

CHRISTIAN SERVANTS HOME CARE, LLC

POLICIES AND PROCEDURES

April 2026 Revision

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SECTION 1: INTRODUCTION

Purpose of this Document

The purpose of this document is to familiarize the employees with the policies, rules and other key aspects of Christian Servants Home Care, LLC (the “Company”). The information in this handbook supersedes all rules and policies that may previously have been expressed or implied, in both written and oral format. Compliance with this handbook is compulsory for all employees. The Company reserves the right to interpret this document’s content as it sees fit, and to deviate from policy when it is deemed necessary.

Changes in Policy

Christian Servants Home Care, LLC reserves the right to change this document’s content, at any time and at our sole discretion. Its provisions may not be altered by any other means, oral or written. Employees will receive written notice of any changes we make to this document and are responsible for understanding and complying with all up-to-date policies. If you are confused about any information defined herein, please contact ownership.

SECTION 2: EMPLOYEE INFORMATION

Employment Forms

All new employees are required to complete and submit the following forms, which will be provided.

Offer Letter: The offer letter states that employment is “at-will”. The job of an “at-will” employee is not guaranteed. It may be ended, at any time and with or without notice, by the employee or, for a lawful reason, by the Company. The Company also reserves the right to alter an “at-will” employee’s benefits, pay rate, and assignments as it sees fit. The “at-will” terms of an employee’s employment may only be changed by ownership of the Company. The offer letter further indicates that employees acknowledge and accept our Restrictive Covenant Agreement. This agreement restricts individuals from offering competitive caregiving services and from directly or indirectly soliciting such services for personal benefit or on behalf of any other organization engaged in similar caregiving activities.

Background Check Forms: Wisconsin’s DHS BID (Background Information Disclosure) form. This document allows the Company to perform appropriate background checks. The Company earns the right to make hiring decisions based on the results of these background checks. The BID form will be completed at least every four years or at any time within that period that the Company has reason to believe new checks should be obtained.

During employment, all employees must notify their manager as soon as possible if they are being investigated or have been convicted of any crime and or if they have substantiated findings of abuse, neglect, or misappropriation including CPS (Child Protective Services) and/or APS (Adult Protective Services) investigations per WI statute code Wis. Admin. Code § DHS 12.07(1). Employees may be subject to sanction if they knowingly give false information or knowingly omit information on the BID form or if after submitting a BID form, subsequently fail to report any information about a conviction for a crime or other act or offense requested on the BID.

Communicable Disease Screening

Employees may be required to complete a communicable disease screening. Based on results of the screen, further testing may be required prior to direct client care. Testing may be repeated annually or at any time based on management discretion.

The following section summarizes your legal rights as an employee of Christian Servants Home Care, LLC. Questions about any policy detailed in this section may be addressed in writing to Bill.Renz@christianservantshomecare.com.

Equal Opportunity Employment Policy

The Company provides equal employment opportunities to all applicants, without regard to unlawful considerations of or discrimination against race, religion, creed, color, nationality, sex, sexual orientation, gender identity, age, ancestry, physical or mental disability, medical condition, or characteristics, marital status, or any other classification prohibited by applicable local, state or federal laws. This policy is applicable to hiring, termination and promotion, compensation, schedules and job assignments, discipline, training, working conditions, and all other aspects of employment. As an employee, all are expected to honor this policy and to take an active role in keeping harassment and discrimination out of the workplace.

Accommodation for Disabled Employees

We are committed to supporting qualified employees with disabilities by providing reasonable accommodations, in accordance with the Americans with Disabilities Act (ADA). Employees seeking accommodation are encouraged to contact their manager and may be asked to provide appropriate medical documentation to support their request.

Additionally, we accommodate employees diagnosed with life-threatening illnesses. These individuals may continue a regular work schedule if they wish, contingent upon receipt of medical documentation confirming that their duties do not pose a risk to themselves or others, and provided their performance meets company standards.

Employment of Minors

Our policy on employment of minors adheres to all FSLA standards, including the following:

- o Minimum employment age (14 for non-agricultural work)
- o Maximum weekly hours for employees under 16
- o Minimum hazardous job employment age (18)
- o Sub-minimum wage standards for students, apprentices, disabled employees, and employees under the age of 20.

Religion and Politics

Christian Servants Home Care, LLC maintains respect for all employees' religious affiliations and political perspectives. Employees who wish to engage in political activities are requested not to involve the Company in any capacity.

The Company is committed to supporting employees with their political and religious obligations. Accommodation may be arranged if requests are submitted to the General Manager in advance.

Private Information

Employee information is treated as confidential and is accessed strictly on a need-to-know basis. Healthcare-related data remains entirely private unless voluntarily disclosed by the employee. In select circumstances, both staff and management may be provided with protocols to ensure compliance with the Health Insurance Portability and Accountability Act (HIPAA).

Personnel files and payroll records are treated as confidential documents and are accessible only for authorized purposes. Should you need to review your records, please submit your request via email to: Bill.Renz@christianservantshomecare.com.

Types of Workers

This section distinguishes between the different types of workers the Company employs. Employee status is established at the time of hire and may only be altered via a written statement signed by the owners of the Company.

Exempt vs. Non-Exempt:

Most employees, including Caregivers, are classified as non-exempt and are therefore legally entitled to receive at least minimum wage and overtime pay. Overtime work is permitted only with prior approval from the reporting manager.

Exempt employees are not governed by these regulations, except as specified in the CSHC Wage & Hours policy. Exempt status is determined by distinct criteria outlined in state law and the Federal Labor Standards Act (FLSA). Management personnel are classified as Exempt, as their compensation consists entirely of commission based on the volume of clients they serve.

Performance Evaluations

Employees will receive scheduled performance evaluations completed by their reporting manager as deemed necessary. Evaluations will be made through observation of the employee's work and/or discussion with the clients they serve. Areas of evaluation can include but are not limited to communication, professionalism, dependability, knowledge of care, quality of service, and safety.

SECTION 3: EMPLOYEE RESPONSIBILITIES

Payment Schedule

Employees are paid on a bi-weekly basis. In cases where the regular payday falls on a holiday, or any day making it difficult for accounting to submit payroll, employees will receive payment on the first business day after said holiday.

Leaves of Absence

Employees requiring time off from work may apply for a leave of absence. All leaves must be approved by their manager, as we must always consider the client and plan for backfills to assist with leaves. For planned leaves, employees must submit requests at least 30 days in advance. Emergency leave must be requested as soon as possible. Accepting/performing another job or applying for unemployment benefits during leave will be considered voluntary resignation.

We consider all requests in terms of effect on the Company and reserve the right to approve or deny requests at will, except when otherwise directed by law. Any request for leave of absence due to disability will be subject to an interactive review. A medical leave request must be supported in a timely manner by a certification from the employee's health care provider. Extension of leave must be requested and approved before the current leave ends. No employee is guaranteed reinstatement upon returning from leave, unless the law states otherwise. However, the Company will try to reinstate each returning employee in his or her old position, or one that is comparable.

Below are the three main types of leave that Christian Servants Home Care, LLC offers employees. Some, but not all, are governed by law:

- o **Work-Related Sickness & Injury:** Employees eligible for Worker's Compensation rendered unable to work because of work-related injury or illness will receive unpaid leave for the period required. For eligible employees, the first 12 weeks will be treated concurrently as family and medical leave under the Family and Medical Leave Act.
- o **Maternity:** An employee disabled on account of pregnancy, childbirth, or a related medical condition may request an unpaid leave of absence of up to four months. Time off may be requested for prenatal care, severe morning sickness, doctor-ordered bed rest, and recovery from childbirth.
- o **Election Days:** Provided an employee's schedule does not allow time for voting outside of work, and that he/she is a registered voter, he/she may take up to two hours at the beginning or end of a workday to vote in a local, state or national election.

On the Job

Employees are expected to begin and end each shift at the time and on the day appointed. This is extremely critical for the home care business, so even minor infractions will lead to disciplinary action and possible termination. Failing to call one's manager to report an absence prior to start time, or failure to report to work for even a single day without proper planning for coverage, will be considered voluntary resignation, and will result in removal from payroll. Being early is being on time. All employees are expected to be ready to work the minute they clock in.

Client satisfaction is a top priority for our organization. Ultimately, the client determines whether to retain or discontinue our services. The Company maintains the right to terminate an employee should the client request such action.

Professional Boundaries and Worker Expectations

We expect all our employees to use respectful communication, written, verbal, and nonverbal as well as active listening. As a caregiver, you may work with a care recipient or family that has different beliefs. As a professional, you should respect these points of view and still be able to work with those individuals. It is best practice not to share your personal opinions when you are around the people you work for. Try to redirect the conversation to a different topic. Stay respectful and professional in all your interactions. Remember not to impose your personal beliefs on the care recipients.

Even with open communication, conflicts can occur. You should remain professional in all your interactions and be open to hearing what everyone is saying. Talk things out with your supervisor. Create a plan of action to address the conflict. Keep a record of everything. This helps to protect you as the provider.

Professional boundaries are guidelines for maintaining a positive, healthy, and helpful relationship with your client(s). Understanding boundaries helps employees avoid stress and misconduct, recognize boundary crossings, and provide the best possible care. A good question to ask, is: "Are my actions more about my needs than about the needs of my client?" If so, you may be crossing a professional boundary.

Professional boundaries include but are not limited to sharing personal information, not seeing behavior as symptomatic, touch, gifts/tips/favors, romantic or sexual relationships, over-involvement, and secrets. For example, it may be tempting to talk to your client about your personal life or problems. Do not share information because you need to talk, or to help you feel better. Remember that your relationship with your client must be therapeutic for them, not sociable for you.

Your professional demeanor affects how others perceive you. Personal and professional demeanor may be different. Body language and facial expressions speak volumes to clients. Good personal hygiene is a top priority due to proximity to clients. Accepting a gift from a client might be taken as fraud or theft by another person or family member, which also is crossing the professional boundary. Refrain from accepting gifts. If you feel a professional boundary was crossed: talk to your manager, consider a re-assignment, explain to the client that you are unable to behave in certain ways due to professional guidelines (e.g. accept gifts, keep secrets, etc.), draw a line between your work and private life.

Additional Job Standards and Requirements

Employees are strictly prohibited from:

- Sleeping or napping during scheduled work hours, including overnight shifts, unless explicitly authorized in the participant's approved service plan and by agency policy.
- Using participant bedrooms, beds, or private living spaces for personal rest or non-care-related activities.
- Showering, bathing, or conducting personal hygiene activities within the participant's home.
- Using participant personal belongings (e.g., towels, hygiene products, bedding, clothing, or grooming items).
- Engaging in personal business or activities unrelated to the delivery of authorized services while on duty.

Staff may:

- Use restroom facilities as necessary, maintaining cleanliness and respect for the participant's home.

- Take meal or rest breaks only as permitted by the care plan and agency policy, and only in participant-approved areas.
- Utilize household items strictly as required to complete assigned care tasks.

Awake Overnight and Supportive Home Care Shifts:

- Staff must remain awake, alert, and be able to respond to participant's needs unless sleep time is specifically authorized in the service plan (e.g., supportive home care with approved sleep time).
- Any approved rest periods must occur in designated areas and must never infringe upon the participant's personal or private space.

Participant Offers and Boundaries:

- If a participant offers access to personal spaces or items (e.g., offering a bed, shower, or personal belongings), staff must respectfully decline.
- Employees should explain that agency policy and Wisconsin program requirements prohibit acceptance to protect both the participant and the worker.

Professional Expectations:

- Staff are expected to arrive prepared for duty, including attending to personal hygiene needs prior to their shift.
- Employees must maintain professional boundaries consistent with DHS caregiver conduct expectations and agency code of ethics.

Dress Code

Employees are expected to always present themselves in a professional and appropriate manner. Depending on your job description and the day's tasks, dress may vary. For example, if you are performing household chores or personal care tasks, scrubs may be appropriate. We understand the need for comfort based on the job duties, weather, and daily activities but please keep your appearance tidy and well-groomed. Appropriate footwear is required for both your and the client(s) safety.

Safety

Safety in the workplace is the Company's number one priority. You must inform your reporting manager in the event of unsafe conditions, accidents, or injury, and always use safe working methods. If you feel that unsafe conditions are not being handled appropriately, please send a message to:

Bill.Renz@christianservantshomecare.com.

Employees must:

1. Prioritize safety first.
2. Immediately report any accidents, injuries, unsafe practices or conditions to your direct supervisor.
3. Understand and follow practices that will keep you safe as they apply to your job responsibilities.
4. Take necessary precautions to protect yourself, clients, and equipment from harmful situations.
5. Practice safe lifting techniques.

Transportation of Clients

This section details our requirements in accordance with our insurance coverage for driving a client while working for Christian Servants Home Care (CSHC). You must follow the policies below to be covered under our insurance and therefore may not drive for the company unless you fulfill these requirements. Many institutions that send us clients require that insurance covers our company while driving, so this is mandatory for driving any client where it is mandated by the hiring authority. If any of these items are not adhered to by those clients' demanding insurance, employees may not drive on behalf of the company. As an employee, you are responsible for having insurance that covers any accidents or events while driving for work. It is your responsibility as an employee to maintain the appropriate levels of insurance while driving on behalf of the company.

To drive for the company, employees must submit and follow these requirements:

- 1) Proof of auto insurance (this includes submitting renewed or changed policy information to your manager).
- 2) Maintain a minimum Liability limit of \$250,000 per person, \$500,000 per accident with \$100,000 of property damage, or a combined single limit of \$500,000.
- 3) Review, sign, and submit a copy of our "Motor Vehicle Driver Safety Policy".
- 4) Review, sign, and submit a copy of our "Driver Eligibility Guidelines" form, and meet the criteria according to MVR eligibility guidelines. Submit to having CSHC review their driving record from the Dept. of Motor Vehicles.

Incident Reporting

If an employee and/or client is involved in an incident while the employee is providing services, the employee shall immediately inform their reporting manager. The reporting manager will then send an Incident Report Form to the employee to complete. This must be completed by staff within 24 hours of the incident/accident. Upon completion of the form, the manager will provide a signature that has been received.

If necessary for certain types of incidents, additional reports may be made to law enforcements, CPS, and/or APS. This includes but is not limited to physical and/or verbal aggression or sexual advancements or harassment. Managers will follow up with case management and/or family appointed guardians for any incidents reported. Please review our *Aggressive and Sexual Behavior and Incident Reporting Policy* for further guidance on protocol to follow.

If an employee is injured while working, we have a 24/7 nurse hotline available for non-life-threatening injuries. Please call the Medical Nurse Hotline (800) 775-5866. Your manager will share more detailed information on this process with you.

Medical Assistance Compliance & Time Reporting

Every year, billions of dollars are improperly spent because of fraud, waste, and abuse (FWA). It affects everyone, including you. You are part of the solutions to detect, correct, and prevent FWA.

Compliance is everyone's responsibility! As an individual who provides health or administrative services for publicly funded enrollees, every action you take potentially affects the enrollees, public and private funding sources (MA, HCBW funding, Private Insurance), or HSD Service Delivery Programs.

Employees are expected to allow GPS locations and to be tracked while working for surveyable reporting. Employees are expected to be clocked in while performing job related duties. Time entries must be completed in real time while at the client's service location. Clients may be asked to verify services received by signing or electronically confirming visit times. Accurate reporting protects both the client and the agency and ensures services are billed correctly.

Failure to follow timekeeping procedures may result in corrective action, up to and including termination of services or employment.

This training is required at hire and annually per the HSD/MA Compliance Plan and Title 42 CFR, Section 438.608

Medical Assistance Compliance:

1. CSHC is committed to help with MA fraud detection and prevention
2. The owners are responsible for the Compliance Officer, and communicators of the MA Compliance program
3. CSHC strives to ensure all employees are versed in understanding how to detect and prevent MA fraud and misuse of funds.
4. All reports can be posted directly to the owners at bill.renz@christianservantshomecare.com or can be posted on our website anonymously.
5. Our time tracking system is used as a mechanism to ensure compliance with federal and state requirements by tracking the location of care and fields to add notes for care plans.
6. Payroll, General Managers, routinely monitor activities and audit care processes.
7. Corrective actions and follow-up are the responsibility of the General Manager or Director to validate any known complaints and follow up with interval verification of process compliance.

SECTION 4: EMPLOYMENT WAGES & BENEFITS

Wages

Wages vary from employee to employee and are based on level of skill and experience. The Company conducts ongoing evaluations of all employees and issues promotions as it sees fit.

Time Paid Between Client Shifts

Effective March 1st, 2025, we have decided as a company to pay Caregivers for time between client shifts any time it is less than 60 minutes between shifts. Caregivers must clock in separately during this time between shifts to get paid for this. This only includes time from client to client, not for traveling to and from home. The rate of this pay between shifts will be minimum wage. Any pay above and beyond this limit must be approved by each Caregiver's manager. In addition, this is only paid by the company when travel is not paid by another source, such as an MCO paying mileage or hourly per a contracted agreement.

Deductions & Garnishment

Federal and state law requires that we deduct the following from every paycheck:

- o Social Security
- o Income Tax (federal and state)
- o Medicare
- o State Disability Insurance & Family Temporary Disability Insurance
- o Other deductions required by law or requested by the employee

A Wage and Tax Statement (W2) recording the previous year's wages and deductions will be provided at the beginning of each calendar year. If you wish to adjust your income tax withholding, please contact your manager.

Sometimes, the Company receives legal papers that compel us to garnish an employee's paycheck – that is, submit a portion of said paycheck in payment of an outstanding debt of the employee. We must, by law, abide by this either until ordered otherwise by the court or until the debt is repaid in full from withheld payments.

Unemployment Insurance

Employees rendered unemployed through no fault of their own or due to circumstances described by law, receive unemployment insurance. State agencies administer this insurance and determine benefit eligibility, amount (if any), and duration.

Workers' Compensation

Workers' Compensation laws compensate for accidental injuries, death and occupational disabilities suffered in the course of employment. Christian Servants Home Care, LLC provides Workers' Compensation Insurance for all employees.

1. Employees must report work injuries to their supervisor immediately
 - a. The supervisor will have the employee fill out an incident report to document the injury, even if no medical treatment is required or the employee chooses not to seek medical treatment.
 - b. The employee will be required to contact the **Medical Nurse Hotline ((800) 775-5866)**
 - c. Should the employee seek medical treatment, they will be required to provide the physician with the assessment form that they will fill out and return to their supervisor.
2. Employees will be brought back to work as soon as they are medically able, even if light duty and work modifications are required.
3. Fraud is not tolerated
4. Workers' Compensation fraud is punishable under state law and will not be tolerated by CSHC company or the Workers' Compensation company.

Social Security Benefits (FICA)

Both employees and the Company contribute funds to the federal Social Security Program, which provides retirees with benefit payments and medical coverage.

Health Insurance

The company now offers an individual coverage health reimbursement arrangement (HRA). The reporting manager can provide additional information upon request.

Section 5: ETHICAL STANDARDS

Cell Phone Use

Cell phones brought to work must be on silent or vibrate mode to avoid disrupting clients. They may only be used during short breaks while not in the presence of the client. If a cell phone interferes with work in any way, an employee's cell phone privilege may be rescinded and disciplinary action, up to and including termination, may be used. Cell phones may not be used to take photos or videos of the client(s) or their home. Absolutely no sharing of client photos or information on social media accounts.

Rules & Policies

- o Confidentiality: No previous or current employee may disclose or give access to confidential Company information, in any way or at any time, unless otherwise authorized by owners in writing. Employees must never share any information about the client, or their family, in any way, including but not limited to, verbally, taking pictures, posting messages or pictures online, or any other means.
- o Discrimination & Harassment: In keeping with our Equal Opportunity Employment clause, the Company will not tolerate on-site discrimination or harassment on any legally protected basis. Harassment and discriminatory behavior among employees will result in disciplinary action, with the possibility of termination.
- o Drugs & Alcohol: Good performance on the part of our employees is crucial to Christian

Servants Home Care, LLC. For this reason, we strictly forbid employees to do the following while at work:

- Drinking alcohol and selling, purchasing or using illegal drugs at work. An “illegal drug” is any drug that has not been obtained by legal means. This includes prescription drugs being used for non-prescribed purposes.
- Possession of any non-prescribed controlled substance, including alcohol and legal, yet illegally obtained, prescription drugs.
- Reporting for work intoxicated. We reserve the right to test employees for substance abuse. Illegal drugs, illegal drug metabolites, or alcohol in your system will result in disciplinary action, up to and including termination of employment.

Disciplinary Action

The Company takes disciplinary matters very seriously and will exact discipline as it sees fit for any unacceptable action or behavior. These may include:

- o Lateness and/or absence
- o Improper or indecent conduct
- o Poor communication
- o Uncooperative attitude
- o Abuse, perfunctory or unauthorized use, or unauthorized possession of Company property
- o Unauthorized use or disclosure of Company information
- o Possession and/or use of illegal drugs, weapons or explosives
- o Illegal harassment and/or discrimination of any kind
- o Violation of Company policy

Disciplinary action may consist of anything from verbal/written warnings and counseling, to demotion, transfer, suspension, or termination. Rather than following rote procedures, the Company will handle each matter individually to ensure fairness to all involved. Please review and internalize the list of “Don’ts” above, and make an effort to use good judgment at all times.

Sexual Abuse & Molestation Prevention Policy

Christian Servants Home Care (CSHC) is strongly against sexual abuse and molestation and takes this matter very seriously. Sexual abuse and molestation is defined to include any conduct or activity leading to, or resulting in, sexual arousal or gratification of one, or all, of the parties involved. It includes, but is not limited to, inappropriate touching, inappropriate physical contact, titillating or romantic conversations. Sexual misconduct includes violation of boundaries. Boundaries are the critical issue reflecting the actual underlying intent of a non-erotic action.

It is the expressed policy of CSHC that all employees shall not engage in sexually oriented activity, including sexual conversations with clients, nor allow such conduct to exist between the clients themselves. Employees shall not develop sexual or intimate social relationships with clients, or the family members of clients, during and following services provided to such clients and their families by CSHC. Employees shall not engage in non-erotic activities for which the true intended result is sexual arousal or gratification.

Any person associated with CSHC who violates this policy will be discharged, reported to the proper authorities, and fully prosecuted of the law. Sexual abuse, molestation, and misconduct are crimes. As mandated reporters, any person associated with CSHC who fails to report such activity will be discharged, reported to the proper authorities, and fully prosecuted of the law.

HIPAA Policies and Procedures

WHO?

Employees must keep all Protected Health Information (PHI) or Electronic Protected Health Information (ePHI) confidential for all past, present, and future clients.

WHAT?

PHI and ePHI include anything written or spoken that could identify the client.

In order to de-identify a client you must remove:

- o Names
- o Geographic subdivisions smaller than state (address, city, county, ZIP)
- o All elements of dates (except year) including DOB, beginning/ending dates of care, death, age
- o Telephone, fax, SSN, VIN, license plate number
- o Medical record, account, or health plan beneficiary numbers
- o Certificate and license numbers
- o Email or IP addresses, and URLs
- o Biometric identifiers
- o Device identifiers or serial numbers
- o Full-face photographic and comparable images
- o Any other unique identifying number, characteristic, or code

WHERE?

PHI and ePHI must be kept in encrypted and locked electronic devices, and/or locked cabinets or rooms, where only those who are authorized to consume the PHI can do so.

WHEN?

You are required by law to protect PHI at all times, 24/7/365 for all past, present, and future clients, whether you're working or not!

When HIPAA permits you to disclose PHI, you must ONLY DISCLOSE THE MINIMUM NECESSARY AMOUNT of client information to accomplish your purpose.

PHI may be disclosed to other providers for treatment, covered entities for payment, and other covered entities that have a relationship with the client for healthcare operations AFTER a signed HIPAA authorization form is on file. Never give out information outside of your company, unless you know there is an authorization form on file!

WHY?

Following HIPAA is the law! Not following HIPAA guidelines would be cause for termination from CSHC.

HHS is now required to investigate and impose civil penalties where violations are due to willful neglect of PHI, including \$100-\$1.5M fines per breach and/or 1-10 years in prison per breach. The fine is given to the individual who committed the breach.

However, above all, follow HIPAA out of respect for our clients and their loved ones.

HOW?

In order to follow HIPPA laws, you are required to have all ePHI safe on encrypted platforms, as well as two-step verification on any electronic device.

- Examples:
 - Intuit Workforce Time App is encrypted. If you're using the Time App on your phone to clock in and out, you must log out of the Time App at the end of your shift, as well as have a passcode on your phone. This makes it encrypted, with a two-step verification.
 - Only use your encrypted work email to send PHI, and only do so where unauthorized persons are unable to see your computer screen.
 - Make sure to only use private Wi-Fi, don't ever access PHI while on public Wi-Fi.
 - Never take photographs of clients or client care spaces.

In order to follow HIPPA laws, you are required to have all PHI in print form locked when not in use.

Example: When finished writing Care Notes at the end of a shift, be sure the notebook or binder is placed in a locked cabinet or room.

Never remove PHI from a work site unless you have specific authorization from management.

REPORTING

Any breach of PHI or ePHI must be reported!

A breach is considered any time a client's PHI MAY HAVE BEEN consumed through speech, print, or digitally by an unauthorized person, or beyond the minimum necessary amount of required information with an authorized person.

Examples: ~A phone with the TSheets Application is stolen, and the employee may have forgotten to sign out of T-Sheets, leaving it compromised by not being two-step verified.
~A fax containing PHI was accidentally sent to the wrong number.

If there is a breach of a client's PHI, be sure to report it within 24 hours to:

Karolyn Klauer-Disterhaft HIPAA Compliance Agent
Christian Servants Home Care
karolyn.kd@christianservantshomecare.com
920-940-8030

Mandatory Reporting of Abuse/Neglect/Exploitation

Christian Servants Home Care, LLC (CSHC) complies with all relevant laws with regard to mandatory reporting of any suspicions of abuse or neglect. All CSHC employees are required to complete Wisconsin's Mandated Reporter Training. If CSHC becomes aware of possible abuse of a client we serve or has any reasonable suspicion of abuse or neglect, CSHC is required by law to notify the county where the client lives. To ensure incidents are reported in accordance with the law, any employee who witnesses abuse or neglect will report the incident as soon as possible within twenty-four (24) hours to their manager and CPS or local law enforcement.

Civil Rights Compliance Policies & Procedures

Christian Servants Home Care, LLC. adheres to all federal and state civil rights laws banning discrimination within home care agencies. Christian Servants Home Care, LLC. will not discriminate against any client receiving our services, potential client seeking our services, employee, or applicant for employment on the basis of race, religion, primary language, hearing status, personal appearance, gender, pregnancy, political affiliation, source of income, residence, creed, ethnicity, national origin, physical or mental disability, age, marital status, sexual orientation, military status, or any other protected persons under applicable local, state, or federal laws.

Christian Servants Home Care's Equal Opportunity Coordinator (EOC,) and Limited English Proficiency Coordinator (LEPC,) Karolyn Klauer-Disterhaft, will ensure that the following procedures are followed for civil rights compliance:

Each client receiving our services, and each potential client seeking our services will be made aware of our ability to provide any assistance necessary for them to understand our company's ability to assist with their needs, including but not limited to a translator, sign language translator, braille translation, and oral language assistance over the phone. If a barrier to communication arises, Christian Servants Home Care, LLC. will take whatever steps necessary to sufficiently communicate with the individual and update our procedures accordingly. Each General Manager will be trained by the EOC/LEPC on all Civil Rights Compliance Policies & Procedures. Each employee of Christian Servants Home Care, LLC will be trained by their manager on our Civil Rights Compliance Policies & Procedures. Every employee of Christian Servants Home Care, LLC. will be required to update their Civil Rights Training every three years.

Please contact Karolyn Klauer-Disterhaft with any questions and/or concerns regarding Christian Servants Home Care's Civil Rights Compliance Policies & Procedures at 920-940-8030 OR karolyn.kd@christianservantshomecare.com.

Client Grievance Procedure

It is the policy of Christian Servants Home Care (CSHC) to treat all clients with fairness and professionalism and to strive for excellence in providing services to clients. CSHC policy provides clients and their families or legal guardians with the opportunity to express a problem or grievance related to the quality of services. If you feel you have been treated unfairly, or unprofessionally or feel that your rights have been breached, the following procedure should be used.

CSHC grievance procedure is designed to provide a means for clients receiving services to bring a grievance to

the attention of CSHC and to reach a speedy resolution. CSHC has a strict policy prohibiting retaliation in any form against anyone who files a grievance.

A grievance is defined as any situation or condition that a client thinks is unfair, unjust, or inequitable. In addition, if a client merely states they want to file a grievance, a grievance should be completed. Under this Client Grievance Procedure, you should submit a grievance in the following sequence:

- If you have a grievance, the concern can be discussed with a CSHC staff. If you decide to speak to a CSHC staff member and an agreement cannot be reached, you should proceed to the next step of this grievance procedure. You can also file a grievance without any discussion and proceed to the next step.
- If the matter has not been resolved to your satisfaction, you may choose to discuss your concerns with any General Manager. Once notified in writing, CSHC will initiate an investigation within two business days and provide an acknowledgment to you within 7 business days.
- CSHC will report the outcome of the complaint investigation to you within 14 business days after the complaint is received. If it has not been possible to gather the necessary information that would lead to a resolution in 14 days, you will be notified and given a new date, up to 30 days, by which a resolution or determination will be made.
- If for any reason you are unsatisfied with the results, you may contact CSHC's Managing Partner (Owner) to further discuss the matter.
 - Contact Email: Anna.Stroschein@christianservantshomecare.com, Contact Phone: 262-939-0894.
 - The Managing Partner will conduct a review of the matter and will respond to you in writing within 10 business days. The Managing Partner's decision and recommendations will be final.

SECTION 6: JOB DESCRIPTIONS / SERVICES PROVIDED

The most prevalent and important role within our Company is the actual provider to our clients. We are including the job descriptions right within our Policies & Procedures. As an employee, you provide a variety of non-medical services that allow seniors or other individuals with needs to remain in their home. These services generally fall under three categories: companionship, home helper, and personal service. In addition, our employees also support the needs of children and their parent(s) / guardian(s), commonly in the form of respite care.

Companionship

Companionship services are those that stimulate, encourage, and assist an individual. The primary responsibilities of companionship services include the following:

- Providing companionship and conversation
- Providing stabilization and assistance with walking
- Preparing meals and cleaning up meal-related items
- Providing medication reminders and appointment reminders

Home Helper

Home helper services generally involve light housekeeping, errands, or incidental transportation. The primary responsibilities of home helper services include the following:

- Performing light housekeeping tasks (dusting, vacuuming, making beds, changing linens, cleaning bathrooms, kitchens, etc.)
- Washing and ironing laundry
- Running errands
- Accompanying clients to appointments

Personal Service

Personal services are personal in nature and often include assistance with activities of daily living. The primary responsibilities of personal service include the following:

- Assisting with bathing
- Assisting with grooming
- Assisting with toileting and incontinence issues
- Independent living support

Secondary responsibilities include contributing to a positive living environment to enhance a client's quality of life, performing other reasonable duties as assigned, and reporting hours as requested.

Respite Provider

Respite care services maintain and strengthen the individual's natural supports by easing the daily stress and care demands for their family, or other primary caregiver(s). A respite provider's role is to have meaningful, one-on-one interaction with the client while giving the primary caregiver a needed break. The primary responsibilities of this role include the following:

- Providing supervision
- Engaging in appropriate activities that the client enjoys
- Accompanying the client on community-based outings

Other responsibilities may include helping with meals or other routine tasks that the primary caregiver would otherwise do.

Comprehensive Community Service (CCS) Provider

CCS is a recovery-focused, integrated behavioral health program for adults and children with mental illness and or substance use disorders. Christian Servants Home Care CCS provider services may include the following:

- Individual Skill Development and Enhancement
- Employment Related Skills Training
- Individual and or Family Psychoeducation
- Peer Support

*Please note that CCS providers are required to have an applicable Bachelors and or Master's Degree.

Additional Comprehension of Job Responsibilities

It is very important that all employees understand what they may NOT do, as we are solely a non-medical provider. Employees are **NOT allowed** to perform any medical care. Items that are NOT allowed, include (but are not limited to):

- Under any circumstances, employees are **not** allowed to use physical or manual restraints, seclusion and/or physical discipline.
- IV Infusions, catheter care, injections, tracheostomy care, ventilator patient care, or anything relating to needles or actions that require breaking the skin.
- Wound Care – cleaning of a wound is NOT allowed. The furthest we are allowed to do is to hand someone an adhesive bandage.
- Medical Administration – we are allowed to remind clients to take medication but must NOT administer.
- Physical Therapy, post-op rehab training or therapies – we are NOT experts on movements that promote mobility and function. We assist, but do NOT provide advice.
- Blood Pressure Checks – we are NOT allowed to check blood pressure for our clients.
- Pain Management – we do not have the knowledge or training to provide advice on pain management.
- Education on disease management – again, we do NOT have the knowledge or training to provide advice.
- Medical Equipment – we are not to use any medical equipment.
- Topical Medications – we may NOT apply topical medications; eye drops or ear drops. We can assist with lotion and provide reminders for topical medications.

SECTION 7: MEMBER PROCESS & PROCEDURE

Admissions and Discharge

A client can be brought into our program through various referral processes, word of mouth and/or networking. In cases in which a referral is received through a formal contract (MCO's, State Programs) our standard process is to have the referring agency complete a referral form. This referral form has the necessary information we need to make contact with the family, guardian and/or client.

When it is determined that a member no longer requires services, communication will occur between the client, family and/or guardian, case worker (if applicable), caregiver and CSHC management. A mutually agreed upon date will be set for when services will be ended. Any other necessary information and communication will be left up to the individual manager.

Member File Management & Records Retention Policy

The standard process is to store member information on the company's secure Google. The information stored in this folder can include: referral documents, client assessments, and any other pertinent information

management would need to perform services adequately. This information is accessed in accordance with HIPAA policies and procedures.

Upon termination of services by either the agency and/or participant all necessary information is archived immediately. Records will be kept for at least the minimum amount of time set forth by the state in which the services were rendered. In the event that records need to be disposed of, it will be done in accordance with local and/or state and/or federal guidelines.

SECTION 8: TRAINING

It is critically important that employees are properly trained to care for our clients. Our hiring philosophy involves hiring the best-of-the-best providers, to ensure that they already have been trained thoroughly, however, it is important that all employees understand the responsibility to seek training any time they feel they need it, whether for the first time, or a refresher course. Each client is different, and may require different skills, so it is important to seek training if you are approaching something new.

The Company will pay for training or provide the training directly that any associate feels they need, which must be approved by ownership. Locations and providers of training may differ given the vast geography of our Company. Knowledge that is mandatory and must be obtained in the event that an employee has not previously been trained, include:

- o First aid and CPR Training
- o Crisis Management Training – knowing when to seek medical help
- o Mandated Reporter Training

In addition, all employees will be trained and will agree to sign off when starting with our company on the following:

- o Mission Statement
- o History of CSHC
- o HIPAA & Confidentiality Requirements
- o Abuse, Neglect, and Exploitation
- o Aggressive and Sexual Behavior
- o Professional Boundaries and Job Expectations
- o Ethical Standards
- o Clocking In & Out with T Sheets Electronic System
- o Charting & Documentation in the Home
- o On-Call & Emergency Protocols
- o Incident Reporting
- o Understanding the Client Assessment: Client Specific Training with your Manager
- o Understanding Who We Serve
- o Providing Quality Care: Above & Beyond
- o Attendance Policy

Employees do have 24/7 access to Christian Servants Home Care Employee Training Portal at

<https://sites.google.com/christianservantshomecare.com/cshcemployeecenter/trainings>

Appendix A: Document History Changes

- 3/18/2026 – Added [“Additional Comprehension of Job Responsibilities”](#)
 - “Under any circumstances, employees are **not** allowed to use physical or manual restraints, seclusion and/or physical discipline.”
- 3/18/2026 – [Added to “Employee Information”](#)
 - “During employment, all employees must notify their manager as soon as possible if they are being investigated or have been convicted of any crime and or if they have substantiated findings of abuse, neglect, or misappropriation including CPS (Child Protective Services) and/or APS (Adult Protective Services) investigations per WI statute code Wis. Admin. Code § DHS 12.07(1).”
- 3/18/2026 – [Added to “Medical Assistance Compliance & Time Reporting”](#)
 - “Employees are expected to allow GPS locations and to be tracked while working for surveyable reporting. Employees are expected to be clocked in while performing job related duties. Time entries must be completed in real time while at the client’s service location. Clients may be asked to verify services received by signing or electronically confirming visit times. Accurate reporting protects both the client and the agency and ensures services are billed correctly. Failure to follow timekeeping procedures may result in corrective action, up to and including termination of services or employment.”
- 3/18/2026 – [Added to “Section 8: Training”](#)
 - “Abuse, Neglect, and Exploitation”
 - “Aggressive and Sexual Behavior”
- 4/21/2026 – [Added new paragraph “Additional Job Standards and Requirements”](#)