

BOARD POLICY STATEMENTS

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Inclusion Inc.

Offering people resources and education to direct their lives.

BOARD POLICY STATEMENT

SUBJECT: AUTHORITY TO APPROVE AND SIGN SERVICE CONTRACTS

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

The Executive Director, as appointed by the Board, shall be authorized to approve and sign on behalf of Inclusion, Inc. without prior Board of Director approval any service contracts or related amendments to said contracts provided the maximum amount of the contract does not exceed a total of \$250,000.

Any service contract in excess of \$250,000 shall require prior approval by the Board of Directors and shall also require the signature of the President or a specifically designated member of the Board.

The Executive Director shall seek to inform the Board of Directors prior to the signing of any service contract whenever reasonably possible. If not possible, the Executive Director shall inform the Board of the signing of any service contract and of the key provisions of such service contract as soon after the signing as is feasible.

BOARD POLICY STATEMENT

SUBJECT: BANK ACCOUNT CONDITIONS AND SIGNERS

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 1/24/08

The Board of Directors will approve, by resolution, the establishment and names of all bank accounts to be used by Inclusion, Inc. All bank accounts shall be under the name of Inclusion, Inc. with whatever additional information is necessary for the expressed purpose of the account. All accounts will be at a financial institution approved by the Board of Directors.

Unless specifically approved by resolution, all checks, drafts or other non-electronic withdrawals of Inclusion, Inc. operational funds from financial institutions shall require the following approval:

- Amounts in excess of \$1,500 require two signatures from the list most recently approved by the Board of Directors
- Smaller amounts (equal to or less than \$1,500) shall require one signature from the list on the resolution most recently approved by the Board of Directors

The pre-signing of checks is expressly prohibited by this policy.

Within this policy it is understood that the two primary check signers will be the Executive Director and the Operations Coordinator. Other designated signers will primarily serve as “back-up” signers unless specific operational situations dictate otherwise. Generally, the back-up signers will be utilized in emergency or extremely urgent situations when the Executive Director and/or Operations Coordinator are not readily available to provide their signatures. In these situations, the Executive Director will be informed as soon as is reasonable that an alternate signer was used to fulfill a financial transaction and for what reasons this was necessary.

The Board of Directors has also approved by resolution the use of four debit/credit cards drawing from the same accounts. Cards will be signed out by those who will be responsible for and who will use them: Executive Director, both Lead Personal Agents and Operations Coordinator. Cards will be used for business reasons only and will be subject to monthly limits. Cards will not be used in situations where existing accounts or other recognized vendors could be used.

Receipts relating to use of company card will be transferred as soon as possible to the Accounting Manager who will be responsible for reconciling the account upon receipt of the monthly statement from the bank. If used accidentally by the bearer a personal check or cash equal to the amount put on the card will be immediately paid to the agency to offset the expense.



BOARD POLICY STATEMENT

SUBJECT: BOARD INSURANCE AND INDEMNIFICATION

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

Inclusion, Inc. shall keep in force executive liability and Indemnification insurance, i.e. directors and officers liability coverage, with the following coverage minimums:

\$1,000,000 each loss

\$1,000,000 each policy year

BOARD POLICY STATEMENT

SUBJECT: BOARD MEETINGS

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

The sole purpose of Board meetings relate to the single task of getting the work of the Board completed. In regard to this purpose, the following policies will apply:

1. **AGENDA CONTROL:** The Board will have sole authority over its own agenda. The President will exercise this control on behalf of the Board. However any Board member, with a majority of members agreeing, can add or delete business from the agenda. It will be the goal to provide materials related to the agenda to Board members with adequate lead-time for their preparation for meetings.
2. **AGENDA CONTENT:** The President or other Board members will include on the agenda only the issues that represent the Board's areas of responsibility. The Board will undertake matters that only relate to fulfilling their governance responsibilities and not those management matters appropriately delegated or assigned to the Executive Director. The Board may, however, review the performance of the Executive Director against Board imposed expectations, duties, or desired outcomes any time it wishes.
3. Board members are obligated to prepare for meetings and to participate constructively in discussion, always within the boundaries of discipline and expectations established by the Board.

BOARD POLICY STATEMENT

SUBJECT: BUDGET DEVELOPMENT

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

The Board of Directors of Inclusion, Inc. shall plan and control revenues and expenditures through the development and monitoring of an approved budget for each fiscal year. The responsibility for the development of the annual budget and monthly monitoring and reporting will lie with the Executive Director as appointed by the Board. This material shall be presented to the full Board of Directors for discussion and acceptance. The budget process shall include:

Operating and capital expenditures.

- Conservative projections of available revenues.
- Conservative reliance on fund raising proceeds.
- Adequate cost-control analysis.
- Annual review and approval of staff wage scales and benefits.
- Schedule of critical dates related to draft development and review prior to board approval of the annual budget on or before the July board meeting.
- Contingency plans to be implemented to reduce deficits that may become evident during the monitoring phase of the budget process.

All budgeted Inclusion, Inc. program functions and activities shall be in keeping with the mission statement and stated objectives of the strategic plan and mindful of the tax exempt status of the organization.



BOARD POLICY STATEMENT

SUBJECT: COMPENSATION OF EXECUTIVE DIRECTOR

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

The Board of Directors shall approve the compensation and any adjustments to the compensation of the appointed Executive Director.

BOARD POLICY STATEMENT

SUBJECT: CONFLICT OF INTEREST (BOARD)

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

Members of the Inclusion, Inc. Board of Directors are expected to evidence the highest ethical standards in fulfilling their duties. Board members will receive no honoraria or funds for board service, nor shall a Board member receive funds directly from Inclusion, Inc. except for approved out-of-pocket expenses. No member of the Board will receive preferential treatment for the receipt of Inclusion, Inc. services.

No Board member shall use his or her position, or the knowledge gained therefrom, in such a manner that a conflict between the interest of the organization or any of its affiliates and his or her personal interests arise.

Each Board member has a duty to place the interest of the organization foremost in any dealings with the organization and has a continuing responsibility to comply with the requirements of this policy.

The conduct of personal business between any Board or committee member and the organization and any of its affiliates is prohibited.

Board or committee members may not obtain for themselves, their relatives, friends, or businesses a material interest of any kind from their association with the organization.

If a Board member has an interest in a proposed transaction with the organization in the form of a significant personal financial interest in the transaction or in any organization involved in the transaction, or holds a position as trustee, director, or officer in any such organization, he or she must make full disclosure of such interest before any discussion or negotiation of such transaction.

When a conflict of interest exists, the Board member(s) must abstain from voting on items that relate to the conflict. Such notice and actions shall be recorded in the minutes of the meeting. In cases of question, the member shall request that a Board decision be made as to whether or not a conflict of interest exists. Until a determination is made, the member must act as if the conflict exists.

I have read the statement of policy regarding of conflict of interest and agree to comply with the expectations and conditions.

Signature: _____

Date: _____

BOARD POLICY STATEMENT

SUBJECT: DELEGATION OF RESPONSIBILITIES TO THE EXECUTIVE DIRECTOR

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

To facilitate optimum effectiveness, the Board of Directors of Inclusion, Inc. recognizes the Board's responsibility as being generally confined to establishing topmost policies, strategic planning, and generally governing the agency. This leaves the management responsibilities of implementing plans and policies as well as the development of subsidiary plans and policies to a Executive Director, as appointed by the Board. All Board authority delegated to staff is delegated through the Executive Director so that all actions of agency staff will be considered, as far as the board is concerned, as the authority and accountability of the Executive Director.

1. The Executive Director is authorized to establish all further policies, make all decisions, take all actions and develop all activities which are true to the Board's overall policies, plans and governance expectations. The Board may, by extending or its policies, further modify areas of the Executive Director's authority, but will respect that person's choices so long as the delegation continues. This does not prevent the Board from obtaining information about policies, decisions, actions and activities delegated to the Executive Director.
2. Only the Board, by majority vote, has authority over the Executive Director. The Executive Director will make every effort to make agency information readily available to Board members and to honor requests from individual Board members and committees. However, if a request from an individual Board member or a committee of the board, in the Executive Director's judgment, requires a material amount of staff time, it may be refused.
3. The Executive Director may not perform, allow or cause to be performed any act which is unlawful, insufficient to meet commonly accepted business and professional ethics or the "prudent person" test, in violation of funding source requirements or regulatory bodies or contrary to explicit board constraints on the Executive Director's authority.
4. Unless otherwise approved by the Board, the Executive Director shall devote full time efforts to his/her duties Inclusion, Inc. and shall avoid participation in or support of activities that conflict with the mission and goals of the organization.

BOARD POLICY STATEMENT

SUBJECT: FINANCIAL CONDITIONS POLICY

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 1/24/08

The overriding policy of Inclusion, Inc. is that its financial condition never results in fiscal jeopardy to the organization or substantial disruption in efforts to fulfill the agency mission.

In relationship to this overriding policy, the following subordinate policies shall apply:

1. Expenses over the course of a fiscal year shall not exceed revenue except as specifically approved by the Board. Depreciation expense is not considered an expense for the purpose of this policy.
2. Capital expenditure purchases will be pre-planned within the annual budget development process and approved by the Board of Directors upon approval of the annual operating budget. Any capital expenditure purchases not approved within the operating budget must be specifically prior approved by the Board of Directors. Capital expenditures will be defined as equipment with an initial cost in excess of \$500 and an anticipated useful life of two (2) years or more.
3. The assumption of any long-term debt obligation must be approved by the Board of Directors. Long-term debt shall include any monetary obligation of the agency that has a repayment period in excess of twelve months.
4. Funds received with restricted use conditions or otherwise designated for specific use by the Board must be used only for the specified purpose.
5. The principal administrative staff shall see that agency debts are settled in a timely manner.
6. The Board shall monitor financial performance by reviewing monthly agency financial information.

The Board shall have access to any and all financial information deemed necessary to carry out its responsibilities. This information at a minimum shall include summarized Balance Sheet and Income and Expense Reports. Also available on a regular basis will be detailed monthly financial information by project activity to assist the Board in determining if the conditions of this policy are being followed.

7. The Board will select an independent accounting firm to conduct an annual audit.

BOARD POLICY STATEMENT

SUBJECT: MONITORING AND QUALITY ASSURANCE

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

To fulfill its responsibility to promote the agency mission and promote quality services for the individuals and families supported, the Board of Directors will review on a schedule determined by the Board several quality assurance indicators and other types of management or operational data. These informational areas include, but are not necessarily limited to:

- Customer satisfaction with Inclusion, Inc. services and individual plans in all areas of support
- Service outcomes (e.g. achievement of personal goals and effective use of resources)

The review will utilize information from a broad range of customer, advocate, professional and other sources. Review will include Inclusion, Inc. Customers in the process of evaluating the quality of their supports.

The appointed principal administrative staff member will be responsible for maintaining the data or information required to comply with this policy and to report the information to the Board based on the required schedule.

In addition to the above activities the Board of Directors assigns the Executive Director with the development, implementation and reporting of systems to monitor and maintain quality in:

- Program effectiveness and compliance with applicable rules and contract requirements in the provision of the Support Services Brokerage
- Development of Individual Support Services Plans
- Record keeping

Inclusion, Inc. will participate in statewide evaluation and regulation activities as directed by contracting or regulatory authorities.

BOARD POLICY STATEMENT

SUBJECT: NOTIFICATION OF FRAUD AND EMBEZZLEMENT

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

It is the policy of Inclusion, Inc. that all agencies or organizations contracting with Inclusion, Inc. for services will be notified of any alleged fraud or embezzlement activities. The appointed Executive Director will be required to notify these agencies not later than one working day after the date that the alleged fraud/embezzlement activity comes to his or her attention. The Executive Director will also inform the Board immediately of any suspected or alleged fraud or embezzlement activities. In the case where the Executive Director is a suspected party to the alleged fraud or embezzlement, the notification responsibility will be assumed by an appointed member of the Board of Directors.

In the case of suspected fraud or embezzlement, Inclusion, Inc. will immediately initiate an investigation into the matter and notify any authorities necessary to insure that a thorough and proper investigation is performed. Inclusion, Inc. will also cooperate fully in any investigation or review of internal controls conducted by contracting agencies to determine if resources within their particular financial arrangement with Inclusion, Inc. are compromised, at risk, or otherwise negatively impacted by the suspected fraud/embezzlement. If such an evaluation results in recommended operational changes, the staff will make the recommended changes.

Inclusion, Inc. will disclose to contracting agencies appropriate information to assist in their determination if they are impacted negatively by the alleged fraud or embezzlement. This information may include any person who has ownership or control interest of more than 5% or is an officer, director, managing employee and has been convicted of a crime related to his or her current position with Inclusion, Inc.

BOARD POLICY STATEMENT

SUBJECT: RESPONSES TO FISCAL REVIEW/AUDIT FINDINGS

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

All evaluative reports that result from financial reviews or audits of the accounting system of Inclusion, Inc. will be routed immediately to the Secretary/Treasurer of the Board of Directors who will share this information with the Board. The appointed Executive Director, in consultation with the Secretary/Treasurer, will be responsible for preparing a written response to financial review or audit recommendations. The Executive Director will also be responsible for providing any needed corrective actions. Such corrective actions, and any required notification of these actions, will occur within six months of the issuance of the fiscal review/audit findings.

BOARD POLICY STATEMENT

SUBJECT: SELECTION AND SUPERVISION OF AUDITOR

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

The Board of Directors will select an independent, qualified accounting firm to conduct an annual financial audit.

The firm selected for the financial audit shall not be the same firm engaged by Inclusion, Inc. to conduct its monthly and ongoing financial services.

The audit will be conducted under the auspices of the Secretary/Treasurer of the Board, with support by the Executive Director and Chief Fiscal Officer. Audit findings will be presented to the Board of Directors for discussion and acceptance. The auditor will be asked to be present at the Board meeting should this be determined necessary or beneficial by the Board of Directors.



BOARD POLICY STATEMENT

SUBJECT: SERVICE ADDITIONS OR MODIFICATIONS

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

Any modification to the size, scope or composition of Inclusion, Inc. services that is not already approved within the agency's strategic plan or annual operating budget must be prior approved by the Board of Directors. Consideration of such matters will be based upon the professional analysis and recommendation presented by the agency's appointed principal administrative staff member and justified in terms of the agency's philosophy, role, mission, and plans. Any financial impact of such proposed changes will be reviewed at a full Board meeting for discussion and decisions.

BOARD POLICY STATEMENT

SUBJECT: Board Member Orientation and Training

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

It shall be the policy of Inclusion, Inc. to adequately orient all members of the Board of Directors. The orientation process shall occur on a timely basis and shall, as a minimum, include the following topics:

- Agency history and mission, including the role of the agency in the overall service system.
- Member role and responsibilities, including job description and legal responsibilities.
- Member expectations, including code of ethics, conduct, and conflict of interest.
- Board policies and procedures, including the articles of incorporation and bylaws.
- Board organizational structure.
- Role of the Executive Director and agency staff.
- Board and committee meeting dates, processes, and formats.
- Parliamentary procedures.
- Description of agency services and service recipients.
- Funding sources, structures, and contractual responsibilities.
- Financial records and processes.
- Risk management procedures.
- Review of the current strategic plan.

It shall also be the policy that the Board of Directors will have an ongoing program of Director training/development. This program will be based on an annual plan developed and approved by the Board and intended to assist Directors in fulfilling their respective responsibilities. This ongoing training program will include, but will not be limited to, such topics as:

- Trends in the field of developmental disabilities.
- Evaluation process for assessing the performance of the organization, Board, individual Directors, and the Executive Director.
- Understanding fiscal procedures and records.
- Public relations and marketing.
- Policy Development.
- Strategic Planning.
- Resource Development.
- Cultural Diversity and Competency.



BOARD POLICY STATEMENT

SUBJECT: EMPLOYEE DEVELOPMENT

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

Inclusion, Inc. is committed to continued and ongoing training and development of staff. A condition of employment may require training in certain areas that the organization deems necessary to fulfill their job assignments. Training and development activities will be in addition to the general orientation a new employee will receive.

To support and insure the implementation of staff development and training, the Board will include funds in the organization's annual budget for this purpose. The budgeted amount will be based on an annual plan of staff training and development presented to the Board of Directors by the Executive Director. The Director will then be expected to report the progress of implementing this plan to the Board on a schedule determined by the Board.

BOARD POLICY STATEMENT

SUBJECT: CULTURAL COMPETENCY AND DIVERSITY

INITIAL DATE APPROVED: 9/25/01

LATEST DATE APPROVED: 9/25/01

Inclusion, Inc. is committed to developing, maintaining and encouraging a work environment in which diversity and individuality are respected. Our goal is for the work environment to be free of cultural, racial, and sexual bias or harassment. To maintain and encourage a workplace that accepts diversity, Inclusion, Inc. is committed to the development of professional skills which respect and honors individuals from all walks of life. To this end, Inclusion, Inc. has:

1. A Board of Directors and staff which supports a diverse community;
2. A program to invite community representatives to address issues of diversity and relate them to the developmental disabilities service community. All staff and members of the Board of Directors are encouraged to attend these meetings.
3. A set of personnel policies and procedures which includes a nondiscrimination policy; and
4. Delivery of services to individuals and programs which respect and acknowledge cultural relevance and diversity.

BOARD POLICY STATEMENT

SUBJECT: FISCAL INTERMEDIARY SERVICES FOR CUSTOMERS

INITIAL DATE APPROVED: 1/24/08

LATEST DATE APPROVED: 1/24/08

Inclusion, Inc. shall contract out for customer Fiscal Intermediary Services. The fiscal agent performing these services shall:

- Have sufficient education, training and experience to effectively perform all required activities
- Demonstrate a practical understanding of the laws, rules and conditions that accompany use of public resources
- Have an accounting system that operates effectively on a large scale while tracking individual customer budgets
- Follow through with timelines for payments that meet individual needs
- Operate an effective payroll system including the comprehensive management of payroll tax obligations
- Generate service, management and statistical information as might be required by the Executive Director and the Board of Directors
- Generate and make accessible plan budget and expenditure information needed by customers to effectively manage their supports
- Generate reports on customer expenditures required by the State of Oregon and other contracting agencies
- Maintain accounting system flexibility to adapt to changing support plans and circumstances of customers

The Accounting Manager will have the necessary background and education to provide training and technical assistance to customers in fiscal issues including employer roles and responsibilities, payroll requirements and other financial issues related to support plan implementation.

BOARD POLICY STATEMENT

SUBJECT: RECORDS

INITIAL DATE APPROVED: 1/24/08

LATEST DATE APPROVED: 1/24/08

Inclusion, Inc. will maintain individual customer records and make them available for review by contracting agencies and regulatory authorities. Customer records will include:

- Written individual applications for services that meet the requirements of the Support Services Rule
- A summary of basic information including name (family name if applicable); guardian, designee or conservator (if applicable); address; phone number; date of entry into program; date of birth; sex; marital status; financial resource information; plan start date and plan year anniversary date
- Documents related to eligibility for Support Services and funding limitations (e.g. Basic Supplement Criteria, Waiver Status)
- Records related to receipt and disbursement of funds, including expenditure authorizations and verifications, copies of CPMS expenditure reports and qualification of providers
- Signed documentation that the customer or their legal representative have been informed of responsibilities associated with use of Support Services funds
- Incident reports involving Inclusion, Inc. Personal Agents
- Assessments used to determine required supports, preferences and resources
- Individual Support Plans and reviews
- Correspondence and notes related to resource development and plan outcomes
- Information and surveys related to customer satisfaction with personal supports and services provided by Inclusion, Inc.

Inclusion, Inc. will maintain expenditure records related to Support Services funds. These records will include:

Itemized invoices and receipts to record any single item purchase costing \$25.00 or more

- A trip log indicating purpose, date, destination and total miles to verify vehicle mileage reimbursement
- Signed contracts and itemized invoices for any services purchased from independent contractors and professionals
- Pay records including time-sheets signed by both employee and employer, to record employee services
- Records of the purchase of any equipment for exclusive use by individual customers including the purpose, final cost and date of receipt
- Documentation/ written agreement of securing the interest/ exclusive use of equipment or furnishings costing over \$500.00 specifying the time period the item is to be available to the individual and the responsibility of all parties should the item become lost, damaged or sold within that time-period
- Records of environmental accessibility adaptations involving renovation or construction in a customer's home costing \$5000.00 or more (for either a single modification or cumulative modifications) including securing of approval through the State Seniors and People with Disabilities Services before work is begun and before final payment is made, documentation that the work is completed and supervised by a contractor licensed and bonded in the State of Oregon and records of steps taken to protect the State's interest through liens or



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other legally available means as required by relevant contract conditions and Support Services administrative rules

For compliance with applicable laws and regulations, any goods purchased with Support Services funds that are not used for the documented purposes as described in the customer's Individual Support Plan or according to the agreement securing the State's interest may be immediately recovered. Customers are to be informed that failure to provide written documentation upon written request from the State may be deemed reason to recover payments and/or deny further assistance.

BOARD POLICY STATEMENT

SUBJECT: CONFLICT OF INTEREST (STAFF)

INITIAL DATE APPROVED: 1/24/08

LATEST DATE APPROVED: 1/24/08

Given that the field of developmental disabilities services in Oregon is a relatively small and close-knit community it is probable that our Personal Agents will have and utilize their personal network of associations with other's in the field. In most cases the network of relationships is a positive attribute for Personal Agents and should be encouraged. In some cases referrals may be questionable and there must be a process for reviewing their validity. In order to address potential conflicts of interest or nepotism the Board of Directors will ~~form~~ designate the Quality Assurance Committee as a Conflict of Interest Review group to review questionable provider/ vendor referrals.

The Conflict of Interest Review group will ~~develop and implement forms and~~ develop procedures for review of potential conflicts or questionable referrals.

Any Personal Agent or Inclusion, Inc. staff working in the role of Personal Agent who is married, related to or living with a provider/ vendor of support services shall not refer, recommend or otherwise support their customer's use of this provider/ vendor unless:

- The Conflict of Interest Review group conducts a review of provider options demonstrating that the provider/ vendor's services will be the cost-effective and best suited to the needs of the individual customer
- The review establishes that services provided by the provider/ vendor are the most effective and desirable for meeting the needs and circumstances represented in the Individual Supports Services Plan

Once the referral is approved, the customer may freely select the provider/ vendor from a range/ list of provider/ vendors qualified to provide the required services. The Inclusion, Inc. Board of Directors will serve as an appeals board should decisions of the Conflict of Interest Review Group be challenged. The agency's grievance policy will dictate the appeals process.