who provided critical guidance and language regarding Washington employment law. Also, two board members, Thomas Tellefson and Erin Williams-Hueter, reviewed the manual and provided valuable input and suggestions (see below).

#### *Tellefson*

- Medical Records - Mention compliance with *HIPAA* and *RCW 70.02* confidentiality requirements. Legal counsel deleted; *HIPAA* applies to healthcare providers and insurance companies.
- Unlimited Time Off – Clarify that Washington's paid sick leave law and *FMLA* statutory leave rights still apply. Consider a tiered approach. Incorporated a contiguous four-year *UPTO* milestone for full-time staff.
- Observed Holidays – Asked if UD holidays align with city, state, or federal holidays. They do except the week between Christmas and New Year's.
- Remote Work – Suggested a reimbursement clause (for cost of home internet, cell use) might be relevant. The UD does provide a cell stipend.

#### *Williams-Hueter*

- Appreciate that the ethics of the organization are reflected throughout the document: unlimited PTO, high ethical standards around conflicts of interest and gifts of gratitude, etc.
- Social Media Policy – Consider policy regarding employees' representation of the organization on their social media. Legal counsel added language.
- Domestic Violence Policy – Suggest considering a more robust domestic violence policy that may be guided by organizations like the [Domestic Violence Coalition](#). Legal counsel researching as laws change frequently.

### **Other Key Features**

Policies included for grant funders:

- Sexual Harassment and Discrimination
- Employee Ethics (COI, Whistleblower)
- Employee Safety and Security
- Information Technology (Cybersecurity)
- Change from accrued vacation leave and PTO to the Unlimited Paid Time Off (*UPTO*) model.
- Sabbatical leave is allowed for longer-term, full-time employees.



- One-time payout for accrued vacation leave after the board approves the manual.
- Christmas to New Year's week, the office is closed.
- Employee Annual Goal Setting Template (encourage skills training and enrichment).
- Employee Annual Performance Evaluation Template (summarizes accomplishments to inform compensation adjustments). Also added annual bonus guidelines.
- CEO Annual Performance Evaluation – Performance review and compensation adjustment processes developed with EAC input. Also added performance-based bonus guidelines.



UNIVERSITY  
DISTRICT

HUMAN RESOURCES  
**EMPLOYEE MANUAL**

*DRAFT UPDATED 2/11/2026  
EFFECTIVE TBD*



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This is a living document and will be reviewed and updated every two years or as needed.

Revision	Date	Change
1.0		Adopted by UDDA Board

## **SECTION 1: INTRODUCTION**

### **1.0 Mission**

The University District (UD) leverages its unique connectivity to foster shared community wellness and vibrancy by developing infrastructure and programming that enable it to serve as a globally recognized hub of education, innovation, research, and health care. See [www.spokaneudistrict.org](http://www.spokaneudistrict.org) for more information regarding the organization.

## **SECTION 2: GENERAL EMPLOYMENT POLICIES**

### **2.00 Employment Relationship**

The UD expects to continue the policies, procedures, and programs outlined in this employee manual but reserves the right to withdraw, revise, or replace any policies, procedures, or programs included in the manual at any time without prior notice to employees. The employee manual is not intended to be comprehensive or to address all possible applications or exceptions to the general policies and procedures included. The employee manual is not a contract of employment unless it is covered by a written individual contract or a collective bargaining agreement that states otherwise.

#### **Forms to Complete**

The following documents/information are required at the start of employment:

- Signed offer letter with position description attached;
- Completed I9 and chosen ID document(s);
- Completed W4;
- Emergency contact info;
- Direct deposit information and a copy of a voided check;
- Digital brief bio and photo for staff website page;
- Signed cell stipend agreement, if applicable;
- Signed medical, dental, LTD, and Simple IRA enrolment forms if applicable;
- Signed Confidentiality Policy document;
- Signed Conflict of Interest Policy document; and
- Signed Acknowledgment of Human Resources Employee Manual.

Additionally, new employees will be:

- connected to the UD's IT service provider for computer, email, scanning, printing, remote access, etc.
- provided office key/access code and supplies as needed;
- reimbursed for a parking pass and/or bus pass with appropriate documentation; and
- featured on the staff website, social media, and via press release as appropriate.

### **2.01 At-Will Employment**

Employment with the UD is "at-will", unless and except as specifically modified by a specific individual's written employment contract explicitly stating that the employment relationship is not at-will and signed by the CEO or board chair. At-will employment means an employee may terminate employment with or without notice, with or without cause. It also means that the UD can terminate the employment relationship at any time, with or without notice or reason.

Nothing in any UD policy or procedure should be construed to alter the at-will relationship or as a promise of permanent employment, employment for any time, termination only for cause, or a right to any corrective action, discipline, or termination procedure. At-will employment does not guarantee employment for any set

period. No one at the UD, except the CEO, may make any representation or promise of employment in a written, signed contract, other than an at-will arrangement.

While the UD generally adheres to the principles of corrective action and progressive discipline when possible and appropriate, it is not bound or obligated to do so. Any disciplinary action does not alter the at-will employment relationship.

Regarding at-will employment, there are standards about employee conduct. It is impossible to list all improper conduct; however, the following examples of policy violations will result in disciplinary action up to and including termination of employment. In each case, the appropriate disciplinary action will be determined by one or more of the following factors: the seriousness of the offense, the employee's overall employment record, the length of employment, and/or previous disciplinary actions. Using disciplinary actions does not alter an employee's at-will status with the UD.

- Not being ready to begin work at the start of the workday; not being prepared to resume work immediately following any lunch or break periods; leaving before the end of the workday without supervisory permission.
- Excessive absenteeism or tardiness as interpreted by WA State Initiative 1433.
- Failure to report an absence (*i.e.*, no-call, no-show) for two (2) consecutive days is considered voluntary termination of employment by the employee, absent extenuating circumstances.
- Inefficiency or poor work performance.
- Providing false information on any employment application, personnel record, or document, including absence, sickness, or production-related records.
- Dishonesty, cheating, theft, or misappropriation of property or money of the UD, member, or any employee.
- Negligent or wilful acts which result, or could result, in damage to UD property or equipment.
- Insubordination.
- Fighting or any other disorderly conduct; threatening, intimidating, or interfering with other employees; distracting other employees by unnecessary shouting or demonstrations; using obscene or abusive language to other employees, supervisors, management, members, or visitors.
- Immoral or indecent conduct reflecting adversely on the UD.
- Possessing weapons, ammunition, explosives, or firearms on UD property or representing the UD.
- Altering UD records or documents without UD authorization.
- Making or assisting another person in making a video or audio recording of any conversation between employees, management, or officers of the UD without first obtaining the express written consent of all parties to the conversation. This prohibition applies regardless of whether the individual making the recording is part of the conversation.
- Not permitting the UD to inspect an employee's work area, garments, handbag, shopping bag, locker, automobile, etc., on UD premises.
- Failing or refusing to cooperate fully with the UD's investigation of suspected business improprieties, poor quality of work, and misconduct.
- Providing false or misleading information in response to an investigation by the UD.
- Failing to complete or sign any UD notice, form, record, or document accurately.
- Using the UD's equipment for personal use without prior authorization from management.
- Smoking in designated "no smoking" areas near entrances, exits, windows, and air vents.
- Violation of any term of the Employee Manual or other stand-alone policies.

## **2.02 Equal Employment Opportunity (EEO)**

The UD maintains a policy of treating all employees and applicants for employment equally, based on their qualifications, abilities, experience, and other relevant employment standards. The UD hires, trains, promotes, and compensates employees without regard for race, color, religion, ancestry, national origin,

age, sex, sexual orientation, gender expression or identity, marital or veteran status, disabilities, or any other legally protected characteristic or status. It is the practice and policy of the UD to comply with all applicable federal, state, and local laws.

The UD's equal employment opportunity philosophy applies to all aspects of employment, including but not limited to recruitment, selection, compensation, training, transfer, discipline, termination, promotion, job benefits, educational assistance, and social and recreational activities.

Employees who feel they have been subjected to discriminatory treatment related to any employment practice should report the situation as soon as possible. The report should be made to the CEO, supervisor, or current Chair of the Board. The UD will review the circumstances of the incident, gather pertinent information, conduct an appropriate investigation if necessary, and, if applicable, develop a plan to protect the workplace from discriminatory treatment.

### **2.03 Employees with Disabilities**

The Americans with Disabilities Act (ADA) and the Washington Law Against Discrimination protect qualified individuals with physical or mental disabilities who can perform the essential functions of the job, with or without reasonable accommodation. The law also prohibits discrimination based on an individual's relationship or association (parent, sibling, child, spouse, etc.) to someone with a known disability.

The UD offers equal employment opportunities to qualified individuals with disabilities who can perform the essential functions of the job with or without reasonable accommodation. Reasonable accommodations are available to employees and applicants if they do not create undue hardship for the organization. Individuals protected by the law should discuss their need for possible accommodation with their immediate supervisor.

### **2.04 Recruitment and Selection**

The UD hires qualified employees to meet the job requirements and the organization's goals. The UD's hiring practices are designed to comply with all applicable local, state, and federal laws, thereby protecting the employment rights of current employees and ensuring they are free from discrimination.

The UD reserves the sole and exclusive right to recruit, promote, reassign, discipline, and terminate employees based on the need for work to be performed, the availability of revenues, effective performance, conduct, and the ability of employees to perform essential functions.

### **Authority**

The UD Board has the authority to hire the CEO. The CEO can hire all other UD positions or delegate that authority.

### **Promotion**

The UD is committed to providing promotional opportunities to employees who demonstrate exemplary job performance and self-motivation. To inform employees of internal job opportunities, postings will be placed on the UD website. Employees interested in being considered for positions for which they meet the minimum job qualifications should contact the UD for further information about the position. Positions posted are not necessarily reserved or held exclusively for the internal consideration of employees. The UD may concurrently advertise or otherwise recruit the best-qualified people in the appropriate labor market.

### **2.05 Job Descriptions**

The UD makes every effort to create and maintain accurate job descriptions for all positions. They will aid in orienting new employees to their jobs, identifying the requirements of each position, establishing hiring criteria, identifying training needs, setting standards for employee performance evaluations, and defining the

essential functions of each position. Job descriptions may be rewritten periodically to reflect changes in the position's duties and responsibilities.

### **2.06 Employment References**

The UD will provide a prospective employer calling for a reference with the employee's dates of employment, salary, and position title. The UD may also release factual information related to job performance after receiving an acceptable written release from the employee, directing the UD to release the information to a specific source.

Requests for job references will first be directed to the CEO, who will assign them to appropriate staff. These staff may fulfill the request and provide letters of recommendation only if the UD has received a written release signed by the employee authorizing the disclosure of information. This does not prevent anyone from giving personal references that do not officially represent the UD.

### **2.07 Hours of Work and Breaks**

Their direct supervisor will determine each employee's schedule. Employees are expected to work their scheduled shifts unless authorized by their direct supervisors or applicable law to do otherwise. The UD's core office hours are 8:00 a.m. to 5:00 p.m., Monday through Friday. Different schedules may be established based on the organization's needs and at the CEO's discretion.

Employees are entitled to a 10-minute paid break for every four hours worked. Employees are entitled to a 30-minute, unpaid, uninterrupted meal break for every five hours worked.

### **2.08 Alternative Work Arrangements**

Alternative work arrangements at the UD are *optional* work schedules that allow employees to choose from various work hours and schedules. By way of illustration, an alternative work arrangement may include the following:

- Flextime: Flextime allows employees to vary their starting and ending hours while requiring them to be present during some core hours. For example, 6:30 am to 3:30 pm or 9:00 am to 6:00 pm.
- Compressed work week: An employee would have 40 hours in fewer than five work days in a compressed work week. For example, 10 hours a day, 4 days a week.
- Part-time: Part-time work would involve working fewer hours (<30 hours weekly) regularly or on-call.
- Telecommuting: Working from a home workstation or another remote location.

Some alternative work arrangements may not be suitable for specific positions at the UD. The CEO must approve alternative work arrangements on a case-by-case basis. The employee must discuss alternative work arrangements with their supervisor and then submit a *written* request for approval. The supervisor will *approve or deny* the request on a case-by-case basis, considering staffing needs, the employee's job duties, work record, and their ability to temporarily or permanently return to a standard work schedule when needed. Alternative work arrangements may be suspended or canceled at any time.

This policy aims to provide UD employees with flexible work schedules throughout the year. The UD recognizes the importance of a work/life balance. By implementing this flexible work arrangement, the UD hopes to accomplish the following goals:

- Enhance retention and recruitment
- Improve scheduling for peak workloads
- Improve wellness
- Reduce tardiness and absenteeism
- Increase employee morale
- Improve employee performance

- Promote cross-training and teamwork, producing a more effective workforce
- Assist in meeting Washington’s Commute Trip Reduction goals
- Reduce carbon emissions by reducing employee commute trips

## **2.09 Separation from Employment**

All separations from employment with the UD will generally fall into one of the following categories: retirement, layoff, resignation, voluntary termination, or involuntary termination. In the absence of a specific written contract, employees may resign at any time and for any reason. The UD reserves the right to terminate employment at any time, with or without cause. Employees are encouraged to give written notice of their intent to resign or retire. Written notice should be sent to the employee’s supervisor as soon as possible, but no later than two weeks before the last day of employment.

### **Voluntary Termination**

If an employee voluntarily terminates their employment, they are encouraged to provide at least two weeks’ notice to their immediate supervisor and to state the reason for the resignation. Employees who fail to provide proper notice may not be considered eligible for rehire.

### **Involuntary Termination**

An employee may be involuntarily terminated from UD employment at any time, for any reason, or no reason, including as outlined in the discipline and corrective action policies, or for failure or refusal to perform job duties.

### **Layoff**

There may be times when it becomes necessary to lay off employees due to changing business conditions, reorganizations that result in the elimination or modification of a job, budgetary constraints, or changes in job functions or technology.

### **Exit Interviews**

Whenever possible, an exit interview will be scheduled when an employee leaves the UD. This allows all separating employees to address any unresolved issues and encourages them to voice opinions on improving the organization. All employees are encouraged to participate in an exit interview while still employed. The UD will discuss the continuation of medical and other insurance benefits, employment verification, final pay, and other information relating to leaving employment. The UD values all opinions and suggestions received in this process.

### **Return of UD-owned Property**

All UD property in an employee’s possession must be returned to the UD by the employee’s last day of employment. UD property includes written, graphic, or electronic proprietary information as defined in this Manual, such as keys, ID cards, credit cards, cell phones, tools, electronic data, laptop computers, software, vehicle decals, and any other items that belong to the UD.

## **2.10 Diversity**

The UD is committed to fostering, cultivating, and preserving a culture of diversity and inclusion. Our human capital is our most valuable asset. The collective sum of the individual differences, life experiences, unique capabilities, knowledge, skills, and talents that our employees bring to their work represents a significant part of our culture, our reputation, and UD’s achievements.

We embrace and encourage our employees’ differences in gender, age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

The UD's diversity initiatives are essential to the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs when possible.
- Employer and employee contributions to the communities we serve promote a greater understanding and respect for diversity.

All UD employees are always responsible for treating others with dignity and respect. All employees are expected to exhibit conduct that reflects inclusion at all times, including during work, at work functions on or off the work site, and at all other UD-sponsored and participatory events. Any employee found to have engaged in inappropriate conduct or behavior toward others in violation of this policy may be subject to disciplinary action. Employees who believe they have been subjected to discrimination that conflicts with the UD's policies or initiatives should seek assistance from a supervisor, manager, or the CEO.

### **2.11 Appearance and Dress**

Employees contribute to the feeling and reputation of the UD through how they present themselves. A professional appearance is crucial for making a favorable impression on customers and the public. Due to the diversity of our workforce and job-specific environmental conditions, it is often challenging to apply a uniform standard to all employees. The guidelines are simple. The standard the UD adheres to is appropriate attire in good taste for the particular work area.

### **2.12 Travel Policy**

Please see the *UDDA Fiscal Policies and Procedures Manual* for travel policy information.

### **2.13 Training Approval Process**

The UD believes that employee development is critical to its ongoing success. To assist employees, the UD may provide funds for training in the annual budget to encourage staff to participate in "outside" learning opportunities. UD management seeks to maximize training dollars for the organization by reviewing each training request. This process enables employees to request funds for training opportunities, subject to budget constraints and supervisor approval. Additionally, this process provides training dollars to be allocated across the organization as needed.

Training programs required by the UD are paid by the UD, including the employee's wages, travel, registration, and, if needed, out-of-area expenses directly related to the training. Training programs initiated by the employee and not required by the UD are considered voluntary and may or may not be paid by the UD. If a benefit to the UD can be demonstrated, the UD may cover training costs, but wages cannot be included.

### **2.14 Tobacco-Free Work Environment**

The UD is a tobacco- and marijuana-free work environment. This includes smokeless tobacco and vaping. Tobacco use is limited to designated areas outside the buildings. Employees may use tobacco during break periods and lunch periods in designated smoking areas. Employees may not use tobacco within 25 feet of entrances, exits, windows that open, and ventilation intakes of any UD buildings or other places of employment.

### **2.15 Release of Records**

Employee personnel files are confidential; however, the UD may receive requests for information from personnel records as part of court proceedings or government activities. Personnel files are public records exempt from public disclosure, except within the narrow exceptions outlined in Chapter 42.56 RCW. The UD

policy is to respond to all requests for disclosure of public records required by law. Except for documents and information required by law, information about an employee released to third parties during or after employment includes salary, date of hire, termination date, and position title. A signed authorization form from the employee is required before the UD will release any additional information regarding an employee's employment. The CEO will be responsible for releasing approved information.

### **2.16 Access to Employee Files**

The UD maintains personnel records for each employee. These records are treated confidentially, and their access is restricted to authorized persons only. Authorized persons are individuals who are in a direct line of supervision over the employee and the CEO. Employee personnel files are available for review upon request by the employee. Employees may review their personnel files at any mutually convenient time, provided they give reasonable notice of their request. Examination of personnel files will generally be limited to regular business hours.

The following forms, documents, and information shall be obtained and included in the personnel files and/or in electronic payroll records:

1. Employment Application (and resume, if applicable) and job description.
2. Applicant references.
3. Interview questions and notes.
4. Form W-4 Employee Federal Withholding Certificate.
5. Form I-9 Employment Eligibility Verification.
6. Copy of driver's license (or another acceptable alternative document).
7. Copy of Social Security card issued by the Social Security Administration.
8. Starting date and scheduled hours.
9. Job title and starting salary.
10. Authorization for direct deposit of paycheck, with a voided check or deposit slip.
11. Background check (if required).
12. Indicate if the employee is exempt or non-exempt.
13. Any documented changes to employment or pay authorized in writing by the CEO.

### **2.17 Change in Personal Information**

Employees are expected to keep their personal information up to date. Changes in any of the following items should be provided to the UD as soon as possible:

- Name and/or marital status
- Home address and/or telephone number
- Emergency contact
- Direct deposit information
- Retirement deduction %
- Health benefits coverage
- Number of dependents
- Military status

### **2.18 Medical Records**

To ensure compliance with applicable law, the UD maintains all employee medical records, if any, in a separate confidential file. Access to medical records will generally be limited to the employee and the CEO. It will not be provided to individuals unless there is a specific need for others to access this information or as required by law.

## **SECTION 3: EMPLOYEE LEAVE POLICIES**

### **3.01 Unlimited Paid Time Off (UPTO)**

The UD believes that employees should have opportunities to enjoy time away from work to help balance their personal lives. The UD utilizes an Unlimited PTO policy for that purpose. The policy offers significant flexibility to employees and rewards their productive use of work hours.

Under this policy, full-time employees with four years or more tenure are entitled to take approved time off, including vacation, personal leave, and/or any of the leave types specified in Section 10 of the Appendix. Employees with less than four years of tenure have a limit of 20 consecutive days of time off. Per RCW 49.46.210, Washington paid sick leave is still tracked separately and can't be denied for qualifying reasons. Likewise, the UPTO policy does not alter FMLA statutory leave rights.

#### **Eligibility and Requesting Time Off**

The policy applies to all current, full-time exempt employees and is effective as of March 1, 2026. Future full-time exempt employees are eligible for benefits upon hire.

UPTO for part-time (less than 30 hours per week) or temporary employees will be at the CEO's discretion on a case-by-case basis. Per Washington law, part-time employees accrue one hour of sick leave for every 40 hours worked.

Employees must request time off from the CEO as soon as possible, unless unforeseen circumstances arise. The CEO can approve or deny time-off requests based on the organization's needs and workload. The Administrator will maintain a UDPTO record for each employee.

#### **Team Coordination**

To ensure proper coverage and workload distribution, employees should coordinate with their team members when planning their time off. Employees should communicate their scheduled time off with their team and arrange coverage during their absence as needed.

#### **No Accrual and Lawful Carryover**

Since employees are encouraged to take time off when needed without limitations, the UD will no longer add/deduct leave time. However, Washington law requires a minimum of 40 hours of leave per full-time exempt employee to be carried over year to year. The UD will reflect this carryover on its balance sheet.

#### **Transition to UPTO Policy**

Before the first month of implementing the UPTO Policy, full-time employees with accrued vacation leave will receive a one-time payout of their entire vacation leave balance. Thereafter, vacation leave will not accrue; therefore, at employment separation, no vacation leave balances will be paid.

### **3.02 UD Observed Holidays**

The UD observes the following paid holidays and is officially closed on these days, also known as the "observed" days. All employees receive these holidays.

- New Year's Day (see below at the bottom of the listing)
- Martin Luther King Jr.'s Birthday
- President's Day
- Memorial Day
- Juneteenth
- Independence Day

- Labor Day
- Veterans Day
- Thanksgiving Day
- The day after Thanksgiving Day
- Christmas Eve Day through New Year's Day

An annual schedule will be provided to employees, outlining the observed holidays. Employees may not elect financial compensation instead of a holiday. If an exempt employee is asked to work on a holiday, an alternate day off will be allowed and taken within thirty (30) days of the holiday. If non-exempt employees are requested to work on a holiday, they will be paid at their overtime rate. If a holiday falls on a weekend, the holiday will be observed on the closest Friday or Monday.

## **SECTION 4: EMPLOYEE CONDUCT**

### **4.01 Attendance and Punctuality**

Regular attendance is essential to the smooth operation of the UD. To maintain a safe and productive work environment, the UD expects employees to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and the UD. It shows a lack of respect for fellow employees who must compensate for absences.

Employees who are unable to be at work on time are expected to contact their immediate supervisor promptly. If an employee is unable to contact their supervisor, they are expected to leave a phone message, text, or email. Absenteeism and/or tardiness may result in disciplinary action, up to and including termination of employment. Absent extenuating circumstances, failure to report to work for three consecutive days for which the employee is scheduled to work without receiving authorization will be considered a voluntary resignation due to job abandonment.

### **4.02 Discipline and Corrective Action**

It is the policy of the UD to take corrective action, when necessary, to address performance deficiencies or violations of policies or work rules. The purpose of corrective action is to rectify the situation and prevent it from recurring. Employees will be informed of any necessary corrective action as soon as reasonably possible after a performance or behavior issue is identified. The supervisor will discuss the situation with the employee, explaining the policy and the necessity of corrective action.

Although one or more corrective action measures may be taken in connection with a particular performance issue, no formal order or progression will be required. UD employees are employed “at-will” and may be terminated, or terminate their employment, at any time. Egregious conduct may result in immediate suspension or termination of employment without any opportunity for corrective action. Corrective action may include a range of measures, depending on the circumstances and severity of the specific situation. Corrective actions may be taken at the discretion of management and may include, but not be limited to, any of the following:

- Verbal counseling, which may be documented in the supervisor’s notes but will not be included in the employee’s personnel file.
- Written warning, which will be signed and placed in the employee’s personnel file.
- Suspension, which may be paid or unpaid and will be confirmed in writing, signed, and put in the employee’s personnel file.
- Final written warning, which will be signed and placed in the employee’s personnel file.
- Termination, which will be documented in the employee’s personnel file.

The corrective action process will not always start with verbal counseling or include every step. Consideration will be given to the seriousness of the offense and the individual's motivation to change their performance or behavior.

### **Employer Investigation**

Upon receiving a complaint of alleged discrimination, harassment, misconduct, or other policy violations, the UD will promptly investigate to determine relevant facts and circumstances. Complaints may be submitted anonymously; however, anonymous complaints may limit the UD’s ability to conduct a thorough investigation. While the UD cannot promise complete confidentiality due to the necessity of the inquiry, information about any complaint will be treated as confidentially as possible, consistent with a proper investigation and any necessary responsive action. This means confidential information will be shared only on a need-to-know basis.

Based on the investigation, the UD will take appropriate corrective action. In determining the proper action, the UD will consider all circumstances, including the nature of the complaint and the context in which the events occurred. Appropriate action may include counseling and/or discipline, up to and including termination of employment. Individuals who lodge good-faith complaints or who participate truthfully in a UD investigation will not be retaliated against.

### **Problem Resolution**

Any other employment-related concern or issue should be discussed first with the employee's immediate supervisor as soon as possible. If a satisfactory solution has not been reached after discussing the concern with the employee's immediate supervisor, or if the employee is not comfortable reporting it to their immediate supervisor, the employee may directly contact the next level of management or a member of the Board of Directors for assistance.

### **Appeal Process**

There may be valid reasons not to discuss a situation with an employee's immediate supervisor. Any employee who feels they have been unfairly treated or unjustly disciplined by their supervisor has the right to present the matter to their supervisor, the CEO, or the Board Chair for review and consideration. The official will review the issue and provide the employee with a written decision. If the employee is not satisfied with the decision of that official, the employee may present the matter in writing an alternate official for review and settlement. The decision of that official will be final.

### **4.03 Sexual Harassment and Discrimination Policy**

The UD is committed to providing a workplace that is free from all forms of discrimination, including sexual harassment. The UD's policy on sexual harassment is part of its overall efforts to provide a workplace free from discrimination, according to local, state, and federal laws prohibiting discrimination based on age, race, color, creed/religion, national origin, honorably discharged veteran and military status, marital status, disability, sexual orientation, gender identity, and sex, or any other characteristic that is protected by law. This policy is also part of UD's commitment to diversity and inclusion, as well as to a workplace free from harassment, disrespect, and divisiveness. Sexual harassment is prohibited by the Civil Rights Act of 1964, as amended in 1991, and the Washington State Law Against Discrimination.

### **Policy General Provisions**

This policy applies to all employees, applicants for employment, executives, managers, supervisors, interns, and volunteers (whether paid or unpaid), contractors, vendors, customers, and all persons conducting business with the UD, collectively referred to hereinafter as "employees."

- Sexual harassment will not be tolerated. Sexual harassment includes harassment based on sex (including pregnancy, related medical conditions, and breastfeeding), gender identity and expression, sexual orientation, or any other category protected by applicable local, state, or federal laws. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to corrective action, up to and including termination of employment.
- Sexual harassment is offensive, is a violation of our policies, can be unlawful, and may subject the UD and/or the offending employee to legal liability. Harassers may be individually liable. Employees who engage in sexual harassment, including executives, managers, and supervisors, will be subject to corrective action for such misconduct. Executives, managers, and supervisors will be subject to corrective action if they fail to take appropriate action upon learning of or observing harassment.
- The UD must conduct a prompt and thorough investigation that ensures due process for all parties whenever management receives a complaint about sexual harassment or otherwise becomes aware of possible sexual harassment occurring. The UD will keep the complaint and investigation confidential to the extent possible. When sexual harassment is found to have occurred, effective corrective action will be taken. All employees are required to cooperate with any internal investigation of sexual harassment.

- Harassing behavior does not necessarily need to be illegal harassment for the UD to take corrective action. The UD will strive to create a workplace free from disrespect, divisiveness, and inappropriate behavior. Therefore, behavior that could create a harassing environment, if it continues or escalates, will not be tolerated and may lead to corrective action.
- Retaliation is prohibited: The UD will not tolerate retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment.
- All employees will receive training on this policy.

### **Sexual Harassment Definition**

Sexual harassment is defined as unwelcome conduct of a sexual nature or conduct that is based on sex, when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment (this can happen even if the complaining party is not the intended target of the sexual harassment);
- Such conduct is made either explicitly or implicitly a term or condition of employment; or,
- Submission to or rejection of such conduct is used as the basis for employment decisions.

### Examples of Conduct that is Considered Prohibited Harassment

- Physical conduct, such as rape, attempted rape, sexual assault, attempted sexual assault, pinching, patting, kissing, hugging, grabbing, pressing, or intentionally brushing up against another employee's body, poking, or physical intimidation by impeding or blocking someone's movement or invading their space.
- Visual conduct: leering; making sexual gestures; displaying sexually suggestive objects, pictures, cartoons, posters, screen-savers, or websites.
- Verbal conduct: making or using sexually derogatory comments, epithets, slurs, and jokes; verbal abuse of a sexual nature; graphic verbal commentaries about an individual's body; sexually degrading words used to describe an individual; derogatory comments related to gender or stereotypical gender roles; subtle or noticeable pressure for unwelcome sexual activities; sexually suggestive or obscene letters, notes, emails texts, or invitations; conversations, comments or jokes about a person's sexuality or sexual experience; questions about a person's sexuality or sexual experiences.
- Asking a co-worker on a date multiple times if they decline the first request.
- Verbal abuse or joking concerning a person's gender characteristics, such as vocal pitch, facial hair, or the size or shape of a person's body, including remarks implying that a male is too feminine, or a woman is too masculine.
- Offering an employment benefit (such as a raise, bonus, promotion, assistance with one's career, or better working conditions) in exchange for sexual favors, or threatening an employment detriment (such as termination, demotion, worse working conditions, or disciplinary action) for an employee's failure to engage in sexual activity.
- Sending sexually related text messages, videos, or messages via social media.
- Physical or verbal abuse concerning an individual's actual sex or the perception of the individual's sex.
- Making or threatening retaliatory action after receiving a negative response to sexual advances.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity, or the status of being transgender, such as:
  - Interfering with, destroying, or damaging a person's workstation, tools, or equipment, or other interference with the individual's ability to perform the job;
  - Sabotaging an individual's work; and
  - Bullying, yelling, or name-calling.

- Degrading comments in the form of sex stereotyping, which occur when conduct or personality traits are considered inappropriate simply because they may not conform to other people’s ideas or perceptions about how individuals of a particular sex should act or look.
- Other actions not listed above could constitute sexual harassment and/or a violation of this policy and be subject to corrective action.

#### Location and Timing of Behavior

Sexual harassment is not limited to the physical workplace. It can occur during travel, at events sponsored by the UD, or via phone, email, text, or social media. Such behavior can also happen outside of scheduled work time. Employees who engage in sexually harassing conduct outside of the workplace or outside of work hours will be subject to corrective action.

#### **Employee Responsibilities**

- Each employee has the responsibility to refrain from sexual harassment in the workplace. The harassing employee will be subject to disciplinary action, up to and including termination.
- Any employee who believes they have been the target of sexual harassment or witnesses sexual harassment shall follow the UD’s Reporting Method to report the sexual harassment.
- An employee who believes that they have been the target of sexual harassment is encouraged to inform the harassing person that such conduct is unwelcome and offensive and must stop if they can safely do so. However, this step is not necessary for an investigation and corrective action to take place.
- Employees shall familiarize themselves with this Policy and the Reporting Method and attend any required sexual harassment training.

#### **The UD’s Responsibilities**

- The UD, including executives, managers, and supervisors, is ultimately responsible for maintaining a workplace free from sexual harassment.
- Executives, managers, and supervisors must take a harassment complaint or an observed incident of sexual harassment seriously and take prompt action. The parties should be separated to the extent possible, without any negative impact on the complaining party. A report should be made to a supervisor or the Board of Directors of the UD if the supervisor is the offending party. All management and supervisory personnel will cooperate with the investigation.
- Managers and supervisors are required to report all complaints that they receive or any harassment that they observe. This applies even when an employee reports behavior that constitutes sexual harassment to a manager or supervisor but does not wish to file a formal complaint, or when the complaining party changes their mind and retracts the complaint.
- Retaliation against those who report sexual harassment or who participate as a witness to a complaint will not be tolerated. If a supervisor or manager observes any retaliation or retaliatory harassment toward an employee, they must report it to UD. If an executive, supervisor, or manager engages in retaliation, they will be subject to corrective action.
- Executives, managers, and supervisors shall familiarize themselves with this Policy and the Reporting Methods and attend all sexual harassment training. Owners, executives, managers, and supervisors shall understand and recognize sexual harassment and provide employees with information and direction regarding the Policy and Reporting Procedures.

#### **Reporting Methods**

Reporting sexual harassment is everyone’s responsibility. The UD will not be able to prevent or correct sexual harassment unless it is aware of it.

- All employees should report any harassment or behaviors that violate this Policy. Anyone in an executive, managerial, or supervisory role can receive a complaint of harassment.

- If an employee feels that they are being sexually harassed in violation of this policy by another employee, owner, executive, manager, supervisor, or third party doing business with the UD, or witnesses sexual harassment, they are encouraged to contact the UD immediately

### **What is Not Retaliation**

An adverse employment action is not retaliatory merely because it occurs after the employee engages in protected activity. Employees remain subject to all job requirements and disciplinary rules after engaging in such activity. Changes in work duties, job site, or hours due to a legitimate business need are not retaliation.

### **Contacting Law Enforcement**

If the harassing conduct involves or attempts rape, assault, unwanted touching, or confinement, the conduct could be a crime. The victim of such conduct is encouraged to call 911 or the local police department. Unless criminal behavior also occurred against the UD, the UD will not contact law enforcement on the victim's behalf without the victim's permission. The decision to do so or not will be left to the victim.

### **4.04 Criminal Conviction of An Employee**

Reportable violations are described as a conviction of a felony, a criminal offense involving either dishonesty or breach of trust, a conviction of a misdemeanor for criminal activity involving drugs, criminal use of drugs, or criminal drug promotion. It is the employee's responsibility to report any convictions, as previously defined, to the designated UD official. An employee may be dismissed at the CEO's discretion for failure to report any of the above.

### **4.05 Drug and Alcohol-Free Workplace Policy**

In compliance with the Drug-Free Workplace Act of 1988, the UD has a longstanding commitment to providing a safe, quality-oriented, and productive work environment that is consistent with the community standards in which we operate. Alcohol and drug abuse pose a threat to the health and safety of UD employees and the security of our equipment and facilities.

The purpose of this policy is to outline the methods for maintaining a work environment free from the effects of alcohol/drug abuse or other substances that adversely affect the mind or body. To continue to fulfill our responsibility to provide reliable and safe service to our customers and a safe work environment for our employees, employees must be able to perform their duties safely and efficiently. For these reasons, UD is committed to the elimination of drug and/or alcohol use and abuse by UD employees in the workplace.

This policy outlines the practice and procedure designed to correct instances of identified alcohol and/or drug use in the workplace. This policy continues to apply to all employees and all applicants for employment at the UD. The UD is responsible for policy administration.

### **Employee Assistance and Drug-Free Awareness**

Illegal drug use and alcohol misuse have several adverse health and safety consequences. Information about those consequences and sources of help for drug/alcohol problems is available from the UD, the members of which have been trained to make referrals and assist employees with drug/alcohol problems.

UD will assist and support employees who *voluntarily* seek help for such problems before becoming subject to discipline and/or termination under this or other UD policies. Such employees may be allowed to take leaves of absence, referred to treatment providers, and/or otherwise accommodated as required by law. Such employees may be required to document their successful adherence to prescribed treatment and to undergo and pass follow-up tests if they have previously violated this policy.

Employees should report to work fit for duty and free of any effects of illegal drugs or alcohol. This policy does not prohibit employees from using and possessing prescribed medications in accordance with the law. Employees must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely and promptly disclose any work restrictions to their supervisor. Employees *should not*, however, disclose underlying medical conditions unless directed to do so by their medical provider.

### **Work Rules**

1. Whenever employees are working, operating any UD vehicle, present on UD premises, or conducting UD-related work off-site, they are prohibited from using, possessing, buying, selling, manufacturing, or dispensing any illegal drug defined under federal, state, or local law (to include marijuana), or any drug paraphernalia; being under the influence of alcohol or an illegal drug defined under federal, state or local law as described in this policy.
2. The presence of any detectable amount of any illegal drug or illegal controlled substance defined under federal, state, or local law in an employee's body system while performing UD business or while in a UD facility is prohibited.
3. UD will also not permit, under any circumstances, any employee to perform their duties while taking prescribed drugs that adversely affect the employee's ability to safely and effectively perform their job duties. Employees taking prescribed medication must carry it in a container labeled by a licensed pharmacist or be prepared to produce the label if asked.
4. Any illegal drugs defined under federal, state, or local law or drug paraphernalia will be turned over to the appropriate law enforcement agency and may result in criminal prosecution.
5. An exception may be made should the UD host events where alcohol is served on or off UD property.

### **Required Testing: Pre-employment**

All applicants offered employment at UD may be asked to pass a drug test before beginning work. Refusal to submit to testing will result in disqualification from further consideration for employment.

### **Reasonable Suspicion**

Employees are subject to drug/alcohol testing based upon (but not limited to) observations by the supervision of events, evidence, or conduct that give rise to reasonable suspicion of workplace use, possession, or impairment. UD shall be consulted before sending an employee for testing. All levels of supervision making this decision must utilize the "Observation Checklist" to document specific observations and behaviors that create a reasonable suspicion that the person is under the influence of illegal drugs and/or alcohol. Suppose the results of the "Observation Checklist" indicate further action is justified. In that case, the manager/supervisor should confront the employee with the documentation and with a union representative present (for all unionized employees) and/or with the UD (for all non-unionized employees). *Under no circumstances will the employee be allowed to drive themselves to the testing facility. A member of supervision or management, and a union representative (if applicable), must escort the employee; the supervisor or manager will make arrangements for the employee to be transported home.*

### **Post-accident**

Employees are subject to drug/alcohol testing when they cause or contribute to accidents that damage property in excess of \$1,000 and/or result in an injury to themselves or another person requiring off-site medical attention. The investigation and subsequent testing must take place within two (2) hours following the accident, if not sooner. *Under no circumstances will the employee be allowed to drive themselves to the testing facility.*

### **Reasonable Suspicion and/or Post-Accident Testing Protocol**

- The employee will be advised that UD reasonably suspects that they are under the influence of illegal drugs or alcohol (or, due to the nature of the accident, the policy mandates this) and that this test is being offered to confirm or deny this suspicion.

- The employee will be transported to any one of the testing facilities. One member of management will accompany the employee. *Under no circumstances will the employee be allowed to drive themselves to the testing facility.*
- Before leaving for the testing facility, UD management will contact the testing facility to inform them that staff from UD will be arriving and will need a drug and/or alcohol test completed.
- The UD will provide water for the employee to drink before leaving the UD and a reasonable time, not to exceed 15 minutes, to secure a photo ID in the UD of a UD representative.
- The employee to be tested MUST present a photo ID (i.e., a driver's license or state ID card) to the testing facility staff before the specimen can be obtained. Ensure that the employee brings this with them when leaving UD premises.
- The employee to be tested must sign a consent form provided by/the testing facility. Refusal to sign is addressed under the "Consequences" section of this policy.
- UD representative must sign as a witness to the collection procedure, along with the tested employee.
- If test results are immediate and indicate that the employee is not under the influence of any alcohol or illegal drug as defined under local, state, or federal law, the employee will be returned to work.

## **CONSEQUENCES**

Applicants who refuse to cooperate in a drug test or who test positive for a prohibited substance will not be hired and will not be allowed to reapply/retest for one year. Employees who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture, or dispense an illegal drug in violation of this policy will be terminated. *If the employee refuses to be tested, yet is believed to be impaired,* they will be encouraged to accept a ride home, either by cab or with UD personnel. The first time an employee tests positive for alcohol or illegal drug use under this policy, the result will be discipline up to and including discharge.

Employees will be paid for time spent in alcohol/drug testing and then suspended pending the results of the drug/alcohol test. After the test results are received, a date and time will be scheduled to discuss the results. This meeting will include a member of UD management or supervision and a union representative (if applicable and requested). Should the results prove to be negative, the employee will receive back pay for the time or days of suspension.

Employees who have tested positive or otherwise violated this policy are subject to discipline, up to and including discharge. Depending upon the circumstances and the employee's work history/record, the UD may offer an employee who violates this policy or tests positive the opportunity to return to work on a last-chance basis according to mutually agreeable terms, which could include follow-up drug testing at times and frequencies determined by the UD for a minimum of one (1) year as well as a waiver of the right to contest any termination resulting from a subsequent positive test. If the employee either fails to complete their rehabilitation program or tests positive after finishing it, they will be subject to immediate discharge from employment.

## **Confidentiality**

Information and records relating to positive test results, drug and alcohol dependencies, and legitimate medical explanations provided to the medical review officer shall be kept confidential to the extent required by law and maintained in secure files separate from regular personnel files. Such records and information may be disclosed among managers and supervisors on a need-to-know basis. They may also be disclosed, where relevant, in a grievance, charge, claim, or other legal proceeding initiated by or on behalf of an employee or applicant.

## **Inspections**

The UD reserves the right to inspect all portions of its premises for drugs, alcohol, or other prohibited substances. Affected employees (where applicable) may have union representation involved in this process. All employees, contract employees, and visitors may be asked to cooperate with inspections of their

persons, work areas, and property to detect drugs, alcohol, or other contraband. Employees who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline, up to and including discharge.

### **Crimes Involving Drugs**

The UD does not desire to intrude into the private lives of its employees but recognizes that employees' off-the-job involvement with drugs and alcohol may have an impact on the workplace. Therefore, the UD reserves the right to take appropriate disciplinary action for drug usage/sale/distribution while off UD premises. **All employees who are convicted of, plead guilty to, or are sentenced for a crime involving an illegal drug are required to report the conviction, plea, or sentence to the UD within five days. Failure to comply will result in automatic discharge.** Cooperation in complying may result in suspension without pay, allowing management to review the nature of the charges and the employee's record with UD.

### **Definitions**

- **“UD Premises”** includes, but is not limited to, all buildings, offices, facilities, grounds, parking lots, lockers, places, and vehicles owned, leased, or managed by UD or on any site on which UD is conducting business.
- **“Illegal Drug”** means a substance whose use or possession is controlled by federal law but that is not being used or possessed under the supervision of a licensed health care professional. (Controlled substances are listed in Schedules I-V of 21 C.F.R. Part 1308.)
- **“Refuse to Cooperate”** means to obstruct the collection or testing process; to submit an altered, adulterated, or substitute sample; to fail to show up for a scheduled test; to refuse to complete the requested drug testing forms; or fail to promptly provide a specimen(s) for testing when directed to do so, without a valid medical basis for the failure. Employees who leave the scene of an accident without a justifiable explanation before submission to drug and alcohol testing will also be considered to have refused to cooperate and will automatically be subject to discharge.
- **“Under the Influence of Alcohol”** means an alcohol concentration equal to or greater than .04, or actions, appearance, speech, or bodily odors that reasonably cause a supervisor to conclude that an employee is impaired because of alcohol use.
- **“Under the Influence of Drugs”** means a confirmed positive test result for illegal drug use per this policy. In addition, it means the misuse of legal drugs (prescription and possibly over the counter) where there is not a valid prescription from a physician for the lawful use of a drug during medical treatment (containers must include the patient's name, the name of the substance, quantity/amount to be taken, and the period of authorization).

## SECTION 5: EMPLOYEE ETHICS POLICIES

### 5.01 Business Ethics and Conduct

The UD believes that policies and procedures are essential for the orderly operation of our business and for ensuring the fair treatment of all employees. Employees are expected to behave and perform according to the following values:

**Integrity:** Always doing the right thing.

**Professionalism:** Doing our work efficiently and responsibly.

**Respect:** Showing consideration and value for all with whom we come in contact.

**Partnership:** Working cooperatively with others toward a common goal.

**Achievement:** Creating results that meet or exceed our corporate goals.

The successful business operation and reputation of the UD are built upon the principles of fair dealing and the ethical conduct of our employees. Our reputation for integrity and excellence requires the careful observance of the spirit and letter of all applicable laws and regulations, as well as a commitment to the highest standards of conduct and personal integrity.

The continued success of the UD depends on our community's trust, and we are dedicated to preserving it. Employees owe a duty to the UD, its employees, and the general public to act in a manner that merits continued trust and confidence in these groups. The impressions of the UD depend, to a large degree, on how employees interact with the public. Employees are, therefore, expected to serve as ambassadors to the community by openly and actively supporting the UD's goals and business practices. Employees are expected to provide good customer service by communicating and acting in ways that promote customer confidence and goodwill.

The UD will comply with all applicable laws and regulations, and it expects its employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct. Compliance with this policy of business ethics and conduct is the responsibility of every UD employee.

### 5.02 Conflicts of Interest

#### Personal or Financial Benefit

Employees may not solicit, obtain, accept, or retain any personal benefit from any supplier, vendor, customer/client, or any individual or organization doing or seeking business with the UD. No employee may maintain an outside company or financial interest or engage in any outside business or economic activity that conflicts with the interests of the UD or interferes with the employee's ability to perform job responsibilities fully. Employees are required to sign a Conflict of Interest Policy document at hire.

A potential or perceived conflict of interest may arise when an employee receives personal gain due to their position with the UD. An actual conflict of interest may occur when an employee or a member of their immediate family receives personal gain from the employee's position at the UD. Traditionally, potential, perceived, or actual conflicts of interest are considerations for employees who hold a position with sufficient discretionary authority to influence decision-making at the UD. However, the conflict may exist for all employees regardless of their position within the UD. In the event of an actual, perceived, or potential conflict of interest, such relationship(s) must be disclosed to the employee's supervisor for purposes of analysis and recommendation. It is not the UD's intent to unfairly restrict an employee's outside activities or relationships; however, direct conflicts of interest must be avoided. Employees will be required to sign the same Conflict of Interest and Confidentiality policies that board members must sign.

#### Additional Guidelines

The purpose of these guidelines is to provide both general and specific guidance to all UD employees on avoiding actual, potential, or perceived conflicts of interest. The Code of Ethics for Municipal Officers – Contract

Interests (Chapter 42.23 RCW) sets forth the legal standard for actual conflicts of interest. All employees are encouraged to become familiar with these statutes.

In addition to assisting employees in avoiding “potential” or “perceived” conflicts of interest, the following policies are adopted regarding all UD employees:

- If employees, spouses, and dependent children of those employees have an ownership interest in a business, that business is prohibited from providing supplies and/or services directly to the UD, except as provided by law.
- Publicly-traded companies are excluded as long as the employee owns less than a 1% share.
- Employees, their spouses, and dependent children may purchase goods and services from vendors or service suppliers that also provide goods and services to the UD if those goods and services are obtained at customary and usual fees. The UD may require that the purchase terms and conditions be fully disclosed. Employees should therefore be careful to document such purchases in case a question arises about customary charges.
- Those UD employees who have direct supervision or control or make recommendations concerning a vendor or tenant shall be governed by this policy regarding the vendors or tenants for which they have direct supervision or control. These UD employees may purchase goods or services from the vendor or tenant for which they have direct supervision or control, or for whom they make recommendations. However, those purchases must be at customary and usual fees. The UD may require that the purchase terms and conditions be fully disclosed in a statement signed by all parties.

### **5.03 Nepotism (Employment of Relatives)**

The employment of close relatives and cohabitants within the same area/department of an organization may lead to serious conflicts, including potential issues with favoritism, performance evaluations, and employee morale. To reduce the likelihood of such issues, relatives and/or cohabitants of UD employees and/or the UD Board will be prohibited from:

- Working with each other within the same department and/or within the same functional area where one might exercise authority or practical power to supervise, appoint, remove, or discipline the other;
- Auditing the work of the other;
- Holding positions that create an actual or reasonably foreseeable conflict of interest between the UD’s interests and their own; or
- Holding a position where one party handles confidential material or information that creates improper or inappropriate access to that confidential material or information by the other party.

### **Relationships Established During Employment**

Suppose a close relative or cohabitation relationship is established between employees during employment with the UD. In that case, it is the responsibility and obligation of the individuals involved in the relationship to disclose the relationship to management. The individuals concerned will be allowed to decide who is to be transferred to a vacant, available position. If no alternate position is available, and/or no adequate accommodation, as determined by the CEO, can be made to eliminate the problem, or if the transfer decision is not made by the individuals involved within thirty (30) days, management, in its sole discretion, will decide to terminate one of the parties.

In other cases, where an actual or reasonably foreseeable conflict arises from a familial or cohabitation relationship between employees, even if there is no line of authority or reporting involved, the employees may be separated by reassignment or terminated from employment.

### **Definitions**

“Relative” is defined as parent, spouse, child, grandchild, sibling, grandparent, step-parent, step-child, step-sibling, aunt, uncle, niece, nephew, corresponding in-laws, and registered domestic partners. “Cohabitants” are defined as individuals, whether or not they are otherwise related, who live in the same household as friends,

roommates, or significant others. This policy applies to all employees, regardless of their marital status, gender, or sexual orientation.

#### **5.04 Confidential and Proprietary Information**

The UD has developed or has access to proprietary information and processes that are unique to the UD and its stakeholders. All such information is the property of the UD. Keeping such information confidential is an integral part of our success. The UD protects proprietary information by restricting dissemination on a "need to know" basis and in accordance with applicable state laws governing requests for inspection or copying of UD public records. The release or use of proprietary information is strictly prohibited and may result in disciplinary action, up to and including termination of employment. Employees are required to sign a Confidentiality Policy document upon hire.

#### **5.05 Outside Employment**

While employed at the UD, employees may not engage in outside employment that conflicts with the nature of the UD's business, that may be reasonably perceived by members of the public as a conflict of interest or otherwise discredits public service, with a competitor of the UD, with a business that conducts business with the UD, involves the use of UD resources, or otherwise interferes with one's ability to perform according to established standards of performance and work rules without express permission from their supervisor. Employees may not conduct business connected to outside employment during work hours at the UD. Employees must disclose all outside employment to the CEO.

#### **5.06 Whistleblower Protection**

Whistleblower reports may be filed at: <https://www.sao.wa.gov/EN/Investigations/Whistleblower/Pages/Whistleblower.aspx>

It is the policy of the UD (1) to encourage reporting by its employees of improper governmental actions taken by UD officers or employees, and (2) to protect UD employees who have reported improper governmental actions by the UD's policies and procedures.

#### **Definitions**

As used in this policy, the following terms shall have the meanings indicated:

- **“Improper governmental action”** means any action by a UD official or employee that is undertaken in the performance of the officer's or employee's official duties, whether or not the action is within the scope of the employee's employment; and is in violation of any federal, state, or local law or rule, (ii) is an abuse of authority, (iii) is of substantial and specific danger to the public health or safety, or (iv) is a gross waste of public funds.

“Improper governmental action” does not include personnel actions, including employee grievances, complaints, appointments, promotions, transfers, assignments, reassignments, reinstatements, restorations, reemployment, performance evaluations, reductions in pay, dismissals, suspensions, demotions, violations of collective bargaining or civil service laws, alleged violations of labor agreements, or reprimands.

- **“Retaliatory action”** means any of the following actions taken as a result of an employee reporting improper governmental action: Any adverse change in a UD employee's employment status, or the terms and conditions of employment including denial of adequate staff to perform duties, frequent staff changes, frequent and undesirable office changes, refusal to assign meaningful work, unwarranted and unsubstantial letters of reprimand, or unsatisfactory performance evaluations, demotion, transfer, reassignment, reduction in pay, denial or promotion, suspension, dismissal, or any other disciplinary action; or

Hostile actions by another employee towards a UD employee that were encouraged by a supervisor, senior manager, or official.

- **Emergency** means a circumstance that, if not immediately changed, may cause damage to a person or property.

### **Procedures for Reporting**

UD employees who become aware of improper governmental actions should raise the issue first with their immediate supervisor. If requested by the supervisor, the employee shall submit a written report to the supervisor or to a person designated by the supervisor, stating in detail the basis for the employee's belief that an improper governmental action has occurred. Where the employee reasonably believes the improper governmental action involves their immediate supervisor, the employee may raise the issue directly with the CEO or a member of the Board. In the event of an emergency in which the employee believes that damage to persons or property may occur if action is not taken immediately, the employee may report the improper governmental action directly to the appropriate governmental agency responsible for investigating it.

The supervisor or the CEO shall take immediate action to confirm that the UD will promptly and properly investigate the report of improper governmental action. UD officers and employees involved in the investigation shall maintain the confidentiality of reporting employees to the extent permitted by law, unless the employee authorizes the disclosure of their identity in writing. After an investigation has been completed, the employee reporting the improper governmental action shall be advised of a summary of the investigation's results within thirty (30) days, except that personnel actions taken as a result of the investigation may be kept confidential.

Suppose a UD employee reasonably believes that the UD did not undertake an adequate investigation to determine whether an improper governmental action occurred, or that the UD has taken insufficient action to address the improper governmental action, or that, for other reasons, the improper governmental action is likely to recur. In that case, the employee may report information about improper governmental action directly to the appropriate government agency responsible for investigating it.

UD employees who fail to make a good-faith attempt to follow the UD's procedures for reporting improper governmental action shall not receive the protections provided by those procedures. Reporting a misunderstanding or an employee's misconduct (or failure to perform their job duties) is not grounds for whistleblower protection. Nothing in this section limits the UD's ability and discretion to discipline an employee for their misconduct.

### **Protection Against Retaliatory Actions**

UD officials and employees are prohibited from taking retaliatory action against a UD employee who, in good faith, reports an improper governmental action under these policies and procedures. Employees who believe they have been retaliated against for reporting an improper governmental action should advise their supervisor or the CEO. UD officials and supervisors shall take appropriate action to investigate and address complaints of retaliation. If the employee's supervisor or the CEO does not satisfactorily resolve an employee's complaint that he or she has been retaliated against in violation of this policy, the UD employee may obtain protection under this policy and, according to state law, by providing written notice to the UD commission that:

- Specifies the alleged retaliatory action; and
- Specifies the relief requested.

UD employees shall provide a copy of their written charge to the UD CEO (or, if the charge relates to the CEO, to the board chair) no later than thirty (30) days after the occurrence of the alleged retaliatory action. The UD shall respond within thirty (30) days to the charge of retaliatory action. After receiving either the UD's response or thirty (30) days after delivery of the charge to the UD, the UD employee may request a hearing

before a state administrative law judge to establish that a retaliatory action occurred and to obtain the appropriate relief provided by law.

An employee seeking a hearing should deliver the request for a hearing to the UD CEO (or board chair) within the earlier of either fifteen (15) days of delivery of the UD's response to the charge of retaliatory action, or forty-five (45) days of delivery of the charge of retaliation to the UD for a response. Upon receipt of a request for a hearing, the UD shall apply to the State Office of Administrative Hearings within five (5) working days for an adjudicative proceeding before an administrative law judge.

Office of Administrative Hearings  
P.O. Box 42488  
2420 Bristol Court SW, Olympia, WA 98502  
(360) 664-8717, (800) 558-4857 toll-free

Relief that may be granted to the UD employee by the administrative law judge consists of reinstatement, with or without back pay, and such injunctive relief as may be found to be necessary to return the employee to the position they held before the retaliatory action and to prevent any recurrence of retaliatory action.

Suppose a determination is made that the retaliatory action has been taken against the employee. In that case, the administrative law judge may impose a civil penalty personally upon the retaliator, up to three thousand (\$3,000) dollars, payable by each person found to have retaliated against the UD employee. The UD will consider any recommendation by the administrative law judge that the retaliator be suspended, with or without pay, or dismissed.

### **Responsibilities**

The CEO is responsible for implementing the UD's policies and procedures (1) for reporting improper governmental actions and (2) for protecting employees against retaliatory actions. This includes ensuring that this policy and these procedures (1) are permanently posted where all employees will have reasonable access to them, (2) are made available to any employee upon request, and (3) are provided to all newly hired employees. Officers, managers, and supervisors are responsible for ensuring the procedures are fully implemented within their areas of responsibility. Violations of this policy and these procedures may result in appropriate disciplinary action, up to and including dismissal.

### **5.07 Political Contributions and Activities**

The UD respects and encourages independent employee participation in political activities. However, employees are prohibited from engaging in political activities on behalf of or as representatives of the UD, on UD time and/or on UD property.

Employees may not solicit contributions or campaign for an individual or ballot issue on UD property, nor may they, by their words or actions, imply the UD's support for any campaign or ballot issue. Employees who wear UD uniforms or are assigned to deal with the public generally as representatives of UD may not display campaign buttons on their uniforms or while representing UD. Employees may not place campaign signs, stickers, or other political statements on the UD's vehicles or in their work areas. Employees shall not be penalized in any way for refusing to make any political contribution.

### **5.08 Gratuities**

An employee may not accept gifts (see exceptions) with an aggregate value over fifty dollars (\$50) from a single or multiple source(s) in a calendar year. The following items are presumed not to influence an employee's action and may be accepted without regard to the \$50 limit.

- Unsolicited flowers, plants, or floral arrangements
- Unsolicited advertising or promotional items of nominal value, such as pens and notepads
- Unsolicited tokens or awards in the form of a plaque, trophy, desk items, or similar items

- Food and beverages consumed at hosted events where attendance is related to the employee's official duties
- Food and beverages set out in common areas or employee break rooms, not taken home by individuals
- Admission to, and the cost of food and beverages consumed at, events sponsored by or in conjunction with a civic, charitable, governmental, or community organization
- Unsolicited gifts from dignitaries from another state or a foreign country, when approved by the CEO. The gift becomes the property of the UD, not the employee.

No employee is permitted to accept a gift from any party that is currently engaged in negotiations related to any UD business transaction. If the UD receives an unsolicited gift, it will be donated to a community charity immediately. The person receiving the gift is responsible for mailing a thank-you note to the giver, announcing that the UD cannot accept the gift and it has been donated to a charity on behalf of the giver.

### **5.09 Misrepresentation**

Employees should always consider how to represent the UD in all business transactions and interactions. Employees must be careful not to misrepresent UD policies, practices, procedures, or prices, or misrepresent their status and authority to enter into agreements. Intentional, willfully negligent, or reckless misrepresentation may result in employee discipline or termination. Employees must also refrain from using the organization's name, likeness, facilities, assets, or other resources, and/or the authority of their position with the UD for personal gain or private interests.

### **5.10 Solicitations**

Individuals who are not employed at the UD and are not approved vendors are prohibited from distributing literature of any kind or soliciting employees for any purpose at any time on the UD property. Employees are not permitted to solicit other employees for any purpose during working time or to distribute literature of any kind at any time in work areas.

## SECTION 6: EMPLOYEE SAFETY AND SECURITY POLICIES

### 6.01 Workplace Safety and Accident Prevention

The UD's commitment to the safety and well-being of all employees and visitors is a prime concern. The UD demonstrates its commitment to risk control and accident prevention by complying with the following responsibilities:

- All levels of management have primary responsibility for the safety and well-being of employees. This responsibility is fulfilled by continuously promoting and implementing safe work practices across all operations, as well as maintaining property and equipment in safe operating condition.
- No person will be instructed or allowed to work in a manner that may endanger themselves or those around them.
- Safety will be a prime factor in considering new equipment purchases.

### Workplace Accidents and Injuries

The Washington Industrial Safety and Health Act (WISHA) requires the UD to maintain records of all occupational illnesses and injuries that occur on UD property or while conducting UD business. WISHA also requires that employees report any on-the-job illness or injury, regardless of its severity. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

In the event of a workplace injury, incident, collision, or near-miss accident, no matter how minor it may seem, the injured employee and/or employee witness must report the event to his/her supervisor immediately. Employees must complete an injury/incident report and forward it to their supervisor and UD.

If an injury requires medical attention, the injured employee must inform the attending healthcare provider that the injury is work-related. The physician will then complete the necessary Labor and Industries form, which will be forwarded to the UD for further processing.

Whenever emergencies occur, all necessary efforts should be made to protect human life, followed by property, without endangering employees or the general public. As soon as possible after the emergency measures have been taken, the employee in charge is to complete an incident report and notify his/her immediate supervisor with the most complete details available concerning the incident. Incident reports shall be forwarded to the Administrator and the CEO for processing insurance claims and filing purposes.

### 6.02 Violence Prevention in the Workplace

The UD has a "zero tolerance" policy for any actions or statements that threaten its employees. This includes verbal and physical harassment, verbal and physical threats, confrontations, and any actions that cause others to feel unsafe in the workplace. As part of this policy, employees are prohibited from bringing **any** weapons to UD premises or UD events. The UD, as proprietor of the property, reserves the right to inspect, with or without notice, the automobiles, packages, and/or other items that come onto the UD premises. The UD shall not, however, search for any property without a reasonable suspicion that weapons or explosive devices are contained in the personal property searched. The UD reserves the right to inspect all UD property with or without notice, as well as any or all third-party property moving through the UD on a commercial basis.

Employees are encouraged to raise workplace safety concerns with their immediate supervisor. If the supervisor is unavailable, the complaint remains unresolved after speaking with the supervisor, or the employee does not feel they can discuss the complaint with their supervisor, the employee may submit a complaint to other appropriate managers or directors, including the CEO. Each employee should also notify the relevant supervisor, director, or CEO if a third party unrelated to the UD threatens him/her. The goal of this policy is to achieve zero incidents that threaten the safety and well-being of UD's workforce. All employees are urged to deal with the issues of workplace violence responsibly and professionally.

### **6.03 Inclement Weather**

During inclement weather, a reasonable effort should be made to report to work safely. If an employee is unable to get to work safely due to extreme weather conditions, they should notify their supervisor as soon as possible and work remotely. When weather conditions improve, every effort should be made to report to work. If necessary, management will notify employees if the UD will be closed.

### **6.04 Workers' Compensation Insurance**

All injuries occurring on the job must be reported to the CEO immediately. An injury or incident report will be completed by the employee and their supervisor as soon as possible. The UD will pay for an employee injured on the job through the end of that workday. The employee may take leave for any unpaid waiting period from the Washington State Department of Labor & Industries. Any further benefits for a work-related injury or illness will be through the Washington State Department of Labor and Industries. The UD and its employees share the cost of L&I insurance. The UD and its industrial insurance carrier shall not be responsible for the payment of industrial insurance benefits for any injury that arises out of an employee's voluntary participation in any off-duty recreational, social, or athletic activity, or any injury or illness that is not part of the employee's work-related duties.

## **SECTION 7: INFORMATION TECHNOLOGY POLICIES**

### **7.01 Technology and Cyber Security Policy: Introduction and Purpose**

The Technology and Cyber Security Policy is a formal set of rules governing the use of UD technology and information assets by those granted access. This policy informs UD employees, contractors, and other authorized users of their obligations and responsibilities regarding the use and protection of UD's technology and information assets. This policy also outlines procedures for responding to incidents that pose a threat to the security of UD's computer systems and network. Failure to comply with any component of this policy may result in disciplinary action, up to and including termination and/or loss of technological access and privileges.

#### **Scope**

This policy applies to all UD employees, contractors, and other authorized users of the UD technology and information assets. All users should properly use and protect the UD technology and information assets.

#### **Use of Technology Resources**

Employee accounts on UD computer systems are intended solely for UD's business purposes, not for personal use. Unauthorized use of the system may violate the law, constitute theft, and be punishable by law. In addition to disciplinary action, unauthorized use of the UD computing system and facilities may constitute grounds for civil or criminal prosecution. Employees are required to abide by the following:

- Employees are personally responsible for protecting all confidential information used and/or stored on their accounts. This includes their logon IDs and passwords. Furthermore, employees are prohibited from making unauthorized copies of such confidential information and/or distributing it to unauthorized persons outside the UD.
- Employees must secure technology assets when not in use, such as locking computer screens when away from their work area, creating a passcode to access their cell phone, and securing laptops when not in use.
- Employees shall not purposely engage in activity with the intent to harass other users, degrade the system's performance, divert system resources to their use, or gain access to UD systems for which they do not have authorization.
- Employees shall not attempt to access data outside their area of responsibility unless the supervisor of the accessed data has authorized them.
- Employees shall not attach unauthorized devices to their PCs or workstations without prior specific authorization from the UD.
- Employees shall not download unauthorized software from the Internet onto their UD-issued devices.
- Employees will not install or utilize any "hacker tools" without authorization from the UD.
- All UD portable and mobile equipment, such as digital cameras, digital camcorders, laptop computers, and overhead projectors, is available for UD employees to use for UD business purposes only. Tools and equipment belonging to the UD may not be taken off the premises for personal use.
- All UD-supplied laptops and tablets will have full disk encryption managed by the UD's IT provider.
- All employees are encouraged to lock their computers when leaving their desks for an extended period.

#### **Internet**

The UD will provide Internet access to employees and may provide access to contractors with UD-related business needs. Contractors must obtain the UD's permission before connecting, which may be revoked at any time at the UD's sole discretion. The Internet is a business tool for the UD. It is to be used for UD-related business purposes, such as communicating via electronic mail with suppliers and business partners and obtaining helpful business and technical information necessary to conduct the UD's business.

The Internet may *not* be used to transmit, retrieve, or store any discriminatory, harassing, derogatory, obscene, pornographic, defamatory, or threatening communications. It may not be used for “chain letters” or any other illegal purpose or for personal gain. Occasional personal research on the Internet is allowed if it does not interfere with job performance.

### **E-mail**

The UD currently retains all emails, allowing designated staff to search emails that may be responsive to public records requests. UD employees are required to follow designated UD procedures for the organization and cataloging of their e-mails. E-mails created and received by any agency of the State of Washington in the course of public business are public records, as per Chapter 40.14 RCW. They are subject to all the laws and regulations governing the retention, disclosure, destruction, and archiving of public records.

### **Voicemail and Text Messages**

Voicemail messages related to UD business are public records that must be retained and will be captured and saved to the UD’s server for retention and response to public records requests.

Text messages related to UD business, whether sent or received on a UD device or an individual’s device, are public records that must be retained. These messages will be captured and saved to the UD’s server for retention and to respond to public records requests. It is recommended that messages relating to UD business should not be sent from non-UD devices. If non-UD devices are used, the employee is responsible for safeguarding all UD-related messages.

### **Social Media**

The UD may use social media networking sites as additional communication and outreach tools to further its goals and mission. Social media communications related to UD business are public records that must be retained and will be captured and preserved for future reference and to respond to public records requests. When posting on UD social media sites, employees must always post content that promotes the UD and shall not post content for personal gain or that disparages the UD in any way. If employees identify the UD as their employer on their personal social media sites, personal posts may reflect poorly on the UD. The UD asks employees to keep this in mind when posting.

### **Telephones**

Personal telephone calls must be kept to a minimum and are authorized only when they do not adversely affect an employee’s performance of official duties or the effective functioning of the organization. Calls must be of reasonable duration and frequency.

### **Cellular Phones**

Cellular phones or a monthly stipend are provided at the CEO’s discretion when a UD employee has a demonstrated ongoing business need for such communication or is away from the UD and needs to maintain UD-related communications. Employees are accountable for monthly cellular phone charges if they become excessive. Employees can use cellular phones for personal, limited-duration, local calls only. Exceptions are permitted for travel or work outside the office.

### **Monitoring**

The UD owns all data, files, information, and communications created on, stored on, transmitted, received, or exchanged via its network, communications systems, equipment devices (including email, text messages, voicemail, and Internet/intranet usage logs, even if such communications resides with a third-party provider), and reserves the right to inspect and monitor all such communications at any time, for any business purposes, with or without notice to the employee.

The UD may conduct random and requested audits of employee accounts (including accounts with commercial or third-party providers, if used while conducting UD business), including to ensure compliance with policies and requirements, to investigate suspicious activities that could be harmful to the organization, to assist departments in evaluating performance issues and concerns, or to identify productivity or related issues that need additional educational focus within the UD.

Email, voicemail, text message communications, and Internet/intranet usage logs may be subject to public disclosure and discovery rules in the event of a lawsuit. The UD's Internet/intranet connection and usage are subject to monitoring at any time, with or without notice to the employee. There is no right to privacy when using UD technology resources.

## **Technology Assets and Cyber Security**

### **Access Control**

The UD is responsible for assigning access control to specific technology resources to authorized individuals or systems. Access control is implemented and controlled primarily by logon ID and password. Other access control methods may be implemented at the application and database levels to restrict access further. Employee permissions on the network and within applications are reviewed annually to ensure they are valid and necessary.

### **Network Access**

All users must have a unique login ID and password to access systems. The user's password should be confidential and **MUST NOT** be shared with employees or non-employees, including management and supervisory personnel. All employees must comply with the following rules regarding the creation and maintenance of passwords:

- Passwords must not be found in any English or foreign dictionary. Do not use any common name, noun, verb, adverb, or adjective. These can be easily cracked using standard "hacker tools."
- At a minimum, passwords must be at least 12 alphanumeric characters with upper and lower-case letters and symbols. Symbols can also include spaces.
- Passwords should not be posted on or near employee computers or otherwise be readily accessible in the area of the computer.
- Employees cannot access password files on any network infrastructure component. Password files on servers will be monitored for unauthorized users. Copying, reading, deleting, or modifying a password file on any computer system is prohibited.
- Employees will not be allowed to log in as system administrators. Employees who need this level of access to production systems must request a Special Access account.
- Employees will be responsible for all transactions during log-on sessions initiated using the employee's password and ID. Employees shall not log on to a computer and then allow another individual to use it unless authorized by a supervisor.

### **Terminated Employee**

- Employee Logon IDs and passwords will be deactivated as soon as possible if an employee is terminated, fired, suspended, placed on leave, or otherwise leaves the employment of the UD office.
- Supervisors shall immediately and directly contact the CEO to report changes in employee status that require termination or modification of employee login access privileges.
- When employment is terminated, the UD will notify the IT service provider of the need to discontinue all electronic services for the departing employee.
- The IT service provider will notify UD of all electronic equipment that the terminated employee has been provided during employment.

### **Special Access**

Special access accounts are provided to individuals requiring system administrator privileges to perform their jobs. The UD monitors these accounts and requires the CEO's permission to do so. The unique access accounts are monitored by assigning users to specific areas and by periodically generating reports for management upon request. Two-factor authentication will be used when available.

### **Connecting Devices to the Network**

Only authorized devices may be connected to the UD network(s). Authorized data devices include cell phones, smartphones, tablets, laptops, and notebooks that the UD owns and complies with the UD's configuration guidelines. Other authorized devices include network infrastructure devices used for network management and monitoring. Employees shall not attach to the network any non-UD computers that are not authorized, owned, and/or controlled by UD. Employees are not permitted to attach any device that alters or detects the network's topology characteristics, including unauthorized storage devices such as DVD players and hacking tools.

### **Remote Access**

Only authorized persons may remotely access the UD network. Remote access is provided to those employees, contractors, and business partners of the UD who have a legitimate business need to exchange information, copy files or programs, or access computer applications. A secure ID is the only acceptable method of remotely connecting to the internal network. Users may not install personal software designed to remotely control the PC or workstation. Employees may use non-UD devices to gain remote access; however, these devices will then be subject to public disclosure. Any remote access connections will require multifactor authentication. All network connections are logged and tracked for security reasons.

### **Reporting Breaches in Security**

A cyber breach, or "security incident," is defined as any irregular or adverse event that threatens the security, integrity, or availability of the information resources on any part of the UD's network. These may include:

- Illegal access to a UD computer system. For example, a hacker logs in to a production server, gains unauthorized access to data files, and copies the password file.
- Damage to a UD computer system or network caused by illegal access, such as releasing a cyber virus or worm.
- Denial of service attack against a UD web server. For example, a hacker initiates a flood of packets against a Web server designed to cause the system to crash.
- Malicious use of system resources to launch an attack against another computer outside the UD network. For example, the system administrator notices a connection to an unknown network and a strange process consuming a significant amount of server time.
- Attaching external devices to discover the UD's systems or protocols.

All known or perceived cybersecurity-related breaches will be reported immediately to the CEO, the IT service provider, and the bank of record, if applicable. If pecuniary in nature, the board chair and treasurer will also be notified. The UD may refer breaches by non-UD employees to law enforcement for possible prosecution and filing of criminal charges. The employee shall not turn off the computer or delete suspicious files. Leaving the computer in the condition it was in when the security incident was discovered will help identify the source of the problem and determine the steps to remedy the situation.

### **Staff Responsibilities**

UD staff will work with the UD to ensure that:

- The UD is working to maintain a coherent and responsible filing system of active records in its possession via the SharePoint file storage platform, which is intended to preserve the integrity and accessibility of the public records for the duration of the established retention periods.
- Active records (referred to at least monthly) are stored in the UD's office space or shared cloud sites.

- Records (both hard-copy and electronic) are accessible, and their security is maintained according to the provisions of the Public Disclosure Act.
- Staff will follow the proper check-out procedure (cited above) to ensure record integrity.

### **7.02 Electronic Records Retention**

Electronic records are bound by the same records retention provisions as paper documents outlined in chapter 40.14 RCW. Electronic records must be retained in accordance with the retention schedules established by the records committees. Destruction of or changes to the retention period of any public record, regardless of format, require legal approval from the state or local records committee, as outlined in chapters 40.14 RCW and 434-635 WAC, as well as other applicable state laws.

## SECTION 8: EMPLOYEE COMPENSATION

### 8.01 Salary Administration, Classifications, Compensation, and Performance Evaluation

#### Salary Administration

It is the policy of the UD to provide equitable and consistent remuneration to employees for their assigned duties and responsibilities, to attract the best-qualified people available to achieve the UD's mission, and to encourage the retention and productivity of qualified personnel. In setting salary levels to attract and retain qualified personnel, the UD will monitor the compensation structures of organizations that employ similarly skilled personnel in the geographic area. This compensation policy shall define commonly used terms, explain the authority and responsibilities for the program and its implementation, and detail salary administration and payroll procedures. The policy will be reviewed periodically and revised, if necessary, to better serve the needs of the UD and its employees. The salary ranges will be regularly evaluated, and management will adjust as needed.

#### Employee Classifications

Employees may be classified as full-time, part-time, or part-time on-call. All UD employees, including full-time, part-time, or part-time on-call (unless otherwise specified), are employed at will. The following definitions apply:

- **Regular full-time:** An employee regularly scheduled to work 40 hours or more per week. Such an employee is ordinarily eligible for benefits.
- **Part-time:** An employee regularly scheduled to work less than 40 hours per week. Employees who work less than 30 hours per week may not be eligible for benefits. Certain employees may be eligible for certain reduced benefits.
- **On-call:** An employee scheduled for minimal shifts but primarily works as needed. Such an employee is eligible for certain reduced benefits.
- **Temporary:** An employee hired for a specified period, usually no more than 5 months in a calendar year (full- or part-time). Such an employee is not eligible for benefits and must reapply for each assignment and project to become a regular employee. Employees are further classified under federal and state wage-and-hour laws into two categories: exempt and non-exempt. UD will assign the appropriate status designation to each new position or to a change in status for an existing position.
- **Exempt:** An employee who is exempt from the overtime pay requirements under federal and state laws. Exempt employees include executives, managers, supervisors, professional staff, and others whose duties and responsibilities qualify them for exemption under federal and state law.
- **Non-exempt:** An employee whose job calls for overtime payment as appropriate under state and federal regulations.

#### Compensation Overview

The organization's primary objective is to offer a competitive total compensation package to employees, consistent with market-based compensation practices, for individuals possessing the necessary experience and skills to fulfill the organization's mission.

Generally, total employee compensation, including benefits, falls within the market range. The organization aims to be flexible within this range so that compensation can be above or below the median, based on experience, performance, and business needs, to attract and retain specific talent.

While the organization will focus on comparable regional organizations to benchmark pay, it also recognizes that, as an economic development entity, the talent market at both general and executive levels may be broader than this group. Market information from additional market segments — public agencies (local and

state) and published for-profit compensation surveys with regional adjustments — may be used as supplements.

The EAC will work with the CEO to collect and update benchmark data from comparable local organizations and market segments to form a “market composite,” ensuring the CEO's and employees’ compensation is competitive, fair, and appropriate.

### **CEO Evaluation, Compensation, and Bonus Process**

The Executive Advisory Committee (EAC) sets the CEO’s compensation. As the principal representative and the person responsible for the efficient operation of the UD, the organization aims to provide fair, reasonable, and non-excessive compensation for the CEO. The following information is a guide to the CEO compensation and bonus process

In Q3-Q4, the EAC and CEO will review benchmark salary data and the “market composite” for updates as needed.

In Q4, the EAC will meet with the CEO to plan for the following year’s performance goals and complete the current year's CEO performance evaluation.

Progress on performance goals and objectives is typically documented and tracked in the annual Work Plan, which is tied to board-adopted strategic documents. The EAC will use the tracked Work Plan to help assess the CEO’s annual accomplishments.

In Q4, before the final EAC meeting of the year, the CEO will complete the self-assessment sections of the *CEO Annual Performance Evaluation Form* (see Exhibit 3) and send it to the board chair. The board chair circulates the Evaluation Form to the EAC for input before the final EAC meeting. Note: Per RCW 42.30.140(4), the EAC may adjourn into Executive Session to discuss the performance of the CEO; however, discussion of benchmark data and CEO compensation shall occur in a public meeting.

After the EAC meeting, the chair will complete a composite *CEO Annual Performance Evaluation Form* for the file and notify the CEO and the finance/payroll team of any compensation adjustments, which will be reflected in the following year’s pro forma budget.

The CEO is also eligible for a performance-based bonus, predicated on a percentage of revenue generated by the CEO for the organization. The EAC will determine this percentage no later than Q1 of the applicable year. In late Q4, the EAC will review year-end revenue generation, authorize the applicable bonus, and notify the CEO and the finance/payroll team.

The chair of the UDDA board, who is a volunteer and not compensated by the organization, will operate independently, free from undue influence from the CEO. No member of the EAC will be a relative of the CEO or a staff member or have any relationship with the CEO or a staff member that could present a conflict of interest. The CEO, as a member of the EAC, shall be recused from any meeting, discussion, and vote regarding their compensation.

### **Employee Evaluation, Compensation, and Bonus Process**

Employees receive annual evaluations that offer the opportunity for a pay increase to recognize and reward competent, contributing performance. Employee compensation ranges are established, and salary increases are authorized by the CEO. Cost-of-living (COLA) or step increases are at the CEO's discretion. An increase in base pay may be authorized, provided it does not exceed the maximum of the assigned pay range. All increases are subject to the availability of UD financial resources.

The process for employee compensation review includes the following:

- In October, staff will meet 1:1 with the CEO to plan for the next year's performance goals and objectives and will document them on the *Employee Annual Goal Setting Form* (see Exhibit 1).
- In April, the employee will meet 1:1 with the CEO to check the status of these goals and make needed adjustments, if any.
- In October-December, the CEO will complete an *Employee Annual Performance Evaluation Form* (Exhibit 2) based on the employee's performance against the goals established in the goal setting form.
- The CEO will determine compensation changes, explain them to the employee, and include them in the following year's pro forma budget.
- Staff are eligible for a non-performance-based holiday bonus at the discretion of the CEO, and the amount will be equitable across all staff. The CEO will notify the EAC of staff holiday bonuses and compensation adjustments.

### **Promotional Pay Increase**

A promotion is moving from one salary grade to a higher one. This can occur due to a re-evaluation of the employee's current position, a promotion within the same department, or a promotion to a position in a different department. Promotions may occur at any time of the year and are not limited to the annual performance evaluation schedule mentioned above. Staff promotional pay increases will be determined as described below and approved by the CEO:

- The promoted employee will receive a new pay rate based on the employee's new job and responsibilities. The new pay rate should reflect the promoted employee's experience and competencies in the new role and not exceed the maximum of the new salary range.
- All employees must receive the minimum salary in the new salary grade.

### **8.02 Non-Exempt Overtime and Compensatory Time**

By federal and state law, overtime will be paid to *non-exempt employees* for all hours worked in excess of 40 in a regular workweek (Monday morning through Sunday night). Leave time will not be counted in computing the 40 hours worked. Non-exempt employees are not to begin work before their regular starting time or continue working beyond their standard quitting time without their supervisor's advance approval. Non-exempt employees are not permitted to work during breaks or meal times. A non-exempt employee may not work overtime without prior authorization from a supervisor. Supervisors are responsible for ensuring that no unauthorized overtime hours are worked. Overtime is paid at 1.5 times the regular pay rate, or as specified in union contracts.

### **8.03 Pay Periods**

All employees are paid twice monthly, generally on the 15th and 30th of each month. When the 15th or 30th of the month falls on a weekend or a holiday, payment will be distributed on the last working day before the weekend or holiday. If an employee believes a mistake has been made in preparing the paycheck or reporting time worked, they must notify their supervisor immediately.

### **8.04 Time Records**

All non-exempt and exempt employees must submit an individual record (provided by the UD at the start of the calendar year) detailing the leave taken. Time records will cover one month and will not track leave accruals or deductions. Employee leave records are reviewed and approved by the supervisor. Falsifying any record is prohibited and will be grounds for disciplinary action up to and including termination.

### **8.05 Payroll Deductions**

Certain mandatory and elective deductions are applied to employees' pay and noted on the paycheck stub. Only deductions mandated by law or those authorized in writing by the employee will be made.

### **8.06 Direct Deposit**

All UD employees are required to enroll in direct deposit of their paychecks. If an employee does not have an eligible banking account, special arrangements will be made via paper check.

### **8.07 Wage Garnishments**

The UD shall comply with all court-ordered wage garnishments. Employees will be notified of garnishments by the UD.

### **8.08 Severance Allowance**

The UD may pay a severance allowance to regular full-time employees who are terminated due to a reduction in the UD workforce, the elimination of a job or position, or at the CEO's discretion. The severance allowance is in addition to any payments required by law. The decision to provide a severance allowance and the amount of the allowance (if not specified in a signed offer letter) will be made by the CEO, the Chairman of the Board, or the Board Treasurer.

### **8.09 Final Paycheck**

The organization will ensure that payments upon employee termination are made in accordance with employment contracts and Washington State Labor laws. The final payment report requires the CEO's approval before the payment is issued. According to the UPTO policy, no leave accrual will be paid upon separation.

## **SECTION 9 – BENEFITS OF EMPLOYMENT**

The UD offers equitable, cost-effective employee benefits, recognizing their significant impact on employees' economic and personal well-being. Paid in various benefit forms, the total cost to provide the benefits program is a substantial supplement to regular pay and should be viewed as additional compensation. The UD reserves the right to design plan provisions and to add, eliminate, or in other ways modify any discretionary benefits described in this manual or elsewhere in plan documents, where and when it is deemed in the UD's best interest to do so.

Employees will be provided with summary plan descriptions upon eligibility and enrollment. The benefits programs are explicitly defined in legal documents, including insurance contracts, official plan texts, and trust agreements. The plan documents will govern in the event of any conflict with this policy.

### **9.01 Medical, Dental, Vision Insurance**

Employees who work 40 hours or more per week are considered full-time and are eligible for the UD's benefits package(s). Employees in other categories do not receive benefits unless specified in a contract or agreement. Medical, dental, and vision insurance benefits for eligible employees begin on the first day of the month after the hire date. If employment starts on the first of the month, benefits begin on the same day.

A comprehensive medical, dental, and vision insurance plan is reviewed and selected annually. The plan's details will be explained during open enrollment and employee orientation. The insurance provider may change from time to time to maintain cost-competitive rates. Information and summaries to explain these benefit plans will be promptly furnished to all plan participants and beneficiaries.

The UD currently covers the premium costs for eligible medical and dental insurance for the eligible employee, their spouse, domestic partner, and eligible dependents. If employees are required to contribute to health insurance premiums in the future, detailed information on the amounts the UD and/or employee will pay will be available during open enrollment, new employee orientation, or at any time through a UD representative.

### **9.02 Long-Term Disability Insurance**

UD employees may enroll in long-term disability insurance at no cost.

### **9.03 Employee Assistance Program**

Upon request, the UD offers employees and their immediate family members free, short-term, confidential counseling for relationship conflicts, parenting and child care issues, eldercare concerns, life crises such as death or divorce, financial and legal concerns, work-related pressures, and drug and alcohol problems. This program may be used beginning on an employee's date of hire. Employees may be required to pay part of the cost at any time.

### **9.04 Consolidated Omnibus Budget Reconciliation Act (COBRA)**

The UD does not employ enough employees to be eligible for COBRA.

### **9.05 Simple IRA**

Eligible employees may contribute to a Simple IRA offered through a UD-selected retirement investment program, up to 3% of their gross monthly salary. The UD will match this contribution at a rate of 3%. If an employee wishes to discontinue contributions, they must provide adequate notice to update their contribution status before the next payroll is processed.

### **9.06 Flexible Spending Account (FSA)**

The UD provides an FSA and matches the employee's share up to the allowed legal annual limit.

### **9.07 Life Insurance Policy**

With the CEO's approval, the UD will reimburse employees for a life insurance policy.

### **9.08 Employee Service Awards**

The UD recognizes employee service based on the consecutive length of service. According to RCW 41.60.150, service awards may not exceed \$200. Additional anniversary awards at any level, in the form of gift certificates from business establishments of the employee's selection, are presented at the CEO's discretion.

- Five Years: \$100
- Ten Years: \$150
- Fifteen+ Years: \$200

### **9.09 Continuing Education Assistance**

The UD encourages employees to expand their professional skill set and pursue lifelong learning. As such, the UD may support employee training and higher education programs relevant to the UD's work and mission. The UD sees this benefit as a valuable tool for recruitment, retention, productivity, and employee satisfaction. At the discretion of the CEO, and for activity that falls under [IRS Section 127: Educational Assistance Programs \(EAPs\)](#), an employee may be eligible for tax-free educational assistance up to the IRS annual limit. Additionally, employees are encouraged to seek out other relevant training opportunities outside Section 127 and request approval for the UD to cover or share fees.

## SECTION 10: APPENDIX – LEAVE TYPES

### Sabbatical Leave

The UD Sabbatical leave policy provides a framework to support employees in taking breaks from work for rejuvenation, motivation, innovation, and/or to pursue personal and professional interests and inquiries. Employees are eligible for a sabbatical after completing four years of full-time employment. The following is the breakdown of sabbatical leave:

- After four consecutive years of full-time service, employees are eligible for a sabbatical leave of 20 straight workdays per calendar year.
- After seven consecutive years of full-time service, employees are eligible for a one-time sabbatical leave of 60 consecutive workdays.

### Jury Duty/Witness Leave

Employees may take leave if subpoenaed to serve on jury duty or as a witness in a trial. This leave is available for the period covered by the initial subpoena or court order, as well as any involuntary extensions. Employees must notify their supervisor and provide a copy of the subpoena or court order within 5 days of receiving the notice. Employees are expected to report to work during regular working hours, unless they are attending court proceedings or have a valid reason for absence. The UD will pay regular earnings during civic duty leave. Funds received from the court are to be remitted to the UD, excluding mileage or meals.

### Bereavement Leave

In the event of a death in an employee's immediate family, the employee may take paid time off to attend to family affairs. "Immediate family" is defined as child, parent, brother, sister, grandparent, grandchild (to include step of each of the previous categories), spouse, mother-in-law, father-in-law, significant other/domestic partner, or any relative residing in the employee's primary residence. "Significant other" is defined herein to mean a mentally competent adult who is not related by blood with whom the employee cohabits and shares an exclusive relationship that is intended to be lasting or permanent.

### Washington State Family Care Act Leave

[Washington's Family Care Act](#) allows UD employees to use leave to care for an ill child or a family member, including a parent, spouse, registered domestic partner, parent-in-law, or grandparent, with a serious health condition or an emergency health condition. Employees must comply with the terms of their employment agreement or the applicable UD policy(ies) for their chosen leave, including providing advance notice and, if required, medical certification. The Family Care Act does **not** provide for additional leave beyond what employees receive through their employment agreements or under the UD's policies.

### Pregnancy Disability Leave

Eligible employees are entitled to use any period medically necessary for pregnancy-related conditions, including, but not limited to, pregnancy-related medical conditions, miscarriage, pregnancy termination, and complications of pregnancy. This leave is limited to the disability phase of the pregnancy and childbirth and provides no entitlement to time to care for a newborn child. Any employee who suffers from pregnancy-related conditions or is recovering from childbirth is eligible as of their date of hire.

### Military or Uniformed Services Leave

Under Washington state law (RCW 38.40.060) applicable to public employees, employees of the UD may be granted a paid leave of absence from employment for a period not exceeding twenty-one (21) working days per year for required military duty, training, or drills in the Washington national guard or the Army, Navy, Air Force, Coast Guard, or Marine Corps reserve of the United States, or any organized reserve or armed forces of the United States. Said paid military leave of absence "shall be in addition to any leave to which the officer or employee might otherwise be entitled, and shall not involve any loss of efficiency rating, privileges, or

pay.” An employee on such military leave shall be entitled to his or her “normal pay” during said leave. Leave will be charged only for days that the employee is scheduled to work for the UD.

The UD complies with the requirements of RCW 73.16.005 *et seq.* and the Uniformed Services Employment and Reemployment Rights Acts of 1994 (USERRA), as amended, concerning unpaid leave of absence and re-employment rights for employees who leave UD employment to serve in the uniformed services. ***The federal and state laws and regulations governing military leave are complex, and not all details are covered in this policy. Any questions should be directed to UD HR.***

### **Domestic Violence Leave**

Under the Washington State Domestic Violence Leave Act ("DVLA"), all UD employees have the right to leave work to get help or help a family member with domestic violence, sexual assault, or stalking. "Family member" means any individual whose relationship to the employee is that of a child, spouse, domestic partner, parent, parent-in-law, grandparent, or a person with whom the employee is in a dating relationship.

Leave can be taken for the following purposes when related to incidents or situations of domestic violence, sexual assault, or stalking: (1) seeking legal or police assistance, or to prepare for or participate in a civil or criminal legal proceeding, to ensure the health and safety of the employee or the employee’s family member; (2) seeking treatment or participating in a family member’s treatment for physical or mental injuries; (3) obtaining or assisting a family member to obtain services of a domestic violence shelter, rape crisis clinic, or other social services program; (4) obtaining or assisting a family member to obtain mental health counseling; or (5) participating in safety planning, relocation, or other safety-related actions.

DVLA leave is unpaid, but can be full-time, intermittent, or on a reduced work schedule. DVLA provides no set amount of leave. Instead, the amount of leave is what is "reasonable" under the circumstances. DVLA does not negate any other eligible time off. The employer must restore the employee to their former position or an equivalent position upon return from leave.

The employee seeking DVLA leave must provide their supervisor with notice of the need for leave. If it is an emergency, they must notify UD by the close of business on the first day of leave. The UD may require verification of the need for leave, which can be shown through (1) a police report; (2) a protective order or similar court order; (3) documentation from a victim’s advocate, attorney, member of the clergy, or medical professional; or (4) the employee’s written statement. A statement may require verification of family status from the employee, such as a birth certificate, court document, or similar documentation. Verification must be given in "a timely manner." In addition to providing the requested verification, the employee is not required to provide any further information regarding the circumstances that necessitated the leave. The UD will keep the verification and all other related information confidential.

### **Unpaid Leave for Reason of Faith or Conscience**

Employees should obtain their supervisors' advance approval for unpaid leave due to religious or conscientious beliefs. Requests will be reviewed and are subject to supervisory approval based on several factors, including whether the employee's absence would impose an undue hardship on the UD or whether the employee is necessary to maintain public safety. Faith holidays must be used in increments of at least one day. Employees are not allowed to perform any work for the UD while on a faith holiday. The definition of “work” includes, but is not limited to, work at home, online, on the telephone or cell phone, or working lunches.

### **Personal Leave Without Pay (PLWP)**

The UD may, in exceptional circumstances, grant an employee a leave of absence without pay that does not fall within any of the customary leave entitlements, provided that such leave is consistent with the UD's overall goals and mission. Leave of absence without pay is considered on a case-by-case basis. A written request for PLWP explaining the circumstances must be submitted to an employee’s supervisor at least one

week before the start of PLWP, except in an emergency. All leave requests must include an expected date of return.

If the PLWP is 30 consecutive days or less, the UD will continue to pay the insurance premiums in the same proportion as if the employee were not on a PLWP. For an approved PLWP that exceeds 30 consecutive days, an employee may continue their health benefits under COBRA. Other UD-paid or self-paid benefits may also be eligible for continuation. Benefits that accrue based on length of service do not accrue during periods when an employee is on an authorized PLWP. Employees on a PLWP will not be eligible for holiday pay during any of their PLWP. Failure to report to work on the first day after the expiration of the personal PLWP without receiving an extension will be considered a voluntary termination of employment. The UD reserves the right to deny any requested leave without pay.

### **Light/Restricted Duty**

A light-duty assignment involves temporary alterations to the employee's regular job duties, assigning limited duty within the same department, or, in limited instances, assigning the employee to duties in another department. Light-duty work is not guaranteed. Under certain circumstances, light-duty work may be required. Employees may be eligible for a light-duty assignment if:

- The employee is in a regular full-time or part-time position
- The employee has a short-term injury, illness, or short-term disability that prevents them from performing the full scope of their job duties
- The employee is expected to recover from the injury, illness, or disability and return to complete duties
- Light-duty work is available

Light-duty assignments typically do not exceed six months, and the employee's supervisor must approve any assignment exceeding six months. For on-the-job injuries, UD will coordinate the return-to-work plan, which may include a light-duty assignment. For off-the-job injuries, an employee must provide a medical release form from their treating healthcare provider. The employee's supervisor will work with UD to coordinate the return-to-work plan, which may include a light-duty assignment.

### **Paid Administrative Leave**

Paid administrative leave is leave that is not otherwise classified under UD policies. It is initiated and approved by an employee's supervisor. The employee's regular pay and benefits will continue during periods of authorized paid administrative leave. Examples of paid administrative leave include:

- During the investigation of an alleged improper act;
- When the employee has been involved in a critical incident;
- When allowing an employee to remain in the workplace may be detrimental to the interest of the UD or unsafe for the employee, coworkers, or the general public; or
- Due to other extraordinary circumstances.

**SECTION 11: Acknowledgment of the University District Human Resources Employee Manual**

By signing below, I acknowledge that I am an at-will employee and understand that I may be terminated at any time, with or without notice, and for any reason, with or without cause.

I acknowledge receipt and review of the UD Human Resources Employee Manual (“Manual”). I understand that the UD may add new information or policies and replace, change, or cancel existing ones. However, those changes can only be made by the UD’s management.

I further understand that I will be informed of any said changes. I know that it is my responsibility to read and comply with all policies outlined in this Manual. I also know that I should consult my supervisor regarding any questions I may have.

\_\_\_\_\_  
Employee Signature                      Printed Name                      Date

\_\_\_\_\_  
Supervisor Signature                      Printed Name                      Date

**These Exhibits follow:**

Exhibit 1: Employee Annual Goal Setting Template

Exhibit 2: Employee Annual Performance Evaluation Form

Exhibit 3: CEO Annual Performance Evaluation Form



# Employee Goal Setting Form

Employee Name, Title	
Supervisor Name, Title	
Covered Period	

SMART goals are designed to help you identify whether what you want to achieve is realistic and to set a deadline.

Goal - Specific, Measurable, Achievable, Relevant, Time-bound (SMART)		
Employee Goal	UD Goal (Use drop down menu)	UD Value (Use drop down menu)

**Why does this goal matter?**

**Benchmarks for Success**

**Evaluation Plan**

Strategic Action Descriptions	Performance Metrics	Date to Begin	Date Due	Resources Required	Potential Challenges	Desired Outcome
		MM/DD/YY	MM/DD/YY			
		MM/DD/YY	MM/DD/YY			
		MM/DD/YY	MM/DD/YY			
		MM/DD/YY	MM/DD/YY			
		MM/DD/YY	MM/DD/YY			

**Additional Notes**

\_\_\_\_\_  
Employee Name and Signature                      Date

\_\_\_\_\_  
Supervisor Name and Signature                      Date



## Employee Evaluation Form Template

Employee Name	
Position or Title	
Reviewer Name	
Reviewer Title	
Review Date	
Evaluation Period	

### Employee Self-Assessment

*Blue indicates the employee completes prior to the assessment of the manager and/or the board.*

Self-Evaluation Topic	Employee Comments (bullets or narrative response)
Include 3-5 achievements with measurable outcomes where possible.	
Identify significant challenges, actions taken, outcomes or lessons learned	
Focus on skills, processes or behaviors. Include at least on actionable improvement goal	
What support or resources would help you grow? Consider training, tools, mentoring, or process improvements	

### Employee Section: Professional Development Needs

Development Area	Target Completion Date	Success Measure

### Review: Performance against Employee Goals

*Please respond with bullets or narrative response*

Goal (Scorecard): Employee to List	Reviewer Rating (1-4) See Notes below	Please identify which UD Goal your work supported (Employee to List)

UD Goals: 1) Pioneering Urban Systems in Energy, Infrastructure and Mobility; 2) Creating a Thriving Prosperous District for All; Celebrating and Honoring Place

### Review: Competency and Skill Assessment

*Please respond with bullets or narrative response*

Competency	Reviewer Rating (1-4) See Notes below	Comments
Job Knowledge		
Problem-Solving and Critical Thinking		
Productivity and Efficiency		

Communication and Collaboration		
Adaptability and Learning		
How has the employee contributed to a respectful, inclusive, and collaborative work environment?		
Leadership and Decision-Making (if applicable)		

### Review: Leadership Evaluation

*Please respond with bullets or narrative response*

Leadership Skill	Reviewer Rating (1-4) See Notes below or NA	Comments
Performance Management		
Employee Development		
Decision-Making		
Resource Utilization		
Team Leadership and Collaboration		
<b>Total Performance Score (from three sections above)</b>		

### Review: Assessment of Employee

*Please respond with bullets or narrative response*

Assessment Topic	Manager or Board Comments
Key Strengths and Contributions	
Performance Challenges and Improvement Areas	
Additional Feedback on Goal Attainment	

### Final Evaluation and Approval

Final Performance Score	Summary Rationale	Compensation Recommendation

### Signatures for Approval

Employee Signature	
Date	
Reviewer Signature	
Date	

# CEO Evaluation Form Template

Name, Title	Juliet Sinisterra, CEO
Reviewer Name	
Review Date	
Evaluation Period	

## 1. Objectives and Performance Metrics

Please reference the attached annual Work Plan that captures the CEO's goals (per U Vision 2044 strategic plan numbers), tasks, updates, and completion status. This information will help you complete sections 2, 4-8 below.

## 2. Competency and Skill Assessment

Competency	Weight (100%)	Attainment (%)	Comments
Job Knowledge			
Problem-Solving and Critical Thinking			
Productivity and Efficiency			
Communication and Collaboration			
Adaptability and Learning			
Leadership and Decision-Making (if applicable)			

**TOTAL**                      **0%**

## 3. Employee Self-Assessment

Self-Evaluation Topic	Employee Comments
Describe your key achievements during this evaluation period.	
What challenges did you face, and how did you address them?	
What areas do you think you can improve?	
What support or resources would help you grow in your position or attain your goals?	

## 4. EAC Member Assessment

Assessment Topic	Manager Comments
Key Strengths and Contributions	
Performance Challenges and Improvement Areas	
Additional Feedback on Goal Attainment	

## 5. Management and Leadership Evaluation

Notes: 1 - Below 60%, needs improvement; 2 - Partially meets expectations; 3 - Meets expectations; 4 - Consistently exceeds expectations<sup>2</sup>

Leadership Skill	Self Rating (1-4)	Reviewer Rating (1-4)	Manager Comments
Performance Management			
Employee Development			
Decision-Making			
Resource Utilization			

Team Leadership and Collaboration			
<b>TOTAL</b>	<b>0</b>	<b>0</b>	

## 6. Professional Development Recommendations

Development Area	Suggested Training or Resources	Milestone or Checkpoints	Target Completion Date

## 7. Final Evaluation and Approval

Decision Satisfactory/Needs Improvement	Comments
Enter comments here	

## 8. Overall Performance Rating

Overall Performance Grade (use drop down menu)	Rating (Score 1-4)	Key Comments
Excellent		Enter comments here

## 9. Approval Signatures

Employee Signature	
Date	
Reviewer Signature	
Date	MM/DD/YY

updated 2/24/2026

2026 priorities: Support catalytic investments (Nature-based infrastructure and U Incubation Village), invest in parking, and district beautification and marketing.

### University District - 2026 Work Plan Tracking

STRATEGIC PLAN		COMMUNITY DEVELOPMENT	BUDGETED	START	END	STATUS	UPDATE	KEY DATES
1	3.1.2	400-Block in partnership with Avista Development	\$20,000	Q1 2026	Q4 2026		Working on non-binding agreement with Avista for RFQ release by March 2.	3/2/2026
2	2.4.1, 3.1.1	U Incubation Village Pre-Design Study Completion and Community Partner Roundtables	\$55,705 (carryover)	Q1 2026	Q4 2026		Requesting scope change via CERB Board. Waiting for approval in mid-March to move with remaining phases.	CERB grant complete at EO 2026
3	1.1.1, 1.1.2	District Living Infrastructure Framework and Development Guidelines Phase II	\$40,000	Q1 2026	Q2 2026		Biohabitats presented to EAC. Work to begin on design guidelines.	Final Board presentation in May 2026
4	1.1.2, 1.1.4, 1.1.5, 1.1.7	Nature-Based Infrastructure and Complete Street Pre-Design ( Superior/Springfield)	\$75,000 (carryover)	Q2 2026	Q4 2026		Waiting on completion of District Living Infrastructure framework prior to releasing RFP for pre-design.	EO 2026
5	1.1.2	UD Ecological Development Tool: Feasibility Testing for Software Development	\$15,000	Q1 2026	Q3 2026		Meeting with IntelliTect on March 4.	EO 2026
6	2.4.1, 3.1.9	Host community partners discussion around possible people's choice grocer (retail food bank model) along Division Street	\$500	Q3 2026	Q3 2026		Working to get April meeting scheduled.	
7	1.4	Conduct parking layout study for South Sub-Area in legislated blocks	\$15,000	Q2 2026	Q3 2026		Will start in Q2.	
8	3.1.4	Supporting work of SLIC and Spokane Alliance where needed around development of regional Housing Production Fund	\$0	Q1 2026	Q4 2026		Met with SLIC and Spokane Alliance staff around developing a regional \$200 million revolving housing loan fund for mixed income developments.	
ECONOMIC DEVELOPMENT		BUDGETED	START	END	STATUS	UPDATE	KEY DATES	
1	Overarching	Grant writer for State, Federal, and local grants in alignment with U Vision 2044 Strategies and develop database around district metrics and data for grant writing access.	\$30,000	Q1 2026	Q4 2026		Awarded \$343,000 Dept of Commerce Energy Siting and Permitting grant. Working through contract approval process with Commerce. Work to start April 6.	Varies
3	3.4	Banner implementation along Hamilton	\$15,000	Q2 2026	Q4 2026		Will start in Q2. Working to replace 14 windstorm-damaged banners on MLK Jr Way.	Fall 2026
4	1.4	First Avenue Parking Angled Parking Pilot	\$10,000	Q3 2026	Q4 2026		Will start in early Q3, after South Sub-Area layout plan complete.	Fall 2026
5	1.1.1, 1.1.2	Pacific Avenue Ongoing Maintenance of Nature-Based Infrastructure (6 months)	\$8,000	Q3 2026	Q4 2026		City staff requesting feedback on landscaping plan. Biohabitats drafting a review/one page memo.	Fall 2026
MARKETING & COMMUNICATIONS		BUDGETED	START	END	STATUS	UPDATE	KEY DATES	
1	1.1.8, 2.2.2, 2.5.2, 3.1	Outreach Materials; 4 cutsheets and vision document	\$15,750	Q2 2026	Q4 2026		Funding for three outreach cutsheets. Will start in Q2.	
2	1.1.8, 2.2.2, 2.5.2, 3.1	Juliet to develop a TED Talk; Speaking Support and Graphics	\$12,000	Q1 2026	Q3 2026		Bringing on TED Talk speaker support for \$3000 flat fee.	Apply before May
3	3.1.1	Website Development: Photography and Illustrations	\$25,000	Q3 2026	Q4 2026		Waiting on new Marketing & Communications Manager to lead.	Spring and Fall 2026

Notes: Black: Focus Area; Blue: Dependent on Others