

Choices for Women Policies and Procedures Manual

Last Review/Print 05/09

TABLE OF CONTENTS

PART I: INTRODUCTION TO THE CENTER

Welcoming Statement	7
Mission Statement	8
Statement of Faith	8
Statement of Principle	9-10

PART II: STAFF

EMPLOYEES

At-Will Employment.....	11
Equal Employment Opportunity	11
Employee Selection and Screening.....	12
New Employee Processing	13
Employee Classification	13
Job Descriptions.....	14
Wage and Salary Determination	15
Pay Period.....	15
Overtime Pay	15
Compensatory Time	16
Attendance	17
Holidays.....	17
Vacation.....	18
Sick Days and Other Absences	19
Jury Duty and Court Appearances	19
Parental Leave.....	19
Bereavement Leave	19
Military Leave.....	19
Conferences	20
Performance Evaluations.....	21
Personnel Files	21
Employee Discipline	22
Voluntary Termination	22
Sexual Harassment	23
Employment of Relatives	24
Honoraria	24
Outside Employment.....	24

VOLUNTEERS

Volunteer Recruitment and Screening	25-26
Guidelines for Volunteers.....	27
Volunteer Bill of Rights	28
Volunteer Training	29
Volunteer In-Services.....	29
Volunteer Evaluations	29

OTHER STAFF ISSUES

Dress and Appearance	30
Minimum Age for Staff	30
Involvement in Adoptions	31
Post-Abortion Applicants	31
Activism at Abortion Clinics	32
Political Activities of Staff Members.....	32
Conflicts of Interest.....	33-36
Whistle-Blower Protection	36
Use of Illegal Drugs or Alcohol.....	37
Release of Employee or Volunteer Information	37
Personal Usage of Telephone, Postage, Fax, and Copier	38
Personal Usage of E-mail	38
Visitors of Staff at Center	39
Staff Safety	39

CONFLICT RESOLUTION

General Conflict Resolution Principles.....	40
Grievance Procedure	41

PART III: CLIENT SERVICES

GENERAL

"Our Promise to You"	42
Confidentiality	43
Reporting Requirements	44-45
Parental Involvement.....	46
Responding to Subpoenas and Other Official Requests.....	47

PEER COUNSELING

General Guidelines.....	48
Non-Discrimination.....	49
Evangelism	49
Touching Clients	49
Freedom of Access	50
Same-Sex Counseling	50
Educational Materials	51
Off-Site Client Contacts	52
Transporting Clients.....	52
Translators	53
Contact with Children of Clients	53
Assisting Minors Who Refuse Abortion	54
Charting and Record-Keeping / Record Retention	55
Referrals	56
Adoption Information.....	56
Client Church Referrals.....	57-58
Client Complaints	59
Exit Interviews	59

TELEPHONE PROTOCOL	
General Guidelines	60-61
After-Hours Phone Procedures	61
Obscene, Harassing or Threatening Calls	62
PREGNANCY TESTS	
Self-Testing Model.....	63
Ultrasound	64-65
Universal Precautions.....	66
CLIA.....	67
Release of Test Results.....	68
ABSTINENCE	
General Philosophy	69
Contraception Education	69
LONG-TERM CARE (see also EWYL)	
Parenting Classes	70
Advocacy/Mentoring	70
Post-Abortion Counseling Education	
Healing Choices General Guidelines	71
Screening Clients	72
MATERIAL ASSISTANCE	
General Guidelines.....	73
Procedure for Distribution of Materials	74
Earn While You Learn Client Agreement.....	75
Earn While You Learn Returning Items.....	76
PART IV: CENTER OPERATIONS	
GENERAL	
Office Hours	77
Security Procedures.....	77
Mail Procedures	77
Cleaning.....	78
Center Safety.....	78
Responding to Incidents	78
Responding to Media Inquiries.....	79
Solicitations	79
After-Hours Procedures.....	80
Center Web Site	81
Insurance.....	81
State Registration	81
Political Activities of Center	81

Working with Other Organizations	82
FINANCES	
General Guidelines	83
Check-Writing Procedures	83
Petty Cash	83
Purchase Authorization	84
Reimbursement of Expenses.....	84
Investment of Funds	84
Procedures for Handling Donated Monies	85
Annual Audits	85
Public Access to Financial Statements and/or By-Laws	85
ADVERTISING	
General Principles	86
Yellow Pages Advertising	86
FUND-RAISING	
General Guidelines.....	87
Donor Bill of Rights.....	88
Tax Deductibility and Receipts to Donors	89
Designated Gifts.....	89
Compensation for Fund-Raisers	89
Banquet Testimonies	90
OTHER	
Document Retention.....	91-95

PART I: INTRODUCTION TO THE CENTER

WELCOMING STATEMENT

Welcome to Choices for Women. We are happy to have you as a member of our team! Choices for Women is a non-profit ministry. The mission of Choices for Women is to demonstrate and share the life-changing message of Jesus Christ by providing practical help and loving support to those facing an unplanned pregnancy. We seek to bring compassionate help and hope to women and teens who are unprepared for pregnancy; to present sexual abstinence as a positive lifestyle for singles; to provide opportunity for healing and restoration to those who have been hurt by abortion; and to present Jesus Christ as Savior and Lord. As an affiliate of Care Net, Choices for Women is a part of a national network of pregnancy centers that share the common mission of ministering to women and men in need. This manual has been prepared to provide a ready reference to the established policies and procedures of Choices for Women. These policies and procedures have been adopted to assure good management practices, to assure the fair treatment of staff, and to assure that appropriate practices and standards are followed in connection with all aspects of the center's operations. All supervisors, employees and volunteers are responsible for knowing the applicable information contained in this manual.

MISSION STATEMENT

Choices for Women exists to demonstrate and share the life-changing message of Jesus Christ by providing practical help and loving support to those facing an unplanned pregnancy.

STATEMENT OF FAITH

1. We believe the Bible, consisting of 66 books of the Old and New Testament, is the inspired, infallible, authoritative Word of God.
2. We believe there is one God eternally existent, revealed to us in three persons: Father, Son, and Holy Spirit.
3. We believe in the Deity of our Lord and Savior Jesus Christ, that He was conceived by the Holy Spirit, was born of a virgin, and lived a sinless life; that He performed miracles; that by His death on the cross He made provision for the redemption of men and women from sin; that He ascended into heaven to the right hand of God; and that He will return in power and glory to judge the world and complete His redemptive purpose.
4. We believe the Holy Spirit is the Spirit of God. He inspired men to write the Scriptures, enables men and women to understand truth, exalts Christ, convicts of sin, calls men and women to the Savior Jesus Christ, and effects regeneration. We believe He empowers believers to live godly lives, comforts believers, and bestows spiritual gifts on believers by which they serve the Savior Jesus Christ.
5. We believe that, for the salvation of the lost and sinful people, regeneration (the conviction of sin, repentance toward God, faith in the Lord Jesus Christ) by the Holy Spirit is essential. Salvation is not the result of good works.
6. We believe in the resurrection of both the saved and the lost. We believe the saved are resurrected unto life everlasting and the lost are resurrected unto eternal condemnation.
7. We believe in the spiritual unity of redeemed believers in the Lord Jesus Christ and in the scriptural importance of church membership.
8. We believe every Christian is under obligation to seek to make the will of God supreme in his or her own life and in human society. We believe it is our responsibility and privilege to minister to those who are orphaned, in need, and helpless, being careful to act with redemptive love without compromising our loyalty to Christ and His truths.
9. We believe in the purposes of the Choices For Women Resource Center as set forth in its By-laws and agree to abide by those purposes as we serve this Center.

STATEMENT OF PRINCIPLE

Our Beliefs

The Child

- (1) The Bible clearly teaches the humanity, personhood, intrinsic value, and divine creation of the unborn child from the moment of conception.

The Pregnant Woman

- (1) She is a person for whom Christ died; therefore, she deserves the Christian's acceptance, love, and care.
- (2) She is accountable to God for her choices about her pregnancy, her unborn child, her own life, and her response to God.

The Christian

- (1) Each Christian has a divine obligation to protect the unborn child and to promote the sanctity of life.
- (2) For the Christian, to fail to protect the life of the unborn child is a sin.
- (3) A Christian is called to minister to the pregnant woman and her child.

Choices for Women is an outreach ministry of Jesus Christ through His church. Therefore, the pregnancy center, embodied in its volunteers, is committed to presenting the Gospel of our Lord to women with crisis pregnancies both in word and in deed. Commensurate with this purpose, those who labor as pregnancy center board members, directors and volunteers are expected to know Christ as their Savior and Lord.

Choices for Women is committed to providing clients with accurate and complete information about both prenatal development and abortion.

Choices for Women is committed to integrity in dealing with clients, earning their trust and providing promised information and services. The pregnancy center denounces any form of deception in its corporate advertising or individual conversations with clients.

Choices for Women is committed to assisting women to carry to term by providing emotional support and practical assistance. Through the provision of God's people and the community at large, women may face the future with hope, and plan constructively for themselves and their babies.

Choices for Women does not discriminate in providing services because of race, creed, color, national origin, age or marital status of its clients.

Choices for Women does not recommend, provide, or refer for abortion or abortifacients.

Choices for Women offers assistance free of charge at all times.

Choices for Women is committed to creating an awareness within the local community of the needs of pregnant women, and of the fact that abortion only compounds human need rather than resolving it.

Continued

Choices for Women does not recommend, provide, or refer single women for contraceptives. (Married women seeking contraceptive information should be urged to seek counsel, along with their husbands, from their pastor or physician.)

Choices for Women recognizes the validity of adoption as one alternative to abortion, but is not biased toward adoption when compared of other life-saving alternatives. Centers are independent of adoption agencies, relating to them in the same manner as to other helpful referral sources. Pregnancy centers receive no payment of any kind from these agencies, do not enter into contractual relationships with them, and do not share combined office space. Adoption agencies are not established under the auspices of centers. Pregnancy centers neither initiate nor facilitate independent adoptions, though they may refer for independent adoptions in states where it is legal.

PART II: STAFF — EMPLOYEES

At-Will Employment

Choices for Women does not enter into employment contracts with its employees. This Policies and Procedures Manual is not a contract, and it can be changed at any time. Choices for Women recognizes the right of its employees to terminate their employment relationship with Choices for Women at any time for any reason. Similarly, Choices for Women reserves the right to terminate its employment relationship with any employee at any time for any reason.

Equal Employment Opportunity

Choices for Women is committed to providing equal employment opportunities for all qualified persons without regard to race, color, national origin, sex, disability, or age, to the extent required by law and corresponding biblical principles. This applies to all employment practices, including hiring, promotions, training, disciplinary action, termination and benefits. Because Choices for Women is a religious organization, it has the legal right to require its employees to agree to certain religious tenets. Employees of Choices for Women must have made a personal profession of faith in Jesus Christ as Savior and Lord, and each employee must affirm his or her agreement with the Choices for Women Statement of Faith.

Employee Selection and Screening

Choices for Women seeks to recruit, select and hire the most qualified applicant for every available employment position. A personal profession of having received Jesus Christ as Savior and Lord is a requirement for any applicant. Those persons vested by the Board with hiring authority should give proper consideration to all relevant factors in evaluating the qualifications of applicants, including: (1) personal character; (2) personal gifts and skills; (3) educational background; and, (4) prior relevant experience. Such persons with hiring authority are also expected to follow appropriate selection and screening procedures to verify the qualifications of each applicant under consideration and to investigate the background of each such applicant to assure that they are reasonably fit to perform the duties of the position in question.

Persons responsible for screening and selecting employees will follow these steps in recruiting and considering applicants for a center job position:

1. Advertise the job opening. This may be accomplished by notification of existing staff, communications to local churches, personal referrals, and advertisements in Christian publications.
2. Require each applicant to complete and submit Choices for Women's standard employment application.
3. Screen written applications and eliminate unqualified or unacceptable candidates. Evaluate the remaining applications to identify the most qualified candidates.
4. Conduct personal interviews of the top candidates. Go over the information on the applicant's written application and make additional inquiries to assess the qualifications and fitness of each such applicant.
5. Identify a top applicant and conduct a background check. Contact recent employers to verify work history and experience; contact personal references, including the applicant's pastor; and, verify other information on the application such as listed college degrees. If the position involves interaction with minor clients, obtain a criminal background check.
6. Review with candidate any discrepancies or serious concerns elicited during background check. If the applicant is able to provide a satisfactory explanation, he or she may still be included for consideration. If the applicant is unable to provide a satisfactory explanation, he or she should be dropped from further consideration.
7. Extend a job offer to the candidate chosen.
8. Once a candidate has accepted the job position, notify all other applicants by an appropriate letter. Internal applicants should be notified in person.

New Employee Processing

Choices for Women complies with all applicable laws that require steps to be taken in connection with processing new employees. The Director, or such person as he or she may assign, assures that all appropriate paperwork is promptly prepared and, if applicable, submitted to appropriate agencies in connection with the hiring of any new employee. A W-4 form and an I-9 form are promptly completed for each employee. Also, a copy of the employee's W-4 form is promptly submitted to the designated state agency responsible under federal law (PRWORA) for receiving such reporting information. The Director, or such person as he or she may assign, assures compliance with all other paperwork and reporting legal requirements that pertain to center employees.

Employee Classification

Employees of Choices for Women are classified as "exempt" or "nonexempt" according to the following definitions:

EXEMPT. Salaried positions of a managerial, administrative or professional nature, as prescribed by federal and state labor laws, which are exempt from minimum wage requirements and mandatory overtime payments.

NONEXEMPT. Positions of a clerical, technical or service nature which require the payment of minimum wages and overtime in accordance with federal and state labor laws.

Employees are further classified as follows:

1. **FULL-TIME.** An employee who works 36 hours or more per week on a regularly scheduled basis.
2. **PART-TIME.** An employee who regularly works less than 36 hours per week.
3. **TEMPORARY.** An employee who is hired for a limited period of time for a specific purpose or project, including interns and student-hires.

All employees, regardless of status, are subject to all center rules and procedures.

Job Descriptions

Job descriptions for each center position are prepared by the Director and approved by the Board. Each job description contains a clear and concise description of the duties and responsibilities encompassed within the job position. The job description is made known to all applicants that are being considered for employment in such position. Upon hiring, each employee is requested and expected to become thoroughly familiar with his or her job description as well as with the job descriptions of any other persons with whom they will closely work. The job criterion set forth in the job description is considered as a primary reference in connection with any related job evaluations.

The Director periodically reviews and, if necessary, modifies center job descriptions to assure that they are up to date. Any employee affected by such changes is promptly provided with a copy of the amended job description.

All job descriptions include the following information:

- Job title
- Identity of supervisor
- Qualifications
- Description of all relevant duties
- Number of hours required per week

Wage and Salary Determination

The wage or salary level for each center employee is initially determined by the Board. Wage and salary levels are established with the goal of paying all center employees fairly and equitably. Initial wage and salary levels for job positions are based upon the degree of responsibility, education and experience required. All nonexempt employees are paid at an hourly rate that meets or exceeds the applicable minimum wage level. Wage and salary levels are reviewed at least once a year. The Director makes appropriate recommendations to the Board concerning any proposed pay adjustments, except as related to the Director's own pay. The Board, at its sole discretion, may authorize pay adjustments based upon such relevant factors as level of job performance, cost of living increases, and the financial status of the center. No employee is paid a salary or wage that may be deemed unreasonably excessive.

Pay Period

Choices for Women employees are paid each Friday.

Overtime Pay

An employee's regular hourly rate will be paid for all time worked up to 40 hours in one work week, which will run from Sunday to Saturday. All hourly and salaried employees, other than exempt employees who are not subject to federal overtime requirements, will be paid at one and one-half times their regularly hourly rate of pay for all time worked in excess of 40 hours in any one work week. Paid leave or vacation hours used in a given week will not be counted toward overtime hours. Overtime pay will be paid on the regular payday. Overtime hours will not be accrued at the discretion of the employee but must be approved in advance by the employee's supervisor. Overtime hours will only be authorized when the supervisor determines that they are reasonably necessary to accomplish the work of the center. Employees will not be permitted to devote volunteer hours to the center in lieu of working overtime hours.

Compensatory Time

NON-EXEMPT EMPLOYEES. With the approval of their supervisor, non-exempt employees may elect to use overtime hours to compensate for a previous absence or to take subsequent time off. Compensatory time is calculated on an hour for hour basis and must be used within 30 days of when the overtime is worked.

EXEMPT EMPLOYEES. Exempt employees are not legally entitled to overtime pay and are not strictly subject to a 40 hour work week. As executives and professionals, such employees are paid to perform more broadly defined functions which may reasonably require them from time to time to work hours in excess of their normally scheduled hours. Nevertheless, Choices for Women seeks to avoid having any employee, whether exempt or nonexempt, work an unhealthy and excessive number of hours. To this end, compensatory time may be granted to exempt employees under the following conditions:

.....
The Director, at his/her discretion (or the Board with respect to a request from the Director) **MAY** choose to grant equal time off to an exempt employee for hours worked in excess of 40 hours in a week.

The extra work must be approved in advance.

Compensatory time must be taken within 30 days of being earned.

Compensatory time will not be exchanged for monetary compensation.

Attendance

The center's ability to perform its ministry depends upon the regular attendance of employees. Each staff member has an important role in this ministry, and therefore unexcused absences and unexcused incidents of tardiness are undesirable as they disrupt the normal operations of the center. Each employee is required to arrive at the center in a timely manner and to work the hours normally scheduled for that employee. An unexcused absence is defined as an absence that occurs contrary to any of the Choices for Women's leave policies. An unexcused tardiness is defined as tardiness that occurs without justifiable reason. An employee may expect that repeated incidents of unexcused absences or unexcused tardiness will lead to disciplinary action, including possible termination. Under any circumstances, an employee will notify his or her supervisor as soon as reasonably possible if such employee is going to be absent from work or tardy for work.

Holidays

Choices for Women provides the following paid holidays each year:

January	New Years Day
.....	Martin Luther King Day
February	President's Day
March/April	Good Friday
May	Memorial Day
July	Independence Day
September	Labor Day
November	Thanksgiving and day after
December	Christmas Eve thru New Years Day

Holidays falling on Saturday will be observed the preceding Friday and those falling on Sunday will be observed the following Monday.

Full-time employees are eligible for full holiday pay. Regular part-time employees are eligible for holiday pay based upon the number of hours that would have been worked if the day were not a holiday. Temporary employees are not eligible for holiday pay.

Vacation

Choices for Women recognizes the importance of vacation time for obtaining rest, recreation and renewal. Therefore, Choices for Women seeks to grant each full-time employee adequate paid vacation to allow for necessary time off for these purposes. Each employee is encouraged to take advantage of these vacation benefits.

Vacation benefits begin to accrue the day employment begins but are available only after the Employee's one year anniversary. Vacation benefits accrue as follows:

After 1 year of continuous service	10 days
After 2 years of continuous service.....	15 days
After 5 years of continuous service.....	20 days
After 10 years of continuous service.....	25 days

Part time employees will receive vacation days after their one-year anniversary based upon their average number of hours scheduled per week.

Vacation time earned but not used within the Employee's anniversary year will be forfeited. Employees who are separated from employment after one year of service will be entitled to receive any vacation pay that has accrued as of such time.

No vacation time will be allowed unless approved in advance by the Director. Employees are encouraged to make requests for vacation as soon as in advance as possible. The Director will approve vacation requests on a first come first serve basis and upon a determination that the employee's absence during the requested period will not unduly interrupt the center's ability to carry out its functions.

Vacation requests will not be granted in smaller increments than 2 hours.

If the requested vacation time includes a paid holiday, the employee will not have the paid holiday charged against vacation time.

Vacation time must be used within the year it is accrued or else it will be forfeited. A written request to carry over vacation may be submitted to the Director prior to November 30. The Director will only approve such a request if she reasonably concludes that circumstances beyond the employee's control have or will prevent the use of such accrued vacation during the current year.

If employment is terminated for any reason, all unused accrued vacation will be paid at the employee's regular rate of pay in effect at that time.

Sick Days and Other Absences

Sick Time: Each full-time and permanent part-time employee is entitled to 7 days of paid sick leave each year to be used in the event of personal or family illness, injury or other medical reasons. Unused sick leave will not be allowed to accumulate from year to year. Upon separation from employment unused sick time will not be compensated.

Personal Leave: All full-time and part-time regular employees are eligible for one paid day per year to conduct their personal business. Employees must notify their supervisor at least 24 hours in advance of taking personal time.

Bereavement Leave: In case of a death in an employee's immediate family, Choices for Women will allow up to three days of paid leave for the employee to prepare for and to attend the funeral of such family member. Choices for Women defines immediate family as spouse, children, parents, brother, sister, father-in-law, mother-in-law, grandparents and grandchildren. If an employee requires additional time off, the employee's supervisor may grant a request to use accrued personal or vacation time, as appropriate.

Jury Duty and Court Appearances Choices for Women recognizes the civic responsibility of employees to serve as jurors and witnesses in court proceedings. An employee should promptly notify his or her supervisor if called to serve as a juror or witness. During any such absence, the employee will receive regular pay, less any juror or witness fees paid, upon furnishing adequate proof of jury or witness service.

Parental Leave: Parental leave in connection with pregnancy, childbirth or related medical conditions will be treated as any other personal leave or sick leave. If an employee needs additional time off beyond the amount of their accrued personal and sick leave, the employee may use accrued vacation time and then, if necessary, apply for leave without pay. The Director will grant such requests so long as the anticipated absence will not unduly disrupt the operations of the center.

Military Leave: Employees going into active military service are approved for automatic leave of absence upon presentation of orders. Employees who are reservists in such service organizations as the National Guard, Naval Reserve, and the Air Force Reserve shall also be approved for automatic leave to participate in periodic training and other exercises as may be required in connection with their service. Employees may opt to take such leave without pay or to use their accrued personal leave and vacation time. Such employees will retain appropriate reinstatement and benefit rights in accordance with applicable federal and state laws.

Conferences

Employees may attend one national conference per year (as budget allows) at the expense of Choices for Women. Regular pay will be given during this time away. Additional conferences deemed beneficial to the Center and employees (or volunteers) may be attended at the discretion of the Director and Board.

Performance Evaluations

Performance evaluations will be given each year for all employees. An employee's immediate supervisor will conduct these evaluations, except that the Director will be evaluated by the Board Chair or by an appropriate committee appointed by the Board. Performance evaluations reflect an employee's performance, responsibilities and objective for a given period of time. The written performance evaluation is intended to address: (A) the quality of past performance and (B) a determination of achievements of objectives.

Employees will be given an opportunity to meet and discuss their performance evaluations with their immediate supervisors. All employees shall receive copies of their annual evaluation, which will also be kept in their personnel files.

Personnel Files

Personnel files will be maintained for all center employees. These files will be kept strictly confidential. Employees may inspect their own personnel files upon making arrangements with their supervisors.

Employee Discipline

Choices for Women expects all employees to perform their jobs in a satisfactory manner and in accordance with all Choices for Women standards. There may be times, however, when employees fail to perform their jobs in a satisfactory manner or fail to comply with center standards. Minor performance deficiencies and minor incidents of misconduct will usually result in a discussion with a supervisor and an attempt to remedy problems before termination. Matters that may result in termination or other disciplinary action include, but are not necessarily limited to, the following: (1) Unsatisfactory job performance; (2) Repeated tardiness; (3) Excessive absence; (4) Insubordination; (5) Illegal acts; (6) Dishonesty; (7) Falsification of center records; (8) Destruction of center property; (9) Failure to adhere to the Employee Pledge; (10) Improper conduct toward a client or co-worker; (11) Sexual Harassment; and (12) Other misconduct.

THIS POLICY DOES NOT ALTER AN EMPLOYEE'S AT-WILL RELATIONSHIP WITH THE CENTER, AND THE CENTER RESERVES THE RIGHT TO TERMINATE AN EMPLOYEE AT ANY TIME FOR ANY REASON OR NO REASON AT ALL.

Voluntary Termination

Employees who are contemplating leaving employment due to work-related problems or issues are encouraged to first speak with their supervisor and/or to utilize the center's grievance procedure. All employees are expected to give two weeks notice prior to leaving their employment. Failure to provide such notice will result in a loss of one-half of the accrued leave payments to which the employee would otherwise be entitled.

In the absence of extraordinary circumstances, any employee who fails to report to work or to call in after 3 consecutive scheduled workdays will be deemed to have abandoned his or her job, and such situation will be treated as a voluntary termination without notice.

Exit interviews may be conducted of employees who voluntarily separate from employment to ascertain the reasons for their leaving, to identify any specific job concerns or issues, and to facilitate possible workplace improvements.

Sexual Harassment

Choices for Women will not tolerate any form of sexual harassment within the work environment. Sexual harassment is illegal, unbiblical, degrading and interferes with work performance.

Sexual harassment occurs when unwelcome conduct of a sexual nature becomes a condition of an employee's continued employment, affects other employment decisions regarding the employee or creates an intimidating, hostile or offensive work environment.

Sexual harassment may include requests for sexual favors, unwanted physical touching, unwelcome sexual comments or jokes, nonverbal sexual conduct or gestures, unwelcome displays of sexual pictures or objects, and other sexually based unwelcome conduct.

Choices for Women requires the cooperation of every employee to assure that no sexual harassment takes place within the workplace. An aggrieved employee should promptly report sexual harassment to his or her immediate supervisor. However, if the immediate supervisor is an offending party, the aggrieved party shall report the matter to the next highest supervisor or, if there is no such higher supervisor, to the Board Chair.

All reports of sexual harassment will be promptly investigated, and appropriate remedial actions will be taken. Any employee who is found to have engaged in sexually harassing conduct will be subject to immediate discharge.

Employment of Relatives

Choices for Women recognizes that the hiring of relatives (spouses and immediate family members) presents special concerns for the center and must be prohibited under certain circumstances.

Relatives of board members and center supervisors will not be eligible for permanent employment at the center. Relatives of non-supervisory employees may be considered for permanent employment, but only if it is first determined that the employment of such related employees will not produce any undue effects upon center morale or operations. No persons, including relatives, will be considered for any job position unless they meet all minimum qualifications.

Honoraria

Honorarium or other payments made as a result of an employee's speaking engagement or as a result of other activity undertaken **in a representative capacity for Choices for Women** will be deemed to belong to the center and will be promptly turned over to the center if paid directly to the employee. If an employee is asked to speak in a personal capacity not related to their position in the organization, such as women's ministry events, honoraria may be retained by that employee. Honoraria paid to the employee from trainings conducted on the part of another entity (such as North American Mission Board) are retained by the employee.

Outside Employment

Any employee who is able to continue to perform job duties for Choices for Women in a satisfactory manner will not be restricted from outside employment. If outside employment appears to be detrimental to the employee's performance or in conflict with Choices for Women's policies, the Director will request the employee to terminate the outside employment.

STAFF – VOLUNTEERS

Volunteer Recruitment and Screening

Choices for Women recruits and selects qualified applicants to serve as center volunteers. A personal profession of having received Jesus Christ as Savior and Lord is a requirement for any applicant. Applicant must also agree with and sign the Centers Statement of Faith. Such persons with authority to recruit and select volunteers follow all applicable selection and screening procedures to verify the qualifications of each volunteer applicant under consideration. Each volunteer applicant submits a written application; each volunteer applicant participates in an initial training session related to required duties; and, each volunteer applicant is interviewed by the Director and Client Services Director. Based upon the written application, the applicant's participation in the training session, and the interview, the Director and Client Services Director make an initial determination concerning the qualifications of the volunteer applicant to serve in one or more volunteer positions at the center. No volunteer applicant is allowed to begin to serve the center until appropriate screening procedures have been completed. This includes a thorough and careful investigation of the background of each such applicant to assure reasonable fitness to perform the duties of the position in question. A criminal background check is obtained for all volunteers who will be required to work with minor clients.

Volunteer Recruitment and Screening

Persons responsible for selecting volunteers will follow these steps in recruiting and screening volunteer applicants:

1. Conduct recruiting efforts in local churches and within the community to invite interested Christians to serve as volunteers in the center's ministry.
2. Require each volunteer applicant to complete and submit Choices for Women's standard volunteer application.
3. Conduct an interview of each volunteer applicant. Questions should explore their walk with the Lord, their understanding of abortion issues, how they want to serve and other issues related to the center and the required duties. Also, any issues arising from the written application or concerns raised should be explored. Based upon the written application and the interview, eliminate any unqualified or unacceptable candidates.
4. For each remaining volunteer applicant, conduct a thorough and careful background check. This should include contacting listed references and any recent employers. If the volunteer will be involved in one-on-one counseling or other close interaction with minor clients, a criminal background check must also be conducted.
5. If negative information or discrepancies are discovered during the reference or background check, this information should be addressed with the applicant. If the applicant is able to provide a satisfactory explanation, he or she may still be included for consideration. If the applicant is unable to provide a satisfactory explanation, he or she should be dropped from further consideration.
6. Any volunteer applicant who is deemed unqualified or unfit to serve should be given appropriate notice.

Guidelines for Volunteers

The primary goal of this ministry is to bring the good news of Jesus Christ in both word and action to clients. In light of this goal, volunteers are encouraged to remember the following:

We are worshipping and serving Jesus Christ. We are not in the ministry strictly to serve clients, but also to worship and serve Him. In worshipping and serving Him, He shall enable us to minister to those who come to the center. Volunteers must be continually in prayer, studying the Word and in fellowship in a local church.

God is as interested in transforming volunteers' lives through the work of the center as He is in the salvation and transformation of the women and men who come to the center.

Honoring God as we serve Him is the goal of the ministry. While we record the number of clients who come in and the number of clients who do or do not have abortions, this must not become the center's definition of success.

God is teaching us through all the circumstances of daily operation and outreach, as well as serving on the boards and in committees. The "hands-on" part of the ministry is not the only area God will use for transformation. Being faithful when there are no clients and finishing up office work (sorting clothes etc.) are a test of commitment.

God will use the center to rework priorities in your life, test and strengthen you and reshape relationships.

Take the temperature of your home life often. No ministry is more important than your family. Lines of communication need to stay open continually as your involvement in the ministry develops. Be realistic with your time commitment before the Lord.

The ministry is always growing and changing. Be flexible and open to God's leading at all times.

God will teach you patience and will give you strength to deal with the challenges of the ministry as you submit to Him in prayer, Bible study and worship.

Do not compare your progress or development with other volunteers. You have a unique set of gifts that He will strengthen and refine. He uses different pressures and experiences to transform each person.

Volunteers may come from many Christian denominations. An attitude of respect and unity must be exhibited at all times. We agree upon and adhere to our common Statement of Faith and leave denominational differences and discussions outside the Center. At no time will negative speech in regards to various "non-essential" beliefs be tolerated.

Volunteer Bill of Rights

Choices for Women recognizes that its volunteers have the following rights:

To be treated as co-workers, not free help

To engage in a suitable assignment, with consideration for personal preference, temperament, life experience and education

To know as much about the organization as possible including its policies, its people and its purpose

To obtain appropriate training, thoughtfully planned and effectively presented

To receive continuing education as a follow-up to initial training, stressing new information and developments

To receive sound guidance and direction by a supervisor who is experienced, patient and well informed

To be a part of a variety of experiences

To be heard, to have a part in planning, to feel free to make suggestions

To be recognized and appreciated as a valued co-worker

Volunteer Training

Choices for Women recognizes that the effectiveness of its ministry depends upon the proper and thorough training of volunteers. All center volunteers are required to successfully complete on-the-job training before serving clients one-on-one. This includes being observed by Client Services Director or Executive Director before entering into active volunteer service.

The Client Services Director is responsible for assuring that all such training is properly conducted, completed and documented.

Volunteer In-Services

Choices for Women recognizes that volunteers must continue to receive appropriate training throughout their period of service for the center. Volunteer staff meetings are held at a minimum of four times per year. These staff meetings are used, in part, as a time to upgrade the information and skills of peer counselors and other volunteers. In-services conducted during these staff meetings cover such topics as evangelism, sexuality, prenatal care, adoption, advanced counseling skills, computer proficiency and such other topics as the Director or Client Services Director may determine. At least one in-service per year is used as a refresher to review basic information addressed during previous training opportunities.

Volunteer Evaluations

Choices for Women recognizes that volunteers are entitled to receive appropriate feedback from their supervisors so they may continue to improve their skills and address any weaknesses. Therefore, volunteers are evaluated at least annually by their immediate supervisor (Client Services Director). For peer counselors, such evaluations include, if possible, first hand observation of counseling sessions. All volunteers are given an opportunity to meet with their respective supervisors to discuss their evaluations.

OTHER STAFF ISSUES

Dress and Appearance

Choices for Women staff should reflect professionalism. Therefore, all employees and volunteers are expected to dress appropriately, with attention to the message their attire communicates. Employees and volunteers should dress in a manner appropriate for a professional office. While it is important not to dress in a manner that would intimidate clients, the attire of employees and volunteers should reflect competence, neatness and a professional demeanor. Jeans, casual shorts, or revealing attire is not appropriate during regular office hours. Exceptions may be made for certain days or events at the discretion of the Director. The Director will be responsible for evaluating the propriety of office dress and appearance.

Minimum Age for Staff

Choices for Women seeks to recruit staff members who possess the requisite maturity to perform the important responsibilities of our ministry. Also, Choices for Women recognizes that younger clients may be subject to potential intimidation and fear of coming to the center if they perceive that their situations may become known to their peers. Therefore, ordinarily, only persons who are 18 years or older are considered for employment or volunteer service at the center. The Director is authorized to make exceptions to this policy in extraordinary circumstances and only when the concerns expressed in this policy are otherwise satisfied. Volunteer opportunities for those under 18 may be available in non-client-related areas.

Involvement in Adoptions

Choices for Women's ministry is to serve the needs and interests of clients. Choices for Women avoids situations in which the interests of employees, volunteers or others for whom they act conflict with the interests of clients. Therefore, Choices for Women strictly prohibits employees and volunteers from taking any steps on their own behalf or on the behalf of others to pursue the adoption of any client's child. This prohibition also applies to any steps that may be taken to pursue adoptions from clients of other Care Net affiliated pregnancy centers. Any such conduct will constitute grounds for immediate termination.

Choices for Women also recognizes that the ability of persons to serve as employees or volunteers for the center may be negatively affected if they are themselves involved in pursuing an adoption. Therefore, persons who are engaged in pursuing adoption will be generally discouraged from applying for employment or volunteer service during the period that any such pursuit of adoption continues. To the extent that existing employees or volunteers become involved in an adoption process, the Director will closely monitor such situations to assure that any such employee or volunteer can continue to perform their responsibilities in an appropriate manner.

Post-Abortion Applicants

The ministry of Choices for Women requires employees and volunteers who maintain a servant's posture and who have the spiritual and emotional capacity to focus on the needs of clients. All of us, of course, continue to have personal needs and to face personal issues. However, some persons may be facing substantial personal issues and problems that render them unable to effectively minister to the needs of others. In reviewing applicants for employment or volunteer service, the Director will assess whether there are any substantial personal issues, problems or past experiences that may currently prevent the applicant from serving as an effective employee or volunteer. When appropriate, the Director may require that an applicant complete a counseling program or Bible study as a prerequisite to employment or volunteer service. The potential volunteer may be able to serve (at Director's discretion) in a non-client-related area of the ministry before counseling is complete.

Activism at Abortion Clinics

Choices for Women's employees and volunteers are expected to project an image and attitude of compassion and empathy toward clients. Choices for Women believes that the ability to do this may be jeopardized if its employees or volunteers are observed by clients or others participating in protest activities at or near abortion clinics. Therefore, all center employees and volunteers are expected to refrain from engaging in any such abortion clinic activism whether during work hours or during off-hours. This includes picketing, sidewalk counseling, and acts of civil disobedience. This policy does not limit staff from participating in other political activities during their own time, including participation in peaceful pro-life marches or prayer vigils.

Political Activities of Staff Members

Choices for Women's status as a tax-exempt corporation requires that it refrain from participating in any political campaigns and other political activities. Therefore, all employees and volunteers are prohibited from engaging in any unauthorized political activities during the time they are working for the center or during the time they are otherwise serving the center in a representative capacity. No employee or volunteer will be allowed to maintain, post or distribute any political campaign literature upon the center premises. No employee or volunteer, while acting in a representative capacity for the center, will be allowed to make statements for or against any political candidates. The Board may authorize center personnel to participate in insubstantial lobbying efforts on behalf of the center, but no such efforts will be undertaken without the express authorization of the board. Employees and volunteers are otherwise free and encouraged, on their own time, to participate in political activities (other than abortion clinic activism), to engage in partisan politics, and to advocate and vote for such candidates and propositions as they deem fit. During the time that an employee or volunteer is participating in any such outside political activities, he or she will refrain from such actions, such as wearing clothing with the center's name, which might erroneously indicate that he or she is acting in a representative capacity for the center.

Conflicts of Interest

(Conformed from the Internal Revenue Service sample policy)

Article I

Purpose

The purpose of the conflict of interest policy is to protect Choices for Women Resource Center's ("Center") interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Article II

Definitions

1. Interested Person

Any director, principal officer, or member of a committee with governing board delegated powers who has a direct or indirect financial interest, as defined below, is an interested person.

2. Financial Interest

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Center has a transaction or arrangement.
- b. A compensation arrangement with the Center or with any entity or individual with which the Center has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with any entity or individual with which the Center is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

Article III
Procedures

1. Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

2. Determining Whether a Conflict of Interest Exists

After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest

- a. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the governing board or committee shall determine whether the Center can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

4. Violations of the Conflicts of Interest Policy

- a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Article IV
Records of Proceedings

The minutes of the governing board and all committees with board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present and the governing board's or committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Article V
Compensation

- a. A voting member of the governing board who receives compensation, directly or indirectly, from the Center for services is precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Center for services is precluded from voting on matters pertaining to that member's compensation.
- c. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Center, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Article VI
Annual Statements

Each board member, executive director, and member of a committee with governing board-delegated powers shall annually sign a statement that affirms such person

- a. Has received a copy of the conflicts of interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy, and
- d. Understands the Center is charitable and in order to maintain its federal tax exemption, it must engage primarily in activities that accomplish one or more of its tax-exempt purposes.

Article VII
Periodic Reviews

To ensure the Center operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews, shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.
- b. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Center's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit, or in an excess benefit transaction.

Article VIII
Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, the Center may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

**Policy on Suspected Misconduct, Dishonesty, Fraud,
and Whistle-Blower Protection**

If any person knows of or has a suspicion about misconduct, dishonesty or fraud, the Executive Director should be contacted. If the alleged wrongdoing concerns the Executive Director, then the Board Chair or other officer of the Board of the organization should be notified instead.

If the Executive Director, Chair or other officer of the organization receives information about misconduct, dishonesty or fraud, they shall inform the Board (or, alternately, the Executive Committee), which shall determine the procedure for investigating all credible allegations.

At all times, the privacy and reputation of individuals involved will be respected. There will no punishment or other retaliation for the reporting of conduct under this policy. If the person providing the information requests anonymity, this request will be respected to the extent that doing so does not impede any investigation.

Use of Illegal Drugs or Alcohol

Choices for Women recognizes that illegal drug use and alcohol abuse by employees and volunteers are dangerous and unacceptable behaviors in the workplace. Therefore, no such substance abuse related behavior will be tolerated. Possession, storage or consumption of illegal drugs or alcoholic beverages on center premises is grounds for immediate termination. Any staff member who reports to the center under the influence of illegal drugs or alcohol will also be subject to immediate termination. Any staff member who is convicted of a felonious drug charge will be subject to immediate termination, without regard to whether the unlawful activities occurred in connection with the performance of center responsibilities.

Release of Employee or Volunteer Information

All reference requests and other outside requests for information concerning current and former employees or volunteers will be referred for handling to the Director. The Director may provide information on current and former employees or volunteers, as appropriate. Except as otherwise required by law, this information will be limited to verification of employment, position held and length of employment.

Personal Usage of Office Telephone, Postage, Fax, and Copier

Choices for Women expects all staff members to exercise honesty, good judgment and common sense in connection with their personal use of any property and materials belonging to the center. Employees and volunteers are permitted to make limited personal use of the center's telephones and office equipment provided that such usage does not interfere with the normal operations of the center and provided, further, that any expenses incurred are promptly reimbursed. Personal phone calls are made or received only as reasonably necessary and limited to no more than 5 minutes. Whenever possible, personal calls are made or received during scheduled breaks. Employees and volunteers will request approval from the Director before making personal use of other office equipment, amenities or materials. The Director will implement appropriate procedures to assure that employees and volunteers reimburse the center for any personal expenses incurred for postage, materials or any other purposes. The Director will determine the amount of reasonable charges to be assessed for personal copies made upon the office copier by staff members. Any staff member who utilizes the office computer or Internet to gain access to pornographic or inappropriate materials will be subject to disciplinary action including the possibility of immediate termination.

Personal Usage of E-Mail

The purpose of the center's e-mail system is to conduct center business. Incidental and occasional personal usage of the center's e-mail system will be permitted if it does not interfere with center business. All e-mail communications will be handled in the same manner as letters, faxes, and other business communications.

All messages created, sent or received using the center's e-mail system, including personal messages, are the property of the center. The center retains the right to access, retrieve, and disclose the contents of all such messages, including personal messages. Employees and volunteers may not retrieve or read any e-mail message that was not sent to them unless authorized by the designated e-mail recipient or the Director.

No business or personal e-mail messages will be sent within or from the center that contain any offensive, obscene or other inappropriate content.

Visitors of Staff at Center

Choices for Women desires to preserve maximum confidentiality and comfort for clients that visit the center. Therefore, employees and volunteers are generally discouraged from having visitors at the center, except under such circumstances as reasonably necessary. Employees or volunteers who anticipate the need to have visitors should seek the prior permission of the Director. Except in emergency situations, children and family members of employees or volunteers should not come to the center during regular office hours. Exceptions are made when the family members are coming to perform tasks as volunteers (such as lawn maintenance and general cleaning or special projects).

Staff Safety

Choices for Women is committed to providing a safe work environment for its employees and volunteers. Choices for Women will abide by all applicable OSHA regulations as well as any other applicable state or local safety regulations. All employees and volunteers are expected to follow good safety practices and to adhere to all applicable safety rules and procedures. No employee or volunteer will be requested to perform any duty or responsibility that may expose such employee or volunteer to an unreasonable risk of personal harm. Any employee or volunteer that becomes aware of any unsafe working condition will immediately report such condition to his or her supervisor. Any employment or service related injuries to employees or volunteers will be promptly reported. The willful violation of safety rules, the failure to report unsafe conditions, and the failure to report incidents involving employee or volunteer injury are considered serious offenses and may result in disciplinary action, including possible termination.

Choices for Women strictly prohibits any form of violence in the workplace, including verbal threats, nonverbal threats and related actions. Employees and volunteers will promptly report any incidents involving violence or threats of violence that they may observe. The Director will take prompt and appropriate remedial actions. Any criminal misconduct will be immediately reported to appropriate authorities. Any employee or volunteer who engages in such improper conduct may be subject to immediate dismissal. Clients or client families who become belligerent with staff will be asked to leave. If they refuse, staff is to dial “911” immediately.

CONFLICT RESOLUTION

Conflict Resolution Principles

It is the policy of Choices for Women to foster the resolution of disputes in accordance with biblical principles. All persons associated with the center's ministry, including board members, employees and volunteers, are encouraged to seek prompt resolution of any disputes that may arise. This should first be attempted on a one-on-one basis in accordance with Matthew 18:15. If such initial attempt(s) are not successful, the matter should promptly be referred to an appropriate supervisor or center representative. If applicable, the center's grievance procedure should be implemented and followed. Each person involved in any such dispute is encouraged to engage in self-examination; to relinquish any undue selfish goals; and to humbly submit to the conciliation process so that relationships may be promptly restored in forgiveness and love. Each board member, employee and volunteer will be required to enter into a written agreement providing for implementation of Christian mediation proceedings, and, if necessary, arbitration proceedings for the resolution of any disputes arising in connection with such person's involvement with the center's ministry.

Grievance Procedure

If you have a complaint concerning the center or if you are dissatisfied with any action taken or decision made that affects you, you are encouraged to seek resolution of that matter through the center's grievance procedure. To facilitate the use of this procedure, every supervisor is counted upon to have an "open door" policy to entertain staff concerns or complaints. Similarly, open communication is encouraged and expected of every employee and volunteer.

Step 1. If your complaint is based upon the belief that you have been wronged by a person who is also associated with this ministry, you shall promptly go to that person and seek resolution of your complaint in accordance with the dictates of Matthew 18:15. If such an attempt at personal reconciliation is not successful or if your complaint is not against another individual associated with the ministry, proceed to Step 2.

Step 2. Set forth in writing to your immediate supervisor the nature and basis of your complaint along with a statement of the relief or corrective action which you are requesting. Your immediate supervisor shall consider and investigate the validity of your complaint and shall respond in writing within 10 working days after receiving your complaint. If you are not satisfied with this result, you may proceed to Step 3. If your complaint is against your immediate supervisor and you have already sought resolution of that complaint in accordance with Step 1, you may skip Step 2 and proceed to Step 3. If your complaint is against the Director and you have already sought resolution of that complaint in accordance with Step 1, you may skip Step 2 and Step 3, and proceed to Step 4.

Step 3. Set forth in writing to the Director the nature and basis of your complaint along with a statement of the relief or corrective action that you are requesting. The Director shall consider and investigate the validity of your complaint and shall respond in writing to you within 10 working days after receiving your complaint. If you are not satisfied with this result, you may proceed to Step 4.

Step 4. Set forth in writing to the Board Chair the nature and basis of your complaint along with a statement of the relief or corrective action you are requesting. The Director as well as any person(s) who are the subject of such complaint shall be provided with a copy of the complaint filed. The Board shall consider, investigate and render a decision concerning the validity of your complaint and the relief to be provided, if any. Such decision shall be rendered and communicated to you no later than 60 days after your complaint is filed with the Board Chair.

This grievance procedure may be bypassed if extraordinary circumstances, such as the need to report criminal misconduct, so require. Any deadlines set forth in this grievance procedure may be extended by mutual agreement of the parties involved in the grievance matter. No person who files a good faith complaint in accordance with this grievance procedure shall be disciplined or shall suffer any other form of retaliation for having utilized this grievance procedure.

Part III - CLIENT SERVICES

GENERAL — “Our Promise to You”

Choices for Women upholds a high standard of client care. Choices for Women adheres to the "Commitment of Care" statement in all interactions with clients. The promise statement is prominently displayed in the center and clients are encouraged to read it. The staff at Choices for Women agree to uphold all the tenets of the promise statement.

Our Commitment of Care

1. *Clients are served without regard to age, race, income, nationality, religious affiliation, disability, or other arbitrary circumstances.*
2. *Clients are treated with kindness, compassion, and in a caring manner.*
3. *Clients always receive honest and open answers.*
4. *Client pregnancy tests are distributed and administered in accordance with all applicable laws.*
5. *Client information is held in strict and absolute confidence. Client information is only disclosed as required by law and when necessary to protect the client or others against imminent harm.*
6. *Clients receive accurate information about pregnancy, fetal development, lifestyle issues, and related concerns.*
7. *We do not offer, recommend, or refer for abortions or abortifacients, but we are committed to offering accurate information about abortion procedures and risks.*
8. *All of our advertising and communications are truthful and honest and accurately describe the services we offer.*
9. *All of our staff and volunteers receive proper training to uphold these standards.*

Confidentiality

Every client seen at Choices for Women is promised confidentiality and every member of the center staff has a duty to uphold confidentiality. The only exceptions are when required by law or morally compelling circumstances to break confidentiality. If a client situation arises that may require reporting, that action is taken through the Director.

Confidential information is shared only with persons who have a legitimate need to know, for example the Director or Client Services Director. Prayer requests made for clients are to be generic in nature and contain no identifying details. Volunteers will not discuss details of client cases with each other.

If a client knows a staff member, that client should be assured of confidentiality and the availability of other counselors.

Center staff will only leave phone messages for clients when permission to do so has been previously given by the client.

Client files and information that reveals the identity of clients should be kept in a locked and secured area. The files may be kept unlocked during business hours, but locked at all other times. In general, only the Director and the Client Services Director should have the keys. Files should not leave the center.

When anyone other than the client requests information concerning the client, that request will be refused unless the client's written permission has been obtained or a subpoena or court order is issued.

Client information is not to be given over the phone to anyone unless written permission has been obtained. (This includes parents, boyfriends, medical personnel, etc.)

Reporting Requirements and Concerns

Choices for Women recognizes that circumstances may arise in which otherwise confidential information must be reported to appropriate authorities for the protection of the client, for the protection of third persons, or to otherwise comply with legal reporting requirements. This may occur when a client is a child who is the victim of neglect or abuse (including statutory rape); the client is engaging in child neglect or abuse; the client is a minor who is a runaway; or, the client is threatening to cause harm to self or others. It is expected that all employees and volunteers will be made aware of any reporting requirements that apply to these situations and will follow appropriate procedures when any such situations arise.

A. Situations involving minors:

If any center employee or volunteer reasonably believes that a minor client is or may have been the victim of child abuse, child neglect, sexual abuse, statutory rape, or is a runaway, such information shall be immediately reported to the Director. Similarly, if any employee or volunteer reasonably believes that a client has or is causing abuse or neglect to a child, that information shall also be immediately reported to the Director. The Director will determine whether the circumstances in question warrant reporting in accordance with applicable state law. If a determination is made that state law requires reporting, the Director will promptly proceed to report the situation in accordance with any applicable procedures outlined by state law. Note: The age for sexual consent in Indiana is 16 years old. Therefore, any client under the age of 16 who is involved in a sexual relationship (regardless of the age of the partner) is a reportable situation. If a determination is made that no mandatory reporting duty exists, the Director may choose, in her discretion, to report the situation to appropriate authorities if she believes that the welfare and safety of the client or another person may be significantly threatened in the absence of such a report.

B. Threats of harm to self and others:

If an employee or volunteer receives a phone call from a prospective client who is threatening to cause harm to themselves, that person shall be promptly referred to a suicide hotline or other appropriate emergency service. If possible, the person's name and phone number should be obtained so that a hotline worker can call back. If any employee or volunteer otherwise encounters a client who is threatening to cause harm to self or others, prompt steps should be taken for the reasonable protection of the client or any third persons against whom threats are being made. The Director or such other appropriate supervisory employee will be contacted and involved in the situation as soon as reasonably possible.

If it is determined that the client is already under the care of a mental health professional, the client will be requested to contact that professional for assistance. If the client refuses, center personnel will attempt to contact the professional on behalf of the client. If no professional assistance is readily available, an assessment will be made to determine whether there is a serious or significant risk that any threats of harm being made by the client will be carried out.

(Continued on next page.)

This assessment will be made with reference to the following criteria:

Specificity: How specific are the details of the plan? Does the person have a plan? Have they thought through the process? If so, are the details of the plan vague or does the client know how and when they will act? The greater the specificity of details in the plan, the higher the degree of risk.

Lethality: What is the likelihood that the proposed method will result in death? How quickly will the person die if they do what they plan to do? For instance, guns are potentially more lethal and quicker than pills. The higher the level of lethality in the plan, the greater the degree of risk which should be assessed.

Availability: What is the availability of the proposed method? Does the client have means to carry out the plan immediately? Does the client have a loaded gun? Does the client have pills in her possession? The more readily available the implement to be used is, the higher the degree of risk.

Proximity: What is the proximity to helping resources? How physically and geographically close is the person to others who could rescue them if necessary? Are there other people nearby who care about this person (family, loved ones, friends, support people)? What are the chances the person will be found? Does that appear to be part of the plan? The greater the distance from those who could rescue them in an emergency, the greater the degree of risk.

If it is determined based upon such an assessment that there is any significant risk that the client will cause harm to self or others, immediate assistance will be sought by calling 911. If the client leaves the center before help can be obtained, 911 will be contacted and prompt steps will be taken to notify any specific persons against whom imminent threats of harm have been made.

If it is determined based upon such an assessment that there is not a significant risk that the client will cause harm to self or others AND the client provides specific assurances that he or she will refrain from causing any such harm, no immediate reporting will be required. If, on the other hand, the client refuses to provide such assurances, the presence of a significant risk should be assumed and action should be taken accordingly.

C. Notification of Client:

When the center is required to report otherwise confidential client information to authorities or third persons, reasonable steps will be taken, if feasible, to notify the client and to explain why the reporting is being undertaken.

Parental Involvement

In recognition that God has bestowed the ultimate responsibility for the care and support of children upon their parents, Choices for Women encourages minor clients to communicate with their parents concerning their crisis situations and, if feasible, to involve their parents in the peer-counseling process. However, in the absence of otherwise reportable circumstances, Choices for Women will not violate client confidentiality for the purpose of bringing about parental involvement, nor will Choices for Women respond to parental demands for information without the consent of the client. The staff of Choices for Women will observe the following guidelines in dealing with parental involvement issues:

1. Minor clients will be encouraged to communicate with their parents and to involve their parents in the center's peer-counseling process, unless it is reasonably determined that any such involvement may be significantly detrimental to the client.
2. No confidential client information, including the minor's status as a client, will be communicated to a minor client's parents unless the client has expressly consented. If a staff member is confronted with a parental request for client information, the requesting parent should be politely advised of the center's confidentiality policy. The Director should be promptly advised of any such parental requests.
3. Only the Director may determine to break client confidentiality if she deems that the applicable law or circumstances warrant this for the protection of the minor client.

Responding to Subpoenas and Other Official Requests

Upon receipt of a subpoena or other official request for client information, Choices for Women will provide reasonable cooperation with civil authorities while also taking all appropriate steps to protect the interests of the client and the center. Any such subpoenas or requests will be handled in accordance with the following procedure:

1. Any subpoena or official request for client information received by the center or its staff will be promptly brought to the attention of the Director.
2. The client whose information has been requested will be notified of the request as soon as reasonably possible.
3. The subpoena or request will be submitted to the center's local counsel for review to verify that the subpoena or request has been validly issued and to explore whether there are any proper grounds for the center to oppose any such subpoena or request.
4. In the absence of any opposition to the subpoena or request, the Director will oversee the gathering of all documents and other information necessary to respond. Only documents and information that are specifically responsive to the subpoena or request will be gathered and produced.
5. The Director will serve as the center representative in the event that the subpoena or request requires a representative to appear at a deposition or other proceeding in connection with the production of any such documents or information.
6. To the extent permitted by court rules, the Director will seek reimbursement of the reasonable expenses incurred in gathering and reproducing any such documents and information. No such reimbursement will be requested if the information has been produced in response to a subpoena or other request from a client.

PEER-COUNSELING

General Guidelines

Volunteers and staff are always to be honest and forthright with clients.

Choices for Women offers tender, compassionate care to any woman who is not prepared for pregnancy. We avoid not only intentionally inflicting emotional distress, but also negligently inflicting emotional distress. When discussing abortion procedures and risks, the description is limited to documented facts only. Volunteers often read from approved selections rather than use their own words. If a client has not requested information about fetal development and/or abortion procedures and risks, her volunteer will obtain her verbal consent before discussing these topics with her. This compassion is extended to educational materials (see Educational Materials policy).

Representatives of the center also avoid making derogatory remarks about people or organizations. If a client requests information about an abortion provider, she is told that the center does not have the information. In public appearances, general information about abortion providers is at times given, but only with accurate documentation.

Volunteers always ask consent before touching a client (see Touching Clients policy).

Men counseling women alone is not permitted (see Same Sex Counseling policy).

Clients are always given free access to leave without verbal or physical restraint. (See Freedom of Access policy.)

Non-Discrimination

Choices for Women believes that every client who enters our center is a divine appointment. It is therefore our policy that no person may be discriminated against due to race, nationality, income status, living arrangements, or immigration status. Individually we may hold differing political views on these issues, but corporately we agree to treat each individual with respect and offer them our services. Since we require no proof of residency or income status from any of our clients, we cannot require such information from a select group because of language or nationality. It is our hope that in sharing the Gospel, hearts will be changed and moral and legal failures by the individual will be addressed through the power of the Holy Spirit.

Evangelism

Choices for Women is an evangelistic ministry with a statement of faith that each employee and volunteer must sign. The opportunity to share the Gospel is sought with each client. The center views the spiritual condition as an important part of each of us just as is the physical, emotional, and relational condition or health. Volunteers help clients work through barriers and challenges in a holistic manner, addressing how the client feels and is affected on each level, including the spiritual. Volunteers at the center shall at all times show respect for the religious views and opinions of every client, as well as her autonomy. Therefore, if a client states a preference not to discuss spiritual matters, that request will be honored. A client's agreement with or refusal to hear the Gospel shall never be a condition for providing services.

For the sake of unity, volunteers will adhere to the statement of faith, refraining from sharing specific doctrine that is beyond the basics of the Gospel or what is covered in the center's Statement of Faith. Other potentially divisive doctrines and/or opinions are never to be discussed at the center.

Touching Clients

All Choices for Women staff members and volunteers are expected to refrain from any physical contact with clients, apart from a handshake of greeting. If a touch is perceived by the volunteer to be helpful or comforting to the client, prior verbal consent by the client must be obtained. Touching of any kind that is sexually oriented or motivated is strictly forbidden and will result in immediate dismissal of the involved staff member or volunteer if verified.

Freedom of Access

Choices for Women holds the policy that any client is free to leave the center at any time. This policy is communicated to each client through all appropriate means, including proper furniture placement, media disclosures, and gracious and prompt cessation of his/her session upon verbal communication of a client's will to leave the center.

All volunteers are to be made aware of this policy in office training. Any media presentation should be preceded by permission from the client, and a written or verbal explanation of the client's ability to leave or stop the presentation if she so desires.

Volunteers are to avoid placement of the chair or self in front of the door to the client room for an extended period during the client session.

Volunteers are to be trained in office training or in-services how to promptly close a session that a client would like to end. Printed materials that appropriately follow the line of conversation can be offered to the client as you leave the session room. The volunteer's desire for the client to return at any time shall also be expressed.

Same-Sex Counseling

Volunteers and employees of Choices for Women are to provide advocacy services at the center facility and under the direction of the Director. Advocacy sessions are not to take place off the premises. Male volunteers and employees will not meet with female clients. Female volunteers and employees may occasionally meet with male clients. If such meetings are imperative, the door to the session room is to be left ajar. No volunteer or employee may provide counseling services to any client when they are alone in the center.

Educational Materials

Educational materials to be used in Choices for Women are to be reviewed and approved by the Director and Client Services Director prior to use in the center. Employees and volunteers need to have the Director review any materials that they would like to see used in the center.

Peer counselors will always seek the clients' permission before presenting educational information. This includes verbal descriptions of abortion, adoption, fetal development, post abortion stress, or the Gospel.

Peer counselors will assess all clients' readiness to receive educational information and determine whether or not it would be best to schedule clients for a follow-up visit for that purpose. When clients appear greatly distressed and upset, peer counselors will seek guidance from their supervisor regarding how to proceed.

Choices for Women uses videos or written materials about fetal development. Choices for Women **does not** use graphic videos or depictions of abortion or aborted fetuses as part of their educational materials.

For client comfort, peer counselors do not remain with clients while they are watching a video pertaining to pregnancy decisions. The clients are handed the remote and advised that they may stop the video at any time. Other education materials to be used in the center include information on abstinence, adoption, the Gospel, job training, parenting, prenatal care, post abortion stress, and other pregnancy related concerns. During Earn While You Learn (EWYL) sessions the volunteer may choose to stay in the room while the video is playing.

Choices for Women does not provide education or referrals for natural family planning or any other methods of contraception to unmarried couples. Married clients are referred to their pastors and their medical practitioners for further information about contraception.

Off-site Client Contacts

All interactions with clients by employees or volunteers will be undertaken at the center location, except as may be expressly permitted by the Director. Permission for employees or volunteers to engage in interactions with clients outside the center should only be granted when such contact is deemed reasonably necessary to facilitate the center-client relationship and when on-site contact is not otherwise feasible. If off-site interaction with clients is approved, arrangements should be made whenever possible to have at least two center representatives present. All employees and volunteers who engage in such off-site client interactions will conduct themselves in an appropriate manner and in accordance with all guidelines that would otherwise be applicable to on-site interaction with clients. The general prohibition against off-site contacts with clients extends without regard to whether employees or volunteers deem themselves to be acting on their own behalf or on behalf of the center at the time of such interactions. Any employee or volunteer who willfully violates this policy will be subject to disciplinary action, including possible termination.

Transporting Clients

No center employee or volunteer will transport a client to or from the center without first obtaining the permission of the Director. Such permission will only be granted when other transportation alternatives are not available to the client. The transportation of client will be undertaken in accordance with the procedures established by the center.

The transportation of a client to or from the center will be undertaken only after the following requirements are met:

1. Permission will be first obtained from the Director.
2. If the client is a minor, permission will also be obtained from a parent or guardian.
3. The employee or volunteer transporting the client will verify to the Director that: (a) he or she possesses a valid driver's license; (b) the vehicle in question is safe for usage; and (c) he or she possesses automobile liability coverage for the vehicle.
4. If possible, two center representatives will accompany the client, including at least one of the same gender.

Translators

To aid in ministering to clients whose first language is not English, Choices for Women will provide, when able, a translator who will assist in communications during a client session. This translator will agree to the statement of faith, principles and "Our Promise to You". Ideally, bi-lingual volunteers will be recruited for specific days to assist non-English-speaking clients. This policy applies to deaf and hard of hearing clients as well.

Contact with Children of Clients

Children are a blessing from God and one of the primary reasons any person would be involved with Choices for Women is their love of children. In order to keep our ministry above reproach and allow for the maximum comfort of clients and staff (read as: paid staff, client advocates or board members) the following guidelines are enacted.

1. Under no circumstances is a CFW staff member to be alone in a closed room with a child other than their own. Sitting with a child in the waiting room is permitted.
2. If a room door must be closed for safety or the comfort of other clients when caring for children, there will be no less than 2 staff persons present.
3. When a mother or father comes in with a child, CFW staff shall not kiss or touch a child on the face. This is for sanitary and safety reasons as well as respect.
4. CFW staff shall not ask to hold a child. The initiative must be on the part of the parent. Many new mothers are uncomfortable with others holding their infant and it is a sign of respect to let the mother decide without pressure who may hold the child.
5. Infants are not to be removed from car seats by CFW staff unless the parent specifically asks you to do so.
6. For liability reasons, children must be buckled into their safety seats only by their parent. CFW staff may assist by carrying items or car seats to the vehicle, but are not permitted to secure child into either the seat or the seat into the car. NOTE: be watchful for the following: (a) all children in carrier-type seats (infant to 22 lbs.) must be facing the rear of the vehicle; and (b) no child should ever be placed in the front seat of a car with a passenger side airbag. If you notice a discrepancy, we have safety brochures describing the proper use of child safety seats which you may offer to the parent. While car safety is not our responsibility, we should be aware of times when a parent simply may not know proper procedure or may need to be reminded of its importance.
7. Children of clients are not to be left unattended in any area of the CFW facility. Either the client (or client's friend who accompanied them) or a CFW staff person must be supervising any child on the premises.

Assisting Minors Who Refuse Abortion

The goal for volunteers and staff of Choices for Women is for parents and children to work together through the challenges presented in unplanned pregnancies whenever possible. In instances where a minor who is pregnant refuses an abortion that a parent desires, the client and her parent, when possible, will be informed of the right of the pregnant woman to refuse abortion, even if a minor. Steps will then be taken to address the barriers that the minor client and her family may face with practical solutions. No minor client may be placed in housing, or harbored in any way without parental consent. In instances in which parental coercion rises to the level of abusive threats or conduct, the proper authorities must be notified. The Director or Client Services Director will make this call.

Charting and Recordkeeping

All client contact inside and outside of the center shall be recorded in the client's file. Files shall be kept in the center, in a secure/locked location, and not taken off the premises. Choices for Women employs the use of an online database for client records as well as paper files.

Client records shall be kept a minimum of ten years, after which they must be destroyed, not merely thrown away. See “Client Record Retention Policy.”

Procedure for Notes:

1. Information shall be entered in the online database file for that client.
2. Record pertinent data, including verbal and non-verbal communication.
3. Keep comments concise, but precise.
4. Abbreviate commonly used terms, e.g.: cl. for client, preg. for pregnancy. Omit a, an, the, etc., when not needed to clarify the statement, e.g.: cl. viewed film, “Your Crisis Pregnancy.”
5. Avoid over use of pronouns. Misplaced pronouns may make the meaning vague. For example, “She talked to her mother. She said she should abort.” (Is “she” the client or the mother?)
6. Be an objective observer. Avoid conclusions and extrapolations short of conclusion. What does the next volunteer counselor need to know to begin their conversation with this client?
7. Print file and place in client’s folder in proper order.

Client Record Retention Policy

Choices for Women will retain client files for no less than 7 years after last visit or, in the case of minors, at least 5 years after the client’s 18th birthday. Records that will no longer be retained will be shredded and disposed of under the supervision of CFW Staff or Board.

Referrals

Choices for Women provides quality referrals to clients that are reviewed to ensure proper licensing and operation. Since no contractual relationship exists with any of the referral agencies, clients are offered a choice of several agencies (as available) that address her needs.

Adoption Information

Center will approve a list of adoption referrals.

Volunteers will provide this list to clients as a referral if they are interested in pursuing adoption further - giving them more than one option, and ideally at least three.

Volunteers will share with clients equally about open versus closed and independent (where legal) versus agency adoptions.

No adoption profiles will be kept in the office or shared with clients. These profiles will be returned to the sender with an explanation of the center's policy.

The Director will exercise caution when considering prospective adoptive parents to work with clients in the center.

Adoption counselors will meet in other offices outside the center facility with clients.

Client Referrals to Churches

- I. Client Criteria
 - a. Before any client information is released to any outside organization, including churches, a signed consent form must be obtained.
 - b. For Church referrals, this consent form is the bottom of the Evangelism Sheet.
- II. Church Criteria
 - a. It is the policy of Choices for Women to form partnerships with local churches from various Christian denominations. Our support and our volunteers come from these congregations and we unite under the name of Christ and leave denominational differences outside the doors of the Center.
 - b. As much as is possible, the Director, Board and Staff (including volunteers) should strive to meet with leaders of the local churches and share the mission of CFW and hear the heart of that particular church body.
 - c. If the church is in agreement with our mission (as in they support the Center financially or in other ways) the likelihood is great that a client would be nurtured in their church body.
- III. Choosing a Referral
 - a. The first option is for the Client Advocate who is meeting with the client to invite them to attend with them. Since this is the client's point of reference, she may be more likely to attend with someone she knows.
 - b. If the Client has visited a church or has family at a particular church, this may also be a good option (following Criteria in Section II).
 - c. Since transportation is an issue for some clients, here are some considerations:
 - i. Churches close to the client's residence.
 - ii. Churches that offer bus/van transportation.
 - iii. Churches located on a public transportation route.
 - d. Accommodations for children - If the client has children who have not been exposed to formal settings like church, it may be prudent to recommend a church that has separate activities/rooms for the children so the parent may devote their full attention to the service and the children may be taught on their level.
 - e. If the CFW staff is aware of a certain church that is offering parenting classes or single moms groups, this may be a good first step for the client as well.

(Continued)

- IV. Making the Referral
- a. Obtain signature of client for release of information.
 - b. Discuss with client various church options and decide on a specific church.
 - c. Tracking of referrals is important. This will be handled via email. Having all outgoing correspondence and incoming responses sent to one email address will allow for better tracking and client follow up.
 - d. The Client Church Referral list is in the List Binder. The Client Advocate will log in to the churchreferral@choicesforwomen.org account and send an email including client's name, address and phone number and other necessary information (such as client made a profession of faith, ages of children or client concerns). There is no need to review the details of the client's life to the Pastor. Permission for you to share her phone number and address does not mean permission to share intimate details of her situation.
 - e. Create a follow up in Ekyros for you to check for responses the following week.

Client Complaints

The stated experiences of clients while at the center are very important to Choices for Women. If a client is dissatisfied with her experience at the center, she is to be given the opportunity to speak with the Director, or Client Services Director, who will take any necessary actions based on review. No services for which the client would otherwise be eligible will be refused simply because a Client has in the past complained.

Exit Interviews

The views and experiences of all clients are important to Choices for Women. To this end, we seek to find out how we might improve our services by providing an exit interview form where each client can confidentially and honestly report their experience at the center. Although we strive to have each client complete an exit interview form, completion of the form can be omitted if inappropriate, or if the client does not wish to fill one out. The Director will regularly review the forms.

TELEPHONE PROTOCOL

General Guidelines

Everyone at Choices for Women observes the following policies for answering the telephone:

1. Only trained female employees and volunteers answer. Children and males do not answer the phone.
2. All callers are treated with integrity, compassion, and respect.
3. Clients are addressed as individuals facing uniquely difficult circumstances. Clients are treated with genuineness and empathy.
4. Phone employees and volunteers are straightforward and honest about all services including the fact that the center does not refer for or provide abortions or contraceptives. The employees and volunteers emphasize the services the center does offer and focus on clients' needs and how the center can facilitate meeting those needs.
5. Clients are encouraged to come in for education and information about pregnancy options, fetal development, and the center's support programs. If abortion is discussed it is done in an objective, professional manner. The issue of abortion is not argued or debated. Use helping skills to learn about clients' situations and to allay any fears about coming to the center.
6. No negative remarks are to be made about any persons, organizations, agencies, clinics, etc.
7. Minors are encouraged to come in for an appointment to discuss their situations. Minors are not encouraged to leave their parents, but to consider bringing their parents with them for an appointment.
8. Clients are not given medical advice unless the center is an approved medical clinic. Clients are given referrals to physicians, medical practitioners, and agencies from the approved list of community referrals.
9. Legal advice is not given, but clients are instead referred to attorneys and legal organizations from the approved list of community referrals.
10. Telephone requests for information about clients are not honored without a specific written release from the client. Exceptions to this policy can be made when required by law and are done by the Director.

Continued on next page

11. Calls to clients are only done when permission has been granted by the client.
12. Emergency client calls such as threatened suicide, homicide, or abuse are to be taken seriously. Clients who threaten suicide are to be referred to a suicide hotline and to 911. Homicide and abuse calls are to be referred to 911. The police are also to be notified of all emergency calls received. Notify the Director of the calls at once.
13. All calls from the media, attorneys, physicians, and representatives of pro-life and pro-choice groups are referred to the Director.

After-Hours Procedures

The calls are forwarded to voice mail which gives Center information as well as the toll-free Option Line phone number.

Obscene, Harassing, or Threatening Calls

All personnel at Choices for Women will adhere to the following procedures for handling any calls that are obscene, harassing, or threatening:

Obscene and Harassing Calls

Obscene calls and harassment calls are not tolerated. The caller is politely and firmly informed that the call is not acceptable and will be ended immediately. Even if callers insist that they have pregnancy-related concerns, the conversation is ended. The call is reported to the Director and is recorded on the center phone log. The Director reports calls that are repetitive in nature to the police and the Telephone Company. The Board Chair is made aware of this report.

Threatening Calls

All calls that threaten to harm center personnel or to damage the facility are to be taken seriously. The following steps will be taken in responding to a call that includes a bomb threat or any similar threat:

The caller will be kept on the line as long as possible and asked to provide as much detail as possible about the nature of the threat.

If caller ID is in use, the phone number of the caller will be noted. If caller ID is not in use, the phone upon which the call is received should then be left off the receiver, and no further calls should be made on that phone until the appropriate authorities are able to pursue a trace.

The call will be reported to the Director immediately.

The local police and the FBI will be notified immediately (on a different phone).

The person receiving the phone call will make a detailed record of the incident including the exact wording of the threat, details concerning the caller's voice and the presence of any background noise.

The center will be promptly evacuated if an imminent threat is made to damage the center or to harm its personnel.

The Board Chair will also be notified. With input from appropriate authorities, the Board and the Director will determine how long the center should remain closed. Clients with appointments and volunteers will be advised of the temporary closing of the center.

PREGNANCY TESTS

Self-Testing Model

1. Self-Testing Model

The Choices for Women offers a self-testing model for pregnancy tests. All peer counselors receive training in how to do the pregnancy tests so that they can teach clients to read their own tests.

2. Scheduling Pregnancy Tests

Clients who call for a pregnancy test are asked the date of their last menstrual period. They are informed that the pregnancy test may detect a positive result approximately 10 days after conception occurs. The clients are advised that they will read the test themselves after receiving instructions from the peer counselors. Only a doctor may pronounce to the client they are pregnant. Peer counselors may say, "You have read the test result as positive/negative."

A 60 minute appointment is scheduled for pregnancy test clients. The telephone personnel asks for the clients' phone numbers and requests that they call if they need to change an appointment. Walk-in pregnancy tests are seen as soon as a counselor is available.

3. Procedure for Self-Tests

After client arrives at the center they sign a consent form. They are escorted to the counseling room to get preliminary information for the intake forms. Once this information is gathered, they are escorted to the restroom to leave a urine sample.

A video is started and the volunteer leaves the room. Client is instructed to open the door when the video is over. The volunteer then drops the urine on the test strip, cleans the restroom and places the test strip in a Ziploc bag.

Once the video is complete and the client opens the door she is given verbal instructions for interpreting the test. The peer counselor discusses the pregnancy test result with clients. Clients are reminded that the center is not a medical facility and that only a medical practitioner can confirm a positive or negative test result.

If the test is positive the peer counselor helps clients address their emotions and feelings and personal resources. The clients are offered educational information about fetal development, abortion, adoption, and pregnancy support services. The services of the center are fully discussed. Clients are offered a follow-up appointment for ultrasound and/or family meeting, etc.

If the test is negative the peer counselor helps clients address their emotions and how they might have felt if the test was positive. They are offered educational information about abstinence. The clients are encouraged to come in for a follow-up appointment for a retest if a normal period does not occur in five to seven days.

Ultrasound

- I. Eligibility
 - a. Clients are eligible for having an ultrasound at CFW only when we have performed a urine pregnancy test and gotten a positive result.
 - b. The criteria for determining whether a client will have an ultrasound will be based on their risk of aborting. If a client is experiencing any type of crisis pregnancy they are considered “abortion vulnerable,” thereby making them eligible for an ultrasound.

- II. Indication of an abortion-vulnerable client:
 - a. Unplanned pregnancy
 - b. Previous elective abortion
 - c. Financial difficulties
 - d. Relationship problems/lack of support
 - e. Religious or cultural considerations
 - f. Lack of knowledge regarding options
 - g. Client undecided
 - h. Possible health risks for mother or fetus
 - i. Any client age 16 or younger
 - j. Unspoken reasons determined by counselor observations
 - i. The counselor will use their training and judgment in determining whether the client is experiencing a crisis pregnancy. Once this determination has been made, an ultrasound will be scheduled for the client.

- III. Procedure
 - a. Ultrasounds shall be performed for confirmation of pregnancy only. All ultrasounds performed at CFW are limited in scope and are not provided to diagnose abnormalities that the patient or baby may have. Ultrasounds will be performed on clients who meet the criteria of abortion vulnerable clients as set forth in this policy.
 - b. Ultrasounds will only be provided by medical personnel trained in limited ultrasonography.
 - c. Clients meeting the criteria shall be provided an ultrasound pursuant to the Medical Director’s standing order.
 - d. Client must sign a “Medical Release and Consent Form”
 - e. Ultrasounds are effectively performed starting from six weeks from the patient’s last menstrual period (LMP) which should be considered when scheduling appointments.
 - f. Each chart for an ultrasound performed by the technician or trained nurses shall be reviewed by the Medical Director.
 - g. The medical personnel performing the ultrasound shall complete the Ultrasound Examination report.
 - h. Ultrasound will not be performed on a client experiencing bleeding at the time of visit.
 - i. Photographs may be taken during the ultrasound and given to the patient, but no videos will be taken.

- IV. Performing ultrasounds on return clients

- a. Additional ultrasounds will only be performed when:
 - i. The client is still abortion vulnerable.
 - ii. The first scan was inconclusive because of gestational age and the sonographer has scheduled a follow up.
- b. Additional ultrasounds will NOT be performed when:
 - i. The client has decided not to abort and they were not scheduled for a follow up by the sonographer.
 - ii. They have established OB/Gyn care (either with a private MD or through the county health department).
- c. Occasionally clients who are continuing their pregnancy will request an ultrasound just to determine the sex of the baby or to be sure everything is okay. In these cases we will adhere to the criteria in IV(a).

Universal Precautions

All personnel at the Choices for Women will follow universal precautions.

Any person handling or disposing of pregnancy tests, urine specimens, or soiled diapers or performing any other tasks, which may involve exposure to potentially infectious material shall be required to wear protective gloves at all times while performing such tasks. After the removal of gloves the hands are washed with soap and water.

Any person who comes into contact with any potentially infectious materials shall immediately wash those areas of skin or membrane, which have sustained such contact. Hands and skin shall be washed with soap and water. Flush mucous membranes with water.

All tasks and procedures involving the handling of potentially infectious materials shall be performed in a manner to minimize splashing, spraying, spattering or generating droplets of these materials.

Regularly scheduled housekeeping measures will be implemented to assure that surfaces and other items which may come into contact with potentially infectious materials are decontaminated. Cleaning should be done with disinfectant wipes. Gloves should be worn during cleaning.

Eating, drinking, applying cosmetics, and handling contact lens shall be prohibited in areas where pregnancy tests, urine specimens, or soiled diapers are handled. Food and drinks shall not be kept in areas where potentially infectious materials are present.

Personnel should maintain a high standard of personal hygiene, for example, hands should be washed at the beginning and end of each shift and before and after eating, drinking, and going to the toilet.

In the event of a specific exposure incident, the center will make available to any employee or volunteer an appropriate confidential medical evaluation and follow-up.

The center shall provide initial training and annual retraining for each employee or volunteer who may be exposed to potentially infectious materials.

The center shall maintain appropriate and confidential records for each employee or volunteer who may be exposed to potentially infectious materials.

These guidelines are taken from the web sites for the National Occupational Health & Safety Commission and for OSHA.

CLIA
Clinical Laboratory Improvement Amendments of 1988

Choices for Women offers self-administered pregnancy tests and does not need to apply for a CLIA waiver.

Release of Test Results

Choices for Women is a non-medical facility that offers self-testing for pregnancy tests. The pregnancy test results are determined by the client under the guidance of trained volunteers.

The center offers pregnancy test verifications that state the test was self-administered and self-read. The verification of pregnancy form records the test result and states that the center is not a medical facility, and clients are encouraged to obtain medical confirmation of the test result. The verification form may also include the date of the client's last menstrual period and estimated due date.

Any employees or volunteers who are licensed medical personnel are acting in a non-medical capacity as they serve clients in the center. Therefore, they do not represent themselves to the clients as medical personnel and they do not sign forms with their professional credentials, with the exception of the Ultrasound Technician and Medical Director. Clients are referred to medical practitioners who can independently diagnose pregnancy.

ABSTINENCE

General Philosophy

In regard to sexual activity and relationships, the philosophy of Choices for Women is that sexual abstinence until and exclusively within marriage is the only 100% effective means of preventing unwanted sexually related outcomes. Therefore, this philosophy is implemented on all levels of center operations including client counsel, school presentations, and the expected lifestyle of all volunteers and staff.

Contraception Education

Choices for Women includes information about contraceptives as part of the abstinence curriculum for educational purposes only. The center does not recommend or encourage the use of contraception.

Choices for Women does not provide referrals for contraception for single clients. Married clients are referred to their medical practitioners or their pastors for advice on the use of contraception.

LONG-TERM CARE

Parenting Classes

Choices for Women believes strongly in equipping clients who carry to term for the job of parenting. To this end, the center provides in its Earn While You Learn (EWYL) parenting classes credible teachers and biblically based materials that have been thoroughly reviewed. (See Material Assistance Section)

Advocacy/Mentoring

Choices for Women encourages long term contact with volunteers and clients through mentoring.

Post Abortion Counseling & Education Healing Choices

A trained peer counselor leads the Choices for Women Healing Choices Bible study. The minimum requirement for training includes attending the regular volunteer training provided for all new volunteers and additional training specific to post abortion services. The peer counselor attends a Bible study group as a co-leader prior to leading a group.

The peer counselor is supervised by the Director or the Client Services Director. The supervisor meets with the Bible study leader a minimum of once a month. The supervisor takes appropriate actions as needed for any standards that are not being met during the course of the Bible study.

The Bible study has a planned beginning and end. It is not to be an open-ended study to continue as long as participants are interested.

Participants in the Bible study complete an intake interview and sign a consent form at the beginning of the study. Clients are advised of the biblical basis for the study. Participants are informed that the study is not therapy and that it is led by a peer counselor.

Participants are advised that they may schedule an appointment with the group leader or the supervisor during the course of the study if they have concerns regarding the study or the way that the study is being conducted.

All clients are screened prior to the beginning of a group study to determine appropriateness of inclusion in the group. If a situation arises during the course of the study which indicates that the client's needs may be outside of the scope of the Bible study, the leader should discuss the situation with the supervisor to determine if it is appropriate for the participant to remain in the study group.

The center has a minimum of three licensed Christian counselors or pastoral counselors to whom clients can be referred as needed.

Women lead groups for women. Men lead groups for men.

Ideally a group is led by two people, a leader and an assistant leader or co-leader.

All calls for information and attendance in the Group are strictly confidential.

Screening Clients

During a brief, initial session, clients seeking post abortion services will be screened by considering the following:

Is she so depressed that she might be suicidal? As a lay counselor, you are not equipped to treat clinical depression, but you need to be able to identify when a client is depressed so severely as to require professional help.

Are there too many issues surfacing at once (i.e., recent divorce, death in the family, substance abuse problems, etc.)? If she has too many ongoing conflicts competing for equal time in her emotional life, she should probably be referred to a professional counselor.

Does she have an alcohol/substance abuse problem? If so, she may be so adept at denial that it will be extremely difficult for her to maintain the honesty required to work through the task areas in a group setting. Treating addictions is a difficult process that should be handled by a trained professional.

Is there a history of psychological problems? Just because someone has seen a professional does not disqualify her for group participation, but if she has ever been hospitalized for mental illness or has taken major medications for emotional stress, a professional who understands the dynamics of her current situation will be more appropriate.

Do you think she will be able to work in a group setting? She should be capable of being open in a safe environment, not easily frightened by strong emotions from others and someone who does not monopolize the conversation.

Is she in real pain presently or is she merely curious? If her goal is to address her current pain, the Bible study is appropriate. If her goal is "self-exploration," it is better to meet with her individually to explore the level of her need.

Is she a teenager? It is generally preferable to work individually with a teenager. An exception to this might be with a group that is only composed of teens.

How long has it been since she was in the situation being discussed? An individual who is in pain over a recent situation has wounds that are fresh, intense and immediate. Anger may be her primary emotion. It probably is best to meet individually with the client who has been out of a situation for three months or less.

Are her spouse, family and/or friends supportive? You may choose to invite family or friends to a pre-meeting prior to the group's first session (with the client's permission). During this meeting you will review the workbook, explaining the different healing tasks, explain what will be covered at each session, and prepare them for what the client will be going through emotionally.

MATERIAL ASSISTANCE

General Guidelines

Choices for Women holds the policy that all services, including material assistance to clients are free and confidential. The center will allow clients to earn Boutique Bucks towards assistance by participation in the Earn While You Learn Program. This includes subjects such as parenting, job training or other helpful classes. The center may not, however, receive remuneration from the client in any form for services received.

Procedure for Distribution of Materials

Choices for Women desires that only material items that are safe and fit their intended use will be distributed to clients. The following specific guidelines will be observed:

Any furniture or other items with missing parts should not be distributed. This includes high chairs and car seats without the proper belts. Car seats must meet basic guidelines, such as manufacture date not more than 6 years from date of gift and have all applicable paperwork. Local police departments have information about state-specific car seat regulations.

Any materials that have been deemed dangerous by respected bodies should be rejected for distribution. Center staff should check the expiration date on food items and discard items when they expire.

Centers should also be careful about distributing clothing that is made of flammable materials, which can be hazardous for children. Center staff should inform clients when flammable clothing is distributed.

Federal regulations require the vertical slats on all cribs to be no farther than two and three eighths inches (2 3/8") apart. Only cribs meeting these standards can be donated to clients.

Cribs not meeting these standards must be repaired or discarded.

Paint on furniture and equipment prior to 1978 may have higher levels of lead than is currently permitted. Any items that may be that old should be sanded down and repainted, or discarded.

Distribution of used baby bottles and breast pumps should also be avoided unless properly disinfected.

Each client will be requested to sign an appropriate release form prior to receiving material items.

Earn While You Learn Client Agreement

Choices for Women wants to help you learn to make good choices for your life. We want to help you have a healthy pregnancy, equip you to be the best parent and to have a productive life. We are able to do this by offering individual educational in order for you to earn “boutique bucks” to be spent for the items our Blessing Boutique. We are offering you the Earn While You Learn (EWYL) program.

Here’s how the program works:

You can decide today or call at any time to set up your appointment for EWYL. Most of the time we are scheduling one month out, therefore you’ll want to make your appointment according to your need. If you are pregnant, you may make 3 future appointments at one time.

At your first visit you will receive an EWYL folder which will include your signed agreement, the curriculum choices and a blessing boutique shopping list. You will be able to keep your worksheets, homework assignments and boutique bucks in the folder.

You can come as often as you need to earn the things you want as long as availability on the schedule allows.

On your initial visit, you will be able to earn \$3 and thereafter \$4.

- You will earn \$1 for keeping your appointment
- You will earn \$1 for watching the EWYL DVD of your choice
- You will earn \$1 for completing the worksheet
- You will earn \$1 for completed homework (after your initial visit)

You may bring 2 guests to your appointments, either the father or another caregiver to earn additional bucks.

You may choose to spend your money or save it for a bigger item. If you are saving it for a bigger item, you will set a goal with your mentor. A mentor is the person who will meet with you on your visit. You may choose to reschedule with her and keep the same mentor or you may choose to have a different mentor each time.

You will be responsible for keeping up with your bucks. If you decide to save up your bucks, you must keep them in a safe place. We will not replace them.

You must have your bucks with you to shop in the Blessing Boutique.

All items in the Blessing Boutique are subject to availability.

Your bucks belong to you. They are not to be sold or given to another person.

Each visit will take from 1 – 1½ hours and child care is not available. If your child is not able to sit quietly during the video and discussion, the mentor may ask you to reschedule your appointment when you can make arrangements for child care.

You will need to schedule an appointment and keep it. If you can’t keep it, you will need to call and reschedule or cancel. If you have 1 no show appointment, all future appointments will be cancelled. After 3 no show appointments, you will not be allowed to participate in the EWYL program any longer.

We understand that emergencies arise. We encourage you to make your appointment today and earn some boutique bucks, so that you’ll have them in case of emergency. If you have boutique bucks, you will not need to set up an appointment, you could walk in and get diapers or formula with your bucks.

Check the box of your choice:

- I understand the EWYL program and I want to schedule my next appointment(s).
- I understand the EWYL program and I do not want to participate at this time.

.....
Signed _____ Date _____

Returning Items to Boutique for Credit

It is the desire of Choices for Women to empower families to become givers. It is in this spirit that we will allow clients to return items their children no longer need in exchange for Boutique Bucks. We also recognize that because some individuals may wish to abuse this privilege parameters must be set. This Policy is meant to provide an opportunity for clients to give back to the Center and receive a **small** amount of compensation. It is **not** intended to be an equal exchange for the amount at which it was purchased.

1. Items may only be returned at a scheduled EWYL appointment.
2. Items must be clean and free of stains, tears or excessive wear. In other words, they must be in a condition suitable for redistribution through the Blessing Boutique.
3. Items will be inspected by a CFW volunteer at the end of the appointment. If the Boutique volunteers are on duty and available, they may inspect the items while the Mentor is meeting with the client for her appointment. Otherwise, the Mentor or another available volunteer may do the inspection.
4. Items not meeting the criteria WILL NOT qualify for exchange Bucks. Determination of which items are accepted is at the sole discretion of the volunteer inspector. If the client questions why some items were not accepted a valid explanation will be given (i.e. stain, excessive wear, torn, missing button, broken zipper, inappropriate words or symbols not compatible with Christian ministry).
5. Items with obvious smell of cigarette smoke will not be accepted.
6. Clothing will be exchanged at a rate of ten (10) items for one (1) Boutique Buck.
7. There will be a maximum of 50 clothing items for credit per visit.
8. Gently used baby equipment may be returned for a credit of one-fifth (1/5) the cost in Boutique Bucks (e.g. new pac n play is 20 BB – exchange would be 4 BB). The same inspection criteria apply.
9. Unopened, undamaged cans of powdered infant formula with an expiration date at least 6 months away may be exchanged at a rate of 2 cans per one (1) Boutique Buck.
10. Boutique Bucks will be given at the end of the appointment and may be spent or saved like any other earned Bucks.

CENTER OPERATIONS

Office Hours

The regular office hours of Choices for Women are 9:00 a.m. to 3:00 p.m., Monday through Friday. Additionally on Thursday 4:00 p.m. to 8:00 p.m. Subject to any budgetary constraints imposed by the Board or volunteer shortage, the Director will be responsible for determining and changing, as necessary, the regular office hours of the center. Any changes to the regular office hours should be kept as minimal as possible.

Notice of closing dates (such as holidays or training dates) shall be prominently posted at least 7 days in advance.

Voice mail shall be changed to notify callers of changes in hours or closings.

Security Procedures

Subject to the approval of the Board, the Director will implement such security measures and procedures as are reasonable and necessary to protect the center, its files and its property against theft, vandalism and other potential hazards.

Mail Procedures

The following procedure will be followed for obtaining, opening and distributing the center's mail:

The Director or such person as she may designate will retrieve the center mail from postman upon delivery to the Center.

Any mail containing monetary donations will be opened and handled in accordance with the center's procedure for handling donated monies.

All other center mail will be opened by the Director, or such other person as she may designate, and distributed as appropriate.

Cleaning

The appearance and cleanliness of the center reflect the image of Choices for Women. Each employee and volunteer is responsible for doing their share to contribute in keeping the center neat, clean and sanitary. Upon completing their regular duties, employees and volunteers are expected to leave their work areas neat and orderly and to remove and put away loose papers or other items, as appropriate. Employees and volunteers are expected to contribute in keeping the office bathroom in a clean and sanitary condition at all times. The kitchen area is provided for the convenience of employees and volunteers. Persons who use the kitchen are responsible for keeping it clean, neat and sanitary. The practices relating to cleaning the center should provide a good exercise in exhibiting our "servant" attitude.

Center Safety

Choices for Women's property will be kept in a safe condition for clients and other visitors. Special attention will be given to keeping walkways and other areas traversed by clients, visitors and staff safe at all times. Any ice, snow or debris will be promptly removed from walkways or such other areas. Any other unsafe conditions will also be remedied as promptly as reasonably possible. Employees or volunteers who observe any unsafe conditions will promptly remedy such conditions or report them to the Director.

Responding to Incidents

Employees and volunteers will be prepared to respond in a proper manner to unusual incidents that may occur at the center. The first priority should be to obtain any needed assistance, including emergency medical care or first aid, for persons who appear or claim to be injured in connection with any such incidents. If any outside assistance is required, an employee or volunteer should promptly call 911 and report the situation.

The Director will be promptly notified of any incidents, including those in which no apparent injuries have been sustained. The Director will conduct an appropriate investigation into the details of the incident. The Director will fill out an incident report with input from employees and volunteers who witnessed the incident or who were present when the incident occurred. Names, addresses and phone numbers of any other witnesses should also be recorded. Reasonable efforts will be taken to preserve any physical evidence and to photograph any physical conditions that may have contributed to the incident. Any unsafe conditions should be promptly remedied to prevent future incidents. The Director will promptly notify the center's insurance carrier of any incidents in which any actual or alleged injuries have occurred.

Responding to Media Inquiries

Choices for Women recognizes that its communications through the public media may have a significant impact upon the community's perception of the center's ministry. Therefore, Choices for Women desires that all such communications be made by appropriately designated representatives of the center and in a manner that will fairly and accurately convey information relating to the center's ministry and its biblical positions.

If anyone from the public media (newspaper, television, radio etc.) contacts anyone from Choices for Women for any reason, the following procedure will be followed:

The person initially receiving any such contact will politely decline to answer any questions or to make any statements. Instead, the name and phone number of the caller should be obtained along with any message they may desire to leave. The caller will be advised that the Director or spokesperson will return their call. Do not give out home or work numbers of any persons from Choices for Women.

The Director is considered the official spokesperson for Choices for Women. Any official communication about the ministry of Choices for Women and any responses to media inquiries will be handled by the Director under the direction of the Board of Directors.

Solicitations

Choices for Women recognizes that sales solicitations that occur at the center, whether initiated in person or by telephone, may negatively affect the ministry and should therefore be prohibited to the extent possible. The Director will take such steps, as she deems appropriate, to prevent door-to-door and telephone solicitations at the center.

After-Hours Procedures

Use of the center after regular business hours will be as limited as possible, and employees are generally discouraged from performing work at the center during such hours. All after hour usage of the center must be approved in advance by the Director. Any such usage should be permitted only as reasonably necessary and only for center business. Any employee working at the center after regular business hours will be responsible for keeping the center doors locked while present and after leaving. The Director will implement such further procedures and restrictions, as she may deem necessary, to protect employees and the center in connection with after hour usage of the center.

Center Web Site

Choices for Women maintains a website for the purpose of reaching and assisting prospective clients in receiving the services they need. A second website is also maintained for ministry partners. The Client website will not be used to take the place of providing one-on-one personal assistance, but instead should be viewed as a means to help facilitate such assistance. The Director or a person assigned by the Director will be responsible for seeing that the Web site is properly maintained and updated. All representations and information contained on the Web site will be fully accurate and as current as reasonably possible. Proper disclaimers will be included with referral information and with such other information, as may be appropriate. Prospective clients who communicate with the center via e-mail will be invited, as appropriate, to seek pregnancy tests and/or personal peer counseling at the center or, if the client resides in another area, at another pregnancy care center that is more conveniently located for the client.

Insurance

Choices for Women will at all times maintain general liability insurance, professional liability insurance and such other insurance as may be deemed reasonably necessary to protect the center and the center's representatives against possible claims arising in connection with the center's operations. Choices for Women will at all times maintain such property insurance as may be deemed reasonably necessary to protect the center's property against unexpected loss. Whenever special events such as banquets or walk-a-thons are scheduled, the Director will take appropriate steps to confirm that liability insurance coverage is in place.

State Registration

Choices for Women will comply with all registration and other applicable laws pertaining to solicitation of funds from donors. The Director will be responsible for ascertaining the requirements of any such laws and for taking appropriate steps to comply.

Political Activities of Center

As a 501(c)(3) corporation, Choices for Women is subject to certain limitations relating to political activities. Choices for Women is prohibited from engaging in any campaign to support or oppose any candidate for political office. Therefore, no steps will be taken on behalf of Choices for Women that may be reasonably construed as supporting or opposing any candidate for political office. Choices for Women will avoid inviting as banquet speakers or special guests of the ministry any candidates who are then engaged in ongoing political campaigns unless an equal opportunity is extended to all other candidates. Political literature in support of or in opposition to any political candidates will not be posted or distributed on the center premises. Any political lobbying activities undertaken by Choices for Women will be authorized in advance by the Board and will comply with all applicable IRS requirements and guidelines.

Working With Other Organizations

Choices for Women recognizes that opportunities may arise to work together in various ways with other Christian organizations that share a similar mission as this center. Choices for Women is prepared to pursue such opportunities so long as advance steps are taken to assure the fitness and compatibility of the other organization. Before any informal partnership or working relationship is undertaken with another organization, the Director will conduct an evaluation to confirm that the other organization is a bona fide, reputable and responsible Christian ministry that shares substantially similar goals and philosophies as Choices for Women. The Director should perform the following steps:

1. Obtain and review written copies of the organization's mission or purpose statement, statement of faith, and vision statement.
2. Obtain and review a copy of the organization's 501(c)(3) certificate and annual report.
3. Ask for and check with references.
4. Consult with other reputable ministries that may have information or knowledge about the organization.
5. If still uncertain, meet with the organization's leaders.

Based upon the information obtained, the Director and the Board will determine together whether an informal partnership or working relationship may be undertaken with the other organization.

FINANCES

General Guidelines

Choices for Women recognizes its responsibility to maintain financial controls necessary so that its monetary resources are properly protected against unexpected or improper loss. Choices for Women will implement such accounting procedures and internal controls as are reasonably necessary to accomplish this goal.

Check-Writing Procedures

All checks, drafts or other orders of money will be issued in accordance with the requirements of the center's bylaws and in accordance with any corresponding resolutions adopted by the Board.

The following procedures will govern purchases made by the center:

Checks or debits will only be written to pay for such items as have been directly or indirectly authorized by the center board of directors.

All checks or debits for amounts of \$500 or more require Board approval (which may be granted verbally or via email).

Check stubs or a copy of the online transaction will be filed with the appropriate invoice or other record as may be necessary to verify the purpose and validity of the expenditure.

A record of all checks written will be kept in an appropriate check register that will state the number of the check, the date of the check, the name of the payee, and the nature of the expenditure, whether in written form or in a computer program such as Quickbooks.

The Board Treasurer (or designee) will review and reconcile the center's checking account records each month.

Petty Cash

The Director is authorized to maintain and periodically replenish a petty cash fund that shall not exceed \$50. The director will have exclusive control over these monies, which will be kept in a secure place. The petty cash fund may be used, as necessary, to pay any expenses or costs of up to \$50 that may be incurred for center purposes. Each time any monies are withdrawn from the petty cash fund, a record will be made of the transaction, including the date and purpose of the expenditure. Also, the Director will keep appropriate receipts whenever possible. The Board Treasurer will periodically review and validate the petty cash fund records.

Purchase Authorization

The Director will be responsible for approving purchases subject to the legitimate needs of the center and the relevant budgetary limitations imposed by the Board. In any event, all purchases for amounts exceeding \$500 must be approved in advance by the Board (which may be done verbally or via email).

Reimbursement of Expenses

Choices for Women will reimburse employees and volunteers for all reasonably incurred business-related expenses upon submission of accurate and receipted expense reports. The Director must approve in advance any business-related travel or other activities that will entail incurring such expenses. All such reports should be submitted in a timely manner to ensure proper accounting and prompt reimbursement.

Automobile expenses will be reimbursed at the maximum IRS rate per mile. A detailed log of miles driven shall be submitted for reimbursement within 30 days of the end of the month in which the expenses were incurred. This must show the date, ministry purpose, location and miles driven for each trip.

A detailed monthly report of all other business-related travel expenses, meeting expenses, or other expenses must be submitted within 30 days of the end of the month in which the expenses were incurred. Only expenses reasonably incurred will be reimbursed. Airline travel, if necessary, should be confined to coach class. The maximum daily meal allowance will be \$40 per person. Lodging reservations should be made in hotels of moderate cost.

All travel and conference expenses will be paid for those persons designated and authorized by the Board to attend the annual Care Net Conference and/or other conferences the Board deems beneficial to the operation of the Center.

Investment of Funds

Choices for Women is committed to exercising good stewardship in managing the monies that have been placed in its trust. In the event any surplus or other funds of the center are available for investment rather than immediate use, the Board is responsible for determining the manner in which such funds shall be invested. In making any such decisions, the Board considers all relevant factors as required by law including the need to safely preserve the principal funds that are to be invested. In no event are any forms of investment pursued that may present an undue risk that the principal funds will be lost.

Procedures for Handling Donated Monies

The Director, Client Services Director or the Board Treasurer will be responsible for receiving, recording and depositing the center's monetary receipts. The following procedure will be followed:

Person opening the mail will direct checks and any accompanying correspondence to the Director, Client Services Director, or Treasurer. Cash should be given to one of these designees to secure.

Checks are endorsed with a stamp that says "for deposit only." The stamp should also include the center name and banking account number. Using a stamp ensures that the information is standard, correct and cannot be altered.

Checks are copied along with deposit slip for entry into database which is then imported into QuickBooks. Copies of deposits are also to be maintained and recorded appropriately.

The Director and Board Treasurer are authorized to make deposits of checks and cash. Deposits are to be made no later than 1 week from the date the items were received.

Baby Bottle donations are recorded for each Church on the proper form. With 2 persons present in the room the checks and cash are removed from bottles and counted and totals placed on the form. The change is emptied into canvas bags (still divided by church) to be carried to the bank by the Director or designee. Totals by church are then recorded and appropriate correspondence sent to churches.

Annual Audits

Because of the great expense, Choices for Women will not obtain an annual audit performed by an independent public accounting firm until the yearly budget/income exceeds \$250,000. Until that time internal checks and balances will be in place and an IRS Form 990 will be filed by a reputable accounting firm.

Public Access to Financial Records / Center By-Laws

The IRS requires non-profit organizations to allow public access to Form 990. Upon request (written or in person only – telephone or email requests will not be honored), a copy will be furnished within 24 hours (excluding weekends and holidays). CFW reserves the right to charge \$0.15 per page copied, plus postage if return mail requested. The same policy or public access is in place in regards to the by-laws of this organization.

ADVERTISING

General Principles

As a Christian organization, Choices for Women is committed to conducting all of its public dealings, including advertising, in a completely honest manner. Choices for Women is also committed to complying with all applicable truth in advertising laws. Therefore, any advertising used by this center will contain only truthful and honest information. Deceptive advertising will not be tolerated under any circumstances as an appropriate means for attracting clientele. No language or terminology will be included in any advertisement which might be reasonably construed to imply that the center offers services which, in fact, it does not. The Director will be responsible for reviewing any proposed advertisements to assure that they conform to these biblical principles and any applicable truth in advertising laws.

Yellow Pages Advertising

Any advertisements placed by Choices for Women in the Yellow Pages will be placed under appropriate Yellow Page headings and will contain true and accurate information relating to the services provided by the center. Such advertisements will be placed under the heading "Abortion Alternatives." The specific language used in any such advertisements will accurately represent the services provided at the center. Any language, which may imply the offering of professional counseling or medical services that are not available, will be avoided. Similarly, no advertisement will contain reference to a "24 hour hotline" unless the center has made provision for persons to be available at all times to respond to such calls. The Director will be responsible for reviewing all proposed Yellow Page advertisements to assure that they conform to this policy. Final ad copy should be carefully reviewed before submission.

FUND-RAISING

General Guidelines

Choices for Women seeks to honor the Lord by assuring that all of its fundraising activities are above reproach and are exercised in accordance with principles of good stewardship. All communications made in connection with fundraising appeals will be completely truthful and will only contain information that is current, accurate and relevant to the appeal campaign. No representations will be made which may create unrealistic donor expectations as to what the donor's gift may actually accomplish. All monies obtained through fundraising appeals will be prudently managed and will be used only for such purposes that are consistent with the stated mission of the center and with the reasonable expectations of the center's donors.

Donations from entities whose business may be contrary to the Center's Christian principles will not be accepted. This includes, but is not limited to: gambling, pornography, adult entertainment, alcohol or tobacco.

Donor Bill of Rights

Choices for Women recognizes and declares that its donors and its prospective donors have these rights:

1. To be informed of the organization's mission, its intent for using donated resources, and its capacity to effectively use donations for those purposes.
2. To be informed of the identity of those serving on the organization's governing board and to expect the board to exercise prudent judgment in its stewardship responsibilities.
3. To have access to the organization's most recent financial statements.
4. To be assured that gifts will be used only for the purposes for which they are given.
5. To receive appropriate individual acknowledgment and recognition.
6. To be assured that information about their gift is handled with confidentiality to the extent permitted by law.
7. To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.
8. To be informed of the status of those seeking donations, whether employees, volunteers or paid solicitors.
9. To have the opportunity to have their names deleted from any mailing list that the organization may intend to share.
10. To receive prompt, truthful and forthright answers to any questions asked when making a donation.

Tax Deductibility and Receipts to Donors

Choices for Women will issue receipts to donors in accordance with applicable IRS requirements. A donor who gives a cash gift of \$250 or more will be promptly issued a receipt stating the donor's name, the date of the gift, the amount of the gift and that nothing in value was exchanged. An appropriate “quid pro quo” receipt will be issued to a donor whenever the donor receives anything of value in exchange for a gift. Donors who give property will receive receipts that describe the property given but that contain no estimate of value. Choices for Women will not undertake to provide financial or tax advice to donors.

Designated Gifts

Choices for Women will honor the intentions of donors who request that their gifts be used for certain specified purposes. If it becomes impossible to honor any such request by a donor, Choices for Women will seek permission of the donor or will take other appropriate legal steps before using the gift for any other purpose.

If Choices for Women represents in connection with any appeal for funds that such funds will be used for certain limited purposes, steps will be taken to assure that any such funds are properly segregated from the general funds of the center and only used for the purposes so specified. If the amount of such segregated funds exceeds the amounts necessary to support the specific purposes initially designated, Choices for Women will not allocate such excess funds for any other purpose without first taking reasonable steps to assure that such allocation will be consistent with the intentions of the applicable donors.

Compensation for Fund-Raisers

Any employee or outside consultant hired by Choices for Women to perform fund raising responsibilities will be paid upon a straight salary or fee-for-service basis. Compensation of employees or consultants based on the percentage of funds raised will not be allowed.

This policy will not prevent an employee with fund raising responsibilities from receiving a regular salary increase based, in part, upon that employee's satisfactory performance as a fund-raiser.

Banquet Testimonies

Choices for Women recognizes that client stories or testimonies may be shared from time to time at banquets or other fund raising events. No such information will be disclosed unless the client has signed an appropriate release granting the center permission to share information concerning the relevant aspects of the client relationship. Also, no pictures, statements or other recordings relating to a client or a client's child will be reproduced or published unless and until the client has first signed an appropriate media release form. Any time such consent is requested, the client will be advised that she is under no obligation to give her consent and that nothing of value will be given or withheld in exchange for her decision.

Document Retention and Destruction Policy

1) Policy

This Policy represents Choices for Women's policy regarding the retention and disposal of records and the retention and disposal of electronic documents.

2) Administration

Attached is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of Choices for Women and the retention and disposal of electronic documents. The Executive Director (the "Administrator") is the officer in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Administrator is also authorized to: make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with local, state and federal laws and includes the appropriate document and record categories for Choices for Women; monitor local, state and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy.

3) Suspension of Record Disposal In Event of Litigation or Claims

In the event Choices for Women is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning Choices for Women or the commencement of any litigation against or concerning Choices for Women, such employee shall inform the Administrator and any further disposal of documents shall be suspended until such time as the Administrator, with the advice of counsel, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

4) Applicability

This Policy applies to all physical records generated in the course of Choices for Women's operation, including both original documents and reproductions. It also applies to the electronic documents described above.

This Policy was approved by the Board of Directors of Choices for Women on _____.

Record Retention Schedule

The Record Retention Schedule is organized as follows:

SECTION TOPIC

- A. Accounting and Finance
- B. Contracts
- C. Corporate Records
- D. Electronic Documents
- E. Payroll Documents
- F. Personnel Records
- G. Property Records
- H. Tax Records
- I. Contribution Records
- J. Client Records

The following are some common retention periods. These apply to both physical and electronic documents. If no physical copy of an electronic document is retained, the means to “read” the electronic document must also be retained.

ACCOUNTING AND FINANCE

<u>Record Type</u>	<u>Retention Period</u>
Accounts Payable & Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Bank Statements and Canceled Checks	7 years
Credit card numbers	Full credit card numbers should not be retained any longer than immediate business needs and merchant account agreements dictate.
Employee Expense Reports	7 years
General Ledgers	Permanent

CONTRACTS

<u>Record Type</u>	<u>Retention Period</u>
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

CORPORATE RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Corporate Records (minute books, signed minutes of the Board and all committees, corporate seals, articles of incorporation, bylaws, annual corporate reports)	Permanent
Licenses and Permits	Permanent

ELECTRONIC DOCUMENTS

1. **Electronic Mail:** Not all email needs to be retained, depending on the subject matter.
 - Any e-mail staff deems vital to the performance of their job should be copied to the staff's shared drive folder, and printed and stored in the employee's workspace.
2. **Electronic Documents:** including Microsoft Office Suite and PDF files. Retention depends on the subject matter.

PAYROLL DOCUMENTS

<u>Record Type</u>	<u>Retention Period</u>
Employee Deduction Authorizations	4 years after termination
Payroll Deductions	Termination + 7 years
W-2 and W-4 Forms	Termination + 7 years
Garnishments, Assignments, Attachments	Termination + 7 years
Payroll Registers (gross and net)	7 years

PERSONNEL RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Commissions/Bonuses/Incentives/Awards	7 years
EEO- I /EEO-2 - Employer Information Reports	2 years after superseded or filing (whichever is longer)
Employee Earnings Records	Separation + 7 years
Employee Handbooks	1 copy kept permanently
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after separation
Employment Records - All Non-Hired Applicants (including all applications and resumes - whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence)	2-4 years (4 years if file contains any correspondence which might be construed as an offer)
Job Descriptions	3 years after superseded
Personnel Count Records	3 years
Forms I-9	3 years after hiring, or 1 year after separation if later

PROPERTY RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Property Insurance Policies	Permanent

TAX RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Tax-Exemption Documents and Related Correspondence	Permanent
IRS Rulings	Permanent
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns - Income, Franchise, Property	Permanent
Tax Workpaper Packages - Originals	7 years
Annual Information Returns - Federal and State	Permanent
IRS or other Government Audit Records	Permanent

CONTRIBUTION RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Records of Contributions	7 years
Documents evidencing terms, conditions or restrictions on gifts	7 years after funds are expended

CLIENT RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Client files	7 years or 5 years after 18 th birthday for minor clients