

# **Employment Programs for People with Disabilities: Policies for Effective Operations**



**Institute for Community Inclusion**  
UNIVERSITY OF MASSACHUSETTS BOSTON

## TABLE OF CONTENTS

<b>Overview.....</b>	<b>1</b>
Organization of this document.....	1
<b><i>Policy Area: Policy Development and Review.....</i></b>	<b>2</b>
Writing policies and procedures .....	2
Policy: Development of policies .....	2
Policy: Review of current policies .....	3
<b><i>Policy Area: Employment Services: Core Operational Principles .....</i></b>	<b>3</b>
Policy: Employment First .....	3
Policy: Natural supports.....	3
Policy: Person-centered practices .....	4
Policy: Informed choice and employment.....	4
Policy: Technology First.....	4
Policy: Participant staff preferences .....	5
Policy: Reasonable accommodations for participants .....	5
Policy: Employment transportation .....	5
Policy: Public benefits.....	6
Policy: Families and guardians .....	6
Policy: Engagement of funding sources.....	6
<b><i>Policy Area: Day-to-Day Employment Service Operations .....</i></b>	<b>7</b>
Policy: Policies on the delivery of the various services .....	7
Policy: Accessing services.....	7
Policy: Exiting services.....	7
Policy: Participants with criminal records.....	7
Policy: Internal referral and supports policy .....	8
Policy: Caseloads.....	8
Policy: Tracking of business and employer contacts.....	8
Policy: Meeting with the participant .....	8
Policy: Supporting participants remotely .....	9
Policy: Staff & participant appearance .....	9
Policy: Medication & personal care.....	10
Policy: Drug testing for employment .....	10
Policy: Weather and other emergencies .....	10
Policy: Staff meetings .....	11
Policy: Billing .....	11

<b>Information Sharing .....</b>	<b>11</b>
Policy: Confidentiality and disclosure of disability information.....	11
Policy: Releases.....	12
<b>Policy Area: Use of Vehicles .....</b>	<b>12</b>
Policy: General vehicle usage .....	12
Policy: Agency vehicles.....	12
Policy: Personal vehicles.....	13
Policy: Mileage.....	13
<b>Policy Area: Documentation, Forms, Files, and Reports .....</b>	<b>13</b>
Policy: Internal forms and documents .....	13
Policy: Participant files .....	14
Policy: Agency-to-agency file sharing .....	14
Policy: Case notes and reports .....	15
Policy: Incident reporting .....	15
<b>Policy Area: Quality Improvement.....</b>	<b>15</b>
Policy: Agency surveys.....	15
Policy: Quality control .....	16
<b>Policy Area: Human Resource Issues.....</b>	<b>16</b>
Policy: Employment services organizational structure .....	16
Policy: Hiring policy .....	16
Policy: Onboarding .....	17
Policy: Ongoing training and staff development .....	17
Policy: Schedules, hours of operation .....	17
Policy: In office time, community services, remote work .....	18
Policy: Wage scale .....	18
<b>Policy Area: Technology and Data .....</b>	<b>18</b>
Policy: Staff use of technology .....	18
Policy: Development and maintenance of a database .....	19
<b>Policy Area: Miscellaneous Policies .....</b>	<b>19</b>
Policy: Professional relationship with participants.....	19
Policy: Social media.....	20



## OVERVIEW

This document outlines policies to consider for those who provide employment services and supports to people with disabilities.

Organization and program policies ensure clarity, consistency, and quality in the employment services a provider delivers.

The focus of this document is on policies specific to employment services and supports. It generally does not encompass policies for the organization as a whole (for example, general human resource policies). However, there are areas where general policy areas are reiterated specific to employment services or because of their critical importance.

### Organization of this document

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This document is organized by policy area. Under each policy area, there is a list of policies to consider developing for that area. For each policy, there are recommendations for specific elements to be addressed within that policy. While the document generally leaves it to the discretion of the agency to determine what the actual policy should be, in some cases, aligned with best practices, there is sample language regarding the recommended policy.

As you go through this document, keep in mind:

- A **policy** is a directive on what you are going to do.
- A **procedure** is how you are going to implement a policy.

## POLICY AREA: POLICY DEVELOPMENT AND REVIEW

Policies and procedures are an important component of setting clear expectations for the organization and staff. When developing policies, consider your day-to-day operations and activities, and where policies are necessary to ensure:

- A. consistency in operations and services
- B. quality in operations and services
- C. compliance with legal requirements
- D. clarity regarding staff roles and responsibilities
- E. compliance with expectations regarding staff actions and behavior

### Writing policies and procedures

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The following are basic guidelines for writing policies and procedures.

- 1. Use clear and simple language.
- 2. Avoid ambiguity.
- 3. Define terms and avoid jargon.
- 4. Consider all potential activities/actions that may occur within the area being addressed (including “what ifs” “worst case scenarios”), and work to address them within the policy.
- 5. Ensure that policies are aligned with federal, state, and funding agency requirements.
- 6. Once you have written a policy, you should create the procedure on how you will implement the policy.
- 7. In the process of developing policies and procedures, engage and get input from staff who will be impacted, and as appropriate, also get input from the participants your organization serves.
- 8. Revisit and update policies and procedures as needed.
- 9. Ensure that staff are fully aware of and are trained on all policies and procedures.

### Policy: Development of policies

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#### RECOMMENDED POLICY ELEMENTS:

- A. Include a definition of policy vs. procedure.
- B. Ensure a development process for policies: How are issues identified for employment services policies? Who is involved with development? (e.g., staff, participants, families, funding agencies).
- C. Determine internal agency approval requirements (e.g., Can the Employment Services Director create program policies on their own, or does the Executive Director or the agency board need to approve policies? Does the approval process depend on the nature of the policy?
- D. Establish requirements for funding agency approval of policies as needed.

## Policy: Review of current policies

It is important to have policies and procedures in place that address the agency's needs, and agencies can develop new policies any time. However, agencies existing policies and procedures should be systematically reviewed on a regular basis to ensure they are still current and have not become outdated.

### RECOMMENDED POLICY ELEMENTS:

- A. Develop a timeline for regular policy review. (Note: while accreditation and licensing agencies may have minimum standards on frequency of policy reviews, policies should be updated whenever necessary for operational purposes.)
- B. Establish a policy review process: who is involved, how it will be undertaken, how revised policy will be finalized.
- C. Identify issues to consider in the policy review (e.g., current compliance with policy, issues with policy implementation, continued need for policy, changes in laws/regulations, changes in funding agency requirements, changes in technology, operational issues which require new policy).
- D. Establish requirements for funding agency approval of new/revised policies.

## POLICY AREA: EMPLOYMENT SERVICES: CORE OPERATIONAL PRINCIPLES

### Policy: Employment First

The vast majority of states have [Employment First policies](#), and employment providers may wish to consider whether they want to have their own similar policy that aligns with Employment First principles.

### RECOMMENDED POLICY ELEMENTS:

- A. All individuals of working age are presumed employable in the community.
- B. Individuals will be considered for alternative services, only after employment in the community has been fully explored.
- C. Agency programming and resources will align with supporting employment in the community as the preferred outcome.

### Policy: Natural supports

Given that natural supports are a core component of best practices, agencies can emphasize natural supports by establishing policies in this area.

### RECOMMENDED POLICY ELEMENTS:

- A. Natural supports should be a core goal of service delivery considered throughout the entire employment process.
- B. Social inclusion in the workplace is a core element of a successful placement.
- C. Onsite presence and intervention by employment staff at an employment site should be sufficient for long-term success but not go beyond what is necessary.
- D. Identify the role of staff in the development of natural supports.
- E. Identify the role of staff as the direct trainer of a participant only as necessary.

## Policy: Person-centered practices

Person-centered practices are core to best practices in services for people with disabilities. The intent of this policy is to ensure that employment services align with a person-centered approach.

### RECOMMENDED POLICY ELEMENTS:

- A. The agency should make every effort to ensure the participant drives all elements of the employment process and leads the process as much as possible.
- B. Services are designed to truly understand a participant's interests and preferences and identify employment situations that are a good match for the participant.
- C. All job placements must align with the participant's interests, preferences, and skills identified during the person-centered planning, discovery, and career exploration process.
- D. All job placements must ensure that the participant is able to make meaningful contributions to the workplace and avoid reinforcement of stereotypes and stigma of people with disabilities.

## Policy: Informed choice and employment

Informed choice is a core principle of services for people with disabilities. It is important to have clear policies regarding informed choice specific to employment, to ensure individuals fully understand the possibilities and options for employment in the community.

### RECOMMENDED POLICY ELEMENTS:

- A. The agency should make every effort to ensure participants fully understand their options for employment and are able to make an informed choice about going to work as well as the various aspects of employment.
- B. It is not sufficient to verbally ask a participant their preferences in terms of informed choice. Informed choice requires experiential activities, including for example, business tours, informational interviews, and work experiences.
- C. Peer-to-peer efforts (participant to participant, family to family) are an element of the informed choice process.
- D. If there are concerns regarding employment in the community, the specific issues are identified, and efforts are made to address them.
- E. The agency documents all elements of ensuring informed choice.
- F. A decision not to pursue employment in the community is documented, includes specific justification based on the informed choice process, and is reviewed at a supervisor/administrative level.
- G. The agency revisits a decision by a participant not to pursue employment on a regular basis.

**Resource:** ICI Publication – [Employment and Employment Supports: A Guide to Ensuring Informed Choice for Individuals with Disabilities](#)

## Policy: Technology First

Given the prevalence of technology in our day-to-day lives, it is important to have policies on technology integration for participants within employment services.

### RECOMMENDED POLICY ELEMENTS:

- A. Requirement that use of technology (high-tech and low-tech) should be considered during initial employment planning and through all aspects of the employment process (job search, job placement, ongoing job supports).



- B. Establish a process for undertaking a technology needs assessment and implementation plan.
- C. Requirements for maintenance and security of technology used by participants.
- D. Outline of staff technology competency requirements.
- E. Parameters around the use of participants technology by staff.

### **Policy: Participant staff preferences**

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A core value of community services is self-determination. As such, participants served should have a role in choosing the staff they work with.

#### **RECOMMENDED POLICY ELEMENTS:**

- A. Specifics of how participants will be involved in choosing staff.
- B. Specify areas for consideration in choosing staff including: gender preferences, age preference, geography, cultural identities, preference for staff who smokes or does not smoke, and more.

### **Policy: Reasonable accommodations for participants**

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This policy is specific to reasonable accommodations for participants served. (Accommodation policies for staff should be covered through overall agency human resource policies.)

#### **Recommended policy elements:**

- A. Establish requirements for staff knowledge regarding reasonable accommodations.
- B. Ensure that participants understand their accommodation rights in both service delivery and with employers.
- C. Include procedures for participants to request accommodations as part of service delivery, and staff responsibilities in responding to such requests.
- D. Include procedures for working with participants and employers on identifying and supporting the provision of reasonable accommodations in employment.

### **Policy: Employment transportation**

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Given that participants may not drive, it is important to have clear requirements to address transportation within the service delivery process.

#### **RECOMMENDED POLICY ELEMENTS:**

- A. Include a requirement to incorporate determination of transportation options in early stages of career planning, with a summary of transportation options to consider.
- B. Have a requirement for the participant to fully engage and participate in determining their transportation options and planning.
- C. Establish a goal of maximum independence in transportation for employment and avoiding reliance on service providers for transportation over the long-term.
- D. Include travel instruction requirements for training participants on transportation for their jobs.

## Policy: Public benefits

Addressing public benefits is critically important to both encourage people to seek employment, and ensure they maintain necessary public benefits when going to work.

### RECOMMENDED POLICY ELEMENTS:

- A. Institute a general policy/philosophy that public benefits are not a barrier to employment, and everything possible should be done to address questions and concerns about benefits that allows a participant to pursue employment.
- B. Include a requirement to incorporate discussion of benefits in early stages of career planning.
- C. Emphasize maximizing employment (hours and wages) while preserving necessary public benefits.
- D. Include staff requirements for how to work with participants to address benefit issues that might be a barrier to employment, including how to respond when people say they can't work because of benefit issues, in a way that encourages them to consider employment.
- E. Include staff responsibilities in assisting participants to manage their public benefits.
- F. Include staff training requirements and resources regarding public benefit issues.

## Policy: Families and guardians

Families and guardians often play important roles in the lives of people with disabilities. As part of employment services, it is important to have good relationships with families and guardians, while also ensuring that their role is appropriate.

### RECOMMENDED POLICY ELEMENTS:

- A. Create a core goal of positive relationships with families and guardians as part of the delivery of employment services and supports.
- B. Include parameters of the legal roles of guardians/public administrators.
- C. Ensure you have requirements for contacting families and guardians (frequency, for what purpose), and documentation of contacts.
- D. Include appropriate roles for families and guardians in the delivery of employment services.
- E. Have procedures on dealing with conflict between participant preferences and those of families/guardians.

## Policy: Engagement of funding sources

It is important for the program to build relationships with the staff of the program's funding source and to determine how to accomplish this.

### RECOMMENDED POLICY ELEMENTS:

- A. Have statement on the critical importance of maintaining positive relationships with funding agencies.
- B. Include contact requirements with funding agencies (frequency, who should have contact, etc.).
- C. Include information about responding to funding agency requests (timeliness, who should respond, internal communication requirements, etc.).
- D. Have statement and procedures regarding effective management of participant funding and maintenance of sufficient funding for services.
- E. Include protocols for communicating program issues and concerns to funding agencies.
- F. Include protocols for communicating funding agency issues and concerns to program management.

## POLICY AREA: DAY-TO-DAY EMPLOYMENT SERVICE OPERATIONS

### Policy: Policies on the delivery of the various services

Each service that the employment program is authorized to provide should have its own policy, separated by funding source.

#### RECOMMENDED POLICY ELEMENTS:

- A. How service will be delivered
- B. In what setting (in-person, virtual, hybrid; group or 1:1)
- C. Who will deliver the services
- D. What is included in the service to ensure clarity on what will be provided and what will not

### Policy: Accessing services

This policy covers all of the various ways a participant may access and receive services from the employment program and gives direction to staff, participants, and parents/guardians on the path a person must take to get qualified for services.

#### RECOMMENDED POLICY ELEMENTS:

- A. Who is eligible for agency employment services?
- B. What funding sources are available for employment services?
- C. What information should the program provide to individuals and families interested in services?
- D. What is the process for applying for/accessing agency services, including timelines for acceptance for services?
- E. Have requirements of orientation and intake process for services.
- F. Have requirements for providing information in accessible language to meet the individual and family's needs, including people for whom English is not their first language.
- G. Provide information on whether the agency has the right to refuse to provide services and establish parameters for doing so.

### Policy: Exiting services

This policy covers how and what happens when a participant leaves services.

#### RECOMMENDED POLICY ELEMENTS:

- A. Information on if/when a participant exits services after a successful placement.
- B. Include information about how a participant may be separated from services, potential reasons behind the exit, and the exit process, including documentation and whether a referral for alternate services is made.
- C. Establish procedures for transitioning to other services, including communication with the individual, family, new service provider, case managers, and funding agencies.

### Policy: Participants with criminal records

This policy covers parameters for working with participants with criminal records.

#### Recommended policy elements:

- A. Determine whether and how the agency checks on if a participant has a criminal record.

- B. Establish parameters for deciding whether to serve people with a criminal record.
- C. Determine how issues regarding an individual's criminal record will be addressed within service delivery, including interactions with employers.
- D. If a decision is made not to serve an individual with a criminal record, how assistance will be provided to identify alternate services.

### Policy: Internal referral and supports policy

This policy area is for those agencies that provide more than just employment services to participants, with guidelines on referring participants to employment services and supports from other services.

#### RECOMMENDED POLICY ELEMENTS:

- A. List other agency services that may refer participants to employment services (day habilitation, residential, etc.).
- B. Encourage referrals from other agency services (this is aligned with Employment First).
- C. Establish procedures for internal referrals including documentation.
- D. Include protocols for working with other agency services on referrals and supports for participants in employment services.

### Policy: Caseloads

This policy is about equitable and properly managed caseloads, which are core to successful service delivery.

#### RECOMMENDED POLICY ELEMENTS:

- A. Include information about the development and maintenance of caseload.
- B. Include requirement to ensure there is no nepotism/favoritism in case assignments.
- C. Define the roles of the participant and family/guardian in determining case assignments.
- D. Set a number of maximum caseloads to be assigned under normal circumstances.

### Policy: Tracking of business and employer contacts

This policy covers having a systematic approach to collecting, tracking, and updating business and employer contacts, using a holistic approach across the agency (not just employment services staff).

#### RECOMMENDED POLICY ELEMENTS:

- A. Include procedures for documenting and updating business/employer contacts.
- B. List sources for identification of potential contacts (employment services staff, other agency staff, board members, agency vendors, participants, families, etc.).
- C. Develop a systematic approach to collection of contacts from various sources on a regular basis.

### Policy: Meeting with the participant

This policy covers ensuring ongoing contact with participants to maintain engagement and moving forward on the employment process.

#### RECOMMENDED POLICY ELEMENTS:

- A. Determine the minimum frequency of contact (e.g., once per week for 30 minutes).
- B. Develop standards for meeting sites (e.g., recommend neutral site away from home or office as much as possible).

- C. Determine appropriate meeting content (dependent on current employment status: career planning, job development, initial employment, long-term supports).
- D. Establish parameters regarding the method of contact (phone, online, in-person and include guidelines on use).

### **Policy: Supporting participants remotely**

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Advances in technology have seen increases in providers supporting participants remotely. This can result in more efficient use of staff time while reducing onsite staff presence that can be a barrier to natural supports. At the same time, remote service delivery must be done in a thoughtful manner.

#### **RECOMMENDED POLICY ELEMENTS:**

- A. Have requirement for systematic consideration of providing supports remotely as part of overall support strategies (e.g., integrated within the service planning process).
- B. Provide list of options for providing supports remotely (e.g., video conference, phone, text, etc.).
- C. Set parameters for when provision of supports remotely is appropriate/not appropriate.
- D. Ensure participant choice regarding whether to accept or decline remote services.
- E. Establish protocols for ensuring employer permission and support.
- F. Have statement and procedures for ensuring confidentiality of information and technology security in provision of remote supports.

### **Policy: Staff & participant appearance**

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Dress and appearance create perceptions of the capabilities and professionalism of both the program and participants.

#### **RECOMMENDED POLICY ELEMENTS:**

- A. Establish expectations of staff regarding professional dressing and grooming as part of creating a positive reflection of the organization.
- B. With activities of employment services taking place in a wide variety of settings, have protocols about dress and grooming aligning with the setting that staff are in, while maintaining professionalism.
- C. Establish rules about logos and statements on clothing while at work (what's allowed and not allowed). For example, if the environment is one where sweatshirts and t-shirts are appropriate, they should be generally neutral and avoid any logos or writing that may be deemed controversial or offensive.
- D. Establish guidelines about how job seekers can dress appropriately for the environment they are in. For example, during the job seeking process, participants should be dressed to make a positive impression on employers and be interview-ready. Once a participant becomes employed, they should be dressed appropriately for the workplace, per employer requirements, and similar to co-workers.

## Policy: Medication & personal care

This policy covers the roles of employment services staff regarding personal care assistance and related services for participants.

### Recommended policy elements:

- A. Determine under what circumstances (if any), employment services staff can assist with toileting. The recommendation is to establish guidelines that staff only help with toileting under exceptional circumstances.
- B. Determine if and under what circumstances (if any), employment staff administer medication, with specific training requirements specified.
- C. Establish training requirements for any staff who are assisting with personal care.

It is important to recognize that if employment services staff are providing these services, it will create challenges in terms of fading from the job site.

## Policy: Drug testing for employment

Given that a drug test may be required as part of the job application process or during employment, it is helpful to have a policy on how to deal with drug tests.

### Recommended policy elements:

- A. Reiterate federal and state laws regarding drug testing, including: 1) that drug tests are allowed under the Americans with Disabilities Act during the pre-employment process, as long as testing is required for all individuals in that employment category; 2) parameters/limitations on drug testing when an individual is employed.
- B. If an individual is taking medication to manage health issues, there is a possibility it may result in a positive drug test. Therefore, include information about handling such situations, and parameters of staff roles in terms of disclosing medications to an employer.
- C. Provide information about the use of marijuana (cannabis) for recreational purpose (which may be legal at the state level but not federally) and potential impact on employment. Doing so ensures staff and participants are prepared to manage this issue. This includes understanding that even if recreational marijuana use is legal, an employer could potentially not hire or terminate an individual if they test positive.

## Policy: Weather and other emergencies

Given the nature and hours of employment services and supports, this policy covers information specific to employment services regarding weather and other emergencies.

### RECOMMENDED POLICY ELEMENTS:

- A. Include the actions to take during thunderstorm watches/warning, tornado watches/warnings, winter weather watches/warnings, and other emergencies, in terms of 1) transportation of participants to their jobs and avoiding unsafe travel; 2) responding during weather or other emergencies when participant is at their place of employment.
- B. Establish a process for when businesses/employers are closed due to weather conditions and other emergencies (e.g., notification of individual, cancellation of transportation, providing alternative supports for the day if needed).
- C. Include protocols for when the agency is closed due to weather or emergency, but a participant's workplace is still open, particularly if a participant requires supports.
- D. Include procedures for when a weather warning is issued, and what to do regarding scheduled meetings with a participant (meeting allowed/not allowed).

## Policy: Staff meetings

Regular staff meetings are an important component of team building and service coordination.

### RECOMMENDED POLICY ELEMENTS:

- A. Establish frequency of employment services staff meetings, and when they are held.
- B. Determine if it is mandatory for all staff to attend.
- C. Decide what topics are typically covered in a staff meeting (possibly include a sample agenda).
- D. Determine whether attendance must be in person or if it can be virtual.

## Policy: Billing

Proper billing is critical to ensuring the program is properly reimbursed for all services and generates sufficient revenue to maintain and expand operations.

### Recommended policy elements:

- A. Establish billing requirements/procedures for each funding agency, including documentation requirements, calculation of invoice, billing format, billing schedule/due dates, and submission procedures.
- B. Identify staff roles and responsibilities in the billing process (employment services staff, accounting).
- C. Establish internal controls, such as who/what level of staff can submit billing and whether it requires a supervisor's review as well as periodic sampling of billing to determine trends, catch errors, prevent fraud, and ensure clean billing.
- D. Decide if/when a bill is rejected by the funder and how it is handled to ensure the situation is not repeated.

# INFORMATION SHARING

## Policy: Confidentiality and disclosure of disability information

Disclosure of disability is a major issue in terms of delivery of employment services, and parameters regarding disclosure are critically important.

### RECOMMENDED POLICY ELEMENTS:

- A. Establish parameters regarding staff disclosure of disability information to employers/potential employers and others.
- B. Inform participants about their right to disclose/not disclose information about their disability, that addresses level/type of information to be disclosed/not disclosed, and potential variations in disclosure depending on situation.
- C. Include requirements regarding documentation of disclosure discussion and releases from participant/family/guardian.
- D. Establish regular/ongoing review of disclosure permissions.
- E. Include information about the right to revoke permission to disclose.



## Policy: Releases

Given the personal nature of the work of employment services and issues involved, policies regarding releases and sharing of information are important both for the protection of the participant and the agency.

### RECOMMENDED POLICY ELEMENTS:

- A. Include types of releases
- B. Determine the format and language of releases, with an emphasis on plain language
- C. Decide what the releases cover/types of information (examples: past employment, current employment status).
- D. Set up rules around releases on an individual basis (e.g., a release for each parent/family member, rather than one release for either parent, both parents, or the family as a whole).
- E. Determine how long releases last before they need to be re-signed.
- F. Establish a process for adding of new releases.
- G. Decide what to do about inquiries when a release is not in place.
- H. Establish a process for removing releases by the program participant.

## POLICY AREA: USE OF VEHICLES

### Policy: General vehicle usage

This policy covers the use of both agency and personal vehicles.

#### Recommended policy elements:

- A. Include safety requirements (e.g., all participants in the vehicle, including the driver, are required to wear safety belts).
- B. Information whether it is permitted to put fuel in vehicle while transporting a participant.
- C. Information whether it is permitted to run errands for staff or the participant when transporting a participant.
- D. Information whether and how to transport family members in vehicles.
- E. Information on dealing with issues regarding the participant when providing transportation (e.g., behavior that becomes disruptive to driver or others in the vehicle, medical emergency)
- F. Requirements for emergency kits in all vehicles being used to provide transportation, what goes in the kits, and who is responsible for maintaining them.

### Policy: Agency vehicles

This policy covers the use of agency vehicles for employment services.

#### RECOMMENDED POLICY ELEMENTS:

- A. Requirements for liability and other insurance coverage/requirements for agency vehicles.
- B. Listing of documentation requirements for use of agency vehicles (sign-out/sign-in, logging of trip,).
- C. Include how to purchase fuel for an agency vehicle.
- D. Establish procedures for when agency vehicle breaks down.
- E. Include statement on smoke-free vehicle requirements.
- F. Establish procedures for when staff are in a vehicle accident of any level while using an agency vehicle. This includes whether a drug or alcohol test is required.



## Policy: Personal vehicles

This policy covers staff use of personal vehicles when they are working in the community, including transporting participants.

### RECOMMENDED POLICY ELEMENTS:

- A. Establish rules and requirements regarding transporting participants in a staff member's vehicle (whether it's allowed and what permissions are required).
- B. List liability and other insurance requirements for staff vehicles used during work.
- C. Include procedures for when a personal vehicle breaks down while transporting participants.
- D. Establish smoking rules when transporting participants (e.g., permitted, not permitted, whether individuals can only be transported in smoke-free vehicles).
- E. Include procedures for when staff are in an accident of any level in their personal vehicle while on the clock, with or without a participant in the vehicle. This includes whether a drug or alcohol test is required.

## Policy: Mileage

Given that staff will likely use their personal vehicle as part of their job duties, it is important to have clear policies regarding mileage.

### RECOMMENDED POLICY ELEMENTS:

- A. List under what circumstances the agency provides mileage/parking/toll reimbursement.
- B. Provide parameters regarding when/where mileage starts/ends.
- C. Set an agency mileage rate.
- D. Determine potential tax implications if rate is below national IRS rate.
- E. Establish a process for submission for reimbursement, including timelines/deadlines.

As part of this policy development, ensure policies are reflective of any state requirements regarding mileage reimbursement.

[See more details on what types of mileage are reimbursable.](#)

# POLICY AREA: DOCUMENTATION, FORMS, FILES, AND REPORTS

## Policy: Internal forms and documents

Given the amount and importance of paperwork connected with delivery of employment services, it is critical to have clear policies on internal forms and documents.

### RECOMMENDED POLICY ELEMENTS:

- A. List of forms required for service delivery.
- B. Provide structured methods to ensure all departmental forms are being used in the manner intended and in the proper timeframe.
- C. List timeframes for regular reviews of completed forms to ensure:
  - they are being used and filled out correctly
  - adhering to the assigned schedule
  - signatures and other information are updated on-time

- D. Include requirements for review and updating of forms as necessary to ensure they are compliant with funding source requirements and that the forms do not become outdated.
- E. Include requirements for storage and security of forms and documents.
- F. List length of time that records need to be kept, which may vary depending on funding agency requirements.
- G. Provide procedures for document destruction/disposal.

## Policy: Participant files

This policy cover areas related to participant files (both electronic and hard copy).

### RECOMMENDED POLICY ELEMENTS:

- A. List of what is contained in the participant's file.
- B. Structure for how files are organized.
- C. Parameters regarding what files must be paper vs. electronic.
- D. Parameters regarding when new material is placed in the files.
- E. Parameters regarding when material is taken out and what happens to the material when taken out.
- F. Timeline for how often files should be reviewed for accuracy (aligned with accreditation standards).
- G. Requirements regarding who maintains the files (access granted to what sections of a database, who files hard-copy items).
- H. Parameter regarding under what circumstances and how participant/guardian can access files.
- I. Parameters regarding making copies of files (for whom and what purpose), how often this can be requested, how the copies are sent and whether there is a cost).
- J. Parameters regarding removal of paper files from office: allowed/not allowed; if allowed, under what circumstances.
- K. Protocols regarding electronic transfer of files (emailing of files, putting files on a USB drive, etc.).
- L. Requirements for how files are stored including security requirements for electronic and paper files.
- M. Requirements for how long records need to be kept.
- N. Requirements and procedures for purging process for outdated records.

## Policy: Agency-to-agency file sharing

This policy covers how to respond to a request for a participant's files, if a person participating in your services leaves your agency and chooses a different provider.

### RECOMMENDED POLICY ELEMENTS:

- A. Parameters regarding what portions of the file, if any, may be sent to the new agency.
- B. Parameters regarding what role the person being served has in determining and directing files to be shared.
- C. List of funding agency requirements regarding agency-to-agency file sharing.
- D. Parameters for meeting the requirements regarding protected information.
- E. How agency-to-agency file sharing is addressed within the policy for copying of files.

## Policy: Case notes and reports

Policy on documentation requirements of service provision.

### RECOMMENDED POLICY ELEMENTS:

- A. List of requirements for case notes (format and writing style – what to include/not to include; when case notes need to be completed, etc.).
- B. List of reporting requirements (internal agency and external to funding agency) including report due dates, format, report elements, how they are written, etc.

## Policy: Incident reporting

Incident reporting policies ensure that there is proper documentation of any incidents that could potentially have negative impact on participants or the agency. Any incident reporting policies should align with those required by funding agencies.

### RECOMMENDED POLICY ELEMENTS:

- A. Listing of type of incidents that need to be reported involving staff and participants with employment-related examples, method for reporting, and deadlines for reporting. Examples: human rights violations, accidents, injuries, abuse, neglect, safety concerns, threats at self-harm.
- B. Requirements for review of incident reports to analyze trends.
- C. Requirements for employment services staff as mandated reporters, what that means, and training requirements for mandated reporting, including timelines and documentation requirements.

# POLICY AREA: QUALITY IMPROVEMENT

## Policy: Agency surveys

Surveys are a primary mechanism for quality assurance and quality improvement. They can ensure the agency is providing quality services to the participant, their parent/guardian, funding agencies, and businesses/employers. Staff surveys ensure the agency is providing what staff need to feel supported and engaged and perform tasks consistently according to the program's quality standards.

### RECOMMENDED POLICY ELEMENTS:

- A. Identify what surveys to conduct and who the audience is (e.g., participants served, families/guardians, staff, businesses/employers, funding sources).
- B. Outline steps to ensure the survey is well-designed to solicit information needed and encourage a strong response rate.
- C. Identify timeline for when surveys will be distributed. Examples of possible points for when a survey might be sent out include after a milestone is reached, during transition to a new service, and at exit.
- D. Parameters regarding how surveys will be distributed (online, in-person, outreach, etc.).
- E. Statement on accessibility of surveys, and what steps will be taken to ensure the surveys are fully accessible including availability of alternate formats and languages, use of plain language, translation, administering of surveys verbally as needed, etc.
- F. Requirements for what to do with the information gathered from the survey: how to summarize and share the survey information and how to develop action plans to address issues identified.

- G. Requirements for how to address confidentiality issues regarding survey information gathered and shared.
- D. Requirements for storing the survey data results.

Note: CARF requires surveys to be completed annually, and in most cases, requires the information to be published and available for public review. State funding agencies may have similar requirements.

### Policy: Quality control

Beyond surveys, consider additional mechanisms for quality control and quality improvement.

#### RECOMMENDED POLICY ELEMENTS:

- A. Include procedures about collection and internal analysis of program data.
- B. Requirements for setting and monitoring program benchmarks.
- C. Establish regular program reviews for alignment with industry standards/best practices.
- D. Establish processes for program strategic planning and review.

## POLICY AREA: HUMAN RESOURCE ISSUES

### Policy: Employment services organizational structure

This policy area ensures clarity regarding program structure and specific staff roles.

#### RECOMMENDED POLICY ELEMENTS:

- A. Create a chart of positions in employment services, including management, supervision, and direct support.
- B. Have position summaries and standards for each position.
- C. Establish how positions interact with each other.
- D. Outline department/agency career growth paths.

### Policy: Hiring policy

While the agency likely has general hiring policies, there are specific policy areas regarding hiring of employment staff to ensure recruitment that meets the program's specific needs.

#### RECOMMENDED POLICY ELEMENTS:

- A. Outline preferred backgrounds and experience of employment services staff.
- B. Identify sources of recruitment.
- C. List required skillsets.
- D. List education requirements.
- E. List standard interview questions.
- F. Outline interview process (e.g., possible experiential interview process where individual has to conduct a job development meeting).
- G. Identify participant roles in the interview and hiring process.

## Policy: Onboarding

The agency is likely to have general policies regarding new staff onboarding. There is also a need for policies specific to employment services.

### RECOMMENDED POLICY ELEMENTS:

- A. List training requirements for new hires in terms of content.
- B. Include a mechanism for providing training for new hires, when the training will be provided, and by whom.
- C. List any restrictions on providing services prior to receiving training.
- D. Require as part of onboarding review all applicable policies specific to delivery of employment services.
- E. Requirements for a planned schedule of onboarding procedures that both the supervisor and the new hire follow.

## Policy: Ongoing training and staff development

This policy covers required trainings that funding sources may have for the employment program, as well as additional agency required trainings and staff development opportunities.

### RECOMMENDED POLICY ELEMENTS:

- A. List funding agency training requirements for staff – initial and ongoing.
- B. List of additional agency required staff trainings.
- C. List mechanism(s) and sources for training provision.
- D. Include documentation requirements for completed trainings.
- E. Establish support for optional staff development opportunities, including additional non-mandatory trainings, communities of practice, professional meetings and conferences, and participation in professional associations. Have a process for requesting and reviewing optional staff development opportunities and availability of professional development funds.
- F. Include procedures for provision of training accommodations.
- G. List certification and credentialing options/requirements ([CESP - APSE Credentialed Employment Support Professional](#), [ACRE - Association of Community Rehabilitation Educators](#),).

## Policy: Schedules, hours of operation

Given the nature of employment services, it is important to have clear policies regarding scheduling and flexibility in hours.

### RECOMMENDED POLICY ELEMENTS:

- A. Provide set hours for a full-time schedule, including break/lunch (this may be redundant of general human resources but is important as a reminder).
- B. Requirements regarding expectation that staff may have to work evenings, weekends, and holidays to provide employment supports and assistance.
- C. Have procedures for development and sharing of staff schedule.
- D. Outline procedures for requesting time off.
- E. Outline calling out sick procedures.
- F. Outline shift differential pay policy (if applicable) for working evenings/weekends.
- G. Include protocols around comp time and premium pay (if applicable) for working holidays.

## Policy: In office time, community services, remote work

Given that employment occurs within the community, this policy covers how often and under what circumstances staff should be in the office versus in the community.

### RECOMMENDED POLICY ELEMENTS:

- A. As a community service, set staff expectations regarding time in the community, with specific activities to be conducted in the community (e.g., career exploration, discovery, job development, employment supports, meeting with community partners).
- B. Provide parameters regarding appropriate uses of time in the office (staff meetings, paperwork), with emphasis on limiting office time. For example, office time should be primarily used for staff and supervision meetings, completion of reports and paperwork, conducting online research, and meeting with participants and families as appropriate.
- C. Establish parameters regarding staff working remotely/from home.

## Policy: Wage scale

While the agency as a whole may have policies regarding wage scales, if not, the employment program may wish to consider developing its own. This is one way an agency can not only stay competitive with other regional providers, but also with other regional employers.

### RECOMMENDED POLICY ELEMENTS:

- A. Establish a process for developing a wage scale.
- B. Determine the frequency of wage scale reviews.
- C. Set up a process for conducting wage surveys. For example:
  - Look at the basic duties of each position and send wage surveys to other providers and other employers who have positions with similar duties.
  - Once information is received back, determine the average high range and low range for each position and then determine what percentage of each range the agency will pay to create their wage scale.

# POLICY AREA: TECHNOLOGY AND DATA

## Policy: Staff use of technology

Staff use of technology is a core component of employment services provision, and there are a variety of policy areas to be addressed.

### RECOMMENDED POLICY ELEMENTS:

- A. List the technology provided to staff (laptop computers, tablets, cellphones).
- B. Establish requirements regarding not using agency-issued technology for personal use.
- C. Set security requirements for technology (e.g., passwords, not leaving technology in vehicles, not leaving technology secure, reporting of lost technology, not allowing others to see confidential information on your screen).
- D. Include guidelines about access to online and electronic files.
- E. Include parameters regarding whether personal technology may be used for work purposes, how it can be used, and whether staff are entitled to stipends/reimbursement for using their personal technology for work purposes.
- F. Provide parameters regarding the use of cellphone and tablets for taking pictures and video on agency and personal technology, permission/release requirements, and storage of video/images.

- G. Establish guidelines and restrictions on use of artificial intelligence (AI).
- H. Outline procedures regarding technology for when staff leave (e.g., turning over agency technology, providing access to all files, purging personal technology of any work-related content).
- I. Establish an approval process for download and purchasing of apps and other assistive technology.
- J. Set parameters on requesting access to blocked websites or use of alternate browsers for website compatibility.

### **Policy: Development and maintenance of a database**

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Databases are helpful for recording and analyzing information and producing reports. It is important to have policies to ensure proper entering of information and keeping databases secure.

#### **RECOMMENDED POLICY ELEMENTS:**

- A. Outline what databases are used for employment services and their purpose (e.g., tracking services, employer contacts, case management, etc.).
- B. Determine staff access to database and at what level.
- C. Set staff responsibilities, requirements, and procedures for entering information in database(s).
- D. Outline how database(s) will be used for generation of reports.
- E. Establish database security requirements.

## **POLICY AREA: MISCELLANEOUS POLICIES**

### **Policy: Professional relationship with participants**

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Staff work closely with participants and is important to maintain professional relationships.

#### **RECOMMENDED POLICY ELEMENTS:**

- A. Include a general requirement to maintain professional relationships.
- B. Set protocols to help avoid situations that could cause potential issues (e.g., inappropriate remarks by staff or participants, situations which could be perceived as predatory, taking advantage of a participant through using their personal property, taking advantage of a participant by using their time/expertise for personal benefit).
- C. Set parameters and limits on socializing with participants and their families outside of work.
- D. Determine protocols for social media requests/interactions with participants and families (legally the agency can't prohibit connecting on social media but can provide parameters).
- E. Set guidelines about purchasing items for/from participants and lending or giving money to participants.
- F. Set guidelines about accepting items/gifts from participants and families.



## Policy: Social media

Given the prevalence of social media, it is important to have clear policies on social media to avoid negative repercussions, that also align with legal guidelines. These policies should cover agency/program social media and personal social media. Generally, employers may not restrict what participants post on their personal social media, or who they connect with, but employers are allowed to provide certain restrictions on social media use.

### RECOMMENDED POLICY ELEMENTS:

- A. Establish protocols regarding approval of content and participant postings on agency social media.
- B. Set guidelines about gaining approval and releases for posting information regarding staff, participants served, and businesses/employers on both agency and personal social media.
- C. Have guidelines to avoid disclosure of any agency proprietary information on social media.
- D. Have protocols on using of social media for job searches, and the role of participants and staff. (e.g., staff may assist an individual with developing a LinkedIn profile and then use their own LinkedIn account to share it.)
- E. Establish guidelines for cross-posting or tagging an employer or community partner.
- F. Outline restrictions on use of personal social media during work hours.
- G. Establish guidance about including a statement on personal social media accounts that “all opinions are my own”.
- H. Ensure staff do not include their employer in their personal social media profiles besides LinkedIn and similar social media (this helps ensure that if a staff member posts any content that is political or controversial, it is not associated with the agency).
- I. Establish guidelines around respecting program participants’ confidentiality and avoiding disclosing personal information about them on personal social media.
- J. Set guidelines regarding staff connecting with participants on social media.
- K. Include rules on hate speech, bullying, retaliation, and discriminatory conduct on social media as possible cause for discipline and/or termination.

**Resource:** [Do’s and Don’ts of Employer Social Media Policies](#) (Fuse Workforce Management)

This document was written by David Hoff and Nicholas Holz of the Institute for Community Inclusion, with editorial assistance by Jessica Keenoy and Leslie Quarles.



**Institute for Community Inclusion**  
UNIVERSITY OF MASSACHUSETTS BOSTON