

MEETING AGENDA - Empower Generations Board

Any public records relating to an agenda item for an open session of the Board which are distributed to all, or a majority of all of the Board members shall be available for public inspection at the main office of the school between 9:00 am and 3:30 pm.

Meeting

Meeting Date	Tuesday, May 19, 2026
Start Time	5:30 PM
End Time	6:30 PM
Location	Address: 44236 10th Street West, Suite 105, Lancaster, CA 93534
Purpose	Regular scheduled meeting

Agenda

1. Opening Items

1.1. Call The Meeting To Order

1.2. Roll Call

1.3. Pledge Of Allegiance

1.4. Board Meeting Agenda

Discuss and take action regarding the Board Meeting Agenda.

Resolution #:

1.5. Board Meeting Minutes

Discuss and take action regarding the Board Meeting Minutes from the previous meeting/s.

Resolution #:

Documents

- Minutes-2026-03-17-v1.pdf
-

2. Public Comments

2.1. Public Comments

The public may address the Empower Generations governing board regarding any item within the Board's jurisdiction whether or not that item appears on the agenda during this time. If you wish to address the Board, please complete a public comment card. Comments for the public will be limited to 3 minutes.

3. Action Items

3.1. Injury and Illness Prevention Plan

Discuss and take action regarding the Injury and Illness Prevention Plan.

Due date:

Documents

- IIPP - Empower Generations 2026.pdf
 - IIPP Updates- January 2026 (5).pdf
-

3.2. Workplace Violence Prevention Plan

Discuss and take action regarding the Workplace Violence Prevention Plan.

Due date:

Documents

- WPVP Updates-January 2026 (4).pdf
 - Empower Generations WVPP-2026.pdf
-

3.3. 2025-2026 2nd Interim and Revised Budget

Discuss and take action regarding the 2025-2026 2nd Interim and Revised Budget.

Due date:

Documents

- Empower Generations 25.26 2nd interim alt form .xlsx - Alternative Form (1) (1).pdf
-

3.4. Board Member Terms

Discuss and take action to extend Tapau Osborne's three-year term.

Due date:

3.5. Board Member Roles

Discuss and take action to alter Board Member Roles of President, Secretary, and Treasurer as the Board sees fit.

Due date:

3.6. Appointment of Surrogate Parent for Special Education Students Policy

Discuss and take action regarding the Appointment of Surrogate Parent for Special Education Students Policy.

Due date:

Documents

- Empower Generations Board Recommendation (1) (1).pdf
 - Empower_Appointment _Surrogate_SpeciaEducationStudent_Policy (2).pdf
-

3.7. Uniform Complaint Procedure Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- Board PDF_ EG Uniform Complaint Procedures Policy.pdf
-

3.8. Employee Harassment, Discrimination, and Retaliation Prevention Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- Board PDF_ EG Employee Harassment, Discrimination, & Retaliation Prevention Policy .pdf
-

3.9. Learner Suspension and Expulsion Policy

Discuss and take action regarding the new policy

Due date:

Documents

- Board PDF_ EG Learner Suspension and Expulsion Policy .pdf
-

3.10. Internal Complaint Review Policy

Discuss and take action regarding the new policy

Due date:

Documents

- Board PDF_ EG Internal Complaint Review Policy.pdf
-

3.11. Learner Personal Electronic Device Policy

Discuss and take action regarding the new policy

Due date:

Documents

- Board PDF_ EG Learner Personal Electronic Device Board Policy.pdf
-

3.12. Involuntary Disenrollment Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- Board PDF_ EG Involuntary Disenrollment Policy.pdf
-

3.13. Alternate Pathways to a Diploma for Students with Disabilities Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- Revised Alternative Pathways to a Diploma for SWD.docx - Google Docs.pdf
-

3.14. Physical Education Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- EG REVISED Physical Education Policy.docx.pdf
-

3.15. Graduation Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- Revised Empower Generations Graduation Requirements.pdf
-

3.16. Mathematics Placement Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- Revised Math Placement Policy.docx (4).pdf
-

3.17. School Requirements to Earn a State Seal of Civic Engagement

Discuss and take action regarding the new policy

Due date:

Documents

- California State Seal of Civic Engagement - Google Docs.pdf
-

3.18. Acceleration and Retention Policy

Discuss and take action regarding the updated policy

Due date:

Documents

- Empower Generations Acceleration & Retention Policy.pdf
-

3.19. Revised Holiday Policy

Discuss and take action regarding the revised Holiday Policy for 2025-2026.

Due date:

Documents

- Holiday Policy 26-27 EG For board review.pdf
-

3.20. Revised Vacation Policy

Discuss and take action regarding the revised Vacation Policy for 2025-2026.

Due date:

Documents

- Vacation Policy-EG-20260519-Redline for board approval.pdf
-

3.21. School Records, Retention and Disposal Policy

Request approval of School Records and Disposal Policy to follow legally required and allowable storage and purge processes.

Due date:

Documents

- School Record Retention Policy-EG-20260519-Redline for board approval.pdf
-

3.22. Learner Records Maintenance, Retention, and Destruction Policy

Request approval of Learner Records Maintenance, Retention, and Destruction Policy to follow legally required and allowable storage and purge processes.

Due date:

Documents

- Learner Records Retention Policy-EG-20260519-Redline for board approval.pdf
-

3.23. Equity Policy

Request approval of the Equity Policy which is required by the Federal Government due to the receipt of Federal Funding (Title I, Title II, Title IV)

Due date:

Documents

- Equity Policy-EG-20260519-Redline for board approval.pdf
-

3.24. Harassment, Discrimination, Intimidation, and Bullying Prevention Policy

Discuss and take action regarding the policy compliant with Safe Place To Learn Act

Due date:

Documents

- Harassment, Discrimination, Intimidation, and Bullying Prevention Policy-EG-20260519.pdf
-

3.25. Revised Employee Guidebook

Discuss and take action on the revision to the Employee Guidebook.

Due date:

Documents

- Employee Guidebook-EG-202605-Redline for board approval.pdf
-

4. Consent Items

4.1. Obsolete Technology and Equipment

Resolution #:

Documents

- Obsolete EG (May 2026).pdf
-

4.2. Revised LACOE Certification of Signatures

Resolution #:

Documents

- LACOE Form Blank.pdf
-

4.3. Personnel Report

Resolution #:

Documents

- 5.19.26_EG_PersonnelReport.pdf
-

4.4. Check Register

Resolution #:

Documents

- eg_payment_register_20260513_summary.pdf
-

5. Discussion and Reports

5.1. School Director Report

6. Closed Session

6.1. Public Employee Performance Evaluation

Gov. Code section 54957(b)(1): School Director

7. Closing Items

7.1. Graduation Date

Thursday June 4, 2026 at 6 PM.

7.2. Next Meeting Date

Board Members mark their calendars and confirm quorum.

Wednesday June 17, 2026 at 5 PM.

7.3. Adjournment

Please note: items on the agenda may not be addressed in the order they appear. The Board of Directors may alter the order at their discretion.

- **Board Room Accessibility:** The Board of Directors encourage those with disabilities to participate fully in the public meeting process. If you need a disability-related modification or accommodation, including auxiliary aids or services to participate in the public meeting, please contact the office at least 48 hours before the scheduled Board of Directors meeting so that we may make every reasonable effort to accommodate you. [Government Code § 54954.2; Americans with Disabilities Act of 1990, § 202 (42 U.S.C. § 12132).]

The Secretary of the Board of Directors, hereby certifies that this agenda was publicly posted 72 or 24 hours prior to the meeting as required by law.

MEETING MINUTES - Empower Generations Board

Meeting

Date	Tuesday, March 17, 2026
Started	5:34 PM
Ended	5:53 PM
Location	Address: 44236 10th Street West, Suite 105, Lancaster, CA 93534
Purpose	Regular scheduled meeting
Chaired by	Keisha Como
Recorder	Roselia Calderon

Minutes

1. Opening Items

1.1. Call The Meeting To Order

The Meeting was called to order at 5:34 p.m

Status: Completed

1.2. Roll Call

Keisha- Present

Laura- Present

Tapau- Absent

Status: Completed

1.3. Pledge Of Allegiance

The Pledge of Allegiance was recited.

Status: Completed

1.4. Board Meeting Agenda

Discuss and take action regarding the Board Meeting Agenda.

Motion: Laura

Second: Keisha

Unanimously Approved

Tapau Absent

Resolution #:

Status: Carried

1.5. Board Meeting Minutes

Discuss and take action regarding the Board Meeting Minutes from the previous meeting/s.

Motion: Keisha

Second: Laura

Unanimously Approved

Tapau Absent

Resolution #:

Status: Carried

Documents

- Minutes-2026-02-17-v2.pdf
-

2. Public Comments

2.1. Public Comments

The public may address the Empower Generations governing board regarding any item within the Board's jurisdiction whether or not that item appears on the agenda during this time. If you wish to address the Board, please complete a public comment card. Comments for the public will be limited to 3 minutes.

No Public Comments were made to the Board.

Status: Completed

3. Action Items

3.1. 2025-2026 Annual Audit Agreement

Discuss and take action regarding the 2025-2026 Annual Audit Agreement.

Kelly O'Brien, iCA Support Provider presented the 2025-2026 Annual Audit Agreement.

Motion: Laura

Second: Keisha

Unanimously Approved

Tapau Absent

Due date:

Status: Completed

Documents

- Empower Generations Audit & Tax Engagement Letter 2026-2028.pdf
-

3.2. SB 153 - Model Referral Protocols Board Policies

Discuss and take action regarding SB 153 - Model Referral Protocols Board Policies.

Kimberly Humphries, iCA Support Provider, presented the SB 153- Model Referral Protocols Board Policies.

Motion: Laura

Second: Keisha

Unanimously Approved

Tapau Absent

Due date:

Status: Completed

Documents

- Empower Generations - SB 153 - Model Referral Protocols Board Policy - DRAFT.pdf
-

4. Discussion and Reports

4.1. School Director Report

Sajae presented the School Director Report and answered questions of the Board.

Status: Completed

4.2. Board Member Resignation

Discuss the recent resignation of Annaliisa from the Board.

The Board accepted Annaliisa's resignation from the Board.

Status: Completed

5. Consent Items

5.1. Check Registers

Motion: Laura

Second: Keisha

Unanimously Approved

Tapau Absent

Resolution #:

Status: Carried

Documents

- EG Payment Register_20260311.pdf
 - EG Payment Register Summary_20260311.pdf
-

6. Board Comments

6.1. Board Comments

Keisha said thank you for all the hard work! I see it and it shows with all the college acceptances! You're in step with what California wants to see! Laura said, Echo, echo!!

Status: Completed

7. Closing Items

7.1. Graduation Date

June 4, 2026 at 6:00 p.m.

The Board was invited to the Empower's graduation on June 4, 2026 at 6:00 p.m.

Status: Completed

7.2. 2026 Board Development Dinner

iLEAD CA is pleased to host the 2026 Annual Board Development Dinner on April 23 from 5:00 - 8:30 at HQ. Look for RSVP and information in your Board Email.

The Board was invited to the 2026 Board Development Dinner and they were asked to RSVP.

Status: Completed

7.3. Annual Form 700

Reminder to fill out the electronic Form 700 sent from the "COI Desk" through email by April 1.

Jordan Pereyra, iCA Support Provider, reminded the Board of the Annual Form 700. She offered to help if needed.

Status: Completed

7.4. Next Meeting Date: April 28, 2026 @5:30 p.m.

Board Members mark their calendars and confirm quorum.

Status: Completed

7.5. Adjournment

The Meeting was adjourned at 5:53 p.m.

Status: Completed



INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

Empower Generations

Updated: January 2026

29477 The Old Rd Castaic, CA 91384

Empower Generations

TO: All Employees
FROM: iLEAD Human Resources

RE: **INJURY & ILLNESS PREVENTION PROGRAM (IIPP)**

.....

This Injury and Illness Prevention Program (IIPP) has been reviewed and updated to reflect current California Occupational Safety and Health Administration (Cal/OSHA) requirements, including Title 8 of the California Code of Regulations §3203 and related applicable standards.

This program applies to Empower Generations and is reviewed and updated as necessary to ensure continued effectiveness and regulatory compliance. The 2026 revision includes updated administrative controls, expanded site-level responsibilities, **coordination with the Workplace Violence Prevention Plan, updated references on aerosol-transmissible diseases, and enhanced heat illness prevention procedures.**

This IIPP is effective upon approval and supersedes all prior versions.

As required by Title 8 of the California Code of Regulations §3203, this IIPP contains the required elements for injury and illness prevention for Empower Generations. Hazards associated with workplace violence are addressed through Empower Generations's standalone Workplace Violence Prevention Plan (WVPP), which is maintained separately and incorporated by reference into this IIPP in accordance with California Labor Code §6401.9.

Safety and health must be a part of every operation, and it is every employee's responsibility at all levels. **All school employees should be familiar with the purpose and location where you can find the Injury and Illness Prevention Program.**

A copy of this written Injury and Illness Prevention Program is on file in ADP, and available for review by each and every employee.

All employees share in the responsibility of detecting hazards and controlling them. All employees are required to inform a school director immediately of any situation beyond their ability and authority to correct. If you have any questions, please do not hesitate to contact HR.

Thank you

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PURPOSE

Our Injury and Illness Prevention Program (IIPP) is designed to prevent injuries, illnesses and accidents in the workplace. The primary purpose of the IIPP is to ensure the safety and health of School employees and to provide a safe and healthful work environment. As required by **Title 8, CCR Section 3203**, the IIPP contains the following elements:

- ☐ Program responsibilities
- ☐ Compliance methods to ensure safe work practices
- ☐ Communication system on health and safety issues
- ☐ Hazard assessment and periodic inspections of work areas
- ☐ Hazard correction
- ☐ Health and safety training
- ☐ Accident investigation
- ☐ Record keeping

RESPONSIBILITIES

School Director / IIPP Administrator designee

The School Director has the ultimate authority and responsibility for the effective implementation of The School's IIPP. The School Director provides:

- ☐ Executive management oversight of the IIPP
- ☐ A system of accountability for program implementation
- ☐ Program evaluations and resources to support program implementation

The School Director and/or their designee oversees the effective implementation of the IIPP and has the authority and responsibility for implementing the program. Responsibilities include:

- ☐ Maintain and effectively implementing The School IIPP
- ☐ Oversight to ensure injuries and accidents are investigated
- ☐ Review inspections and hazard correction documentation to ensure identified hazards have been mitigated
- ☐ Follow established procedures for employee reporting of workplace hazards, accidents, and injuries
- ☐ Act as a liaison between educational partners and The School
- ☐ Distribute safety information received by the IIPP Administrator
- ☐ Communicate with school leadership, department heads, and supervisors to coordinate IIPP responsibilities within The School
- ☐ Ensure periodic inspections are conducted as required with corrective action follow-up
- ☐ Maintain The School site required documentation as outlined in the Record Keeping section
- ☐ Maintain a copy of the IIPP at The School site

Department Heads

Department Heads are responsible for compliance with the provisions of the IIPP within their school site and department. Supervisors are responsible for the implementation of the IIPP for employees, facilities, and operations under their direct supervision and control. Responsibilities include:

- ☐ Provide leadership that supports a strong safety culture and continuous improvement
- ☐ Ensure job-specific hazard assessments are conducted to identify employee training requirements
- ☐ Ensure job-specific employee safety training is conducted
- ☐ Provide supervisor IIPP training and ensure supervisors are knowledgeable about health and safety hazards under their supervision and control
- ☐ Communicate with School Directors and the Director of Facilities & Safety (or designee) to coordinate implementation of IIPP responsibilities within the School.
- ☐ Ensure identified hazards are corrected in a timely manner based on severity
- ☐ Conduct periodic safety inspections of facilities
- ☐ Conduct regular observations of employee work practices and instruct employees on safe work practices
- ☐ Enforce safe work practices and procedures for employees and operations under direct supervision and control
- ☐ Ensure employees complete required safety training through the organization's designated training platform

Facilities, Transportation, and Site Safety Roles

Facilities leadership, transportation supervisors, and designated school-site safety coordinators for Empower Generations are responsible for implementing applicable safety procedures within their areas of authority. Responsibilities include:

- ☐ Coordinating site-level inspections
- ☐ Addressing facility and environmental hazards
- ☐ Supporting emergency response actions
- ☐ Communicating hazards to employees
- ☐ Ensuring corrective actions are completed in a timely manner

School-site directors for Empower Generations have the authority to take immediate action during hazardous conditions, including modifying operations, relocating employees, or suspending activities when necessary to protect employee safety.

Employees

Responsibilities of all School employees include:

- ☐ Follow all safe work practices, safety policies, and procedures.
- ☐ Ask a supervisor when questions arise regarding safety procedures
- ☐ Report real or potential unsafe conditions to the immediate supervisor
- ☐ Report injuries immediately to the supervisor
- ☐ Complete required safety training as assigned

Employee's Access to the IIPP

- ☐ A copy of this written Injury and Illness Prevention Plan (IIPP) is available on ADP and may be accessed or downloaded there at any time.

COMMUNICATION

The School recognizes the importance of effective, two-way communication on health and safety issues. All supervisors are responsible for communicating with their employees about occupational safety and health in a form readily understandable by all employees.

Employees may report workplace hazards, injuries, illnesses, or safety concerns without fear of retaliation. Retaliation for reporting safety or health concerns is strictly prohibited and will result in disciplinary action.

New Employee Training

All new employees will complete required safety training upon hire through ADP using Keenan training modules. Training will include the IIPP, workplace safety procedures, hazard reporting, and emergency response.

Safety Meetings

Site safety meetings will be conducted as needed. During safety meetings, The School director, safety coordinator, or other trainer may discuss issues such as:

- ☐ New hazards that have been introduced or discovered in the workplace
- ☐ Causes of recent accidents or injuries and procedures to prevent similar incidents in the future
- ☐ Any health or safety issue deemed by The School to require reinforcement

Employee Hazard Reporting System

Employees are encouraged to report safety hazards. [Hazardous/Unsafe Condition Report forms \(Appendix A\)](#) may be submitted directly to the immediate supervisor or school-site safety coordinator/assistant principal of facilities.

Employees may also report hazards anonymously by sending the written form to the HR Team.

All submitted reports will be investigated in a prompt and thorough manner. All investigations and proposed corrective action will be reviewed by the Facilities & Safety Team.

Workplace Violence Reporting and Communication

Communication regarding workplace violence hazards, threats, or incidents at Empower Generations is addressed through the iLEAD Schools Workplace Violence Prevention Plan (WVPP). Employees may report workplace violence concerns in accordance with the WVPP by completing [Attachment B – Violent Incident Report](#). Reports may be submitted directly by the employee or provided to a supervisor or the Plan Administrator/Designee for documentation. Employees may report without fear of retaliation. Emergency response procedures are outlined in the WVPP “Incident Response” section, reviewed during training, and made available upon request.

Facilities & Safety Team

The Facilities & Safety Team will provide a forum for two-way health and safety communication for The School. The Safety Team will:

- ☐ Advise the Site Director on current health and safety issues, including regulatory requirements
- ☐ Review employee accidents to ensure root causes and corrective actions have been identified
- ☐ Assist in IIPP reviews and evaluations as requested
- ☐ Recommend health and safety training, resources, or other support to facilitate IIPP implementation
- ☐ Address employee hazard reports and safety concerns that have not been resolved at the department level

Safety Bulletin Boards

HR will maintain safety bulletin board(s) to meet Cal/OSHA posting requirements and to ensure ongoing communication on significant health and safety issues.

HAZARD ASSESSMENT/INSPECTION

Periodic inspections to identify and evaluate hazards within the School will be **conducted monthly using the SARC FIT tool**. The School Director or an assigned designee will complete and document the inspection, including identified hazards and corrective actions. Inspection records will be maintained on file by the Site Director and made available upon request.

Facilities	Inspection Frequency
School Site - offices, classrooms, and interior/exterior areas and facilities not mentioned below	Monthly
Science labs, art labs, vocational shops (wood, etc.)	Monthly
Athletic – play space, fields, etc.	Monthly
Auditorium/Theater if applicable	Monthly
Rest Rooms	Monthly
Food service – Kitchen, storage, cafeteria, snack bar	Monthly
Maintenance & Operations yard and shop	Monthly
Transportation yard and shop	Monthly
Walk ways	Monthly
Parking lots	Monthly

Hazard assessments conducted by **Empower Generations** include evaluation of environmental conditions such as excessive indoor heat, ventilation concerns, air quality issues, and conditions that may increase the risk of aerosol transmissible disease exposure. Identified hazards are documented and evaluated for severity, and appropriate engineering, administrative, or work practice controls are implemented.

In addition to the periodic inspection schedule outlined above, hazard assessments will also be conducted under the following circumstances:

- ☐ When the IIPP is first established or updated
- ☐ New equipment, materials, programs, or procedures that introduce new hazards
- ☐ New, previously unidentified hazards are identified
- ☐ Occupational accidents or incidents occur
- ☐ Department hires or reassigns when employees are assigned new duties or responsibilities

At the school site level, hazard evaluations are also conducted through the SARC FIT tool, routine site walk-throughs, and daily custodial inspections of restrooms and food service areas. Any identified hazards are documented and corrected in a timely manner.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, work practices, or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedure:

- ☐ When observed or reported. Hazards may be discovered either as a result of a scheduled periodic inspection or during normal operations. Supervisors of affected employees are expected to correct unsafe conditions as quickly as possible after discovery of a hazard, based on the severity of the hazard.
- ☐ When an imminent hazard exists that cannot be immediately corrected, we will remove employees from the immediate hazard except those needed to correct the condition and to address security issues.

REPORTING A WORK RELATED ACCIDENT OR INJURY

24/7 Injury Response 1(877) 480- 3947

ACCIDENT AND INCIDENT INVESTIGATIONS

The purpose of accident investigation is to determine the cause(s) of accidents and identify what can be done to prevent similar accidents from recurring.

Investigations of workplace accidents, hazardous substance exposures and near accidents will be conducted by the safety coordinator and/or School Director. The IIPP Administrator may review the accident documentation to determine if the contributing factors and corrective actions to prevent future injuries are adequately identified.

Our procedures include:

- ☐ Visiting the scene as soon as possible
- ☐ Interviewing injured employees and witnesses
- ☐ Determining the cause of the accident/exposure
- ☐ Examining the workplace and incident for underlying/contributing causes
- ☐ Corrective actions may include additional training assigned through ADP using Keenan training modules, as appropriate.
- ☐ Recording the findings and actions taken

The Accident Investigation Report form (Appendix B) should be completed to record pertinent information. The School's Accident Investigation forms are located at The School web page, under risk management tab, accident investigation folder. Hard copies can be located with the site office manager.

SAFETY AND HEALTH TRAINING

Safety training is provided through ADP using Keenan training modules.

Workplace violence prevention training for Empower Generations employees is provided in accordance with the Workplace Violence Prevention Plan and includes hazard recognition, reporting procedures, de-escalation strategies, emergency response, and post-incident support.

Training will be provided:

- ☐ When our IIPP is first established
- ☐ To all new employees
- ☐ When employees are assigned new duties
- ☐ Whenever new substances, processes, procedures, or equipment are introduced to The School and represent a new hazard
- ☐ Whenever anyone is made aware of a new or previously unrecognized hazard
- ☐ To supervisors and school-site safety coordinators to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed

General Safety Training

General safety training will, at a minimum, include:

- ☐ An overview of the IIPP and emergency procedures
- ☐ Hazard reporting any unsafe conditions, work practices, and injuries
- ☐ Workplace violence awareness and reporting procedures
- ☐ Provisions for medical services, first aid, and emergency procedures
- ☐ Proper housekeeping, such as keeping walkways clear, keeping work areas neat and orderly, and promptly cleaning up spills
- ☐ Prohibiting horseplay or other acts that adversely influence safety
- ☐ Proper storage, including prohibiting storage near emergency exits, fire extinguishers, and electrical panels

Job-Specific Safety Training

Job-specific safety training will be provided to all employees regarding hazards unique to their job assignment. Training may include, but is not limited to:

- ☐ Ergonomic awareness and the prevention of musculoskeletal disorders, including proper lifting techniques
- ☐ The use of appropriate clothing, including gloves, footwear, and personal protective equipment (PPE)
- ☐ Information about Cal/OSHA's Hazard Communication regulation, including chemical hazards, such as pesticides, cleaning products, lab chemicals, etc.
- ☐ Proper food and beverage storage to prevent contamination
- ☐ Slip and fall hazards and ladder safety
- ☐ Potential exposure during building repairs, such as lead paint and asbestos
- ☐ Potential exposure to bloodborne pathogens and aerosol transmissible diseases
- ☐ Heat illness prevention
- ☐ Indoor air quality
- ☐ Power tools and machinery hazards, including electrical safety, lock-out tag-out of machinery, machine guarding, etc.
- ☐ Defensive driving

- ☐ Mandated reporting: Child abuse and neglect
- ☐ Sexual Harassment Prevention
- ☐ Workplace bullying: awareness and prevention

Indoor Heat Illness Prevention

Indoor heat illness hazards are evaluated at Empower Generations facilities when environmental or facility conditions result in elevated temperatures. When indoor temperatures pose a potential health risk, administrative controls may include modified work schedules, increased rest breaks, access to potable drinking water, relocation to cooler areas, use of fans or air-conditioned spaces where feasible, and suspension of non-essential activities.

Employees are encouraged to report heat-related symptoms immediately without fear of reprisal. Indoor heat illness hazards are evaluated when indoor temperatures or heat index levels may pose a health risk, including when temperatures approach or exceed 82°F for extended periods or when employees report heat-related symptoms.

School Director and School-Site Safety Coordinator Training

School Directors and designees will complete required training through ADP using Keenan training modules.

Codes of Safe Practices

Copies can be found in The School Director/Safety Coordinator of facilities safety binder.

COMPLIANCE

School leadership is responsible for ensuring that all safety and health policies and Procedures are clearly communicated and understood by all employees. School Directors and lead personnel are expected to enforce the rules fairly and uniformly.

All School employees are responsible for complying with safe and healthful work practices. Our system of ensuring that all employees comply with these practices includes the following:

IIPP Training

Employees will receive IIPP training through ADP throughout the school year.

School Director Evaluation of Safety Performance

School Directors will evaluate employee safety performance through routine observation of work practices. Employees will receive coaching and corrective instruction when unsafe practices are identified. Additional training may be assigned as needed.

Non-Retaliation Policy

Employees are encouraged to report workplace hazards, injuries, illnesses, or safety concerns without fear of reprisal. Retaliation against any employee for reporting a safety or health concern, participating in an investigation, or exercising their rights under workplace safety laws is strictly prohibited and will result in disciplinary action, up to and including termination.

Disciplinary Procedures

Fair and consistent disciplining of employees who fail to comply with safety and healthful work practices will be disciplined in accordance with The School's personnel policy. Supervisors are responsible for documenting safety coaching, corrective instruction, and disciplinary actions related to unsafe work practices. Repeated unsafe behaviors will result in progressive corrective action consistent with personnel policies.

RECORD KEEPING

The School maintains the following records to help us more efficiently and effectively implement our IIPP:

Procedures related to aerosol transmissible disease response, including exposure evaluation, training, and applicable protective measures, are maintained in accordance with public health guidance and coordinated through Human Resources for Empower Generations.

- ☐ Records of scheduled and periodic inspections (to identify unsafe conditions and work practices, including the names of the person(s) conducting the inspection, the unsafe conditions and the work practices that have been identified, as well as the action(s) taken to correct the identified unsafe conditions and work practices.
These records are maintained for at least one (1) year.
- ☐ Documentation of our safety and health training.
- ☐ Confirmation of receipt and review of the Injury and Illness Prevention Program (IIPP), Workplace Violence Prevention Plan (WVPP), and applicable aerosol transmissible disease prevention procedures for Empower Generations.

Records associated with the Workplace Violence Prevention Plan for Empower Generations, including training documentation, hazard assessments, and incident logs, are maintained separately in accordance with applicable regulations and are available for review upon request.

Appendix A – Hazardous/Unsafe Condition Report Form

Reporting Information*

School-Site/School Facility:	
Name/Title (optional):	Phone(optional):
Date/time hazard observed:	Date reported:
Location of hazard (building, room, parking lot, other distinguishing area) :	
Description of hazardous/unsafe condition:	
What corrective action would you recommend?	

* Submit completed form to your immediate supervisor or the Assistant Principal of Facilities or School-site safety coordinator. Submit anonymously by sending to Sonia Pishehvar, Risk Manager and Safety Coordinator, IIPP Administrator.

Investigation

Investigator's Name/Title:	Date:
Results of the investigation (<i>Attach additional page if necessary</i>):	
Proposed corrective action:	

Corrective Action

Responsible Person/Department:	Corrective Action Completion Date:
Corrective Action Taken (<i>Attach additional page if necessary</i>):	

School Best Practices and Safety Committee Review

The School Safety Committee reviews all submitted Hazardous/Unsafe Condition reports for thorough investigation and corrective action. The Committee also ensures the person reporting the hazard, if known, is notified of the results.

Committee Chair: _____ Date of Review: _____

Appendix B – Accident Investigation Report (Employee/Workplace Injury or Illness)

Add separate paper if needed

School Site/School Facility:	Department:
-------------------------------------	--------------------

Injured Employee Information

Name:		Job Title:	Contact Number:
Hire Date:	Volunteer: ☐ Yes ☐ No	Supervisor Name:	Contact Number:

Accident Details

Date & Time of Accident:	Date Reported:	Location of Accident: <i>(be specific - building, room #, lab, field, etc.):</i>
Description of Injury/Illness <i>(sprained right ankle, cut left hand, allergic reaction, needle stick, etc.):</i>		
Describe accident <i>(tasks performed, events before accident, equipment/ tools, work conditions, other relevant details):</i>		
Witness Name(s) and contact information		

Cause(s) of Accident

Hazardous conditions, safety management breakdowns, unsafe work behaviors

Corrective Action

Physical changes, changes in procedures, changes in employee work practices

Investigation completed by:	Title:	Date:
Corrective action follow-up conducted by:	Title:	Date:

Appendix C – Protection from Wildfire Smoke: Health and Safety of Employees Exposed to Wildfire Smoke

Purpose:

The purpose of this addendum to the Injury and Illness Prevention Program is to mitigate employee exposure to wildfire smoke and other pollutants when working outdoors.

Background

The School employees may be asked to work outdoors and in conditions where they may be exposed to wildfire smoke and other pollutants considered to be harmful to their health. Employees are offered the opportunity and may decline the opportunity to perform work outdoors when they feel conditions may be harmful to their health without any retribution from School management. The following best practices meets or exceeds regulatory requirements located in [Title 8 of the General Industry Safety Orders, Article 107, Section 5141.1](#), also known as Cal/OSHA Standard 5141 Protection from Wildfire Smoke.

Best Practices

When the Air Quality Index (AQI) PM2.5 is 151 or greater and The School has a reasonable expectation that employees may experience outdoor wildfire smoke exposure for a period of 1 hour or less per shift, The School will implement the following practices:

- A. Prior to each workday and shift, supervisors will check the AQI forecast via the [United States, Environmental Protection Agency AirNow](#) (U.S. EPA AirNow) and then communicate the AQI and its associated Levels of Health Concern to employees in a pre-shift huddle using the following scale:

Air Quality Index (AQI)	
AQI Categories for PM2.5	Levels of Health Concern
0-50	Good
51-100	Moderate
101-150	Unhealthy for Sensitive Groups
151-200	Unhealthy
201-300	Very Unhealthy
301-500	Hazardous

- B. Specify protective measures available to the employees to reduce their wildfire smoke exposure by including:

- a. Administrative Controls
 - i. Rotating employees between working outdoors and inside
 - ii. Limiting the length of employee shifts
 - iii. Transferring employees between locations where the AQI is not as hazardous
 - iv. Offering less strenuous work activities
 - v. Increase the number of rest breaks offered
- b. Voluntary use of Personal Protective Equipment (PPE)—[The Charter School offers all employees exposed to wildfire smoke N95 filtering facepiece respirators. N95 respirators are offered at any time on a voluntary

basis and mandatorily offered when the AQI PM2.5 is 151 or greater but not more than 500. All N95 respirators are approved by the National Institute for Occupational Safety and Health (NIOSH).

- C. Employees are encouraged to notify The School leadership anytime they feel the air quality is progressively worsening during their shift and/or if they experience any adverse symptoms as a result of exposure such as difficulty breathing, asthma attacks, chest pain, etc.

Mandatory Training

All employees, regardless of the AQI levels and potentially exposed to Wildfire Smoke will receive the following training as required by Cal/OSHA Protection from Wildfire Smoke. Training will be provided in a language that is readily understandable by the employees being trained.

A. The health effects of wildfire smoke

- a. Although there are many hazardous chemicals in wildfire smoke, the main harmful pollutant for people who are not very close to the fire is “particulate matter;” these are the tiny particles suspended in the air.
- b. Particulate matter can irritate the lungs and cause persistent coughing, phlegm, wheezing, or difficulty breathing. Particulate matter can also cause more serious problems, such as reduced lung function, bronchitis, worsening of asthma, heart failure, and early death.
- c. People over 65 and people who already have heart and lung problems are the most likely to suffer from serious health effects.
- d. The smallest and usually the most harmful particulate matter is called PM2.5, they have a diameter of 2.5 micrometers or smaller.

B. The right to obtain medical treatment without fear of reprisal

- a. The School shall allow any employee that shows signs of injury or illness due to wildfire smoke exposure to seek medical treatment, and may not punish affected employees for seeking such treatment.
- b. The School shall also have effective provisions made in advance for prompt medical treatment of employees in the event of serious injury or illness caused by wildfire smoke exposure.

C. How employees can obtain the current Air Quality Index (AQI) for PM2.5

- a. Various government agencies monitor the air at locations throughout California and report the current AQI for those places. The AQI is a measurement of how polluted the air is. An AQI over 100 is unhealthy for sensitive people and an AQI over 150 is unhealthy for everyone.
- b. Although there are AQI's for several pollutants, Cal/OSHA Standard 5141 Protection from Wildfire Smoke only uses the AQI for PM2.5. The School's program meets the regulatory requirements of the standard.
- c. The easiest way to find the current and forecasted AQI for PM2.5 is to go to [AirNow](#) and enter the zip code of the location where you will be working. The current AQI is also available from the [U.S. Forest Service](#) and through [Local Air Schools](#).
- d. Employees who do not have access to the internet can contact their manager for the current AQI. The EPA website, [EnviroFlash](#), can transmit daily and forecasted AQIs by text or email for particular cities or zip codes.

D. The requirements in Cal/OSHA Standard 5141 Protection from Wildfire Smoke

- a. If an employee may be exposed to wildfire smoke, The School is required to find out the current AQI applicable to the worksite. If the current AQI for PM2.5 is 151 or more, The School's designee Facilities/Safety AP/Plant Manager/Supervisor is required to:
 - i. Check the current AQI prior to each shift and periodically during each shift
 - ii. Provide training
 - iii. Lower employee exposures
- b. Provide respirators and encourage their use.

E. The School maintains a two-way communication system.

- a. The School designee shall alert employees when the air quality is harmful and what protective measures are available to those employees that may be exposed.
- b. The School encourages employees to inform their supervisor if they notice the air quality is getting worse, or if they are suffering from any symptoms due to the air quality, without fear of reprisal.
- c. The employer's communication system includes:
 - i. Direct communication between employees and their supervisor prior to commencing work activities.
 - ii. Using company email.

iii. Texting and/or telephone conversations.

F. The School's methods to protect employees from wildfire smoke when the AQI for PM2.5 is 151 or greater include:

- a. Locating work in enclosed structures or vehicles where the air is filtered, if at all possible.
- b. Changing procedures such as moving workers to a place with a lower current AQI for PM2.5 if possible.
- c. Reducing the time that an employee is exposed to outdoor smoke.
- d. Increasing rest time and frequency, and providing a rest area with filtered air if possible.
- e. Reducing the physical intensity of the work to help lower the breathing and heart rates.

Appendix D- Employee Acknowledgment of the Injury and Illness Prevention Program



Confirmation and acknowledgment of receipt and review of the Injury and Illness Prevention Program (IIPP).

I have received and reviewed (IIPP) Date: _____

Employee Name: _____

Employee Signature: _____

Job Title: _____

Job site location: _____

Return the signed form to the IIPP Administrator. A copy will be kept on file with HR.

Appendix E – Indoor Heat Illness Prevention Addendum

Purpose

This Addendum establishes procedures to prevent heat-related illness for employees working indoors when temperatures or heat conditions present a risk, in compliance with California Code of Regulations, Title 8 §3396 and related Cal/OSHA requirements.

This Addendum supplements iLEAD Schools' existing Outdoor Heat Illness and Wildfire Smoke programs.

Scope

This program applies to all indoor work locations, including:

- Classrooms
- Offices
- Kitchens and cafeterias
- Gymnasiums
- Multipurpose rooms
- Maintenance shops
- Storage rooms
- Portable classrooms
- Mechanical rooms

Responsible Persons

Implementation and oversight are assigned to:

- HR Director / IIPP Administrator
- Director of Facilities & Safety
- Site Administrator / School Director
- Site Safety Coordinator
- Maintenance Supervisor

Conditions Triggering This Program

This program applies when:

- Indoor temperatures reach 82°F or higher, or
- Employees report heat discomfort or symptoms, or
- Ventilation or cooling systems malfunction, or
- High radiant heat or humidity is present.

Access to Drinking Water

The following will be provided:

- Cool, potable drinking water at no cost
- Encouragement to drink water frequently
- Refill stations maintained
- Temporary bottled water if systems fail

Cooling Areas

When feasible, cooling areas will be made available:

- Air-conditioned rooms
- Areas with fans or improved ventilation
- Temporary cooling units
- Shaded indoor spaces

Employees shall be allowed to take recovery breaks in cooling areas as needed.

Acclimatization

New employees, returning employees, or employees assigned to hotter areas will:

- Be monitored during their first 14 days
- Receive gradual workload increases
- Be checked for symptoms by supervisors

Work Modifications

When heat conditions exist, iLEAD may implement:

- Rotating staff
- Rescheduling tasks
- Reduced physical exertion
- Increased rest breaks
- Temporary relocation
- Early dismissal of non-essential tasks
- HVAC repair escalation

Monitoring & Reporting

Supervisors shall:

- Monitor indoor temperatures when heat risk exists
- Respond to employee reports promptly
- Document corrective actions
- Notify Facilities for HVAC issues
- Escalate unsafe conditions immediately

Employees are encouraged to report:

- Symptoms
- Hot conditions
- Equipment failures
- Ventilation issues

No retaliation is permitted.

Signs & Symptoms of Heat Illness

Employees will be trained to recognize:

Heat Exhaustion:

- Dizziness
- Heavy sweating
- Headache
- Nausea
- Weakness

Heat Stroke (Medical Emergency):

- Confusion
- Fainting
- Hot or dry skin
- Slurred speech

Call 911 immediately if heat stroke is suspected.

Emergency Response

If symptoms appear:

1. Move employee to a cooler area
2. Provide water
3. Loosen clothing
4. Apply cool compresses
5. Call 911 for severe symptoms
6. Notify site leadership and HR
7. Document incident

Training

Training will be provided:

- At hire
- Annually
- When hazards change
- To supervisors

Topics include:

- Indoor heat hazards
- Prevention measures
- Symptoms
- Reporting procedures
- Emergency response
- Acclimatization

Recordkeeping

iLEAD shall maintain:

- Temperature monitoring logs (when applicable)
- HVAC service requests
- Employee complaints
- Training records
- Incident reports
- Corrective actions

Records will be retained per Cal/OSHA requirements.

Coordination with Other Programs

This Addendum integrates with:

- Outdoor Heat Illness Prevention
- Wildfire Smoke Program
- WVPP
- Emergency Action Plan
- Facilities Work Order Systems

Annual Review

This Addendum shall be reviewed:

- Annually
- After heat-related incidents
- After HVAC failures
- When regulations change

IIPP Updates- January 2026

- Updated to reflect current Cal/OSHA Title 8 §3203 requirements (pp. 1–2, 4)
- Integrated coordination with the Workplace Violence Prevention Plan (WVPP) (pp. 2, 7)
- Expanded Facilities & Safety Team oversight (pp. 7)
- Transitioned all safety training to ADP using Keenan training modules (pp. 6, 9–11)
- Implemented monthly site inspections using the SARC FIT tool (p. 8)
- Strengthened hazard identification, correction, and documentation procedures (pp. 8–9, 12)
- Clarified roles and responsibilities for school leadership and staff (pp. 4–6)
- Enhanced safety communication systems, including non-retaliation protections (pp. 6–7, 11–12)
- Expanded environmental health protections (indoor heat, air quality, disease exposure) (pp. 8, 11, Appendix E)
- Improved recordkeeping practices to ensure compliance and audit readiness (p. 12)
- Standardized forms and appendices for hazard reporting and incident investigation (Appendices A–E)

Workplace Violence Prevention Plan Update

January 2026

- **Expanded Scope & Legal Compliance (Page 3)**
Covers all off-site activities and aligns with SB 553 and Labor Code §6401.9.
- **Stronger Prevention & Accountability (Page 7–8)**
Site-specific hazard assessments, correction timelines, and tracking of safety issues.
- **Improved Communication & Emergency Response (Page 8–9)**
New communication system and alignment with CSSP; clear emergency authority established.
- **Enhanced Training & Employee Protections (Page 3, 11–12)**
Annual training through ADP/Keenan, employee participation, and anti-retaliation protections.
- **Data Tracking & Continuous Improvement (Page 10–13)**
Incident investigations, annual trend review, improved recordkeeping, and contractor coordination.

Empower Generations



Workplace Violence Prevention Plan (WVPP)

Date: January 2026

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Authority and Scope

Authority: California Senate Bill (SB) No. 553; **California Labor Code §6401.9**

Scope: This Plan applies to all Empower Generations employees and other personnel conducting business at iLEAD school sites, iLEAD offices, community-based programs, after-school programs, field studies, and any off-site location where employees perform work-related duties.

Policy Statement

Empower Generations is concerned about and committed to our employees' safety and health. We have a policy of zero tolerance for violence in the workplace and will make every effort to prevent violent incidents from occurring through the implementation of this Workplace Violence Prevention Plan (Plan). This Workplace Violence Prevention Plan is maintained as a standalone program and is incorporated by reference into the Injury and Illness Prevention Program (IIPP). Empower Generations will provide adequate authority and budgetary resources to responsible parties so that our goals and responsibilities can be met.

All employees, supervisors, and site directors are responsible for implementing and maintaining this Plan. **Employees shall be provided opportunities to participate in the development, implementation, and annual review of this Plan through the safety team, surveys, hazard reporting, and post-incident reviews. Empower Generations ensures meaningful employee participation in the development, implementation, and review of this Workplace Violence Prevention Plan. Employee participation includes representation on site-based Safety Teams, annual employee safety survey, opportunities to provide input during staff meetings, hazard reporting systems, and post-incident debriefs. Feedback provided by employees will be documented and considered during hazard assessments, incident investigations, and annual plan reviews.** Empower Generations requires prompt and accurate reporting of all violent incidents, whether or not physical injury has occurred. We will not discriminate against victims of workplace violence.

Procedures are in place for accepting reports of workplace violence from employees. Employees reporting violent activity will do so without fear of retaliation. Empower Generations **strictly prohibits retaliation against any employee who reports workplace violence concerns, participates in incident investigations, or exercises any rights under this Plan or applicable law. Any acts of retaliation will be addressed promptly and may result in disciplinary action.**

A copy of this Plan is readily available to all employees and supervisors from the Plan/Site Administrator, and can also be found on ADP.

Our program ensures all employees, including supervisors/site directors, adhere to work practices that are designed to make the workplace more secure and do not engage in verbal threats or physical actions that create a security hazard for others in the workplace.

The management of our establishment is responsible for ensuring that all safety and health policies and procedures involving workplace employee security are clearly communicated and understood by all employees. Supervisors/Site directors are expected to enforce the rules fairly and uniformly.

Plan Authority/Designee

Table 100 provides the roles and contact information for the Administration of the California Workplace Violence Prevention Plan.

Table 100: Personnel Contact Information

Function	Name/Title	Contact Information
Plan/Site Administrator review/investigate reported incidents of workplace violence	Sajae Davison	Work phone: (661) 429-3264 Cellphone: (424) 278-8481
Executive Director of Human Resources	Rick Crunelle	Work phone: (661) 434-1755
Plan Designee, Risk Management & Safety Coordinator- plan maintenance & updates- review for compliance and record retention	April Cauthron	Cell phone: (818) 631-1095

Plan/Site Administrator/Designee.

The Plan/Site Administrator/Designee is responsible for completing and updating the Workplace Violence Prevention Plan as required and ensuring that the Plan is accessible to all Empower Generations personnel. In addition, the Plan/Site Administrator/Designee ensures that:

- Workplace violence hazard assessments are conducted in accordance with this Plan, and employees are provided opportunities to participate in the hazard identification and evaluation process
- Procedures are in place to correct workplace violence hazards in the facility.
- Employees may contact appropriate law enforcement or emergency services at any time during work shifts in the event of a workplace violence emergency.
- Procedures are in place for documenting and communicating workplace violence matters to employees.
- The violent incident log is maintained for every workplace violence incident.
- Procedures are in place for incident response and investigation.
- Any workplace violence incident that meets Cal/OSHA reporting thresholds will be reported in accordance with applicable regulations and the School's Injury and Illness Prevention Program (IIPP).
- All necessary records are retained.

Supervisor.

Supervisors must:

- Communicate employee safety concerns to the Plan Administrator/Designee.
- Assist with preparation, review, and update of the hazard assessments.
- Implement and enforce applicable provisions of the Workplace Violence Prevention Plan.
- Be ready to defuse and/or respond to potential workplace violence situations.
- Communicate the occurrence of all workplace violence incidents to the Program Administrator/Designee.
- Assist with the completion of the Violent Incident Log when needed.

Employees.

Employees must:

- Conduct themselves in a way that will contribute to an environment that is free of violence, intimidation, and threat.
- Report all incidents of workplace violence to a Supervisor/Site Director.
- Take all threats seriously, and be ready to defuse and/or respond to potential workplace violence situations
- Complete all required safety and workplace violence prevention training assigned through ADP/Keenan upon hire and annually thereafter, or as otherwise required.
- Be familiar with all Empower Generations policies that may mitigate the potential for workplace violence.
- Be familiar with Empower Generations' policies for evacuation and sheltering in place.

Plan Review and Update

This Plan will be reviewed at least annually and:

- Whenever workplace policies of Empower Generations change;
- The Violent Incident Log will be reviewed at least annually to identify trends, recurring risk opportunities for factors, and corrective action.
- Whenever regulations or Cal/OSHA guidance changes;
- After a workplace violence incident, *or*
- When a new previously unrecognized hazard is identified;
- When it can be demonstrated that the Plan is not effective.
- Plan effectiveness will be reviewed by Safety Team and Best Practices.
- Any necessary updates to the Plan resulting from a Plan review will be made by the Plan Administrator/Designee.

Last Reviewed: January 2026

Next Schedule Review: January 2027

Plan Access

The Plan is located on ADP and is accessible to employees and employee representatives at all times. Access to the Plan is also available by contacting the Plan/Site Administrator/Designee and the HR Department.

Definitions

Emergency: An unanticipated circumstance that can be life-threatening or pose a risk of significant injuries to the patient, staff, or public, requiring immediate action.

Threat of violence: Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, online posts, or any behavioral or physical conduct that conveys an intent, that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm and that serves no legitimate purpose.

Work practice controls: Procedures, rules, and staffing that are used to effectively reduce workplace violence hazards.

Workplace violence: Any act of violence or threat of violence that occurs in a place of employment that includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:
 - *Type 1 Violence:* Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime;
 - *Type 2 Violence:* Workplace violence directed at employees by vendors, parents, learners, or visitors;
 - *Type 3 Violence:* Workplace violence against an employee by a present or former employee, supervisor, or site director
 - *Type 4 Violence:* Workplace violence committed in the workplace by someone who does not work there but has or is known to have had a personal relationship with an employee.
- *Workplace violence does not include lawful acts of self-defense or the defense of other.*

Hazard Assessment

The Plan Administrator/Designee, in conjunction with the supervisors, will periodically conduct a workplace violence hazard assessment for each work area. The hazard assessment will include a review of records and workplace security to identify risk factors for workplace violence at Empower Generations Sites. Workplace Violence Hazard Assessment, [See Attachment D.](#)

The workplace violence hazard assessment must be conducted when the Plan; is established and it is reviewed and updated on an annual basis and;

- Annually for each site and program
- After each workplace violence incident, *and*
- When the employer becomes aware of a new or previously unrecognized hazard.

Procedures for Correcting Workplace Violence Hazards Empower Generations will correct identified workplace violence hazards in a timely manner based on the severity of the hazard.

- Imminent hazards will be corrected immediately, or operations will be suspended until corrected.
 - Serious hazards will be corrected within 24-72 hours.
 - Non-serious hazards will be addressed within a reasonable timeframe.
- The Plan Administrator/Designee will track all identified hazards, corrective actions, and completion status. Documentation of hazard corrections will be maintained in accordance with recordkeeping requirements.

Hazard assessments must be completed and signed for each individual iLEAD school site and for high-risk programs, including Special Education, after-school programs, and community-based programs.

Records review

As part of the hazard assessment, the following types of records may be reviewed to help identify workplace violence risk factors at:

- OSHA illness and injury logs and incident reports for the most recent 3 years
- Violence incident log entries
- Accident and incident investigation reports
- Employee hazard reports and complaints related to violence
- Training records
- Police reports related to incidents occurring on school property, if applicable

Workplace Violence Hazard Assessments

Workplace violence hazard assessments will be conducted when this Plan is established, at least annually thereafter, following any workplace violence incident, and whenever new or previously unrecognized hazards are identified. The assessment will include a review of physical security measures, work practices, incident trends, and other relevant risk factors. Employees will be provided opportunities to offer input during the hazard assessment process through hazard reporting systems, Safety Team discussions, and post-incident reviews.

Employee safety concerns

Employees are encouraged to report to their supervisors, site director, or the Plan Administrator/Designee at any time any situations in which they feel unsafe or circumstances that may have the potential for violent incidents. No employee will be subjected to reprisal, retaliation, or disciplinary action for such reports.

Workplace Violence Risk Factors

The following are the risk factors for workplace violence identified in the most recent hazard assessment of Empower Generations. ([See Attachment A](#)—Workplace Violence Hazard Assessment for the most recent hazard assessment)

Table 200: Risk Factors

Risk Factor	Job Title Affected	Potential Violent Act or Condition
Disgruntled Staff, Parents	All	Verbal threats, confrontational behavior, or physical assault
Disgruntled employees	All staff	Verbal threats, intimidation, or physical assault
Interaction with parents, visitors, and community members	Front office staff, School Directors, support staff, all staff	Aggressive behavior, threats, or physical altercations
Intruders or unauthorized individuals	All	Aggressive visitors, verbal threats of violence, physical assault
Learner behavioral escalation (including Special Education settings)	Directors, Facilitators, CareTeam, Special Ed Facilitators	Physical aggression, attempts to strike, bite, push or other unintended injury during behavioral incidents

Work Practices and Procedures

Empower Generations implements physical security measures, policies, and workplace practices to reduce the risk of workplace violence. These controls are reviewed and updated by the Plan Administrator or designee as needed to address identified hazards or incidents.

- Each time the hazard assessment is reviewed and updated, *and*
- In response to employee concerns or a workplace violence incident.

Workplace Violence Communication System

Empower Generations maintains effective systems to communicate workplace violence matters to employees. Communication methods include ParentSquare alerts, email notifications, staff meetings, safety briefings, and direct supervisor communication. Employees may report workplace violence concerns or incidents verbally, in writing, or through designated reporting channels without fear of retaliation. Reports may be made to a supervisor, Site Director, Human Resources, or the Plan Administrator/Designee.

In emergency situations, employees are authorized to contact law enforcement or emergency services (911) without delay.

Physical Security Measures

Table 300 lists the physical security measures in place to reduce workplace violence risks identified during the hazard assessment.

Table 300: Physical Security Measures

Risk Factor	Work Area	Control	Control Procedure
Visitors	Site Entrances	Visitor screening and visitor badges	Screen visitors and provide a visitor pass, retrieve pass at exit point.
Unmanned Gates	Entry Gates	Control site entry points	Lock gates and reduce to single point of entry access, when classes are in session. Manned open gates at school start time.
Intruder	All Sites	Parent Square	Issue an alert should an intruder gain access to the site.

Administrative Controls and Work Practices

Empower Generations has instituted the following administrative controls and workplace violence control practices to reduce or eliminate the risk factors for workplace violence identified in the Workplace Violence Hazard Assessment.

Workplace violence prevention courses have been added to the annual mandatory safety training courses on ADP through Keenan. Site Directors will review and enforce the single point of entry and the locking of gates best practices.

Incident Response

Incident response procedures are aligned with the Comprehensive School Safety Plan (CSSP), emergency operations plans, and site-specific emergency protocols.

Authority to issue evacuation, lockdown, or shelter-in-place orders rests with the Site Director or designee.

It is the responsibility of all employees and other personnel conducting business on Empower Generations property to conduct themselves in a way that will contribute to an environment that is free of violence, intimidation, and threat. No one will be subjected to reprisal, retaliation, or disciplinary action for reporting acts pursuant to these guidelines.

Initial Response Procedure

Employees noticing any signs of potential workplace violence will take immediate steps to defuse the situation or will notify a supervisor/site director. The employee or supervisor/site director will:

- Remain calm and continue to speak in a moderate tone of voice.
- Show respect to people even when they become upset.
- Focus on the problem by asking for details about the situation and going over possible solutions.
- Alert a coworker or colleague with a prearranged danger signal if it is believed the person may become violent or the situation generates a sense of fear for personal safety or the safety of others. The coworker or colleague will immediately report to security and/or the police.

In the event of a workplace violence incident, employees may be alerted to the presence, location, and nature of the workplace violence incident. Parent Square may be deployed at the site and ICA/HR will be notified of the threat.

Under certain circumstances, employees may be directed to either evacuate or shelter in place. The Site Director will issue instructions for evacuation or shelter-in-place command.

Response Procedure for Injured Person(s)

In the event of a workplace violence incident that results in one or more person being injured:

- Anyone involved in a violent attack or who witnesses an attack resulting in an injury that requires more than first aid will contact emergency services.
- Injured persons will receive prompt and appropriate medical care. The injured will be transported to medical care facilities.
- The incident will be reported to police and other authorities as required by law.
- The area where the violent actions occurred will be secured to protect evidence and minimize any disturbance during the post-incident response process.
- The Violent Incident Log will be prepared.
- Injured persons, witnesses to the incident, and other affected employees will be provided psychological assistance and counseling to reduce trauma and stress.

Incident Reporting

Employees must report all workplace violence incidents and potential workplace violence incidents to a supervisor as soon as possible. The supervisor will alert the site director. Please note that if this is a **life threatening event call 911**. The incident will be recorded on the workplace violence incident log.

The Plan Administrator/Designee will ensure any Cal/OSHA recordable incident is recorded and reported as required by Cal/OSHA regulations.

Incident Investigation

After each workplace violence incident, the Plan Administrator/Designee, in coordination with the Site Director and Director of Facilities & Safety (or designee), will investigate the incident using appropriate investigation procedures and best practices. The investigation will include documenting the scene as appropriate, gathering relevant information, identifying root causes, and implementing corrective actions. Detailed records of the investigation and any related meetings will be maintained.

The Plan Administrator will prepare a written evaluation report of the incident and will make recommendations to prevent similar incidents from occurring, including revisions to the Plan when necessary.

The Plan Administrator will inform all employees of the corrective actions taken as a result of the incident investigation.

Violent Incident Report & Log

For each incidence of violence in the workplace, a supervisor or the Plan Administrator/Designee will finalize the Violent Incident Report, which must include the following information:

- Date, time, and location of the incident;
- Workplace violence type(s) (i.e., Type 1 violence, Type 2 violence, Type 3 violence, or Type 4 violence. See Definitions for a description of each type.);
- Detailed description of the incident;
- Classification of who committed the violence (e.g., visitor, parent, learner, community member, family, friend, stranger, supervisor, etc.);
- Classification of circumstances at the time of the incident (e.g., whether the employee was completing usual job duties, working in a poorly lit area, rushed, working alone, etc.);
- A classification of where the incident occurred (e.g., in the workplace, parking lot, or other area outside the workplace);
- The type of incident, including, but not limited to, whether it involved any of the following:
 - o Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting;
 - o Attack with a weapon or an object, including, but not limited to, a firearm, a knife, or another object;
 - o Threat of physical force or threat of the use of a weapon or another object;
 - o Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact;
 - o Animal attack; *and*
 - o Other.
 - Consequences of the incident, including, but not limited to, whether security or law enforcement was contacted, and any actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident; *and*
 - Information about the person completing the log (name, job title, date of log entry)

The information recorded in the Violent Incident Report will be entered into the Workplace Violence Tracking Log see [Attachment C](#), based on information obtained from the employees who experienced the workplace violence, on witness statements, and on investigation findings. Any information sufficient to allow identification of any person involved in a violent incident (e.g., person's name, address, e-mail address, telephone number, Social Security number, etc.) must be omitted from the Violent Incident Report. ([See Attachment B— Sample of the Violent Incident Report](#))

The Plan Administrator/Designee, in coordination with the Site Director and Director of Facilities & Safety (or designee), will review the Violent Incident Report, determine root causes, and implement corrective actions as needed. The incident will be documented in the Violent Incident Log, which will be reviewed at least annually to identify trends and opportunities for prevention.

TRAINING

Workplace violence prevention training shall be provided:

- At the time of hire
- Annually thereafter
- When new or previously unrecognized hazards are identified
- When changes are made to this Plan

Employee Training

HR will ensure all new employees complete workplace violence prevention training upon hire through the assigned Keenan training modules in ADP.

Initial employee training will include:

- A review and definition of workplace violence.
- Employee rights under California Labor Code §6401.9, **including the right to report workplace violence concerns, participate in the Plan, and do so without fear of retaliation.**
- An explanation of the Workplace Violence Prevention Plan, including how to obtain a copy and participate in hazard identification;
- Instructions on how to report all workplace violence incidents, including threats and verbal abuse;
- Methods of recognizing and responding to workplace security hazards;
-
- Information about how to identify potential workplace security hazards (e.g., inadequate lighting in the parking lot while leaving late at night, unknown person loitering outside the building);
-
- Review of measures that have been instituted at Empower Generations to prevent workplace violence, including:
 - Use of security equipment and procedures,
 - How to attempt to defuse hostile or threatening situations, *and*
 - How to summon assistance to prevent or respond to violence.
- How to complete the Violent Incident Report and how to obtain copies.
- Post-incident procedures, including medical follow-up and the availability of counseling and referral;

Employees may direct questions regarding workplace violence prevention to HR, their Site Director, or the Plan Administrator/Designee. Employees may provide feedback through direct communication with Human Resources.

Specialized Training

The Plan Administrator/Designee will ensure that employees who may be exposed to elevated workplace violence risks as part of their job duties receive additional training appropriate to their work assignments located in ADP through Keenan Trainings. This may include staff working with learners who exhibit behavioral challenges, staff interacting with parents or the public, and staff working in isolated or higher-risk environments.

Refresher Training

The Plan Administrator/Designee will ensure refresher training is provided annually or more frequently as determined by Empower Generations incidents of violence.

Additional training will be provided when a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the Plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the Plan.

A general review of the training program will be conducted annually. It will be updated to reflect any changes to this Plan.

Record Keeping

The following records are maintained electronically and/or in hard copy by the Plan Administrator/Designee through the Human Resources / Risk Management Office for a period of five (5) years:

- Records of workplace violence hazard assessments and related practices and procedures implemented to reduce the risk of workplace violence and employee injury;
- Violent incident logs; *and*
- Workplace violence incident investigation reports.

Workplace violence training records are maintained by the Plan Administrator/Designee at iCA/HR Office for a period of one (1) year and include:

- Training dates,
- The contents or a summary of the training sessions,
- The names and qualifications of the trainers, *and*
- The names and job titles of all persons attending the training sessions.

All records will be made available to employees and their representatives upon request and at no cost for examination and copying within (15) days of the request.

Cal/OSHA Recordkeeping and Reporting Any workplace violence incident that results in a Cal/OSHA recordable injury will be recorded and reported in accordance with Empower Generations' Injury and Illness Prevention Program (IIPP) and applicable Cal/OSHA regulations.

Coordination with Contractors and Outside Service Providers

The Plan Administrator/Designee will coordinate workplace violence prevention procedures with other employers whose employees perform work at Empower Generations facilities to ensure emergency response protocols, reporting procedures, and relevant safety expectations are communicated and understood.

**CHARTER SCHOOLS SECOND INTERIM
FINANCIAL REPORT -- ALTERNATIVE FORM
July 1, 2025 to June 30, 2026**

Charter School Name: Empower Generations
CDS #: 19-75309-0134619
Charter Approving Entity: Acton-Agua Dulce Unified School District
County: Los Angeles
Charter #: 1836

This charter school uses the following basis of accounting:

Please enter an "X" in the applicable box below; check only one box

☐ Accrual Basis (Applicable Capital Assets/Interest on Long-Term Debt/Long-Term Liabilities objects are 6900, 7438, 9400-9499, and 9660-9669)
☒ Modified Accrual Basis (Applicable Capital Outlay/Debt Service objects are 6100-6170, 6200-6500, 7438, and 7439)

Description	Object Code	Original Budget	1st Interim	Board Approved 2nd Interim(B)	Actuals to Date	Second Interim Budget Unrestricted	Second Interim Budget Restricted	Second Interim Budget Total (D)	Difference (Col B & D)
A. REVENUES									
1. LCFF Sources									
State Aid - Current Year	8011	1,202,856	1,489,527	1,370,853	501,870	1,370,853		1,370,853	0
Education Protection Account - Current Year	8012	14,502	17,450	16,565	6,639	16,565		16,565	0
State Aid - Prior Years	8019	0	0	0	0	0		0	0
Transfer of Charter Schools in Lieu of Property Taxes	8096	36,336	43,353	39,238	16,494	39,238		39,238	0
Other LCFF Transfers	8091, 8097	0	0	0	0	0		0	0
Total, LCFF Sources		1,253,694	1,550,330	1,426,656	525,003	1,426,656	0	1,426,656	0
2. Federal Revenues (see NOTE on last page)									
No Child Left Behind	8290	0	0	0	0			0	0
Special Education - Federal	8181, 8182	11,802	11,802	13,038	0		13,038	13,038	0
Child Nutrition - Federal	8220	0	0	0	0		0	0	0
Other Federal Revenues	8290	41,861	41,861	39,635	23,161	0	39,635	39,635	0
Total, Federal Revenues		53,663	53,663	52,673	23,161	0	52,673	52,673	0
3. Other State Revenues									
Special Education - State	StateRevSE	66,530	66,530	75,999	33,393		75,999	75,999	0
Child Nutrition Programs	8520	0	0	0	0			0	0
Mandated Costs Reimbursements	8550	4,141	3,865	3,865	3,865	3,865		3,865	0
Lottery - Unrestricted and Instructional Materials	8560	19,795	19,795	22,530	6,339	14,737	7,793	22,530	0
Low Performing Student Block Grant	8590	0	0	0	0	0	0	0	0
All Other State Revenues	StateRevAO	69,935	171,735	184,989	90,512		184,989	184,989	0
Total, Other State Revenues		160,401	261,925	287,383	134,109	18,602	268,781	287,383	0
4. Other Local Revenues									
Transfers from Sponsoring LEAs to Charter Schools	8791	0	0	0	0	0		0	0
All Other Local Revenues	LocalRevAO	282,569	284,651	288,522	139,129	17,897	270,625	288,522	0
Total, Local Revenues		282,569	284,651	288,522	139,129	17,897	270,625	288,522	0
5. TOTAL REVENUES		1,750,327	2,150,569	2,055,234	821,402	1,463,155	592,079	2,055,234	0
B. EXPENDITURES									
1. Certificated Salaries									
Teachers' Salaries	1100	261,711	289,240	324,240	148,105	265,844	58,396	324,240	0
Certificated Pupil Support Salaries	1200	70,013	70,013	85,013	42,206	15,000	70,013	85,013	0
Certificated Supervisors' and Administrators' Salaries	1300	143,208	153,208	163,208	89,371	83,064	80,144	163,208	0
Other Certificated Salaries	1900	0	0	0	0	0	0	0	0
Total, Certificated Salaries		474,932	512,461	572,461	279,682	363,908	208,553	572,461	0
2. Non-certificated Salaries									
Instructional Aides' Salaries	2100	112,011	83,880	105,895	40,054	37,323	68,572	105,895	0
Non-certificated Support Salaries	2200	33,600	36,480	41,480	16,536	7,880	33,600	41,480	0
Non-certificated Supervisors' and Administrators' Sal.	2300	0	0	0	0	0	0	0	0
Clerical and Office Salaries	2400	127,746	138,653	160,317	69,378	91,677	68,640	160,317	0
Other Non-certificated Salaries	2900	16,848	17,784	22,784	10,662	5,000	17,784	22,784	0
Total, Non-certificated Salaries		290,205	276,797	330,476	136,630	141,880	188,596	330,476	0
Description	Object Code	Original Budget	1st Interim	Board Approved 2nd Interim(B)	Actuals to Date	Second Interim Budget Unrestricted	Second Interim Budget Restricted	Second Interim Budget Total (D)	Difference (Col B & D)
3. Employee Benefits									
STRS	3101-3102	90,712	101,722	102,318	51,714	62,484	39,834	102,318	0
PERS	3201-3202	0	0	0	0	0	0	0	0
OASDI / Medicare / Alternative	3301-3302	29,088	29,079	33,902	14,573	14,619	19,283	33,902	0
Health and Welfare Benefits	3401-3402	45,254	45,254	45,254	29,058	10,740	34,514	45,254	0
Unemployment Insurance	3501-3502	3,826	3,841	3,849	3,051	2,004	1,845	3,849	0
Workers' Compensation Insurance	3601-3602	6,651	6,651	7,751	4,920	2,967	4,784	7,751	0
Retiree Benefits	3701-3702	0	3,600	3,600	2,100	3,600	0	3,600	0
PERS Reduction (for revenue limit funded schools)	3801-3802	0	0	0	0	0	0	0	0
Other Employee Benefits	3901-3902	0	0	0	0	0	0	0	0
Total, Employee Benefits		175,531	190,147	196,674	105,416	96,414	100,260	196,674	0
4. Books and Supplies									
Approved Textbooks and Core Curricula Materials	4100	6,632	7,689	7,689	2,139	7,689	0	7,689	0
Books and Other Reference Materials	4200	250	250	250	21	250	0	250	0
Materials and Supplies	4300	15,700	16,384	16,742	10,380	0	16,742	16,742	0
Non Capitalized Equipment	4400	44,357	109,540	109,540	52,942	70,070	39,470	109,540	0
Food	4700	0	0	0	0	0	0	0	0
Total, Books and Supplies		66,939	133,863	134,221	65,481	78,009	56,212	134,221	0
5. Services and Other Operating Expenditures									
Sub Agreements for Services	5100								
Travel and Conferences	5200	10,540	28,482	9,849	6,843	0	9,849	9,849	0
Dues and Memberships	5300	5,600	5,600	5,600	2,228	5,600	0	5,600	0
Insurance	5400	14,856	14,856	14,856	9,499	14,856	0	14,856	0
Operations and Housekeeping Services	5500	18,989	18,989	18,989	9,548	18,989	0	18,989	0
Rentals, Leases, Repairs, and Noncap. Improvements	5600	189,438	199,627	199,627	114,381	199,627	0	199,627	0
Professional/Consulting Services and Operating Expend.	5800	454,307	519,914	514,362	236,586	485,753	28,609	514,362	0
Communications	5900	2,409	2,898	2,409	932	2,409	0	2,409	0

Total, Services and Other Operating Expenditures		696,139	790,366	765,692	380,017	727,234	38,458	765,692	0
6. Capital Outlay									
(Objects 6100-6170, 6200-6500 for modified accrual basis only)									
Land and Land Improvements		6100-6170	0	0	0	0	0	0	0
Buildings and Improvements of Buildings		6200	0	0	0	0	0	0	0
Books and Media for New School Libraries or Major Expansion of School Libraries		6300	0	0	0	0	0	0	0
Equipment		6400	0	0	0	0	0	0	0
Equipment Replacement		6500	0	0	0	0	0	0	0
Depreciation Expense (for accrual basis only)		6900	29,820	29,820	29,820	29,820	0	29,820	0
Total, Capital Outlay			29,820	29,820	29,820	29,820	0	29,820	0
7. Other Outgo									
Tuition to Other Schools		7110-7143	0	0	0	0	0	0	0
Transfers of Pass-Through Revenues to Other LEAs		7211-7213	0	0	0	0	0	0	0
Transfers of Apportionments to Other LEAs - Spec. Ed.		7221-7223SE	0	0	0	0	0	0	0
Transfers of Apportionments to Other LEAs - All Other		7221-7223AO	0	0	0	0	0	0	0
All Other Transfers		7280-7299	0	0	0	0	0	0	0
Debt Service:									
Interest		7438	0	0	0	0	0	0	0
Principal (for modified accrual basis only)		7439	0	0	0	0	0	0	0
Total, Other Outgo			0	0	0	0	0	0	0
8. TOTAL EXPENDITURES			1,733,566	1,933,454	2,029,344	967,226	1,437,265	592,079	2,029,344
C. EXCESS (DEFICIENCY) OF REVENUES OVER EXPEND. BEFORE OTHER FINANCING SOURCES AND USES (A5-B8)			16,761	217,115	25,890	(145,824)	25,890	0	(0)
Description	Object Code	Original Budget	1st Interim	Board Approved 2nd Interim(B)	Actuals to Date	Second Interim Budget Unrestricted	Second Interim Budget Restricted	Second Interim Budget Total (D)	Difference (Col B & D)
D. OTHER FINANCING SOURCES / USES									
1. Other Sources		8930-8979	0	0	0	0	0	0	0
2. Less: Other Uses		7630-7699	0	0	0	0	0	0	0
3. Contributions Between Unrestricted and Restricted Accounts (must net to zero)		8980-8999	0	0	0			0	0
4. TOTAL OTHER FINANCING SOURCES / USES			0	0	0	0	0	0	0
E. NET INCREASE (DECREASE) IN FUND BALANCE (C + D4)			16,761	217,115	25,890	(145,824)	25,890	0	(0)
F. FUND BALANCE, RESERVES									
1. Beginning Fund Balance									
a. As of July 1		9791	320,636	399,986	399,986	399,986	0	399,986	0
b. Adjustments/Restatements to Beginning Balance		9793, 9795	30,118	0				0	0
c. Adjusted Beginning Balance			350,754	399,986	399,986	399,986	0	399,986	
2. Ending Fund Balance, Oct 31 (E + F.1.c.)			367,515	617,101	425,876	425,876	0	425,876	
Components of Ending Fund Balance:									
Reserve for Revolving Cash (equals object 9130)		9711	0	0	0	0	0	0	
Reserve for Stores (equals object 9320)		9712	0	0	0	0	0	0	
Reserve for Prepaid Expenditures (equals object 9330)		9713	0	0	0	0	0	0	
All Others		9719	0	0	0	0	0	0	
Legally Restricted Balance		9740	0	0	0		0	0	
Designated for Economic Uncertainties		9770	367,515	617,101	425,876	425,876		425,876	
Other Designations		9775, 9780				0	0	0	
Net Investment in Capital Assets (Accrual Basis Only)		9796	0	0	0	0	0	0	
Undesignated / Unappropriated Amount		9790	0	(0)	(0)	0	0	0	

To: Board of Directors, Empower Generations

Date: April 28, 2026

Subject: Review and Adopt Policy-***Appointment of Surrogate Parent for Special Education Student***

1. Recommendation

It is recommended that the Board of Directors approve the adoption of the **Appointment of Surrogate Parent for Special Education Student Policy**, effective April 28.

2. Background / Rationale

In accordance with federal and state requirements, Empower Generations must ensure that students with disabilities are appropriately represented in educational decision-making when a parent or guardian is unavailable or unable to serve in that role.

This policy establishes clear procedures for the identification and timely appointment of surrogate parents in qualifying circumstances, including when a student is a ward of the court, an unaccompanied homeless youth, or when no parent or guardian can be identified or located. It also defines the qualifications, responsibilities, and authority of surrogate parents to represent students in all matters related to special education services, including participation in the development and review of Individualized Education Programs (IEPs).

Adoption of this policy ensures compliance with applicable laws and safeguards each student's right to a free and appropriate public education (FAPE) through appropriate advocacy and representation.

3. Legal References

This policy has been reviewed for compliance and is aligned with applicable federal and state laws, including:

- Individuals with Disabilities Education Act (IDEA), 20 USC 1400–1482 • 34 CFR 300.1–300.818 and 300.519
- California Government Code 7579.5
- California Education Code 56050 and 56055
- Welfare and Institutions Code 300, 601, 602, 361, and 726

The policy is consistent with California School Boards Association (CSBA) model guidance and applicable legal standards.



Appointment of Surrogate Parent for Special Education Student Policy

Board Approved:

Conditions Necessitating a Surrogate

The School Director or designee shall appoint a surrogate parent to represent a student with disabilities under one or more of the following circumstances: (Government Code 7579.5; 20 USC 1415(b)(2); 34 CFR 300.519)

1. No parent/guardian for the student can be identified.
2. The LEA, after reasonable efforts, cannot discover the location of a parent or legal guardian of the student.
3. The student is adjudicated a dependent or ward of the court pursuant to Welfare and Institutions Code 300, 601 or 602 and all of the following conditions are satisfied:
 - a. The court has referred the student for special education and related services or the student has a valid individualized education program (IEP)
 - b. The court has specifically limited the right of the parent/guardian to make educational decisions for their child
 - c. The student has no responsible adult to represent them pursuant to Welfare and Institutions Code 361 or 726 or Education Code 56055
4. The student is an unaccompanied homeless youth not in the custody of a parent/guardian, as defined in 42 USC 11434a
5. The student has reached the age of majority but has been declared incompetent by a court of law

Appointment of Surrogate Parents

Upon a determination that a student needs a surrogate parent, the School Director or designee shall make reasonable efforts to ensure that the surrogate is appointed within 30 days. (20 USC 1412(b)(2)(B))

When appointing a surrogate parent, the School Director or designee shall give first preference to a relative caretaker, foster parent or court-appointed special advocate, provided any of these individuals exists and is willing and able to serve. If none of these individuals is willing or able to act as a surrogate parent, the School Director or designee shall select the surrogate parent of their choice. If the student is moved from the home of the relative caretaker or foster parent who was appointed as the student's surrogate parent, the School Director or designee shall appoint

another surrogate parent if a new appointment is necessary to ensure adequate representation of the student. (Government Code 7579.5)

The School Director or designee shall ensure that individuals to be appointed as surrogate parents have passed a criminal background check and have demonstrated interest and skill in working with students with disabilities.

Duties of Surrogate Parent

The surrogate parent shall have all the rights relative to the student's education that a parent has under the Individuals with Disabilities Education Act pursuant to 20 USC 1400-1482 and 34 CFR 300.1-300.818. The surrogate parent may represent the student in all matters relating to identification, assessment, instructional planning and development, educational placement, review and revision of the IEP, and in other matters relating to the provision of a free and appropriate public education. (Education Code 56050; Government Code 7579.5)

In addition, the representation of the surrogate parent shall include the provision of written consent to the IEP, including nonemergency medical services, mental health treatment services, and occupational or physical therapy services pursuant to Government Code 7570-7587. (Education Code 56050)

Surrogate parents shall volunteer their services to the LEA and serve without compensation.

Surrogate parents shall have access to the student's school records as necessary to fulfill their responsibilities as surrogate parents and in accordance with Board policy and administrative regulation.

Termination of Appointment

The School Director or designee shall terminate the appointment of a surrogate parent under the following conditions:

1. When the student is no longer in need of special education (Government Code 7579.5)
2. When the student reaches 18 years of age, unless they choose not to make education decisions for themselves or are deemed by a court to be incompetent (Government Code 7579.5)
3. Another responsible adult is appointed to make educational decisions for the student (Government Code 7579.5)
4. The right of the parent/guardian to make educational decisions for the student is fully restored (Government Code 7579.5)
5. When the surrogate parent no longer satisfies the requirements for appointment as a surrogate parent, as specified above

Uniform Complaint Procedures Policy

Board Meeting Month/Year	May 2026
Overview of Policy	The Uniform Complaint Procedures (UCP) Policy, developed per Title 5, CCR, § 4600 et seq., outlines rules for complaints alleging School violations of state and federal laws in specific educational programs and activities. The School is responsible for ensuring compliance and will investigate and resolve UCP complaints regarding noncompliance, discrimination, harassment, intimidation, bullying, and issues related to all UCP-subject programs.
Updates to Policy	• The entire policy was reviewed and updated by legal pursuant to current Ed Code. • Updates to contact information.



Uniform Complaint Procedures Policy

Board Approved: 06/18/2025

Board Revised Date:

The Board of Empower Generations Charter School (the “School”) recognizes that ~~they are the~~ **School** is responsible for complying with applicable state and federal laws and regulations governing educational programs.

This Uniform Complaint Procedures (“UCP”) Policy contains rules and instructions about UCP complaints regarding any alleged violation of ~~federal or state laws or regulations governing~~ certain educational programs and activities offered by the School. The School developed this UCP in accordance with Title 5, California Code of Regulations (CCR), §§ 4600 *et seq* ~~4687~~. The School has primary responsibility to ensure School’s compliance with applicable state and federal laws and regulations. ~~The and~~ School will investigate and seek to resolve, *in accordance with this UCP Policy*, complaints *alleging failure to comply with applicable state and federal laws and regulations including, but not limited to, allegations of discrimination, harassment, intimidation, or bullying or noncompliance with laws relating to all programs and activities implemented by the School that are subject to the UCP in accordance with this UCP policy.* This UCP has been approved by the School’s Board of Directors.

UCP Complaints

Not all complaints fall under the scope of the UCP. Complaints arising from the employment relationship are separately addressed by the School’s employment policies. Many concerns, including classroom assignments, grades, ~~graduation requirements~~, hiring and evaluation of staff, homework policies and practices, ~~learner advancement and retention~~, learner discipline, learner records, the Brown Act, and other general education requirements, are not UCP complaints. ~~The School, however,~~ *However, the School* may use these complaint procedures to address complaints not covered by the UCP in its sole discretion. Only allegations within the subject matters falling within the UCP can be appealed to the **California Department of Education** (“CDE”).

~~A UCP complaint is a written and signed statement alleging a violation of federal or state laws or regulations, which may include: complaints regarding certain programs and activities (list below); complaints alleging the charging of learner fees for participation in an educational activity; complaints regarding non-compliance with the requirements of the School’s Local~~

~~Control and Accountability Plans (“LCAP”); or an allegation of unlawful discrimination, harassment, intimidation, or bullying in certain programs or activities.~~

~~Complaints Regarding Programs and Activities~~

According to ~~applicable lawstate and federal codes and regulations~~, the programs and activities subject to the UCP are:

- Accommodations for Pregnant and Parenting Learners
- Adult Education **Programs**
- After School Education and Safety
- Agricultural Career **Technical Education**
- Career Technical and Technical Education; Career Technical and Technical Training **Programs**
- Childcare and Development Programs
- Compensatory Education
- Consolidated Categorical Aid Programs
- Course Periods without Educational Content (grades nine through twelve)
- ~~Complaints of Discrimination, Harassment, Intimidation and/or Bullying any protected group as identified in Education Code §§ 200 and 220 and Government Code § 11135, including any actual or perceived characteristics set forth in Penal Code § 422.55, based on sex, sexual orientation, gender, gender identity, gender expression, race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics, in any program or activity conducted by the School which is funded directly by, or that received or benefits from, any state financial assistance~~Discrimination, Harassment, Intimidation and/or Bullying against any protected group as identified in Education Code §§ 200 and 220 and Government Code § 11135, including any actual or perceived characteristics set forth in Penal Code § 422.55, or on the basis of a person’s association with a person or group with one or more of these actual or perceived characteristics, in any program or activity conducted by an educational institution, as defined in Education Code § 210.3, that is funded directly by, or that receives or benefits from, any state financial assistance. Unlawful discrimination further includes noncompliance with Education Code §§ 243(a) and 244.
- ~~Complaints Regarding the School’s LCAP~~
- Education and Graduation requirements of learners in foster care, learners who are homeless, learners from military families, learners formerly in Juvenile Court now enrolled in the School, learners who are migratory, and learners participating in a newcomer program
- ~~Education and Graduation requirements of Learners in Foster Care, Homeless Learners, former Juvenile Court Learners, and Learners of Military Families.~~
- Every Learner Succeeds Act (ESSA)
- Local Control and Accountability Plans (LCAP)
- Migrant **Child Education**
- Physical Education Instructional Minutes
- ~~Learner Pupil Fees, which includes a purchase that a learner is required to make to obtain materials, supplies, equipment or clothes associated with an educational activity~~
- Reasonable Accommodations to a Lactating Learner
- Regional Occupational Centers and Programs

- School or athletic team names, mascots, or nicknames
- School Plans for Learner Achievement
- ~~School Safety Plans~~
- State Preschool Health and Safety Issues in LEAs Exempt from Licensing
- State Preschool
- Schoolsite Councils
- ~~Technical Education~~
- Any other state or federal educational program the State Superintendent of Public Instruction (SSPI) ~~or the California Department of Education~~ or designee deems appropriate

The UCP Annual Notice

The School provides **written** notice of this UCP on an annual basis. The notice addresses all learners, employees, parents or guardians, school **advisory** committee members, appropriate private school officials or representatives (if applicable), and other interested parties. The notice includes information regarding allegations about discrimination, harassment, intimidation, or bullying. It lists all federal and state programs within the scope of the UCP. It lists the position at the School who is responsible for **processing UCP complaints** and **is** knowledgeable about ~~processing UCP complaints~~ the laws and programs that they are assigned to investigate, and the identity(ies) of the person(s) currently occupying the position if known. The School's annual UCP notice is in English. If 15% or more of learners enrolled at the School speak a single primary language other than English, the annual notice will be provided in that language as well pursuant to Education Code § 48985.

Designation of Responsible Employee

The School Director is the employee responsible for receiving, investigating and responding to UCP complaints (the "Responsible Employee"):

Sajae Davison
School Director
~~44248~~ 44236 10th Street West, Ste 105
 Lancaster, CA 93534
~~Info~~ director@empowergenerations.org
 (661) 429-3264

In no instance will the Responsible Employee be assigned to investigate a complaint in which ~~he or she has~~ **they have** a bias that would prohibit ~~him or her~~ **them** from fairly investigating or responding to the complaint. Any complaint against the Responsible Employee or that raises a concern about the Responsible Employee's ability to investigate the complaint fairly and without bias should be referred to **another** appropriate School official, who will help assist how the complaint will be investigated.

The School will ensure that the Responsible Employee (or designee) investigating the complaint is knowledgeable about the laws and programs at issue in the complaints. The School may consult with legal counsel as appropriate.

Confidentiality and Non-Retaliation

The School will ensure that complainants are protected from retaliation and that the identity of a complainant alleging discrimination, harassment, intimidation or bullying remains confidential as

appropriate.

Complaint Procedures

Step 1: Filing a UCP Complaint

A UCP complaint must be filed according to the procedures set forth herein.

Any individual, including a person's duly authorized representative or an interested third party, public agency, or organization, may file a UCP complaint. However, a complaint filed on behalf of a learner may only be filed by that learner or that learner's duly authorized representative.

A complaint alleging unlawful discrimination, harassment, intimidation, or bullying may be filed by a person who alleges that they personally suffered unlawful discrimination, harassment, intimidation, or bullying, or by a person who believes that ~~an individual or~~ any specific class of individuals has been subjected to the same, ~~or by a duly authorized representative who alleges that an individual student has been subjected to the same.~~

A UCP complaint is written and signed. If a complainant is unable to put their complaint in writing due to a disability or illiteracy, the School will assist the complainant in the filing of the complaint. A signature on a UCP complaint may be handwritten, typed (including in an email), or electronically-generated. Complaints related to learner fees and/or LCAPs may be filed anonymously ~~(that is, without an identifying signature)~~ if the complaint provides evidence or information leading to evidence to support an allegation of noncompliance.

~~Complainants are encouraged, but not required, to use the School's complaint form attached.~~

Complaints shall be filed with the Responsible Employee at the address provided herein. A pupil fees complaint may also be filed with the School's ~~Responsible Employee~~ Director or designee. The Responsible Employee will maintain a log of complaints and subsequent related actions to the extent required by oversight agencies.

Upon receipt of a complaint, the Responsible Employee (or designee) will evaluate the complaint to determine whether it is subject to this UCP and will endeavor to notify the complainant within five (5) workdays if the complaint is outside the jurisdiction of this UCP.

~~The Responsible Employee (or designee) may also determine if interim measures are necessary pending the result of an investigation. The interim measures shall remain in place until the Responsible Employee (or designee) determines that they are no longer necessary or until the School issues its final written Investigation Report, whichever occurs first.~~

Timing of Complaints and Investigation

A complaint alleging unlawful discrimination, harassment, intimidation, or bullying shall be filed no later than six (6) months from the date when the alleged unlawful discrimination, harassment, intimidation or bullying occurred or the complainant first obtained knowledge of it. The time for filing may be extended by the Responsible Employee (or designee) for good cause upon written request from the complainant. Such extension shall be in writing and may not exceed ninety (90) days following the expiration of the six-month period.

All other complaints shall be filed no later than one (1) year from the date the alleged violation occurred, except for complaints regarding the educational rights of foster youth as specified in 5

CCR § 4630.5. For complaints regarding LCAP, the date of the alleged violation is the date when the School's governing board approves the LCAP or annual update.

Unless a UCP complaint is resolved through mediation as set forth below, ~~the~~ School will investigate the UCP complaint and issue a written Investigation Report to the complainant within 60 calendar days from the date of receipt of the complaint, unless the complainant agrees in writing to an extension of time.

Step 2: Mediation

The Responsible Employee may informally discuss with the complainant the possibility of using mediation. If the complainant agrees to mediation, the Responsible Employee shall make arrangements for this process.

Before initiating the mediation of an unlawful discrimination, harassment, intimidation, or bullying complaint, the Responsible Employee shall ensure that all parties agree to make the mediator a party to related confidential information.

~~The Responsible Employee (or designee) and complainant may mutually agree to mediation. Any School employee or member of the School's governing board who has not been involved with the allegations in the complaint may be assigned by the Responsible Employee (or designee) to serve as mediator. The mediator will arrange for both the complainant and School to present relevant evidence. The Responsible Employee (or designee) will inform the complainant that the mediation process may be terminated at any time by either the School or complainant, in which case the complaint will and proceed directly to an investigation.~~

If mediation resolves the complaint to the satisfaction of both parties, the School will implement any remedial measures and the complainant may choose to withdraw the complaint. If mediation does not resolve the complaint ~~to the satisfaction of both parties or~~ within the parameters of law, the Responsible Employee ~~(or designee)~~ shall proceed with ~~his/her~~ ~~their~~ investigation of the complaint.

The use of mediation does not extend the School's timelines for investigating and resolving the complaint unless the complainant agrees in writing to such an extension of time.

Step 3: Investigation of Complaint

In order to investigate the complaint, the Responsible Employee (or designee) shall have access to applicable School records and/or information related to the complaint allegations. As part of his/her investigation, the Responsible Employee (or designee) will do all of the following, in any order:

- Provide an opportunity for the complainant ~~and/or complainant's~~ representatives ~~and the School's representative~~ to present ~~evidence or~~ information relevant to the complaint or investigative process.
- Obtain statements from individuals/witnesses who can provide relevant information concerning the alleged violation.
- Review documents that may provide information relevant to the allegation.
- When necessary, seek clarification on specific complaint issues.

Refusal by the complainant or ~~his/her~~ ~~their~~ representatives to provide the Responsible Employee (or designee) with documents or other evidence related to the allegations in the complaint, or

failure or refusal to cooperate or obstruction of the investigation, may result in dismissal of complaint because of a lack of evidence to support the allegations.

Refusal by the School to provide the Responsible Employee (or designee) with **access to records and/or other information**~~documents or other evidence~~ related to the allegations in the complaint, or failure or refusal to cooperate or obstruction of the investigation, may result in a finding, based on evidence collected, that a violation has occurred and may result in the imposition of a remedy in favor of the complainant.

Step 4: Final Written Decision (Investigation Report)

The Responsible Employee (or designee) shall prepare and send to the complainant a written report of the investigation and final decision (the “Investigation Report”) within sixty (60) calendar days of receipt of the complaint, unless the complainant agrees to extend this date. The School’s Investigation Report shall be written in English and, when required by law, in the complainant’s primary language.

The Investigation Report shall include:

1. The finding(s) of fact based on the evidence gathered;
2. Conclusion providing a clear determination as to each allegation as to whether the School is in compliance with the relevant law;
3. If the School finds merit in the complaint, the corrective actions required by law;
4. Notice of the complainant’s right to appeal the School’s Investigation Report to the CDE, except when the School has used its UCP to address a non-UCP complaint; and
5. Procedures to be followed for initiating an appeal to the CDE.

In addition, any Investigation Report on a complaint of discrimination, harassment, intimidation or bullying based on state law shall include a notice that the complainant must wait until sixty (60) calendar days have elapsed from the filing of an appeal with the CDE before pursuing civil law remedies.

An Investigation Report shall not include learner information protected under the Family Educational Rights and Privacy Act (FERPA) or any private employee personnel information, including but not limited to the nature of the disciplinary action taken against a learner or employee. If a learner or employee is disciplined as a result of the complaint, the Investigation Report shall simply state that effective action was taken and that the learner or employee was informed of the School’s expectations.

If the School finds merit in a complaint regarding pupil fees, **course periods without education content**, physical education instructional minutes, or LCAP, the remedy will go to all affected learners and parents/guardians. **With respect to a pupil fee complaint, t**~~he~~ **School, in good faith, will engage in reasonable efforts to identify and fully reimburse all learners, parents and guardians who paid any unlawful learner fee within one (1) year prior to the filing of the complaint. For all other complaints within the scope of this UCP, the remedy shall go to the affected learner.**

Appeal Process

A complainant may appeal the School’s Investigation Report by filing a written appeal within thirty (30) calendar days of the date of the Investigation Report to the California Department of Education (“CDE”). This appeal to the CDE must specify and explain the basis for the appeal,

including at least one of the following:

1. The School failed to follow its complaint procedures;
2. Relative to the allegations of the complaint, the Investigation Report lacks material findings of fact necessary to reach a conclusion of law;
3. The material findings of fact in the Investigation Report are not supported by substantial evidence;
4. The legal conclusion in the Investigation Report is inconsistent with the law; and/or
5. In a case in which the School found noncompliance, the corrective actions fail to provide a proper remedy.

The appeal must be sent to CDE with: (1) a copy of the locally filed complaint; and (2) a copy of the School's Investigation Report. ~~As of the date of adoption of this UCP, an online Appeal Assistance Form is available on the CDE website at [Appeal Assistance Form - Complaint Procedures](#) (CA Department of Education).⁴~~

~~Appeals of decisions regarding discrimination, harassment, intimidation, and/or bullying, and regarding provision of accommodations to lactating learners should be sent to:~~
~~California Department of Education~~
~~Education Equity UCP Appeals~~
~~Office 1430 N Street~~
~~Sacramento, CA 95814~~
~~916-319-8239~~

~~Appeals of decisions regarding LCAP should be sent to:~~
~~California Department of Education~~
~~Local Agency Systems Support~~
~~Office 1430 N Street~~
~~Sacramento, CA 95814~~
~~916-319-0809~~

~~Appeals of decisions regarding learner fees or all other educational program complaints should be sent to:~~
~~California Department of Education~~
~~Categorical Programs Complaints Management Office~~
~~1430 N Street~~
~~Sacramento, CA 95814~~
~~916-319-0929~~

Upon notification by CDE that the complainant appealed the School's Investigation Report, the School shall forward all documents as required by 5 CCR 4633 to CDE within ten (10) calendar days of the date of notification. The Responsible Employee shall also notify the School's Human Resource Department.

The CDE may directly intervene in the complaint without waiting for action by the School when one of the conditions listed in Title 5, ~~California Code of Regulations-CCR~~, § 4650 exists, including cases in which the School has not taken action within sixty (60) days of the date the complaint was filed with the School. A direct complaint to CDE must identify the basis for direct filing of the complaint, which must include evidence that supports such a basis.

Civil Law Remedies

A complainant may pursue available civil law remedies under state or federal discrimination, harassment, intimidation or bullying laws, **as applicable**. Complainants may seek assistance from mediation centers or public/private interest attorneys. Civil law remedies that may be imposed by a court include, but are not limited to, injunctions and restraining orders.

UCP Requirements Regarding State Preschool Health and Safety Issues Pursuant to HSC Section 1596.7925

To file a UCP complaint regarding a state preschool health and safety issue pursuant to HSC Section 1596.7925 the complainant must file with the school's preschool program administrator or their designee. The School does not currently operate a preschool program.

A state preschool health and safety issues complaint about problems beyond the authority of a school's preschool program administrator shall be forwarded in a timely manner, but not to exceed 10 working days to the appropriate school official for resolution.

A state preschool health and safety issues complaint may be filed anonymously. A complainant who identifies themselves is entitled to a response if they indicate that a response is requested. A complaint form shall include a space to mark to indicate whether a response is requested. If Education Code Section 48985 is otherwise applicable, the response, if requested, and the school's Investigation Report shall be written in English and the primary language in which the complaint was filed.

A complaint form for a state preschool health and safety issue shall specify the location for filing a complaint. A complainant may add as much text to explain the complaint as they wish.

When investigating a UCP state preschool health and safety issue the preschool program administrator or the school's designee shall make all reasonable efforts to investigate any problem within their authority, and investigations shall begin within 10 calendar days of the receipt of the complaint. A valid complaint shall be remedied within a reasonable time period, but not to exceed 30 working days from the date the complaint was received. The resolution of the complaint shall be reported to the complainant within 45 working days of the initial filing. If the preschool program administrator makes this report, they shall also report the same information in the same timeframe to the school's designee.

Filing an Appeal Regarding UCP State Preschool Health and Safety Issues

A complainant not satisfied with the resolution of the preschool program administrator or the school's designee has the right to describe the complaint at a regularly scheduled hearing of the board. A complainant will not be precluded from filing an appeal to the State Superintendent of Public Instruction ("SSPI") if the complainant does not file a local appeal.

A complainant who is not satisfied with the resolution proffered by the preschool program administrator or the school's designee has the right to file an appeal to the SSPI within 30 calendar days of the date of the Investigation Report.

The complainant shall comply with the same appeal requirements of 5 CCR section 4632.

The school shall report summarized data on the nature and resolution of all UCP state preschool health and safety issues complaints on a quarterly basis to the county superintendent of schools and its board. The summaries shall be publicly reported on a quarterly basis at a regularly scheduled meeting

of the school's board. The report shall include the number of complaints by general subject area with the number of resolved and unresolved complaints.

All complaints and responses are public records.

ANNUAL NOTIFICATION OF THE UNIFORM COMPLAINT PROCEDURES (UCP)

For learners, employees, parents/guardians, school committee members, school officials, and other interested parties.

Empower Generations Charter School (“Charter School”) annually notifies learners, employees, parents or guardians, and other interested parties of the Uniform Complaint Procedures (“UCP”) process. The Charter School is primarily responsible for compliance with federal and state laws and regulations, including those related to unlawful discrimination, harassment, intimidation or bullying against any protected group, and all programs and activities that are subject to the UCP.

1. Programs and Activities Subject to the UCP

- Accommodations for Pregnant and Parenting Learners
- Adult Education **Programs**
- After School Education and Safety
- Agricultural Career Technical Education
- Career Technical and Technical Education; Career Technical and Technical Training **Programs**
- Childcare and Development Programs
- Compensatory Education
- Consolidated Categorical Aid Programs
- Course Periods without Educational Content (grades nine through twelve)
- ~~Complaints of~~ Discrimination, Harassment, Intimidation and/or Bullying any protected group as identified in Education Code §§ 200 and 220 and Government Code § 11135, including any actual or perceived characteristics set forth in Penal Code § 422.55, **or on the basis of a person’s association with a person or group with one or more of these actual or perceived characteristics, in any program or activity conducted by an educational institution, as defined in Educational code § 210.3, that is funded directly by, or that receives or benefits from, any state financial assistance. Unlawful discrimination further includes noncompliance with education code §§ 243(a) and 244. based on sex, sexual orientation, gender, gender identity, gender expression, race or ethnicity, ethnic group identification, ancestry, nationality, national origin, religion, color, mental or physical disability, age, immigration status, or on the basis of a person’s association with a person or group with one or more of these actual or perceived characteristics, in any program or activity conducted by the Charter School which is funded directly by, or that received or benefits from, any state financial assistance**
- Education and Graduation requirements of learners in Foster Care, ~~Homeless Learners, former Juvenile Court Learners, and Learners of Military Families~~ learners who are homeless, learners from military families, learners formerly in Juvenile Court now enrolled in a school, learners who are migratory, and learners participating in a newcomer program
- Every Student Succeeds Act
- **Local Control and Accountability Plans (LCAP)**
- Migrant **Child** Education
- Physical Education Instructional Minutes
- **Pupil Fees**
- Reasonable Accommodation to a Lactating Learner
- Regional Occupational Centers and Programs
- School Plan for ~~Learner~~ **Student** Achievement
- **School or athletic team names, mascots or nicknames**
- Schoolsite Councils
- State Preschool Health and Safety Issues in LEAs Exempt from Licensing
- State Preschool

- Any other state or federal educational program the State Superintendent of Public Instruction (SSPI) or designee deems appropriate
- ~~School Safety Plans~~
- ~~Learner Fees, which includes a purchase that a learner is required to make to obtain materials, supplies, equipment or clothes associated with an educational activity~~
- ~~Charter School's LCAP~~

2. Filing a UCP Complaint

Generally, a UCP complaint shall be filed no later than one year from the date the alleged violation occurred. ~~However, the one-year timeline shall not apply to complaints regarding the educational rights of students experiencing foster care per 5 CCR 4630.5.~~ Complaints alleging unlawful discrimination, harassment, intimidation, or bullying shall be initiated no later than six (6) months from the date when the alleged unlawful discrimination, harassment, intimidation or bullying occurred, or six (6) months from the date the complainant first obtained knowledge of the facts of the alleged unlawful discrimination, harassment, intimidation, or bullying. For complaints relating to Local Control and Accountability Plans ("LCAP"), the date of the alleged violation is the date when the reviewing authority approves the LCAP or annual update that was adopted by the Charter School.

Complaints Concerning ~~Learner~~ Pupil Fees

A learner enrolled in the Charter School shall not be required to pay a ~~learner~~ pupil fee for participation in an educational activity. A ~~learner~~ pupil fees complaint may be filed with the ~~Executive School~~ Director or designee.

A ~~learner~~ pupil fee includes, but is not limited to, all of the following:

1. A fee charged to a learner as a condition for registering for school or classes, or as a condition for participation in a class or an extracurricular activity, regardless of whether the class or activity is elective or compulsory, or is for credit.
2. A security deposit, or other payment, that a learner is required to make to obtain a lock, locker, book, class apparatus, musical instrument, clothes, or other materials or equipment.
3. A purchase that a learner is required to make to obtain materials, supplies, equipment, or clothes associated with an educational activity.

A ~~learner~~ pupil fee or LCAP complaint may be filed anonymously (without an identifying signature) if the complainant provides evidence or information leading to evidence to support an allegation of noncompliance.

Designated Official

The designated official ("Responsible Employee") to receive and investigate complaints is:

Sajae Davison
 School Director
 44248 44236 10th Street West, Ste 105
 Lancaster, CA 93534
~~Infedirector~~@empowergenerations.org

(661) 429-3264

The Charter School will ensure that the Responsible Employee and other employees who may be assigned to investigate complaints are knowledgeable about the laws and programs at issue in the complaints for which they are responsible.

3. Investigation Report and Right to Appeal

Complaints will be investigated and an Investigation Report will be sent to the complainant within sixty (60) calendar days from the receipt of the complaint. This time period may be extended by written agreement of the complainant. The person responsible for investigating the complaint shall conduct and complete the investigation in accordance with the Charter School's UCP policies and procedures.

The complainant has a right to appeal the Charter School's decision concerning complaints regarding specific programs and activities subject to the UCP to the California Department of Education ("CDE") by filing a written appeal within thirty (30) calendar days of receiving our decision. The appeal must be accompanied by a copy of the originally-filed complaint and a copy of the Investigation Report.

4. Charter School's Responsibilities

The Charter School advises complainants of the opportunity to appeal an Investigation Report of complaints regarding programs within the scope of the UCP to the CDE.

The Charter School advises complainants of civil law remedies, including injunctions, restraining orders, or other remedies or orders that may be available under state or federal discrimination, harassment, intimidation or bullying laws, if applicable. A complainant may pursue available civil law remedies outside of the Charter School's complaint procedures.

~~The Charter School provides a standardized notice with educational and graduation requirements for learners in foster care, learners who are homeless, learners from military families and learners formerly in Juvenile Court now enrolled in a school district. The following is link to a standardized notice developed by the California Foster Youth Education Task Force of the educational rights of learners in foster care, learners who are homeless, former juvenile court learners now enrolled in a school district, and learners in military families as specified in Education Code sections 48853, 48853.5, 49069.5, 51225.1, and 51225.2: http://www.cfycf.org/publications_19_421458854.pdf.~~

~~Copies of the UCP policy shall be available free of charge.~~

All Charter School learners have a right to a free public education, regardless of immigration status or religious beliefs. For more information about this issue, we recommend families review the "Know Your Rights" immigration enforcement established by the California Attorney General and available on the California Attorney General website here: <https://oag.ca.gov/immigrant/rights>. The Charter School shall inform learners who are victims of hate crimes of their right to report such crimes.

For UCP Complaints Regarding State Preschool Health and Safety Issues Pursuant to Section 1596.7925 of the California Health and Safety Code

In order to identify appropriate subjects of state preschool health and safety issues pursuant to Section 1596.7925 of the California Health and Safety Code (HSC), a notice shall be posted in each California state preschool program classroom in each school in a local educational agency. The Charter School does not currently operate a preschool program.

The notice is in addition to this UCP annual notice and addresses parents, guardians, pupils, and teachers of (1) the health and safety requirements under Title 5 of the California Code of Regulations (5 CCR) that apply to California state preschool programs pursuant to HSC Section 1596.7925, and (2) the location at which to obtain a form to file a complaint.

COMMUNITY COMPLAINT FORM

Name _____
Address _____



Telephone _____

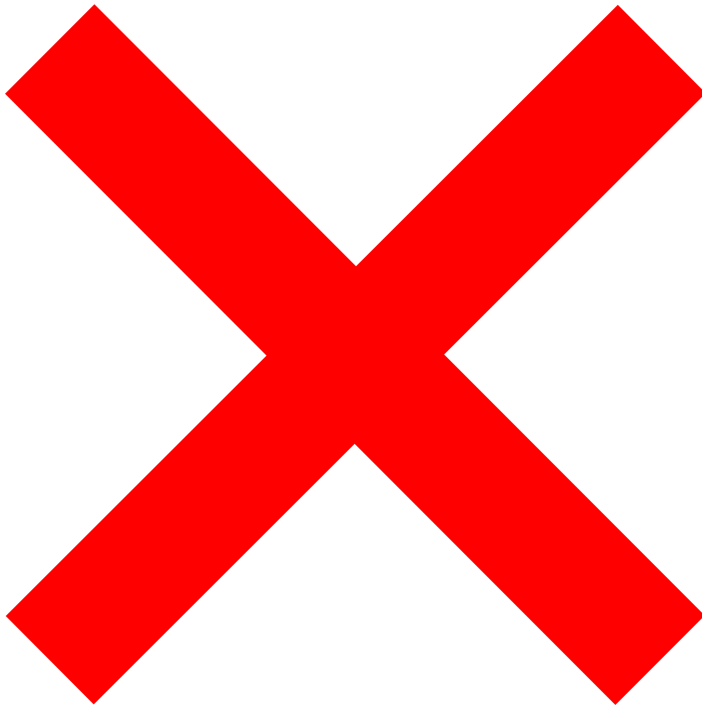
1 School site and person you are filing a complaint against:

2 Has this been discussed with him/her? Y_N Date:

3 Has the complaint been discussed with the principal or supervisor? Y____N____Date:
Description of Complaint: Please include all important information such as location, names, dates, who was present, and to whom it was reported. Please use additional paper if more space is needed

What remedy or action do you suggest?

Signature:



**Email Form To: info@empowergenerations.org Mail Form To: 44236 10th St. West, Suite 105
Lancaster, CA 93535 Date received by Empower Generations Office :**

UCP COMPLAINT FORM

This Complaint Form may be used to file a complaint subject to Empower Generation Charter School's Uniform Complaint Procedures Policy. Complaints concerning pupil fees and/or the LCAP may be filed anonymously if the complaint provides evidence or information leading to evidence to support an allegation of noncompliance. However, if you wish to receive a response, you must provide contact information. Complaints shall be handled in a confidential manner to respect the privacy of all parties to the fullest extent possible. Retaliation in any form for filing of a complaint is prohibited.

Response requested: ☐ Yes ☐ No

Name (Optional for Pupil Fee & LCAP Complaints):	Mailing Address (Optional):
Phone Number (Optional):	Email Address (Optional):

Issue of complaint (please check all that apply):

- ☐ Pupil Fees
- ☐ Local Control and Accountability Plan ("LCAP")
- ☐ Discrimination, Harassment, Intimidation, or Bullying in Programs or Activities
- ☐ Other Complaint Re: Programs and Activities

Date(s) of Problem: _____

Location of Problem (school name, address, and room number or location): _____

Describe the specific nature of the complaint in detail. You may include as much text as necessary: _____

Signature: _____ Date: _____

Please file this complaint with the following Responsible Employee:

Sajae Davison
School Director
44248 44236 10th Street West, Ste 105
Lancaster, CA 93534
Info director@empowergenerations.org
(661) 429-3264

Employee, Harassment, Discrimination, & Retaliation Prevention Policy

Board Meeting Month/Year	May 2026
Overview of Policy	This policy establishes the School's commitment to maintaining a respectful, inclusive workplace free from discrimination, harassment, and retaliation, and outlines prohibited behaviors based on legally protected characteristics. It requires employees to report concerns promptly and ensures that all complaints are investigated thoroughly, impartially, and addressed with appropriate corrective action. Retaliation against individuals who report or participate in investigations is strictly prohibited.
Updates to Policy	Existing policy fully rewritten based on updates to the law.



Employee Harassment, Discrimination, and Retaliation Prevention Policy
Board Approved: July 7, 2020
Revised Board Approved:

It is the policy of Empower Generations (“Empower Generations” or the “School”) to create and maintain a work environment where employees are treated with dignity, decency and respect. It is also the policy of Empower Generations to maintain an environment that encourages and fosters appropriate conduct among all persons and respect for individual values. Accordingly, the School is committed to enforcing this Harassment, Discrimination and Retaliation Prevention Policy at all levels in order to create an environment free from all forms of discrimination, harassment and retaliation. Discrimination, harassment or retaliation based on race (traits associated with race, such as hair texture or hairstyle), religious creed (including religious dress and grooming practices), color, national origin (including language use restrictions and possession of a driver’s license issued to undocumented immigrants), ancestry, physical or mental disability (including developmental, mental health/psychiatric, and HIV/AIDS), medical condition (genetic characteristics, cancer, or a record or history of cancer), genetic information, marital status, sex (including pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy or childbirth), reproductive health decision making, gender, gender identity, gender expression, age, sexual orientation, military and veteran status, or any other legally protected category is unlawful and undermines the character and purpose of the School. Such discrimination, harassment or retaliation violates School policy and will not be tolerated. This policy applies to anyone an employee comes into contact, including coworkers, third parties, supervisors, managers and students.

Any form of retaliation against anyone who has complained or formally reported discrimination or harassment or has participated in an investigation of such a complaint, regardless of whether the complaint relates to the complaining person or someone else, will not be tolerated and violates this policy and the law.

Definitions

Discrimination: Discrimination is the adverse treatment of any employee based on the protected class or category of persons to whom they belong with respect to the terms, conditions, or privileges of employment including, but not limited to hiring, firing, promoting, disciplining, scheduling, training, or deciding how to compensate that employee.

Harassment: Harassment is unwelcome verbal or physical conduct prohibited by law directed toward, or differential treatment of, an employee because of their membership (or perceived membership) in any protected group or on any other prohibited basis. The harasser can be the employee's supervisor, a manager, a co-worker or someone who is not an employee of the school, such as a vendor, parent, or student.

Examples of such conduct include, but are not limited to:

- Offensive or degrading remarks, verbal abuse, or other hostile behavior such as insulting, teasing, mocking, degrading or ridiculing another person or group
- Racial slurs, derogatory remarks about a person's accent, or display of racially offensive symbols
- Unwelcome or inappropriate physical contact, comments, questions, advances, jokes epithets or demands
- Physical assault or stalking
- Displays or electronic transmission of derogatory, demeaning or hostile materials
- Unwillingness to train, evaluate, assist or work with an employee

Sexual Harassment: Sexual harassment is a form of harassment based on sex, including sexual harassment, gender harassment and harassment based on pregnancy, childbirth or related medical conditions. It generally involves unwanted sexual advances, or visual, verbal or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list of violations:

- Unwanted sexual advances
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct: leering, making sexual gestures, displaying of suggestive objects or pictures, cartoons or posters
- Verbal conduct: making or using derogatory comments, epithets, slurs and jokes
- Verbal sexual advances or propositions
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes or invitations
- Physical conduct: touching, assault, impeding or blocking movements

Hostile Work Environment: A hostile work environment results from harassing conduct that has the purpose or effect of unreasonably interfering with an employee's work performance, or creates an intimidating, hostile or offensive work environment.

Retaliation: Retaliation is any adverse action taken against an individual (applicant or employee) because they filed a charge of discrimination, complaint to the School or another agency about discrimination on the job or participated in an employment discrimination proceeding (such as an internal investigation or lawsuit), including as a witness. Retaliation also includes adverse action taken against someone who is associated with the individual opposing the perceived discrimination.

Reporting Discrimination, Harassment or Retaliation

Any employee who believes that they have been the victim of discrimination, harassment or retaliation prohibited by this policy, or any employee who has witnessed such discrimination, harassment or retaliation, should immediately report the circumstances in accordance with the procedure set forth below. The School will investigate any conduct that violates this policy, even in the absence of a complaint, and take remedial action where appropriate.

An employee may make a complaint, written or oral, to any of the individuals listed below:

- The employee's direct supervisor
- Any other supervisor
- The Human Resources Department

Complaints may be submitted to the Human Resources by any of the following methods:

- By phone at 661-214-5520
- By email at hr@ileadcalifornia.org
- By mail at 29477 The Old Road, Castaic, CA 91384

If the person to whom the complaint is directed has a personal relationship with the accused individual or otherwise a conflicting interest, they will forward it to a neutral party.

Any supervisor that receives any complaints of misconduct, or personally observe, learn about from others, or reasonably suspect has occurred, shall report the same to the Human Resources Department, so that the School may attempt to resolve the claim internally.

Complaints may also be submitted to the U.S. Equal Opportunity Commission (EEOC) or the California Civil Rights Department (CRD).

Investigation and Disposition of Complaints

The School will conduct a prompt, thorough and impartial investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The investigation, conducted by a qualified investigator(s), will include an interview with the alleged employee-victim. It may also include interviews with the person who made the initial report, the complainant (if not the alleged victim), the alleged wrongdoer and/or any other person who may have information regarding the incident, each of whom are encouraged to cooperate with any investigation. The investigator may also review any relevant documents.

The School will endeavor to complete its investigation within thirty (30) days of a report of discrimination or harassment.

Confidentiality of the complaint and investigation will be kept by the School to the extent possible, but note that the investigation will not be completely confidential.

The investigator will report their findings to the Director and/or Human Resources Department. Where the investigator concludes that a violation of this policy has occurred, the Director and/or Human Resources Department will take prompt and appropriate remedial action, including disciplinary action. Depending upon the circumstances, disciplinary action may include, but is not limited to: reprimand/verbal counseling, training, censure, removal of privileges, letters of warning or suspension, and termination. Discipline for a violation of this policy is not progressive, so a first violation of this policy may warrant suspension or discharge. This policy does not alter the at-will status of the employment relationship with the School.

Every complaint will trigger the creation of an investigatory file. The investigatory file will consist of the initial complaint, the final investigative report, including a record of remedial action to be taken, if any, and all documents created, used or reviewed during the investigation. The investigatory file will be maintained with the Human Resources Department. The progress of the investigation shall be monitored by Human Resources through a periodic review of the investigatory file during the investigation.

HARASSMENT/DISCRIMINATION/RETALIATION COMPLAINT FORM

It is the policy of the School that all of its employees be free from harassment, discrimination, and retaliation. This form is provided for you to report what you believe to be harassment, discrimination, or retaliation so that the School may investigate and take appropriate disciplinary or other action when the facts show that there has been harassment, discrimination, or retaliation.

If you are an employee of the School, you may file this form with the School Director or the School's Board of Directors.

Please review the School's policies concerning harassment, discrimination, and retaliation for a definition of such unlawful conduct and a description of the types of conduct that are considered unlawful.

Empower Generations will undertake every effort to handle the investigation of your complaint in a confidential manner. In that regard, the School will disclose the contents of your complaint only to those persons having a need to know. For example, to conduct its investigation, the School will need to disclose portions of your factual allegations to potential witnesses, including anyone you have identified as having knowledge of the facts on which you are basing your complaint, as well as the alleged offender.

In signing this form below, you authorize the School to disclose to others the information you have provided herein, and information you may provide in the future. Please note that the more detailed information you provide, the more likely it is that the School will be able to address your complaint to your satisfaction.

Charges of harassment, discrimination, and retaliation are taken very seriously by the School both because of the harm caused by such unlawful conduct, and because of the potential sanctions that may be taken against the offender. It is therefore very important that you report the facts as accurately and completely as possible and that you cooperate fully with the person or persons designated to investigate your complaint.

Your Name: _____ Date: _____

Address: _____

Phone: _____ Email: _____

Date of Alleged Incident(s): _____

Name of Person(s) you believe harassed, or discriminated or retaliated against, you or someone else:

List any witnesses that were present: _____

Where did the incident(s) occur? _____

Please describe the events or conduct that are the basis of your complaint by providing as much factual detail as possible (i.e. specific statements; what, if any, physical contact was involved; any verbal statements; what did you do to avoid the situation, etc.) (Attach additional pages, if needed):

I acknowledge that I have read and that I understand the above statements. I hereby authorize the School to disclose the information I have provided as it finds necessary in pursuing its investigation.

I hereby certify that the information I have provided in this complaint is true and correct and complete to the best of my knowledge and belief.

Signature of Complainant

Date: _____

Print Name

To be completed by the School:

Received by: _____ Date: _____

Learner Suspension & Expulsion Policy

Board Meeting Month/Year	May 2026
Overview of Policy	The Learner Suspension and Expulsion Policy promotes learner safety and well-being through fair disciplinary enforcement, which includes providing interventions. It details the specific grounds and procedures for suspensions and expulsions, while explicitly prohibiting corporal punishment and certain behavioral restraints, and providing due process protections for learners with disabilities.



Learner Suspension and Expulsion Policy

Board Approved:

Introduction

This Learner Suspension and Expulsion Policy (the “Policy”) for Empower Generations (“School”) has been established in order to promote learning and protect the safety and well-being of all learners. When the Policy is violated, it may be necessary to suspend or expel a learner from regular classroom instruction. At the same time, the School intends to provide effective interventions for learners who engage in acts of problematic behavior to help them change their behavior and avoid exclusion from the School.

Staff shall enforce disciplinary rules and procedures fairly and consistently among all learners and accord all learners with similar rights to due process. In addition to the suspension and expulsion policies required for this charter, the School will develop its learner discipline policies and procedures which shall be distributed to each learner/parent/guardian (including incoming learners who transfer midyear) as part of the Learner/Family Guidebook and posted on the website. The notice shall state that these disciplinary rules and procedures are available on request.

Discipline includes, but is not limited to, advising and counseling learners, conferring with parents/guardians, community service on or off campus, the use of alternative educational environments, suspension and expulsion. Corporal punishment shall not be used as a disciplinary measure against any learner. Corporal punishment includes the willful infliction of, or willfully causing the infliction of, physical pain on a learner. For purposes of the Policy, corporal punishment does not include an employee’s use of reasonable force necessary to protect the employee, learners, staff or other persons or to prevent damage to school property.

A learner has the right to be free from the use of seclusion and behavioral restraints of any form imposed as a means of coercion, discipline, convenience, or retaliation by staff. This right includes, but is not limited to, the right to be free from the use of a drug administered to the learner in order to control the learner’s behavior or to restrict the learner’s freedom of movement, if that drug is not a standard treatment for the learner’s medical or psychiatric condition. School staff may use seclusion or a behavior restraint only to control behavior that poses a clear and present danger of serious physical harm to the learner or others that cannot be immediately prevented by a response that is less restrictive. School staff shall avoid, whenever possible, the use of seclusion or behavioral restraint techniques.

School staff shall not do any of the following:

- Use seclusion or a behavioral restraint for the purpose of coercion, discipline, convenience, or retaliation.
- Use locked seclusion, unless it is in a facility otherwise licensed or permitted by state law to use a locked room.
- Use a physical restraint technique that obstructs a learner's respiratory airway or impairs the learner's breathing or respiratory capacity, including techniques in which a staff member places pressure on a learner's back or places the staff member's body weight against the learner's torso or back.
- Use a behavioral restraint technique that restricts breathing, including, but not limited to, using a pillow, blanket, carpet, mat, or other item to cover a learner's face.
- Use a prone restraint.
- Use a behavioral restraint for longer than is necessary to contain the behavior that poses a clear and present danger of serious physical harm to the learner or others.

A learner identified as an individual with disabilities or for whom the School has a basis of knowledge of a suspected disability pursuant to the Individuals with Disabilities in Education Act ("IDEA") or who is qualified for services under Section 504 of the Rehabilitation Act of 1973 ("Section 504") is subject to the same grounds for suspension and expulsion and is accorded the same due process procedures applicable to regular education learners except when federal and state law mandates additional or different procedures. The School will follow Section 504, the IDEA, the Americans with Disabilities Act of 1990 ("ADA") and all applicable federal and state laws when imposing any form of discipline on a learner identified as an individual with disabilities or for whom the School has a basis of knowledge of a suspected disability or who is otherwise qualified for such services or protections in according due process to such learners.

Suspension

Definition

Suspension is the temporary removal of a learner from class instruction for adjustment or disciplinary reasons. Suspension does not mean any of the following:

- Reassignment to another education program or class at the School where the learner will receive continuing instruction for the length of day prescribed by the Board for learners of the same grade level;
- Referral to a certificated employee designated by the School Director or designee to advise learners;
- Removal from the class, but without reassignment to another class for the remainder of the class period without sending the learner to the School Director or designee.

While suspended, the learner may not loiter on or about any School grounds at any time, nor attend or participate in any School activity at any time, no matter where such activity is taking place. Violation may result in further disciplinary action.

The School shall consider suspension from School only when other means of correction fail to bring about proper conduct or where the learner's presence would constitute a danger to persons or property or seriously disrupt the educational process.

Authority to Suspend

The School Director or designee may suspend a student from class, classes or the school for a period not to exceed five days. The School Director or designee may extend a student's suspension pending final decision by the Board of Directors of the School on a recommendation for expulsion. Such extended suspension should not exceed 10 days, unless specific procedural safeguards are met. Those are identified below.

On a recommendation for expulsion, the Board of Directors may suspend a special education learner being considered for expulsion in accordance with the laws relating to expulsion of special education learners.

A learner may be suspended or expelled for acts that are enumerated in this Policy and related to school activity or attendance that occur at any time, including, but not limited to any of the following:

- While on school grounds
- While going to or coming from school
- During the lunch period, whether on or off the school campus
- During, or while going to or coming from a school sponsored activity
- All acts related to school activity or school attendance occurring within the School

Grounds for Suspension

The School Director or designee may use their discretion to provide alternatives to suspension or expulsion recommendations that are age appropriate and designed to address and correct the learner's specific misbehavior. Alternatively, learners may be suspended or recommended for expulsion for any of the following acts (whether completed, attempted or threatened) when it is determined the learner:

- Caused, attempted to cause, or threatened to cause physical injury to another person or willfully used force or violence upon the person of another, except in self-defense
- Possessed, sold or otherwise furnished any firearm, knife, explosive or other dangerous object unless, in the case of possession of any object of this type, the learner had obtained written permission to possess the item from an authorized certificated school employee, with the School Director or designee's written concurrence
- Unlawfully possessed, used, sold or otherwise furnished, or was under the influence of, any controlled substance as defined in Health and Safety Code sections 11053-11058 (including, but not limited to, opiates, hallucinogenic substances, stimulants, depressants and narcotic drugs), alcoholic beverage or intoxicant of any kind. Learners who voluntarily disclose their use of a controlled substance, alcohol, or an intoxicant of any kind in order to seek help through services or supports shall not be suspended solely for that disclosure.
- Unlawfully offered, arranged or negotiated to sell any controlled substance as defined in Health and Safety Code sections 11053-11058, alcoholic beverage or intoxicant of any kind, and then sold, delivered or otherwise furnished to any person another liquid substance or material and represented the same as a controlled substance, alcoholic beverage or intoxicant
- Committed or attempted to commit robbery or extortion
- Caused or attempted to cause damage to school property or private property
- Stole or attempted to steal school property or private property (as used in this policy, "school property" includes but is not limited to electronic files and databases)
- Possessed or used tobacco or any products containing tobacco or nicotine products, including but not limited to cigars, cigarettes, miniature cigars, clove cigarettes, smokeless tobacco, snuff, chew packets, betel and e-cigarettes, whether or not they contain tobacco. However, this section does not prohibit the use or possession by a learner of their own prescription products. Learners who

voluntarily disclose their use of a tobacco product in order to seek help through services or supports shall not be suspended solely for that disclosure.

- Committed an obscene act or engaged in habitual profanity or vulgarity
- Unlawfully possessed or offered, arranged, or negotiated to sell any drug paraphernalia, as defined in Health and Safety Code section 11014.5
- Knowingly received stolen school property or private property
- Possessed an imitation firearm, i.e., a replica of a firearm that is so substantially similar in physical properties to an existing firearm as to lead a reasonable person to conclude that the replica is a firearm
- Committed a sexual assault as defined in Penal Code sections 261, 266c, 286, 288, 289, or former section 288a, or committed a sexual battery as defined in Penal Code section 243.4
- Harassed, threatened or intimidated a learner who is a complaining witness or witness in a school disciplinary proceeding for the purpose of preventing that learner from being a witness and/or retaliating against that learner for being a witness
- Unlawfully offered, arranged to sell, negotiated to sell or sold the prescription drug Soma
- Engaged in, or attempted to engage in, hazing. “Hazing” means a method of initiation or pre-initiation into a learner organization or body, whether or not the organization or body is officially recognized by an educational institution, which is likely to cause serious bodily injury or personal degradation or disgrace resulting in physical or mental harm to a former, current or prospective learner. “Hazing” does not include athletic events or school-sanctioned events.
- Engaged in an act of bullying. “Bullying” means any severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act, and including one or more acts committed by a learner or group of learners directed toward one or more learners that has or can be reasonably predicated to have the effect of one or more the of the following:
 - Placing a reasonable learner(s) in fear of harm to that learner(s) person or property;
 - Causing a reasonable learner to experience a substantially detrimental effect on the learner’s physical or mental health;
 - Causing a reasonable learner to experience substantial interference with the learner’s academic performance;
 - Causing a reasonable learner to experience substantial interference with the learner’s ability to participate in or benefit from the services, activities, or privileges provided by a school.
- An electronic act, for purposes of the immediately preceding paragraph, means the transmission, by means of an electronic device, including but not limited to, a telephone, wireless telephone, or other wireless communication device, computer, or pager, of a communication, including but not limited to, any of the following:
 - A message, text, sound or image.
 - A post on a social network Internet Web site including, but not limited to:
 - Posting to or creating a burn page. “Burn page” means an Internet Web site created for the purpose of having one or more of the effects listed above.
 - Creating a credible impersonation of another actual learner for the purpose of having one or more of the effects listed above. “Credible impersonation” means to knowingly and without consent impersonate a learner for the purpose of bullying the learner and such that another learner would reasonably believe, or has reasonably believed, that the learner was or is the learner who was impersonated.
 - Creating a false profile for the purpose of having one or more of the effects listed above. “False profile” means a profile of a fictitious learner or a profile using the likeness or attributes of an actual learner other than the learner who created the false profile.

- An act of cyber sexual bullying.
 - For purposes of this section, “cyber sexual bullying” means the dissemination of, or the solicitation or incitement to disseminate, a photograph or other visual recording by a learner to another learner or to school personnel by means of an electronic act that has or can be reasonably predicted to have one or more of the effects described above. A photograph or other visual recording shall include the depiction of a nude, semi-nude or sexually explicit photograph or other visual recording of a minor where the minor is identifiable from the photograph, visual recording or other electronic act.
 - Cyber sexual bullying does not include a depiction, portrayal, or image that has any serious literary, artistic, educational, political or scientific value or that involves athletic events or school-sanctioned activities.
- An electronic act shall not constitute pervasive conduct solely on the basis that it has been transmitted on the Internet or is currently posted on the Internet.
- A “reasonable learner” means a learner, including, but not limited to, an exceptional needs learner, who exercises average care, skill and judgment in conduct for a person that age, or for a person of that age with the learner’s exceptional needs.
- Made terrorist threats against school officials and/or school property. For the purpose of this section, “terroristic threat” shall include any statement, whether written or oral, by a person who willfully threatens to commit a crime which will result in death, great bodily injury to another person, or property damage in excess of \$1,000.00, with the specific intent that the statement is to be taken as a threat, even if there is no intent of actually carrying it out, which, on its face and under the circumstances in which it is made, is so unequivocal, unconditional, immediate and specific as to convey to the person threatened, a gravity of purpose and an immediate prospect of execution of the threat, and thereby causes that person reasonably to be in sustained fear for their own safety or for their immediate family’s safety, or for the protection of School property, or the personal property of the person threatened or their immediate family.
- For learners in grades 4 to 12, committed sexual harassment
- Caused or participated in an act of hate violence
- Carried, possessed, sold or otherwise furnished an electronic signaling device
- Committed vandalism/malicious mischief
- Violated academic ethics
- Falsified or misinterpreted notes or phone calls of parents or guardians
- Falsely activated fire alarm
- Habitually violated the dress code
- Intentionally harassed, threatened or intimidated a learner or group of learners to the extent of having the actual and reasonably expected effect of materially disrupting class work, creating substantial disorder and invading learner rights by creating an intimidating or hostile educational environment
- Discriminated against, harassed, intimidated, and/or bullied any person or groups of persons based on the following actual or perceived characteristics: those set forth in Penal Code section 422.55, including immigration status, and Education Code section 220, disability, gender, nationality, race or ethnicity, religion, sexual orientation, gender identity, gender expression or association with one or more of these actual or perceived characteristics. This policy applies to all acts related to school activity or school attendance occurring within the school.
- A learner who aids or abets, as defined in section 31 of the Penal Code, the infliction or attempted infliction of physical injury to another person may be subject to suspension, but not expulsion, pursuant to this policy, except that a learner who has been adjudged by a juvenile court to have committed, as an aider and abettor, a crime of physical violence in which the victim suffered great bodily injury or serious bodily injury may be recommended for expulsion.

Learners shall not be suspended on the basis of having disrupted school activities or otherwise willfully defied the valid authority of supervisors, teachers, administrators, school officials or other school personnel engaged in the performance of their duties (the “Act”), and those Acts shall not constitute grounds for a learner enrolled in kindergarten or any of grades 1 to 12 to be recommended for expulsion.

A certificated or classified employee may refer a learner to school administrators for appropriate and timely in-school interventions or supports from the list of other means of correction specified in Education Code section 48900.5(b) for any of the Acts.

A school administrator shall, within five (5) school days, document the actions taken in response to the referral identified above and place that documentation in the learner’s record to be available for access, to the extent permissible under state and federal law. The school administrator shall, by the end of the fifth business day, also inform the referring certificated or classified employee, verbally or in writing, what actions were taken and, if none, the rationale used for not providing any appropriate or timely in-school interventions or supports.

A suspension or expulsion shall not be imposed against a learner based solely on the fact that they are truant, tardy, or otherwise absent from school activities.

The above list is not exhaustive and depending upon the offense, a learner may be suspended or recommended for expulsion for misconduct not specified above.

Procedures Required to Suspend

The School Director or designee shall investigate the incident and determine whether or not it merits suspension.

Searches: In order to investigate an incident, a learner’s attire,¹ personal property, vehicle or school property, including books, desks, school lockers, computers and other electronic devices, may be searched by a School Director or designee who has reasonable suspicion that a learner has violated or is violating the law or the rules of the school. *Illegally possessed items shall be confiscated and turned over to the police.*

Unless a learner poses a continuing danger to persons or property or an ongoing threat of disrupting the academic process, a suspension will be preceded by an informal conference between the School Director or designee and the learner in which the learner shall be orally informed of the reason for the suspension, the evidence against that learner, the other means of correction that were attempted before the suspension and be given the opportunity to present informal proof of that learner’s side of the story. If the learner poses a continuing danger to persons or property or an ongoing threat of disrupting the academic process, the informal conference will be held within two (2) school days, unless the learner waives this right or is physically unable to attend for any reason, including, but not limited to, hospitalization or detention in a correctional facility.

At the time of the suspension, a School employee shall make a reasonable effort to contact the parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, by telephone, by email or in person to inform that person of the suspension and the reasons therefor and the employee may state the date and time when the learner may return to school.

¹ This does not include removing clothing to permit visual inspection of the under clothing, breasts, buttocks or genitalia of the learner.

If a learner is suspended without the informal conference, both the learner and the parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, will be notified of a learner's right to return to school for the purpose of a conference.

The parent or guardian of a learner, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, shall respond without delay to a request from school officials to attend a conference regarding the learner's behavior.

Penalties shall not be imposed on a learner for failure of the learner's parent or guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, to attend a conference with school officials. Reinstatement of the suspended learner shall not be contingent upon attendance by the learner's parent or guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, at the conference.

The School Director or designee shall fill out a Notice of Suspension Form, a copy of which will be sent to the learner's parent/guardian and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, and to the learner. A copy of this form is also placed in the learner's cumulative file at the School. The Notice of Suspension Form shall state the fact of suspension, its duration and the specific offense committed by the learner. In addition, the notice may state the date and time when the learner may return to school. The notice shall also state that if desired by the parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, a prompt meeting or hearing will be held at which the suspension may be discussed and at which the learner may be present and afforded an opportunity to present informal proof of their side of the case. Additionally, if the School officials wish to ask the parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, to confer regarding matters pertinent to the suspension, the notice may request the parent/guardian to respond to such requests without delay.

The School Director or designee determines whether the offense warrants a police report. School Director or designee will report certain offenses to law enforcement authorities in accordance with Education Code section 48902.

When School Director or designee releases a minor learner to a peace officer for the purpose of removing the minor from the school premises, the School Director or designee shall take immediate steps to notify the parent, guardian or responsible relative of the minor regarding the release of the minor to the officer and regarding the place to which the minor is reportedly being taken, unless the minor has been taken into custody as a victim of suspected child abuse.

Suspension Time Limits

The School Director or designee determines the appropriate length of the suspension (up to five (5) school days). When suspensions do not include a recommendation for expulsion, they shall not exceed five (5) consecutive school days per suspension.

Per EdCode 48903(a) (except as provided in subdivision (g) of Section 45911 and in Section 48912, the total number of days in which a learner may be suspended from school shall not exceed twenty (20) days in any school year unless, for the purposes of adjustment, a pupil enrolls in or is transferred to another regular school, an opportunity school or class, or a continuation education school or class, in which case the total number of school days for which the learner may be suspended shall not exceed thirty (30) days in any school year.

The School Director or designee may require the learner and their parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, to sign a contract that states the conditions that the learner is expected to meet while at the School. Copies of the signed contract are kept by the school and given to the parent/guardians.

Assignment Completion During Suspension

Upon the request of a parent/guardian/educational rights holder/learner, and for foster children, their attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, a teacher shall provide to a learner in any of grades 1 to 12 who has been suspended from the School for two (2) or more school days, the homework that the learner would otherwise have been assigned. If a homework assignment that is requested and turned into the teacher by the learner either upon the learner's return to school from suspension or within the timeframe originally prescribed by the teacher, whichever is later, is not graded before the end of the academic term, that assignment shall not be included in the calculation of the learner's overall grade in the class.

Special Education and Section 504 Learner Suspensions

When suspensions involve special education learners or learners with a 504 plan, a manifestation determination meeting shall be held no later than the 10th suspension day (whether consecutive or cumulative for the school year). The School Director or designee shall notify the learner's special education teacher or regular education teacher when the learner's cumulative days of suspension for that school year reaches eight. That teacher shall promptly notify the School Director or designee of the need for the manifestation determination meeting. The manifestation determination meeting shall include the LEA, the parent, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, and relevant members of the learner's IEP Team or 504 Plan Team (as determined by the parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, and the LEA).

The learner shall be treated as a general education learner for disciplinary purposes, except to the extent that educational services must continue, if at the manifestation determination meeting the following are both determined in the negative, after reviewing all relevant information in the learner's file, including the learner's IEP or 504 Plan, any teacher observations and any relevant information provided by the parents: 1) the conduct in question was caused by, or had a direct and substantial relationship to, the learner's disability under the IDEA or section 504; or 2) the conduct in question was the direct result of the LEA's failure to implement the IEP or 504 Plan. If it is determined at the manifestation determination meeting that 1) or 2) is answered in the affirmative, the conduct is deemed a manifestation of the disability.

If the conduct is deemed a manifestation of the disability, the IEP Team or 504 Plan Team must conduct a functional behavioral assessment (or other appropriate assessment for the 504 learner), create a plan and implement it, or if the plan is preexisting, review it and modify it as necessary to address the behavior.

In the case of a manifestation of a disability, the learner will be returned to the placement from which they were removed, unless the LEA and parent agree to a change of placement as part of the modification of the behavioral intervention plan or updated 504 Plan. For special education and 504 learners, a new manifestation determination meeting is required for all proposed suspensions exceeding ten cumulative school days in one school year.

The special education learner may be removed from school to an interim alternative educational setting for not more than forty-five (45) school days without regard to whether the behavior is determined to be a manifestation of the learner's disability if the learner: 1) carries a weapon to or possesses a weapon at school, on school premises or to or at a school function under the jurisdiction of the School; 2) knowingly possesses or uses illegal drugs or sells or solicits the sale of a controlled substance, while at school, on school premises, or at a school function under the jurisdiction of the School; or 3) has inflicted serious bodily injury upon another person while at school, on school premises, or at a school function under the jurisdiction of the School.

III. Expulsion

Definition

Expulsion means involuntary disenrollment from the School.

Authority to Expel

A learner may be expelled only after a hearing conducted by a single, neutral Hearing Officer and upon the recommendation of the School Director or designee. The Hearing Officer shall be appointed by the presiding officer of the Board on an as-needed basis and shall be a certificated individual who is neither the learner's teacher nor a member of the Board. The Hearing Officer may recommend expulsion of a learner only upon a finding that the learner committed an expellable offense as listed below.

Grounds for Expulsion

Category I Expulsions – Mandatory Recommendation for Expulsion

The School Director or designee shall immediately suspend a learner, and recommend for expulsion, a learner who has committed one or more of the following acts:

- Possessing, selling or otherwise furnishing a firearm when a school employee verifies firearm possession, unless the learner obtained prior written permission to possess the firearm from a certificated school employee, which is concurred in by the School Director or designee
- Brandishing a knife at another person
- Unlawfully selling a controlled substance
- Committing or attempting to commit a sexual assault or committing a sexual battery
- Possession of an explosive

Category II Expulsions – Recommendation for Expulsion Required, Unless Inappropriate Under the Circumstances

A learner who has committed one of the following acts of misconduct must be recommended for expulsion, unless the School Director or designee determines that expulsion should not be recommended under the circumstances or that an alternative means of correction would address the conduct.

- Causing physical injury to another person, except in self-defense
- Possession of any knife, explosive or other dangerous object of no reasonable use to the learner
- Unlawful possession of any controlled substance, except for the first offense for the possession of not more than one ounce of marijuana, other than concentrated cannabis or for possession of over-the-counter medication for use by the learner for medical purposes or medication prescribed for the learner by a physician
- Robbery or extortion
- Assault or battery on a school employee

Category III Expulsions – Discretionary Expulsion Recommendation

In the discretion of the School Director or designee, any act that warrants suspension may warrant expulsion. Additionally, a learner may be expelled for misconduct that is not listed above if the acts disrupt and/or present ongoing health and/or safety concerns, or the learner has repeatedly engaged in the misconduct.

In no event, however, will a learner be expelled for disrupting school activities or otherwise willfully defying the valid authority of supervisors, teachers, administrators, other school officials or other school personnel engaged in the performance of their duties.

School Recommendation for Expulsion

Upon recommendation of expulsion by the School Director or designee, the School shall make the recommendation of expulsion to the single, neutral Hearing Officer.

The School Director or designee investigates the incident and determines whether the offense results in an expulsion. Upon a recommendation of expulsion by the School Director or designee, the learner and the learner's parent/guardian or representative will be invited to a conference to determine if the suspension for the learner should be extended pending an expulsion hearing. In such instances when the School has determined the suspension period shall be extended, such extension shall be made only after a conference is held with the learner and the learner's parent/guardian, unless the learner and the learner's parent/guardian fail to attend the conference. This determination will be made by the School Director or designees upon either of the following determinations: (1) the learner's presence will be disruptive to the education process, or (2) the learner poses a threat or danger to others. Upon either determination, the learner's suspension will be extended pending the results of an expulsion hearing.

Special Education and Section 504 Learner Expulsions

Within ten (10) school days of a recommendation for expulsion to change the placement of a learner with a disability because of a violation of a code of learner conduct, an IEP Team or Section 504 Team meeting shall be called. During that meeting, the School, the parent/guardian, and relevant members of the IEP team or Section 504 Team shall review all relevant information in the learner's file, including the learner's IEP or 504 Plan, any teacher observation and any relevant information provided by the parents/guardians to determine:

- If the conduct in question was caused by, or had a direct and substantial relationship to, the child's disability; or
- If the conduct in question was the direct result of the local educational agency's failure to implement the IEP or 504 plan.

If the School, the parent/guardian, and relevant members of the IEP Team or Section 504 Team determine that either of the above is applicable for the learner, the conduct shall be determined to be a manifestation of the learner's disability.

Notification of Expulsion Hearing

Learners recommended for expulsion are entitled to a hearing to determine whether the learner should be expelled. The expulsion hearing shall be held no later than thirty (30) school days of the date that expulsion is recommended, unless a brief extension is requested by the learner or their parent/guardian for good cause. The hearing shall be held in a closed setting unless a public hearing is requested by the learner's parent/guardian in writing at least three (3) calendar days before the hearing date.

The single, neutral Hearing Officer will send a written notice to the learner and parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker, regarding the expulsion hearing at least ten (10) days before the date of the hearing. The notice shall include:

- The date and place of the expulsion hearing;
- A statement of the facts, charges and offenses upon which the proposed expulsion is based;
- A copy of the School's disciplinary rules relating to the alleged violation;
- Notification of the learner's or parent/guardian's obligation to provide information about the learner's status at the School to any other school district or school to which the learner seeks enrollment;
- The opportunity for the learner or the learner's parent/guardian to appear in person and/or to employ and be represented by counsel or an advocate;
- The right to inspect and obtain copies of all documents to be used at the hearing;
- The opportunity to present testimony, evidence and witnesses and confront and question witnesses who testify at the hearing;
- The opportunity to question all evidence presented and to present oral and documentary evidence on the learner's behalf, including witness testimony.

The School shall maintain documents that may be used at the hearing and make them available for review by the learner and/or parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker. These papers may include, but are not limited to, the following: A record of the learner's attendance and grades, a record of previous infractions, a statement of the facts surrounding the case; a statement of the facts surrounding the case made by a witness, a law enforcement agency's report and any other relevant matter.

If, due to a written request by the expelled learner, the hearing is held at a public meeting, and the charge is committing or attempting to commit a sexual assault or committing a sexual battery as defined in Education Code section 48900, a complaining witness shall have the right to have their testimony heard in a session closed to the public.

Expulsion Hearing Procedure

An expulsion hearing shall be held before a single, neutral Hearing Officer. A record of the hearing shall be made and may be maintained by any means, including electronic recording, as long as a reasonably accurate and a complete written transcription of the proceedings can be made.

While the technical rules of evidence do not apply to expulsion hearings, evidence may be admitted and used as proof only if it is the kind of evidence on which reasonable persons can rely in the conduct of

serious affairs. A recommendation by a single, neutral Hearing Officer to expel must be supported by substantial evidence that the learner committed an expellable offense.

Findings of fact shall be based solely on evidence produced at the hearing. While hearsay evidence is admissible, no decision to expel shall be based solely on hearsay evidence, although sworn declarations may be admitted as testimony from witnesses who are determined by the a single, neutral Hearing Officer that disclosure of their identity or live testimony at the hearing may subject them to an unreasonable risk of physical or psychological harm.

Expulsion Decision by single, Neutral Hearing Officer

The decision to expel a learner will be based on the finding of one or both of the following:

- That other means of correction are not feasible or have repeatedly failed to bring about proper conduct.
- That due to the nature of the violation, the presence of the learner causes a continuing danger to the physical safety of the learner or others.

The final decision by a single, Neutral Hearing Officer shall be made within ten (10) calendar days following the conclusion of the hearing, or within thirty (30) school days after the date of the learner's removal from the School for the incident for which the recommendation for expulsion is made. If the single, neutral Hearing Officer decides not to recommend expulsion, the learner shall be reinstated and permitted to return to classroom programs. The decision not to recommend expulsion shall be final.

If the decision is to expel a learner, the single, Neutral Hearing Officer, shall send written notice of the decision to expel, including the findings of fact, to the learner or parent/guardian, and for foster children, their educational rights holder, attorney, and county social worker, and for Indian children, their tribal social worker and, if applicable, their county social worker. The notice shall include the following:

- Notice of the specific offense committed by the learner;
- Notice of the right to appeal the expulsion to the school's Board of Directors within five (5) calendar days. Decisions of the Board of Directors shall be final.
- Notice of the learner's or parent/guardian's obligation to inform any new district in which the learner seeks to enroll of the learner's status within the School

Expelled learners are responsible for seeking alternative education programs, including but not limited to, programs within the County or their school district of residence. The School will work cooperatively with parents/guardians upon request to assist with locating alternative education programs.

Rehabilitation Plans

The Hearing Officer may, to the extent permitted by law, suspend the enforcement of an expulsion order for a period not to exceed one calendar year. As a condition of such suspension, the Hearing Officer may, but is not required to, assign the learner to a school, class, program, or other intervention deemed appropriate to support the learner's rehabilitation.

Any such assignment or conditions shall be determined on a case-by-case basis and may include expectations related to behavior, attendance, or other appropriate factors. Where a rehabilitation program is implemented, it may include opportunities for parent or guardian involvement in the learner's education; however, such involvement shall not be required, and a parent or guardian's decision not to participate shall not be considered in determining whether the learner has satisfactorily met any conditions of rehabilitation.

Nothing in this policy shall be interpreted to require the School to provide or fund a specific rehabilitation program or placement unless otherwise required by applicable law.

Expulsion Right to Appeal Process

Within five (5) calendar days of an expulsion decision, the family may submit a written appeal to the single, neutral Hearing Officer and request the expulsion be reviewed by the Board of Directors. The School must then schedule a special board meeting within a reasonable time to hear the appeal. During the appeal process, the learner will remain enrolled in the school's independent study program. The Board of Directors decision regarding the appeal and if final and cannot be further appealed.

If the Board of Directors decides not to recommend expulsion, the learner shall be reinstated and permitted to return to classroom programs. Furthermore, if the Board of Directors upholds the expulsion decision, the learner will be disenrolled the same day as the Board of Directors final decision.

The school shall maintain records of all learner suspensions and expulsions at the school site. Such records shall be made available for review upon request.

Readmission Process

The decision to readmit a learner or to admit a previously expelled learner from another school district or School shall be in the sole discretion of the Board of Directors or its designee following a meeting with the single, neutral Hearing Officer. The single, neutral Hearing Officer shall make a recommendation to the Board of Directors following the meeting regarding their determination. The learner's readmission is also contingent upon the school's capacity and any other admission requirements in effect at the time the learner seeks admission or readmission.

Internal Complaint Review Policy

Board Meeting Month/Year	May 2026
Overview of Policy	New board policy to afford all employees of the school the opportunity to seek internal resolution of their work-related concerns and/or to allow a non-employee to raise a complaint or concern about a school employee.



Internal Complaint Review Policy

Board Approved:

The purpose of the Internal Complaint Review Policy is to afford all employees of Empower Generations (the “School”) the opportunity to seek internal resolution of their work-related concerns. All employees have free access to School administration or the Board of Directors to express their work-related concerns.

Specific complaints of unlawful harassment, discrimination, and retaliation are addressed under the School’s Harassment, Discrimination, and Retaliation Prevention policy.

Internal Complaints

(Complaints by Employees Against Employees)

This section of the policy is for use when a School employee raises a complaint or concern about a co-worker.

If reasonably possible, internal complaints should be resolved at the lowest possible level, including attempts to discuss/resolve concerns with the immediate supervisor. However, in the event an informal resolution may not be achieved or is not appropriate, the following steps will be followed by the School:

1. The complainant will bring the matter to the attention of the School Director as soon as possible after attempts to resolve the complaint with the immediate supervisor have failed or if not appropriate; and
2. The complainant will reduce their complaint to writing, indicating all known and relevant facts. The School administrator or designee will then investigate the facts and provide a solution or explanation;
3. If the complaint is about a School administrator, the complainant may file their complaint in a signed writing to Human Resources, who will then investigate the facts and provide a solution or explanation. The employee may also file their complaint with the Board of Directors, who will then confer as a board and may conduct a fact-finding (or authorize a third party investigator on behalf of the board). A board member or investigator will report their findings to the board for review and action, if necessary.

This policy cannot guarantee that every problem will be resolved to the employee’s satisfaction. However, the School values each employee’s ability to express concerns and the need for

resolution without fear of adverse consequence to employment.

Policy for Complaints Against Employees (Complaints by Third Parties Against Employees)

This section of the policy is for use when a non-employee raises a complaint or concern about a School employee.

If complaints cannot be resolved informally, complainants may file a written complaint to the School administration or Human Resources (if the complaint concerns a School administrator) as soon as possible after the events that give rise to the complainant's concerns. The written complaint should set forth in detail the factual basis for the complaint.

In processing the complaint, the School shall abide by the following process:

1. The School administrator, designee, or Human Resources shall use their best efforts to talk with the parties identified in the complaint and to ascertain the facts relating to the complaint.
2. In the event that the School administrator, designee or Human Resources finds that a complaint against an employee is valid, the School administrator, designee or Human Resources may take appropriate disciplinary action against the employee. As appropriate, the School administrator, designee, or Human Resources may also simply counsel/reprimand employees as to their conduct without initiating formal disciplinary measures.
3. The decision of the School administrator, designee, or Human Resources relating to the complaint shall be final unless it is appealed to the Board of Directors. The decision of the board shall be final.

General Requirements

Confidentiality: All complainants will be notified that information obtained from the complainants and thereafter gathered will be maintained in a manner as confidential as possible, but in some circumstances absolute confidentiality cannot be assured.

Non-Retaliation: All complainants will be advised that they will be protected against retaliation as a result of the filing of any complaints or participation in any complaint process.

Resolution: The School will investigate complaints appropriately under the circumstances and pursuant to the applicable procedures, and if necessary, take appropriate remedial measures to ensure effective resolution of any complaint.



INTERNAL COMPLAINT FORM

Your Name: _____ Date: _____

Address: _____

Phone: _____ Email: _____

Date of Alleged Incident(s): _____

Name of Person(s) you have a complaint against: _____

List any witnesses that were present: _____

Where did the incident(s) occur?

Please describe the events or conduct that are the basis of your complaint by providing as much factual detail as possible (i.e. specific statements; what, if any, physical contact was involved; any verbal statements; what did you do to avoid the situation, etc.). Attach additional pages, if needed:

I hereby authorize the School to disclose the information I have provided as it finds necessary in pursuing its investigation. I hereby certify that the information I have provided in this complaint is true and correct and complete to the best of my knowledge and belief. I further understand that providing false information in this regard could result in disciplinary action up to and including termination or expulsion from the School.

Signature of Complainant

Date: _____

Print Name

To be completed by the School:

Received by: _____

Date: _____

Learner Personal Electronic Device Board Policy

Board Meeting Month/Year	May 2026
Overview of Policy	Per Ed Code 48901.7 and by July 1, 2026, the charter school is required to develop and adopt (and shall update every five years) a policy to limit or prohibit the use by its pupils of smartphones while the pupils are at a school site or while the pupils are under the supervision and control of an employee or employees of that charter school. The policy is a conservative approach, allowing for the school to develop and update procedures in their guidebooks.



Learner Personal Electronic Device Board Policy

Board Approved:

Mission and Vision

Empower Generations's mission is for learners to be "Free to Think. Inspired to Lead". The school strives to be a beacon of innovation and creativity, fostering a culture of curiosity and leadership. Our commitment to unlocking the potential of our learners and the communities we serve is unwavering. We believe that by empowering people to become lifelong learners, empathetic citizens, authentic individuals, and design thinkers, we can create a better future for all. This includes the thoughtful and responsible integration of technology in our educational approach.

Purpose of Policy

This policy aligns with California's statewide effort to restrict learners' personal device use in schools, acknowledging the growing evidence of harm to their mental health and well-being, and the established correlation between personal device addiction and negative impacts on learning and academic performance. By implementing this policy, Empower Generations aims to reduce digital distractions within the classroom and across the campus, thereby fostering an environment where learners can better focus on their academic pursuits and social development. Ultimately, this initiative is a proactive step towards addressing the mental health issues associated with excessive personal device usage and promoting a healthier, more focused learning experience for all learners.

Definitions

Learner Personal Electronic Device: Refers to cell phones, smartphones, and other personal electronic devices (such as smartwatches, meta-glasses, tablets, handheld gaming consoles, and similar technologies) that are the personal property of the learner or in their possession and are not issued by the school for specific educational purposes. These devices typically possess communication, internet access, and/or application capabilities.

Expectations

Empower Generations values instructional technology as one way of enhancing our mission to teach the skills, knowledge, and behaviors learners will need as responsible citizens in the global community. The school provides appropriate technology to support instructional objectives, as technology is an avenue to learn collaboration, communication, creativity, and critical thinking in a variety of ways throughout the school day.

Because adjustments may need to be made annually, the school shall develop acceptable use procedures for personal electronic device usage. These procedures shall be outlined in the school's Family Guidebook. The school shall provide resources and support for learners not adhering to the policy.

Guidelines for Personal Device Use on Campus

The use of personal electronic devices on campus by learners and their parents/guardians is governed by the Empower Generations Family Guidebook, California Education Code, the Acceptable Use Policy, and all relevant Board Policies.

In accordance with Education Code Section 48901.7, personal device usage is permitted on campus under specific circumstances:

- In the case of an emergency or in response to perceived threat of danger.
- When a teacher or administrator grants permission.
- When a licensed physician and surgeon determines it is necessary for health or well-being.
- When required in a learner's individualized education program.

When using a personal device on campus:

- Approved devices must be in silent mode/do not disturb while on campus, unless otherwise allowed by a school employee.
- Devices may not be used to cheat on assignments, quizzes, or tests.
- During instructional time, devices must only be used for instructional purposes as permitted by school employees.
- No learner shall use an electronic signaling device with camera, video or voice recording function in a way or under circumstances which may infringe upon the privacy of others.
- Learners and parents/guardians should be aware that devices are subject to confiscation by school staff if the learner is not adhering to the procedures outlined in the Family Guidebook, and the parent/guardian will be notified.

- Each learner is responsible for their own device and should use it responsibly and appropriately. Empower Generations takes no responsibility for lost, stolen or damaged devices, including lost or corrupted data on those devices.

Privacy

A learner's personal electronic device may be searched by a school official only when there is a reasonable belief, in good faith, that an emergency exists involving an imminent danger of death or serious physical injury to the learner or others, and that accessing information on the device is necessary to mitigate the threat.

Digital Citizenship

Digital citizenship is a proactive and essential component of Empower Generations's educational program, with the core purpose of equipping learners with the vital skills and knowledge necessary to navigate the online world responsibly, ethically, and safely. Recognizing the pervasive nature of technology in today's society, the school is committed to providing age-appropriate education to its learners on topics including responsible smartphone use, broader principles of digital citizenship, and a clear understanding of the potential impacts associated with excessive screen time. To further support learners and their families in fostering healthy digital habits and addressing any related challenges, the school will ensure that relevant resources and support mechanisms are readily available as needed.

Policy Updates

This policy will be reviewed and updated every five years to ensure its ongoing effectiveness and alignment with current best practices, evolving technologies, and relevant legislation.



Alternative Pathways To A Diploma For Students With Disabilities Policy

Board Approved:

The Governing Board recognizes that learners with disabilities are entitled to a course of study that provides them with a free appropriate public education (FAPE) and that modifications to the school's regular course may be needed on an individualized basis to provide FAPE. In accordance with law, each learner's individualized education program (IEP) team shall determine the appropriate goals, as well as any appropriate individual accommodations necessary for measuring the academic achievement and functional performance of the learner on state and charter-wide assessments. Additionally, the IEP team shall determine the learner's appropriate graduation pathway based on the Board Policy - Graduation Policy or a policy exemption as outlined below.

Exemption from ~~School Charter~~-Established Graduation Requirements

~~Enrolled~~~~Charter~~ learners shall complete all course requirements for high school graduation as specified in Board Policy - Graduation Policy. However, a learner with a disability who entered the ninth grade in the 2022-23 school year and later may be exempted from all coursework and other requirements adopted by the Board that are in addition to the ~~minimum~~ statewide course requirements for high school graduation if the learner's IEP provides for both of the following requirements: (Education Code 51225.31).

1. That the learner is eligible to take the alternate assessment as described in Education Code 60640
2. That the learner complete state standards-aligned coursework to meet the statewide coursework specified in Education Code 51225.3

Any such exempted learner shall receive a diploma and be eligible to participate in any graduation ceremony and school activity related to graduation in which a learner of similar age without a disability would be eligible to participate. (Education Code 51225.31)

The charter's responsibility to provide FAPE shall not terminate when a learner with a disability who is exempted from ~~school charter~~-adopted graduation requirements participates in graduation activities unless the learner's IEP team, which includes the parent/guardian and learner, has determined that the learner has completed the high school experience. (Education code 51225.31)

Certificate of Educational ~~Achievement or Completion~~

Instead of a high school diploma, a learner with a disability may be awarded a certificate or document of educational achievement or completion if the learner has met one of the following

requirements: (Education Code 56390)

1. Satisfactorily completed a prescribed alternative course of study approved by the board of the charter in which the student attended school or the charter with jurisdiction over the learner as identified in the learner's IEP
2. Satisfactorily met the learner's IEP goals and objectives during high school as determined by the IEP team
3. Satisfactorily attended high school, participated in the instruction as prescribed in the learner's IEP, and met the objectives of the statement of transition services

A learner with a disability who meets any of the criteria specified above shall be eligible to participate in any graduation ceremony and any school activity related to graduation in which a graduating learner of similar age without disabilities would be eligible to participate. (Education Code 56391).



Graduation Requirements

Alternative Pathway to Diploma

An individual with exceptional needs, who entered ninth grade in the 2022–23 school year or later, and who qualifies per the California Education Code shall be eligible for the award of a Diploma and participation in the school's graduation ceremonies. Eligibility will be determined by the IEP team based on a variety of factors. Individuals must meet the course requirements below and will be graded with the traditional A-F grading system per the school's grading policy.

There is no credit maximum for graduation. Learners must enroll in at least four (4) courses per semester to maintain full-time status at the school.

Course Title	Credits
Math	20 Credits Must Complete Algebra I
Two years of Math (may include Fundamental Math, Fundamental Algebra 1, and/or Fundamental Algebraic Concepts)	20
English	30 Credits
Fundamental English 9 A/B	10
Fundamental English 10 A/B	10
Fundamental English 11 A/B	10
Fundamental English 12 A/B (optional)	
Science	20 Credits
Fundamental Life Science A/B or Fundamental Integrated Science I	10
Fundamental Physical Science A/B or Fundamental Integrated Science II	10
Social Studies	30 Credits
Fundamental World History A/B	10
Fundamental US History A/B	10
Fundamental Civics	5
Fundamental Economics or Fundamental Personal Finance (starting class of 2031)	5
Visual and Performing Arts or World Language or Career-Technical Education Pathway	10 Credits
Two years recommended, 1 year required (1 CTE Pathway or 2 World Language/VAPA courses)	20
Recommended Electives	*40 Credits
According to the learner's interests	25
Life Skills Classes as available	10
Ethnic Studies (required starting with the class of 2030)	5
Physical Education	20 Credits
PE 1 A/B	10
PE 2 A/B	10
Total Recommended Credits To Diploma	180
Total Required Credits to Diploma	135

*Sample can be modified to meet IEP goals and learner interestes

Sample 9th Grade	Sample 10th Grade
Fund English A/B	Fund English A/B
Fund Math A/B	Fund Math A/B
Fund Earth Science A/B	Fund World History A/B
General Elective	Elective
Advisory	Advisory
PE 1 A/B	PE 2 A/B
Sample 11th Grade	Sample 12th Grade
Fund English A/B	Fund English A/B or Elective
Algebraic Concepts A/B	Algebraic Concepts C/D
Fund Life Science A/B	Elective
Fund US History A/B	Fund Economics/Fund Civics
Fund World Language, VAPA, or CTE	CTE or Elective
Advisory	Advisory

Certification of Completion Prescribed Course of Study



Courses may be repeated from year to year using the same course title. The goal is to attempt to teach the basic state subject requirements while modifying them according to the learner's IEP goals. Report card grades for Certificate of Completion:

CR grants "5" credits
NC grants "0" credits

There is no credit maximum for completion. Learners must enroll in at least four (4) courses per semester to maintain full-time status at the school.

Course Title	Credits
Math	20
General Math A/B or General Algebraic Concepts A/B	20
English	30
General English A/B	30
Science	10
General Science	10
Social Studies	30
General World History A/B	10
General US History A/B	10
General Civics	5
General Economics or General Personal Finance (<i>starting class of 2031</i>)	5
Electives	60
According to the learner's interests	10
Visual and Performing Arts A/B	10
CTE 2-3 year Pathway (recommended)	20
Life Skills Classes as available	20
Physical Education	10
PE 1 A/B	10
Total Credits To Certify	160

Sample Course Plan

*Sample can be modified to meet IEP goals
*Must take a minimum of 4 classes per semester

Sample 9th Grade	Sample 10th Grade
Gen English A/B	Gen English A/B
Gen Math A/B	Gen Math A/B
Gen Life Science A/B	Gen World History A/B
Elective	Elective
PE 1 A/B	PE 2 A/B
Sample 11th Grade	Sample 12th Grade
Gen English A/B	Gen Earth Science A/B
Algebraic Concepts A/B	Algebraic Concepts A/B
Gen US History A/B	Elective or Gen English A/B
Elective	Gen Economics or Personal Finance and Gen Civics
Elective	Elective



Physical Education Policy

Board Approved:

The Board Members and school leadership understand that Health and Physical Education are vital to keeping learners fit, healthy, and well-rounded. In addition, learners who are physically active through active transport to and from school, recess, physical activity breaks, high-quality physical education, and extracurricular activities do better academically.

The school will deploy a holistic approach to wellness that is a safe, non-judgmental, and supportive process, which allows learners to explore aspects of physical and mental well-being. The school will provide learners with physical education, using an age-appropriate, sequential physical education content consistent with national and state standards for physical education. All learners will be provided equal opportunity to participate in physical education classes, and the classes will make appropriate accommodations to allow for equitable participation for all students and will adapt physical education classes and equipment as necessary.

Grades 9-12

Learners will meet the Physical Education requirements for graduation as outlined in the school's board-approved Graduation Requirements Policy. High school learners may be temporarily or permanently exempted from PE requirements or seek an athletic exemption. Exemptions must be requested, a form filled out, and board-approved. The school will document the exemption appropriately on learner records according to the school's Family Guidebook.

Testing:

The school will adhere to all state Physical Education testing and assessment requirements.



Empower Generations/~~Innovation Studios~~ Graduation Requirements
Board Approved:

Path	Graduation Requirements	UC/CSU Path need a grade of C or better	Competencies	~~Certificate of Completion (COC) (EC section 56390)~~
Social Science	3 years (30 credits) 1 year US History 1 year World History 1 semester Government 1 semester Economics <i>*commencing with the class of 2031, may be substituted with 5 credits of Personal Finance</i>	a. 3 years (30 credits) 1 year US History 1 year World History 1 semester Government ! 1 semester Economics <i>*commencing with the class of 2031, may be substituted with 5 credits of Personal Finance</i>	Understanding Ethical Issues Global Research & Analysis Civic Responsibility Through Local Policies Social History Through Interviews	<del>Empower Generations/~~Innovation Studios~~ may award a learner with a disability a COC if the following requirements, (a), (b), or © are met: ¶</del> <del>a. The learner has satisfactorily ¶ completed a prescribed alternative ¶ course of study approved by the ¶ governing board of Empower ¶ Generations/~~Innovation Studios~~ ¶</del> ~~b. The learner has satisfactorily met ¶ his or her IEP goals and ¶ objectives ¶ during high school as determined ¶ by the IEP program team . ¶~~ ~~c. The learner has satisfactorily ¶ attended high school, participated ¶ in the instruction under his or her ¶ IEP, and has met the objectives of ¶ the statement of transition services.~~
English	3 years (4 recommended) (30 credits)	b. 4 years (40 credits)	Persuasion (ethos, logos, pathos) Powerful Communication to Diverse Audiences Literary Author Analysis Informative Text Application Senior Defense Portfolio	
Mathematics	2 years (20 credits) * Algebra 1 or Integrated Math 1 required	c. 3 years (30 credits) * Algebra 1 or Integrated Math I * Geometry or Integrated Math II * Algebra 2 or Integrated Math III	Mathematical Engineering Geometric Reasoning Financial Literacy Data Interpretation Through Design Process Mathematical Reasoning and Application	

Science	2 years (20 credits) * one year of biology with lab component; and one year of physical science with lab component	d. 2 years/3 years recommended (20 credits) * one year of biology with lab component; and one year of physical science with lab component	Scientific Analysis and Investigation Scientific Experimentation Applied Digital Technologies Divergent Thinking	
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World Language	1 year (10 credits) * <i>World Language</i> * <i>sequential course 1A/1B</i>	e. 2 years/3 years recommended (20 credits) * <i>sequential course 1A/1B(Same language)</i>	Multiple Language Proficiency Diverse Cultural Perspectives	
Visual and Performing Arts	1 year (10 credits) * <i>visual or performing arts</i> * <i>sequential course 1A/1B</i>	f. 1 years (10 credits) * <i>sequential course 1A/1B</i>	Innovative Prototyping Self Expression Through A Variety of Mediums Artistic Connections Through Cultural Context	

			Healthy Relationships Internship with Community Business Lead Through Influential Work Intrapersonal/Interpersonal Understanding Authentic Problem Solving Social Networking Goal Setting & Action Steps Purpose & Belonging Mindfulness Reflection Process/Growth Mindset Self Advocacy	
Electives	(60 credits) * Health (5 credits) * Service Learning (5 credits) * Child Development (5 credits) * Senior Internship (10 credits) *Advisory (20 credits) *General Electives (15 credits) <i>including state-required electives</i>	(80 credits) g. College Approved Elective from a-f (10 credits) * Health (5 credits) * Service Learning (5 credits) * Child Development (5 credits) * Senior Internship (10 credits) *Advisory (20 credits) *General Electives (25 credits) <i>including state-required</i>		

		<i>electives</i>		
	180 Credits	230 Credits <i>*11 UC-required college-preparatory courses must be completed prior to senior year (including summer courses)</i>		

GRADUATION REQUIREMENT EXEMPTION

Under Ed Code 51225.1, the following learners may be exempted from Empower Generations/Innovation Studios' graduation requirements under specific circumstances: •

Foster Youth

- Homeless Youth
- Former Juvenile Court Youth
- Children of Military Families
- Migrant Youth
- Newcomer Youth

Should a learner in one of the above groups meet the requirements under EC 51225.1, school counselors will work with the learners who will either choose to:

- Complete a 5th year at Empower Generations/Innovation Studios in order to meet diploma requirements, OR
- Complete the Empower Generations/Innovation Studios Graduation Requirement Exemption waiver to become eligible for a diploma under California's minimum graduation requirements.*

Empower Generations/Innovation Studios shall ensure a learner who meets the criteria under EC 51225.1 shall be eligible to participate in any graduation ceremony and any school activity related to graduation in which a graduating learner of a similar age would be eligible to participate.

In addition, the school Director or designee shall have authority to grant exemptions from local graduation requirements in accordance with law and Board policy. Individual local exemption determinations shall not require separate Board approval. A learner is permitted to graduate upon completion of the California state minimum graduation requirements when: the learner has experienced significant, documented unforeseen circumstances beyond the learner's control (e.g., severe medical condition, family crisis, displacement, or other hardship), and the learner has made a good faith effort to meet district graduation requirements, and completion of additional district requirements is not reasonably possible within the learner's four-year high school timeline. Any such determination shall be made on a case-by-case basis and shall not establish precedent.

***California Minimum Graduation Requirements (EC 51225.1)**

English	30cr	US History	10cr	PE	20cr
Algebra 1	10cr	World History	10cr	Ethnic Studies	5cr

Math	10cr	American Govt (Civics)	5cr		
Biological Science	10cr	Economics	5cr		
Physical Science	10cr	Vis/perf arts; Foreign Lang; or CTE	10cr		Total 135cr

~~CERTIFICATE OF COMPLETION (COC)~~

~~The COC option is available to learners who cannot complete the requirements for a regular high school diploma that Empower Generations/Innovation Studios offers. These learners are eligible for educational placement and services under their IEP. The COC option **does not** equal a regular high school diploma. The graduation option that the IEP team chooses shall be documented clearly as part of the Transition Plan, as well as marked on the IEP's offer of Free and Appropriate Public Education (FAPE)/Educational Settings page. IEP teams can waive academic courses the learner attempted prior to being identified as progressing towards a COC. Conversely, while a learner is progressing towards a COC, IEP teams should convene to analyze factors preventing a learner from successfully completing a required academic course. The IEP team should evaluate if the IEP goals, services, and supports are reasonably calculated, and if the learner will receive further educational benefit through repeating a specific course. While learners may have access to the general education curriculum, most learners receiving a COC participate in California's Alternate Assessment testing system, which is documented on the IEP's Statewide Assessment page. A learner with a disability who has satisfied the following three requirements, but who has not satisfied the requirements for a diploma, may receive a COC:~~

- ~~• Satisfactory completion of a prescribed alternative course of study as identified on the student's IEP; or~~
- ~~• Satisfactory achievement of the student's IEP goals and objectives during high school as determined by the IEP team; or~~
- ~~• Satisfactory high school attendance, participation in the instruction prescribed in the student's IEP, and achievement of the objectives stated in the transition plan. Empower~~

~~Generations/Innovation Studios shall ensure a learner with disabilities who meets the criteria specified above shall be eligible to participate in any graduation ceremony and any school activity related to graduation in which a graduating learner of a similar age without disabilities would be eligible to participate. In addition, Empower Generations/Innovation Studios shall ensure that the learner will continue to have access to special education and related supports and services until the learner meets Empower Generations/Innovation Studios' criteria to receive a high school diploma or until age 22.~~



Mathematics Placement Policy

Board Approved:

The school and its Board recognize the importance of learners' achievement in all subject areas, in particular mathematics, as critical for college and career readiness.

The Governing Board is adopting a fair, objective, and transparent mathematics placement protocol for pupils entering Grade 9 for all learners in all subgroups, taking multiple objective academic measures of pupil performance into consideration.

In accordance with *the California Mathematics Placement Act of 2015*, the Governing Board therefore directs school staff to create, implement, and monitor a mathematics placement protocol that includes the following elements:

- Ensure a cohesive, vertically aligned math program between the middle and high school grade levels to promote a seamless transition and opportunities for math placement to occur before the start of the 9th-grade school year.
- Systematically consider multiple academic measures of learner performance when determining math placement grades 9-12, including interim and summative assessments that are aligned to state-adopted content standards in mathematics, classroom assignments and grades, and report cards.
- Only consider objective measures, such as placement recommendations made by facilitators and counselors with knowledge of learners' talents and abilities, not measured by objective data, to advance a student to a higher mathematics class than objective data indicates.
- Assessment to occur before the learner enters 9th grade or within the first month of instruction. If placed before instruction occurs, a one-month placement checkpoint must occur to ensure accurate placement and give the opportunity for re-evaluation of placement if needed.
- Process for learners and/or parents/guardians to request a reassessment within 30 days of placement if necessary, with the reassessment request required in writing.

Learner placement data shall be examined annually to ensure that learners who are qualified to progress in mathematics courses based on their performance on objective academic measures selected for inclusion in the policy are not held back in a disproportionate manner on the basis of their race, ethnicity, gender, or socioeconomic background. This data shall be reported to the Board on an annual basis.

This policy will appear on the school website.

This policy is in compliance with California Education Code 51224.7

https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB359

State Seal of Civic Engagement

Board Adoption of Local Requirements

The California State Seal of Civic Engagement (SSCE) is an award recognizing students who demonstrate excellence in civics education, participation, and understanding of the U.S. and California constitutions. It is awarded to students who complete civic projects, engage in community service, and reflect on democratic participation, with a seal affixed to their high school diploma.

School Requirements to Earn a State Seal of Civic Engagement

State Mandated Criteria	School Requirement
Be engaged in academic work in a productive way	1. On track to graduate, earn a certificate of completion, or an alternative diploma AND 2. Demonstrate academic progress and growth by demonstrating one of the following: a. Passing 11th grade CAASPP in ELA and Math with 2's or higher b. Showing one year of growth (CGI) on NWEA MAP in at least one year of high school c. C average or higher in core academic classes, grades 9-12
Demonstrate a competent understanding of the U.S. and California Constitutions	1. C average in the following coursework: a. World History b. U.S. History c. Government/Civics OR Passing score on AP Government OR Passing score on the California Constitution and Tribal Government
Participate in one or more informed civic engagement projects that address real-world problems and require students to identify and inquire into civic needs or problems AND Demonstrate civic knowledge, skills, and dispositions through self-reflection	1. Passing score of C or higher on a Civic Action Project (CAP) AND 2. Passing score of C or higher on Self-Reflection
Exhibit character traits that reflect civic-mindedness and a commitment to positively impact the classroom, school, community, and or society	Exhibit character traits that reflect "Empathetic Citizen" Learner Outcome through two Character Recommendations from a: • School staff • Peer • Local, state, or national officer • Approved Community Member • Employer



Acceleration and Retention Policy

Board Approved:

The Governing Board expects learners to progress through each grade level within one school year. To accomplish this, instruction should accommodate the variety of ways that learners learn and include strategies for addressing academic deficiencies when needed.

Learners shall progress through the grade levels by demonstrating growth in learning, meeting grade level standards, and obtaining high school course credits of expected learner achievement.

Learners shall be identified for acceleration or retention based on the following data:

- CAASPP scores
- NWEA MAP assessments
- Other summative and formative assessments in ELA, writing, and mathematics
- Grades
- High School Credits
- Facilitator observations/feedback
- Any other relevant data in the Student Study Team (SST) process
- **High School credits earned**

Acceleration

Acceleration is possible when high academic achievement is evident. However, the learner's social and emotional growth shall be taken into consideration before placing them in a higher grade. The School Director or designee may recommend a learner for acceleration into a higher grade level upon review of the Student Study Team's (SST) findings.

Acceleration Guidelines - Grades 9-12

~~The following guidelines for acceleration shall be implemented:~~



~~1. When a facilitator or parent/guardian feels a learner should be considered for acceleration, they shall review all available data and then discuss the case fully with the SST. If the learner has more than one regular classroom facilitator, the School Director or designee shall specify the facilitator(s) responsible for discussing the case with the SST.~~

~~2. The SST may consider the learner's grades, facilitator observations,~~

~~assessment results, performance-based assessments, participation in available supplemental instruction programs, and any other relevant data or information available to the SST.¶~~

~~3. The learner should be performing several grades above their current grade level according to work produced and standardized test scores.¶~~

~~4. The SST's decision to accelerate a learner shall be based on what action best serves the child and shall include relevant social and emotional concerns.¶~~

~~5. The parent/guardian shall be involved in any decision regarding acceleration of a learner.¶~~

~~6. A grade level adjustment document, signed by the team, shall be placed in the learner's cumulative file.~~

High School

Progress Toward Graduation

Progress toward high school graduation shall be based on the student's ability to pass the subjects and electives necessary to earn the required number of credits for high school graduation. In alignment with the school's commitment to individualized learning, a student will generally not be retained or accelerated in a specific "grade level" in the traditional sense. Instead, a student's placement and progress are determined by **credit accrual** and the mastery of course standards.

Acceleration via Credit Accrual

Course Advancement: Students may accelerate their path to graduation by enrolling in additional courses during the academic year, summer sessions through an approved outside accredited school provider, or through concurrent enrollment in a community college.

Early Graduation: Students who meet all state and charter-defined graduation requirements in fewer than four years may apply for early graduation, subject to administrative approval and a post-secondary transition plan.

Retention

The Governing Board recognizes that very few children benefit from being retained. When any learner is retained or recommended for retention, the School Director or designee shall offer programs of direct, systematic, and intensive supplemental instruction and social emotional support through Multi-Tiered Systems of Support (MTSS). Learners shall be identified on the basis of academic achievement, social and emotional maturity, and the number of credits earned during the school year in accordance with law, Board Policy, and the following criteria. **Consideration of retention for learners with an IEP will be discussed at an IEP meeting before a decision is made by the School Director or designee. **

Retention Guidelines – High School¶

~~Learners in grades 9-12 are not retained into lower grades but must meet graduation course and credit requirements based on school, State, and board policy for graduation from high school.~~

High School Support and Intervention

Credit Recovery: Rather than retaining a student in a grade level, students who fail to

earn credit in a core subject area will be provided with credit recovery options. This ensures the student remains on a path to graduation with their cohort while addressing specific learning gaps.

Holiday Policy 26-27 Updates Overview

Besides updating the dates for each holiday, three changes were made to the Holiday Policy:

- 1) Language was added to make long-term substitutes eligible for Holiday pay. In many cases, long-term subs will fill a position for several months while an employee is out on leave.
- 2) Language was added to clarify that employees scheduled to work fewer than 8 hours per day, will receive holiday pay based on the actual number of hours they would have worked that day.
- 3) We removed language regarding being present at work on the last day before a holiday and the first day after the holiday. The original intent was that employees on leave wouldn't be paid for that day, but other language already exists. This was causing confusion for employees who took vacation time around a holiday. They were afraid they wouldn't get paid for that day, and that was not the intent.



Empower Generations
Full-Time and Part-Time Hourly Employee Holiday Benefit Policy

Board Approved: May 19, 2026

The following is our company's holiday benefit policy, which outlines all the days of the year that we acknowledge and observe as holidays. Empower Generations will close its doors on these days, and employees are expected to comply by not working. Work done on a day that falls on an observed holiday will only be approved when the work is absolutely necessary to perform vital job functions related to the needs of the organization, such as payroll information submission and processing, state reporting, or any urgent matters that cannot be delayed until after the holiday.

Holiday Benefit Policy Effective July 1, 2026 through June 30, 2027

Eligibility

Non-exempt hourly employees who are classified as regular, full-time or part-time employees are eligible to receive holiday pay. "Regular employees" are defined as employees who are hired to work on a regular schedule. For purposes of this Holiday Policy, Temporary or On-Call employees who are placed into a long-term assignment will be considered "regular employees" once they have completed 10 consecutive school days covering the same assignment, and will revert back to Temporary or On-Call when that assignment ends.

Hourly full-time and part-time employees will receive their normal rate of pay for holidays identified by Empower Generations and set forth on a schedule issued by Human Resources, and approved by the School Board annually. Employees who are scheduled to work fewer than eight (8) hours per day will receive holiday pay on a prorated basis (paid at the rate of hours that would have normally been worked on that particular holiday day of the week). ~~Hourly full-time employees will receive their normal rate of pay for holidays identified by Empower Generations and set forth on a schedule issued by Human Resources, and approved by the School Board annually.~~

~~Hourly eligible part-time employees will receive holiday pay on a prorated basis (paid at the rate of hours that would have normally been worked on that particular holiday day of the week).~~

Hourly employees who are not scheduled to work during summer break or winter break are not eligible to receive holiday pay for any holidays that occur during these breaks.

If a recognized holiday falls during an unpaid leave of absence, no pay will be given for the Holiday.

The following employees are NOT eligible for holiday benefits:

- Temporary employees
- Employees in internship programs.

Paid Holidays

Empower Generations recognizes the following paid holidays each year:

- Independence Day (7/34/20265)
- Labor Day (9/74/20265)
- Veterans' Day (11/11/20265)
- Thanksgiving Holiday (11/256/20265 to 11/278/20265)
- Winter Holiday (12/234/20265 to 1/12/20276)
- Martin Luther King Day (1/189/20276)
- Presidents' Day (2/156/20276)
- Memorial Day (5/3125/20276)
- Juneteenth (6/189/20276)

Should a holiday fall on a weekend, the holiday will be observed on the workday closest to the holiday.

Procedures

The following conditions apply to Empower Generations' holiday benefit policy:

- Holiday pay will not be considered as time worked for the purpose of overtime calculations.
- Holiday pay is computed at an individual employee's base rate of pay.
- If an hourly employee is scheduled to work on a holiday, the employee will be paid his or her regular rate of pay plus holiday pay.
- Holidays will not be paid to employees on any type of unpaid leave.
- Holidays falling within an approved scheduled vacation will be recorded as holiday pay.
- ~~An employee must be present at work on his or her last scheduled day prior to the holiday and the first scheduled day after the holiday to receive holiday pay.~~

Religious Holidays

Apart from observed state and national holidays, some employees may observe separate religious holidays. Employees may take PSL, Vacation, or unpaid time off for an observed religious holiday, unless such an arrangement will cause undue hardship to our company.

Vacation Policy Updates Overview

There are two updates to the Vacation Policy:

- 1) Existing policy says employees accrue on the first day of the month. Our payroll system calculates it on the last day of the month. Policy is updated to reflect this.
- 2) Language has been added to clarify that vacation days are intended to be taken in full-day increments, but the supervisor may approve half-day increments at their discretion.



Vacation Policy

Board Approved: ~~May 198~~ June 198, 20265

Purpose:

Empower Generation's ("EG") paid vacation plan is a part of the benefits package extended to full-time, year-round staff members and is designed to provide employees with the opportunity to balance their work and home lives. The purpose of this policy is to provide eligible employees with flexibility from work that can be used for such needs as vacation, personal or family business, volunteerism, and other activities of the employee's choice. EG's goal is to provide time for personal rejuvenation and to reduce unscheduled absences while providing reasonable accommodation to full-time staff members without impacting employee compensation.

Eligibility:

Staff members eligible for this benefit include non-instructional staff regularly scheduled and working 30 hours or more per week (.75 FTE) and 250 or more days per year.

Accrual:

Employees will accrue vacation time based on the following rate:

- Up to 15 days of paid vacation per year, accruing at the rate of 1.25 days (10 hours) per month worked. The monthly accrual of 1.25 days (10 hours) will be allocated to the employee on the ~~last~~^{first} day of each month.
- The maximum vacation time accrual is 15 days (120 hours). Once the maximum has been reached, the employee will stop accruing vacation time until already accrued vacation time has been used.

Usage:

Vacation days are intended to be taken in full-day increments. However, ~~e~~Employees may request accrued vacation time in half-day or full-day increments. ~~Approval of half-day increments is at the discretion of the supervisor and will depend on school needs.~~ "Borrowing" of vacation time that has not yet been accrued must be approved by the supervisor and/or

School Director, and depending on the needs of the school, may be denied. In any event, an employee may not borrow more vacation time than they are scheduled to accrue in the current school year.

Upon termination (voluntary or involuntary), employees will be required to pay the school for any vacation time that was borrowed but remains unaccrued.

Requesting Time Off:

New employees can request vacation time upon the completion of their first month of employment. Employees should submit a request for vacation time to their supervisor at least two weeks in advance. Approval of requested vacation time is not guaranteed, but additional advance notice will decrease the chances of denial of the request. Requests will be granted on a first-come, first-served basis, taking into consideration the needs of EG.

Unused Vacation Time:

Employees are encouraged to use all of their accrued vacation time by the end of the school year. Any vacation time not used by June 30th of each school year will not be forfeited. Unused vacation time will roll over into the next school year, but the maximum allowable accrual at any time is 15 days (120 hours).

Payout:

Accrued and unused vacation hours will only be paid out at the employee's current hourly rate upon separation from employment with EG, or upon a change in position in which the new position is not eligible to accrue vacation time, employees are not entitled to "cash out" accrued and unused vacation hours during their employment with EG.

Vacation time is a benefit that provides employees with the opportunity to rest and recharge, and we encourage employees to take advantage of this benefit. However, it is also important to balance the needs of the schools that we serve with the needs of individual employees, and we ask that all requests for vacation time be made with consideration for the needs of EG and the learners.

Overview of the changes to the Records Retention Policy

The existing Records Retention Policy was provided to our outside counsel for review. They provided us with a new, more comprehensive version. It was easier to provide a clean new version, rather than trying to redline the existing version. The overall message remains the same, but it is updated to reflect current laws and regulations.



RECORDS RETENTION AND DISPOSAL POLICY

Board Approved: May 19, 2026

I. Purpose

The records of the California public charter schools operated by Empower Generations (the “School”) are important to our efficient and effective operation. The School’s records include those produced by the School’s employees, volunteers, and board members, both in electronic and paper form, when acting in the course and scope of their roles at the School, and/or using the School’s computers, email accounts, or other electronic storage devices owned or controlled by the School. Items that may seem unimportant, such as interoffice emails, desktop calendars, and printed memoranda nonetheless may be considered records under this Record Retention and Disposal Policy and Procedures (“Policy”).

The purpose of this Policy is to ensure that necessary records of the School are adequately protected and maintained, and to ensure that records no longer needed by the School or that are of no value are appropriately discarded at the proper time. This Policy should also aid employees, volunteers, and board members of the School (sometimes referred to herein as “you”) in understanding your obligations in retaining electronic documents, including email, web files, text files, sound and movie files, .pdf documents, and Microsoft Office or other native-format files. If you are ever uncertain as to any procedures set forth in this Policy (e.g., what records to retain or destroy, when to do so, or how), it is your responsibility to seek direction from the designated Administrator (defined below).

II. Policy and Scope

This Policy applies to all records (used interchangeably with “documents”) generated in the course of the School’s operations, including both original documents and reproductions, and also applies to electronic documents (e.g., emails and documents saved electronically).

The goals of this Policy are to:

- Retain important documents for reference and future use in accordance with applicable laws;
- Delete or dispose of documents that are no longer necessary for the operation of the School;
- Organize important documents for efficient retrieval; and
- Ensure that the School’s employees, volunteers, and board members know which

documents should be retained, the length of their retention, means of storage, and when and how they should be destroyed.

Federal and state laws require the School to maintain certain types of records for particular periods. Failure to maintain such records could subject the School to penalties and fines, lead to compliance issues, obstruct justice, affect evidence, and/or seriously harm the School's position in a tax or litigation matter. Thus, it is important that you understand and comply with this Policy.

Notwithstanding anything contrary in this Policy, you should retain and seek direction from the Administrator concerning any records which you reasonably believe: (i) are or could be relevant to any future tax or litigation matter; (ii) arise from a dispute that could lead to litigation; or (iii) pertain to a lawsuit in which the School is a party. In such situations, the School must preserve records unless or until the School's legal counsel determines that the records can be destroyed in accordance with this Policy and applicable legal requirements.

III. Administration and Oversight

Attached as Appendix A is a Record Retention Schedule ("Schedule") that is approved as the initial maintenance, retention, and disposal schedule for physical and electronic records of the School. The Schedule lists several categories of records, including those with specific retention periods. The School's Director (the "Administrator") or their designee is in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Schedule is followed. The Administrator is also authorized to: (i) make modifications to the Schedule from time to time to ensure that it is in compliance with local, state, and federal laws and includes the appropriate record categories for the School; (ii) monitor local, state, and federal laws affecting record retention; (iii) review the record retention and disposal program; and (iv) monitor compliance with this Policy.

To ensure compliance with this Policy, the Administrator is responsible for the following oversight functions:

- Informing employees, volunteers, and board members as needed, of this Policy and the Schedule, as well as any changes to the Policy and/or Schedule;
- Providing oversight of actual retention and destruction/disposal of documents;
- Ensuring proper storage of documents;
- Periodically checking to see if proper retention periods are in place; and
- Suspending the destruction of documents upon actual or foreseeable litigation.

All questions relating to document retention and/or destruction should be directly addressed to the Administrator.

IV. How Records are Stored

Tangible Records

Tangible records are those which you must physically move to store, such as paper records (including printed versions of electronically saved documents). Active records that are retained as set forth in the Schedule and need to be easily accessible may be stored at the School. Inactive tangible records that are retained as set forth in the Schedule may be sent to an off-site storage facility.

Electronic Records

Electronic records are those which are stored digitally, such as email and other computer files. Email that is required to be retained as set forth in the Schedule should be either printed and stored as tangible records, or stored electronically. The School uses Google apps for Education (Gmail) for email communications, which are then archived in Google Vault and backed up separately. Local files on desktops are to be stored on supplied Google Drive unless IT has installed approved local backup software.

V. Destruction/Deletion of Records

Tangible Records

Tangible records that are not required to be retained as set forth in the Schedule should be destroyed by shredding or some other means that will render them unreadable. If you have a record that you do not know how to destroy, such as a photograph, compact disk, or tape recording, ask the advice of the Administrator.

Electronic Records

Electronic records that you “delete” from a device typically remain in the School’s system. Thus, the School’s information technology (“IT”) staff or vendor will be responsible for permanently removing deleted emails from the computer system that are not required to be retained as set forth in the Schedule. Permanently deleting a file is usually sufficient in most circumstances to dispose of a record. Keep in mind, where duplicate records are involved, both/all copies should be destroyed/deleted where proper. In certain cases, a document may be maintained in both paper and electronic form. In such cases, the electronic document may be the official document and the paper version may be destroyed if permitted under the law.

VI. Suspension of Record Disposal in the Event of Litigation or Audit

In the event the School is served with a document subpoena, or an employee becomes aware of a governmental investigation or audit concerning the School or any of its funding sources, or of the commencement of any litigation against or concerning the School, 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.

APPENDIX A RECORDS RETENTION SCHEDULE

The Records Retention Schedule is organized as follows:

SECTION TOPIC

A.	Accounting and Finance
B.	Compliance Reports
C.	Contracts
D.	Corporate Records and Charter
E.	Correspondence and Internal Memoranda
F.	Electronic Documents
G.	Grant Records
H.	Insurance Records
I.	Legal Files and Papers
J.	Payroll Documents
K.	Pension Documents
L.	Personnel Records
M.	Property Records
N.	Tax Records
O.	Donation Records
P.	Programs & Services Records
Q.	Other

A. ACCOUNTING AND FINANCE

Record Type	Retention Period
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Annual Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit (e.g., written contemporaneous records that document student attendance)	3 years after completion of audit
Annual Budgets	At least 2 years
P1, P2, and Annual Attendance reports	Permanent

Bank Statements and Records (deposit slips, canceled checks, electronic fund transfers)	7 years
Employee Expense Reports	7 years
General Ledgers	Permanent
Interim Financial Statements	7 years
Invoices	7 years
Notes Receivable Ledgers and Schedules	7 years
Purchase Orders	7 years
Receipts	7 years

B. COMPLIANCE REPORTS

Record Type	Retention Period
CALPADS	Permanent (maintain copies of revised versions with original)
CBEDS	Permanent (maintain copies of revised versions with original)
Civil Rights Data Collection (CRDC) Survey	2 years
ConApps	Permanent (maintain copies of revised versions with original)
LCAP	Permanent (maintain copies of revised versions with original)
LEA Plans	Permanent (maintain copies of revised versions with original)
National School Lunch Program, National School Breakfast Program, Child and Adult Care Food Program Contracts and Supporting Documents (Pricing and Revenue Records)	Current plus 3 years
School Accountability Report Cards (SARC)	Current plus 3 years
Technology Plans (Internal)	Current
E-Rate Application Documentation	10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request, whichever date is later (maintain copies of revised versions

Title I Plans	with original) Permanent (maintain copies of revised versions with original)
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C. CONTRACTS

Record Type	Retention Period
Contracts and Key Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination of the contract
Records received from a third party when performing under and related to a contract for goods or services	Records should be returned to the third party upon expiration or termination of the contract; unless prohibited by the contract or law, copies should be retained for 7 years after expiration or termination of the contract

D. CORPORATE RECORDS AND CHARTER

Record Type	Retention Period
Corporate Records (e.g. agendas, agenda packets, signed minutes, corporate seals, articles of incorporation, bylaws, annual corporate reports)	Permanent
Charters	Permanent
Fixed asset records	Permanent
Licenses and Permits	Permanent (if project specific, then for project duration)

E. CORRESPONDENCE AND INTERNAL MEMORANDA

General Principle: Key correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or memoranda that do not pertain to documents having a prescribed retention period, or draft correspondence or memoranda, should generally be discarded sooner. These may be divided into two general categories:

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded at any time and at least *within two years*. Some examples include:
 - Routine letters and notes that require no acknowledgment or follow-up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
 - Form letters that require no follow-up.
 - Letters of general inquiry and replies that complete a cycle of correspondence.
 - Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).
 - Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.

Please note that copies of interoffice correspondence and documents where a copy will be in the originating department file should be read and destroyed, unless that information provides reference to or direction to other documents and must be kept for project traceability.

2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

F. ELECTRONIC DOCUMENTS

The School does not automatically delete electronic records beyond the dates specified in this Policy, but may do so at its discretion. The School may keep a backup of any electronic records (including email) on the School's server(s) at its discretion. However, any electronic records shall not be considered retained in the ordinary course of business and are subject to regular and periodic destruction. Any electronic backup is meant to be a safeguard to retrieve lost information should documents or files on the network experience problems. Any backup copy would be considered a safeguard for the record retention system of the School, but it is not considered an official repository of the School's records.

In certain cases, a document will be maintained in both paper and electronic form. In such cases, the official document will be the electronic document and the paper version may be destroyed.

If versions or drafts of an electronic document are automatically saved by the application, the prior versions or drafts shall not be considered retained in the ordinary course of business and are subject to regular and periodic destruction.

1. **Electronic Mail:** Not all email needs to be retained, depending on the subject matter. If the content of an email requires it to be retained under any sections of this Policy, you are responsible for printing and storing the email as a tangible record, or storing the email electronically.
 - All email—from internal or external sources—may be deleted immediately by email users unless the content of the email requires it to be retained under any sections of this Policy. The length of time that an email should be retained should be based upon the content of the email and the category under the

various sections of this Policy.

- The School may archive email (e.g. in Google Vault) for up to one fiscal year beginning July 1 and ending June 30 of the year after the email was created. All emails not saved by the user and older than one fiscal school year after the year the email was created may be deleted from the School email system, servers, backup servers, and any other electronic storage system as early as the first day of the subsequent fiscal year. The subsequent fiscal year is defined as beginning on July 1.
- Staff will strive to keep all of their email communication related to School issues.
- You will not store or transfer the School-related email on non-work-related computers except as necessary or appropriate for the School purposes.
- You will take care not to send confidential/proprietary information of the School to outside sources.

2. **Electronic Documents**, including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.

- PDF documents – The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this Policy.
- Text/formatted files – You will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those you consider unnecessary or outdated.

3. **Web Page Files: Internet Cookies**

- All workstations: It is recommended that Internet browsers should be scheduled to delete Internet cookies once per month.

4. **Social Media Records**

- The School maintains social media accounts to communicate information with the public, but posts and messages on the School's accounts are not retained in the ordinary course of business and are subject to regular and periodic destruction. However, if the content of a social media post or message requires it to be retained under any sections of this Policy, you are responsible for printing and storing the post or message as a tangible record, or storing it electronically.

5. **Surveillance Footage**

- The School may maintain surveillance systems at its school sites for security purposes, but electronic surveillance footage is not retained in the ordinary course of business and is subject to regular and periodic destruction.

G. GRANT RECORDS

All records related to special grants or other funding sources will follow the specific retention requirements as stated in the grant or funding source requirements.

Record Type

Retention Period

Requests for Applications, Submitted

7 years after completion of grant period

Applications, Assurances and Certifications, and other related documents	
Grant agreement and subsequent modifications, if applicable	7 years after completion of grant period
All requested IRS/grantee correspondence including determination letters and “no change” in exempt status letters	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
All evidence of returned grant funds	7 years after completion of grant period
All pertinent formal correspondence including opinion letters of counsel	7 years after completion of grant period
Report assessment forms	7 years after completion of grant period
Documentation relating to grantee evidence of invoices and matching or challenge grants that would support grantee compliance with the grant agreement	7 years after completion of grant period
Pre-grant inquiry forms and other documentation for expenditure responsibility grants	7 years after completion of grant period
Grantee work product produced with grant funds	7 years after completion of grant period

H. INSURANCE RECORDS

Record Type	Retention Period
Annual Loss Summaries	10 years
Audits and Adjustments	3 years after final adjustment
Certificates Issued to the School	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Group Insurance Plans	Permanent or until 6 years after death of last eligible participant
Inspections	3 years

Insurance Policies (including expired policies)	Permanent
Journal Entry Support Data	7 years
Loss Runs	10 years
Releases and Settlements	Permanent

I. LEGAL FILES AND PAPERS

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject matter files)	7 years after close of matter
Litigation Files	1 year after expiration of appeals or time for filing appeals
Court Orders	Permanent
Requests for Departure from Record Retention Schedule	10 years

J. PAYROLL DOCUMENTS

Record Type	Retention Period
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
Labor Distribution Cost Records	7 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets	4 years
Unclaimed Wage Records	6 years

K. PENSION DOCUMENTS

General Principle: Pension documents and supporting employee data shall be kept in such a manner that can establish at all times whether or not any pension is payable to any person and if so the amount of such pension.

Record Type	Retention Period
Retirement and Pension Records (including employment agreements, job descriptions, salary schedules, and contribution records)	Permanent

L. PERSONNEL RECORDS

Record Type	Retention Period
Commissions/Bonuses/Incentives/Awards	7 years
Employer Information Reports	2 years after date of record or action (whichever is later)
Employee Earnings Records	Separation + 7 years
Employee Handbooks	Permanent
Employee Medical Records	Separation + 6 years
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 Contracts – Individual	7 years after separation
Employment Records – Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
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)	4 years
Job Descriptions	Current + 3 years
Forms I-9	3 years after hiring, or 1 year after separation if later

M. PROPERTY RECORDS

Record Type	Retention Period
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Original Purchase/Sale/Lease Agreement	Permanent
Property Insurance Policies	Permanent

N. TAX RECORDS

General Principle: The School must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits, or other matters required to be shown in any tax return.

These documents and records shall be kept for as long as the contents thereof may become material in the administration of federal, state, and local income, franchise, sales, and property tax laws.

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
Rulings and Determination Letters	Permanent
Excise Tax Records	7 years
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns – Income, Franchise, Property	Permanent
Sales/Use Tax Records	7 years
Annual Information Returns – Federal and State	Permanent
IRS or other Government Audit Records	Permanent

O. DONATION RECORDS

Record Type	Retention Period
Records of donations	7 years from date of last expenditure of donated funds
Documents evidencing terms of donations	7 years from date of last expenditure of donated funds
Sponsorship agreements and records	7 years from conclusion of sponsorship

P. PROGRAMS AND SERVICES RECORDS

Record Type	Retention Period
Records relating to programs run by the School	7 years from completion of program

Q. OTHER

Record Type	Retention Period
Consultant's Reports	2 years
Incidents and Investigations (including incident reports, witness interviews, and investigation notes)	3 years (or until resolution of claim and appeal if one is filed)
Material of Historical Value	Permanent
Policies and Procedures Manuals	Current version with relevant revision history

Overview of the changes to the Learner Records Retention Policy

The existing Learner Records Retention Policy was provided to our outside counsel for review. They provided us with a new, more comprehensive version. It was easier to provide a clean new version, rather than trying to redline the existing version. The overall message remains the same, but it is updated to reflect current laws and regulations.



LEARNER RECORDS MAINTENANCE, RETENTION, AND DESTRUCTION

Board Approved: May 19, 2026

I. Purpose

The purpose of this Learner Records Maintenance, Retention, and Destruction Policy (“Policy”) is meant to provide the California public charter schools operated by Empower Generations (the “School”) details for maintaining learner records and provide appropriate guidelines for the maintaining, accessing, and disposing of learner records.

II. Terms and Definitions

“Learner record” means any item of information (in handwriting, print, tape, film, computer, or other medium) directly related to an identifiable learner and maintained or required to be maintained by the School or any employee in the performance of his/her duties. Learner records are divided into the following three categories: (1) mandatory permanent learner records; (2) mandatory interim learner records; and (3) permitted learner records. Learner records do not include, for example:

- Informal notes compiled by a school officer or employee which remain in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a substitute.
- Records of any law enforcement unit of the School, subject to the provisions of Title 34 of the Code of Federal Regulations (C.F.R.) section 99.8.
- Records relating to an individual who is employed by the School that are made and maintained in the normal course of business, relate exclusively to the individual in that individual’s capacity as an employee, and are not available for use for any other purpose.
- Records of a learner who is 18 years of age or older, or is attending an institution of postsecondary education, that are: a) made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in their professional capacity or assisting in a paraprofessional capacity; b) made, maintained, or used only in connection with the treatment of the learner; and c) disclosed only to individuals providing the treatment. For the purpose of this definition, “treatment” does not include remedial educational activities or activities that are part of the program of instruction at the School.
- Records created or received by the School after an individual is no longer a pupil in attendance and that are not directly related to the individual’s attendance as a pupil.
- Grades on peer-graded papers before they are collected and recorded by the teacher.
- Test protocols, test instruments, and interpretative materials that do not contain the pupil’s name or other personally identifiable information (defined below).

“Mandatory permanent learner record” is a record that the School is required to maintain in perpetuity and which the School has been directed to compile by state law, regulation, or administrative directive. Such records shall include the following:

1. Legal name of pupil.
2. Date of birth.
3. Method of verification of birth date.
4. Sex of pupil.
5. Place of birth.
6. Name and address of parent of minor pupil.
 - a. Address of minor pupil if different than the above.
 - b. An annual verification of the name and address of the parent and the residence of the pupil.
7. Entering and leaving date of each school year and for any summer session or other extra session.
8. Subjects taken during each year, half-year, summer session, or quarter.
9. If marks or credit are given, the mark or number of credits toward graduation allows for work taken.
10. Verification of or exemption from required immunizations.
11. Date of high school graduation or equivalent.
12. All records pertaining to any accident or injury involving a minor for which a claim for damages has been filed as required by law, including any policy of liability insurance relating thereto, except that these records cease to be Class – Permanent records one year after the claim has been settled or the statute of limitations has run.

“Mandatory interim learner record” is a record that the School is required to compile and maintain for a period of three (3) years after the learner leaves the School or the usefulness of the record ceases. Such records include:

1. All agreements, including Independent Study Master Agreements and Addendums.
2. Learner assignment and work records.
3. Representative samples of completed learner work with the supervising teacher’s evaluation.
4. Teacher record of apportionment/attendance credits, grades, and other evaluations of independent study assignments.
5. A log or record identifying those persons (except authorized school personnel) or organizations requesting or receiving information from the record. The log or record shall be accessible only to the legal parent or guardian or the eligible pupil, or a dependent adult pupil, or an adult pupil, or the custodian of records.
6. Health information, including Child Health Developmental Disabilities Prevention Program verification or waiver.
7. Participation in special education programs including required tests, case studies, authorizations, and actions necessary to establish eligibility for admission or discharge.

8. Language training records.
9. Progress slips and/or notices.
10. Parental restrictions regarding access to directory information or related stipulations.
11. Parent or adult pupil rejoinders to challenged records and to disciplinary action.
12. Parental authorizations or prohibitions of pupil participation in specific programs.
13. Results of standardized tests administered within the preceding three years.

“Permitted learner record” is a record that has clear importance only to the current educational program and maintained for appropriate educational purpose. It must be kept for six (6) months after its usefulness ceases. Such records may include:

1. Objective counselor and/or teacher ratings.
2. Standardized test results older than three years.
3. Routine discipline data.
4. Verified reports of relevant behavioral patterns.
5. All disciplinary notices
6. Attendance records not covered in the California Code of Regulations, Title 5, Section 400.

“Personally identifiable information” includes, but is not limited to:

1. The student’s name.
2. The name of the student’s parent/guardian or other family members.
3. The address of the learner or student’s family.
4. A personal identifier, such as the student's social security number, learner number, or biometric record (e.g., fingerprints, retina and iris patterns, voiceprints, DNA sequence, facial characteristics, and handwriting).
5. Other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name.
6. Other information that, alone or in combination, is linked or linkable to a specific learner that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the learner with reasonable certainty.
7. Information requested by a person who the School reasonably believes knows the identity of the learner to whom the learner record relates.

“Parent” means a parent/guardian of a learner and includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or a guardian . If the parents are divorced or legally separated, only a parent with legal custody of the pupil may challenge the content of the record, offer a written response to a record, or consent to release records to others. Either parent may grant consent if both parents have notified, in writing, the School that an agreement has been made. If a learner has attained the age of 18 years or is attending an institution of postsecondary education, the permission or consent required of, and the rights accorded to, the parents or guardian of the learner shall thereafter only be required of, and accorded to, the learner, unless the learner transfers his or her educational rights.

III. Maintenance, Retention, and Destruction of Learner Records

Learner records shall be maintained in a central file at the School attended by the learner or, when records are maintained at different locations, a notation shall be placed in the central file indicating where other records may be found.

The School shall not collect or solicit social security numbers or the last four digits of social security numbers from pupils or their parents or guardians unless otherwise required to do so by state or federal law.

The School Director or designee is the designated Custodian of Records. The Custodian of Records and/or his or her designee shall be responsible for overseeing the implementation of this Policy and processing any requests for access to, or transfer of, learner records. The Custodian of Records is responsible for the security of learner records maintained by the School and for devising procedures for assuring that access to such records is limited to authorized persons.

Learner records shall be maintained consistent with the classification of the record as either mandatory permanent learner record, mandatory interim learner record, or permitted learner record. The retention period for the records shall be as follows:

- Mandatory permanent learner records: Must be maintained for an indefinite period of time.
- Mandatory interim learner records: Unless forwarded to another school, must be maintained for a period of three (3) school years after the learner leaves the School or the usefulness of the record ceases. The mandatory interim learner record may be destroyed thereafter.
- Permitted learner records: May be destroyed when their usefulness ceases. They may be destroyed six (6) months after the learner completes or withdraws from the educational program and their usefulness ceases.

Learner records may be destroyed by shredding the records or by other means to assure complete destruction and to prevent any reconstruction of the records and disclosure of any personally identifiable information.

In the event the School is served with a subpoena, or an employee becomes aware of the commencement of any litigation against or concerning the School, such employee shall inform the Custodian of Records and any further destruction of records shall be suspended until such time as the Custodian of Records, with the advice of counsel, determines otherwise. The Custodian of Records shall take such steps as necessary to promptly inform all staff of any suspension in the further destruction of records.

IV. Access to Learner Records

In accordance with state and federal laws, access to any learner record shall be granted to:

1. Parents/guardians of students younger than age 18 years, including the parent who is not the student's custodial parent.
2. An adult learner, or a learner under the age of 18 years who attends a postsecondary institution, in which case the learner alone shall exercise rights related to the student's records and grant consent for the release of records.
3. Parents/guardians of an adult learner with disabilities who is age 18 years or older and has been declared incompetent under state law.

In addition, as permitted by law, certain individuals or agencies may have access to particular records that are relevant to their legitimate educational interest or other legally authorized purpose.

Requesting Learner Records

To inspect, review, or obtain copies of your learner's educational file, authorized persons shall submit a request to the Custodian of Records. For any individual granted access based on a legitimate educational interest, the request shall specify the interest involved. Parents who submit a request shall receive access to their child's educational file within five (5) business days of the request being made.

When required by law, a student's parent/guardian or an adult learner shall provide written, signed, and dated consent before the School discloses the learner record. If the parent/guardian or adult learner refuses to provide written consent for the release of learner information, the School shall not release the information, unless it is otherwise subject to an exception under 34 C.F.R. § 99.31.

Access Logs

A log shall be maintained for each student's record which lists all persons, agencies, or organizations requesting or receiving information from the record and the legitimate educational interest of the requester. In every instance of inspection by persons who do not have assigned educational responsibility, the Custodian of Records shall make an entry in the log indicating the record inspected, the name of the person granted access, the reason access was granted, and the time and circumstances of inspection. The log shall be open to inspection only by the parent/guardian, adult learner, Custodian of Records, and certain state or federal officials specified in Education Code 49064.

Duplication of Learner Records

To provide copies of any learner record, the School may charge a reasonable fee not to exceed the actual cost of providing the copies. No charge shall be made for providing up to two transcripts or up to two verifications of various records for any former learner. No charge shall be made to locate or retrieve any learner record.

Contract for Digital Storage, Management, and Retrieval of Learner Records

The School may enter into a contract with a third party for the digital storage, management, and retrieval of learner records and/or to authorize a third party provider of digital software to access, store, and use student records, provided that the contract meets the requirements of Education Code section 49073.1 and other applicable state and federal laws.

V. Changes to Learner Records

Only a parent/guardian having legal custody of a learner or an adult learner may challenge the content of a record or offer a written response to a record. No additions or change shall be made to a student's record after high school graduation or permanent departure, other than routine updating, unless required by law or with prior consent of the parent/guardian or adult learner.

Request for Amendment to Education Records

Following the inspection and review of a learner's education record, a parent/guardian or eligible student may file a written request with the registrar/admissions office to correct or remove any information in the learner's education record that is any of the following:

- a. Inaccurate
- b. An unsubstantiated personal conclusion or inference
- c. A conclusion or inference outside of the observer's area of competence
- d. Not based on the personal observation of a named person with the time and place of the observation noted
- e. Misleading
- f. In violation of the privacy or other rights of the student

The School will respond within thirty (30) days of receipt of the request to amend. The School's response will be in writing and if the request for amendment is denied, the School will set forth the reason for the denial and inform the parent/guardian or eligible student of their right to a hearing challenging the content of the education record.

If the Director or designee sustains any or all of the allegations, the Director or designee must order the correction or the removal and destruction of the information. The Director or designee must then inform the parent/guardian or eligible student of the amendment in writing.

Hearing to Challenge Education Record

If the School denies a parent/guardian or eligible student's request to amend an education record, the parent/guardian or eligible student may, within thirty (30) days of the denial, appeal the denial in writing to the Board of Directors.

Within 30 days of receipt of the appeal, the Board of Directors shall determine whether or not to sustain or deny the allegations in closed session, in accordance with Education Code section 49070.

The decision of the Board is final.

Name/Gender Change: Former Learners with Government-Issued Documentation

When a former learner submits a state-issued driver's license, birth certificate, passport, social security card, court order, or other government-issued documentation demonstrating that the former student's legal name and/or gender has changed, the School shall update the former student's records to reflect the updated legal name and/or gender. Upon request by the former learner, the School shall reissue any documents conferred upon the former learner, including, but not limited to, a transcript, a high school diploma, a high school equivalency certificate, or other similar documents. The School is not required to modify records that the former learner has not requested for modification or reissuance.

The documentation provided by a former pupil demonstrating legal name or gender change may include, but need not be limited to, any of the following:

1. State-issued driver's license.
2. Birth certificate.
3. Passport.
4. Social security card.
5. Court order indicating a name change or a gender change, or both

If the former student's name or gender is changed and the requested records are reissued, a new document shall be added to the former student's file that includes all of the following information:

1. The date of the request
2. The date the requested records were reissued to the former learner
3. A list of the records that were requested by and reissued to the former learner
4. The type of documentation, if any, provided by the former learner to demonstrate a legal change to the student's name and/or gender
5. The name of the employee who completed the request
6. The current and former names and/or genders of the learner

Name/Gender Change: Former Students Without Documentation and Current Students

Any former learner who submits a request to change the legal name or gender on the student's records but is unable to provide any government-issued documentation demonstrating the legal name or gender change, may request a name or gender change through the process described in Education Code 49070. Current students may similarly request a name or gender change through that process.

Under Education Code section 49070, a former student who is unable to provide government-issued documentation demonstrating a legal change in name and/or gender, or a

current student, may file a written request to the School's Director or designee to change the name and/or gender included in the student's records. Within thirty (30) days of receipt of such a request, the Director or designee shall meet with the student and, if any, the certificated employee who recorded the information in question.

If the Director or designee sustains the request to change the former or current student's name and/or gender in the student's records, the Director or designee shall order the correction or the removal and destruction of the information, and the School shall add a new document to the student's record that includes all of the following information:

1. The date of the request.
2. The date the requested records were corrected.
3. A list of the records that the student requested to be corrected.
4. The type of documentation, if any, provided to demonstrate a legal change to the student's name and/or gender.
5. The name of the employee who completed the request.
6. The corrected and former name and/or gender of the current or former student.

Overview of the changes to the Equity Policy

The existing Learner Records Retention Policy was provided to our outside counsel for review. They provided us with a new, more comprehensive version. It was easier to provide a clean new version, rather than trying to redline the existing version. The overall message remains the same, but since it is a few years old, it has been updated to current language and regulations.



Equity Policy

Board Approval: May 12, 2026

The Board of Directors of Empower Generations, which operates California public charter schools (the “School”) believes that the diversity that exists among the School's community of learners, staff, parents/guardians, and community members is integral to the School's vision, mission, and goals. The School recognizes the inherent value of diversity and acknowledges that educational excellence requires a commitment to equity for all learners and the resulting outcomes.

The School endeavors to proactively identify any practices, policies, and institutional barriers that may negatively influence learner success, perpetuate achievement gaps, and impede equal access to opportunities for all learners.

In doing so, the School’s Board and staff may consider impediments to learning faced by learners of diverse (e.g., cultural, linguistic, socio-economic) backgrounds, consider whether the School’s policies, procedures, and decisions address the needs of all learners, and remedy any inequities, as appropriate. School decisions shall not rely on biased or stereotypical assumptions about any particular group of learners or individuals.

Examples of ways in which the Board and staff may promote equity in School programs and activities as appropriate may include, but is not limited to, the following:

1. Assessing learner needs based on data disaggregated by race, ethnicity, and socio-economic and cultural backgrounds in order to inform policy, planning, and resource development decisions
2. Analyzing expenditures and allocating financial and human resources in a manner that provides all learners with equitable access to school programs, support services, and opportunities for success and promotes equity and inclusion in the school. Such resources include access to high-quality leaders, facilitators, and other school personnel; funding; technology, equipment, textbooks, and other instructional materials; facilities; and community resources or partnerships.
3. Enabling and encouraging learners to enroll in, participate in, and complete curricular and extracurricular courses, advanced college preparation programs, and other learner activities
4. Building a positive school climate that promotes learner engagement, safety, and academic and other supports for learners

5. Adopting curriculum and instructional materials that accurately reflect the diversity among learner groups
6. Providing and/or collaborating with local agencies and community groups to ensure the availability of necessary support services for learners in need
7. Providing School staff with ongoing, research-based, professional learning and professional development on culturally responsive instructional practices
8. Conducting program evaluations that focus on academic outcomes and performance of all learners on all indicators

Nothing in this policy shall be interpreted or applied to authorize the School to discriminate against, or grant preferential treatment to, any individual or group on the basis of a protected characteristic, including race, sex, color, ethnicity, national origin, disability, or any other characteristic protected by applicable law, except as expressly permitted or required by law. The School shall provide equal rights and opportunities in all of its educational programs and activities consistent with applicable law.

Overview of the changes to the Harassment, Discrimination, Intimidation, and Bullying Prevention Policy

The existing Harassment, Discrimination, Intimidation, and Bullying Prevention Policy has been updated to comply with the Safe Place to Learn Act. All updates are in blue.



HARASSMENT, DISCRIMINATION, INTIMIDATION, AND BULLYING PREVENTION POLICY

Complaint with the Safe Place to Learn Act

Board Approved: May 19, 2026

It is the policy of Empower Generations to create and maintain a learning environment where students and employees are treated with dignity, decency, and respect. It is also the policy of Empower Generations to maintain an environment that encourages and fosters appropriate conduct among all persons and respect for individual values. Accordingly, the School is committed to enforcing this Harassment, Discrimination, Intimidation, and Bullying Prevention Policy at all levels in order to create an environment free from all forms of discrimination, harassment, intimidation, and bullying. Discrimination, harassment, intimidation or bullying based on the following characteristics, whether actual or perceived, **or singularly or a combination of two or more of the following protected characteristics:** race or ethnicity (including ancestry, color, ethnic group identification and ethnic background; **race is inclusive of traits associated with race, including, but not limited to, hair texture and protective hairstyles, including, but not limited to, such hairstyles as braids, locs and twists**), religious creed (including religious dress and grooming practices), color, national origin (including language use restrictions), immigration status, citizenship status, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (including pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy or childbirth), gender, gender identity, gender expression, age, sexual orientation, military and veteran status, or association with a person or group with one or more of the aforementioned characteristics or any other legally protected category is unlawful and undermines the character and purpose of the School. Such discrimination, harassment, intimidation, or bullying violates School policy and will not be tolerated. This policy applies to all **acts related to school activity or school attendance occurring within a school under the jurisdiction of the governing board of the Charter School, and all acts of the governing board of the Charter School, including enacting policies and procedures that govern the Charter School. Additionally, the Charter School shall not adopt or approve the use of any textbook, instructional material, supplemental instructional material, or curriculum for classroom instruction if the use of the textbook, instructional material, supplemental instructional material, or curriculum would subject a student to unlawful discrimination.**

Any form of retaliation against anyone who has complained or formally reported discrimination, harassment, intimidation, or bullying or against anyone who has participated in an investigation of such a complaint, regardless of whether the complaint relates to the complaining person or someone else, will not be tolerated and violates this policy and the law.

If the School possesses information that could indicate immigration status, citizenship status, or national origin information, the School shall not use the acquired information to discriminate against any students or families or bar children from enrolling in or attending school. If parents or guardians choose not to provide information that could indicate their or their children's immigration status, citizenship status, or national origin information, the School shall not use such actions as a basis to discriminate against any students or families or bar children from enrolling or attending school.

Each year, the School shall educate students about the negative impact of bullying other students based on their actual or perceived immigration status or their religious beliefs or customs. The School shall also train facilitators, staff, and personnel to ensure that they are aware of their legal duty to take reasonable steps to eliminate a hostile environment and respond to any incidents of harassment based on the actual or perceived characteristics noted above. Such training shall provide School personnel with the skills to do the following:

- Discuss the varying immigration experiences among members of the student body and school community;
- Discuss bullying-prevention strategies with students, and teach students to recognize the behavior and characteristics of bullying perpetrators and victims;
- Identify the signs of bullying or harassing behavior;
- Take immediate corrective action when bullying is observed; and
- Report incidents to the appropriate authorities, including law enforcement in instances of criminal behavior.

Definitions

Discrimination: Discrimination is adverse treatment of any person based on the protected class or category of persons to whom he/she belongs and such treatment limits students from participating or benefiting from school activities or services.

Harassment: Harassment is unwelcome verbal or physical conduct prohibited by law directed toward, or differential treatment of, a learner because of his/her membership (or perceived membership) in any protected group or on any other prohibited basis. The harasser can be a learner, a School official or employee, or someone who is not an employee of the School, such as a vendor or parent.

Examples of such conduct include, but are not limited to:

- Offensive or degrading remarks, verbal abuse, or other hostile behavior such as insulting, teasing, mocking, name-calling, degrading or ridiculing another person or group
- Racial slurs, derogatory remarks about a person's accent, or display of racially offensive symbols
- Unwelcome or inappropriate physical contact, comments, questions, advances, jokes, epithets, or demands
- Physical assault or stalking
- Displays or electronic transmission of derogatory, demeaning, or hostile materials
- Graphic and written statements, which may include use of cell phones or the Internet

Harassment does not have to include intent to harm, be directed at a specific target, or involve repeated incidents. Harassment creates a hostile environment when the conduct is sufficiently severe, pervasive, or persistent so as to interfere with or limit a learner's ability to participate in or benefit from the services, activities, or opportunities offered by the School.

Sexual Harassment: Sexual harassment is a form of harassment based on sex, including sexual harassment, gender harassment, and harassment based on pregnancy, childbirth, or related medical conditions, [gender identity](#), [gender expression](#), and [sexual orientation](#). It generally involves unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list of violations:

- Unwanted sexual advances
- Offering educational benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct: leering, making sexual gestures, displaying of suggestive objects or pictures, cartoons, or posters
- Verbal conduct: making or using derogatory comments, epithets, slurs, and jokes
- Verbal sexual advances or propositions
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes, or invitations
- Physical conduct: touching, assault, impeding, or blocking movements

Intimidation: Intimidation includes adverse actions intended to fill another with fear, to overawe or cow, as through force of personality or by superior display of wealth, talent, etc., or to force another into or deter from some action by inducing fear.

Bullying: Bullying may take place in a variety of hostile acts that are carried out repeatedly over time. The acts involve a real or perceived imbalance of power, with the more powerful child or group attacking those who are less powerful. It may be physical (hitting, kicking, spitting, pushing), verbal (taunting, malicious teasing, name-calling, threatening), or psychological (spreading rumors, manipulating social relationships, or promoting social exclusion, extortion, or intimidation). Bullying is any severe or pervasive action or conduct directed toward one or more students that have the effect of one or more of the following: 1) places a reasonable student in fear of harm to that student's person or property; 2) causes a reasonable student to experience a substantially detrimental effect on the student's physical or mental health; 3) causes a reasonable student to experience substantial interference with the student's academic performance; 4) causes a reasonable student to experience interference with the student's ability to participate in or benefit from the services, activities or privileges provided by the School.

Other types of bullying:

- Sexual bullying includes many of the actions typical of bullying behavior, with the added actions of exhibitionism, voyeurism, sexual propositioning, sexual harassment, and sexual abuse (touching, physical contact, sexual assault).
- Bias or hate-motivated bullying is a basic bias against or hate for a person or group. Examples include taunting one's race, religion, national origin, sexual orientation, or physical or mental disabilities. The bullying behavior may also be aggressive, antagonistic, and assaultive.
- Hazing is a form of aggressive behavior that usually involves intimidation and humiliation during an initiation for a student organization or body, club, group or sports team. It may involve conduct that is likely to cause serious bodily injury or personal degradation or disgrace, resulting in physical or mental harm to a former, current, or prospective pupil. Hazing does not include athletic events or school-sanctioned events.
- Cyberbullying involves bullying conduct that is created or transmitted by means of an electronic device, including, but not limited to, a telephone, wireless telephone or other wireless communication device, computer or pager communicating any of the following: 1) a message, text, sound or image; 2) a post on a social network Internet Web site, including a "Burn Page," an impersonation of another student, and a false profile.
- Cybersexual bullying involves dissemination of, or the solicitation or incitement to disseminate, a photograph or other visual recording by a pupil to another pupil or to school personnel by means of an electronic act that has or can be reasonably predicted to have one or more effects described in (1) – (4) above. A photograph or other visual recording shall include the depiction of a nude, semi-nude, or sexually explicit photograph or other visual recording of a minor where the minor is identifiable from the photograph, visual recording, or other electronic act.
- Social media bullying involves bullying through forums for social media, such as internet websites with free registration and ease of registration, internet websites offering peer-to-peer instant messaging (such as Snapchat, WhatsApp, Slack, Teams, Messenger), internet websites offering comment forums (such as Facebook, Twitter, Reddit) and internet websites offering image or video posting platforms (such as YouTube, Instagram, TikTok, Vimeo).

Retaliation: Retaliation is any adverse action taken against a student because he or she filed a charge of harassment, discrimination, intimidation, or bullying complaint to the School or another agency or participated in an investigation about the same (such as an internal investigation or lawsuit), including as a witness. Retaliation also includes adverse action taken against someone who is associated with the individual opposing the perceived harassment, discrimination, intimidation, or bullying.

Reporting Discrimination, Harassment, Intimidation, Bullying or Retaliation

Any student who believes that he or she has been the victim of discrimination, harassment, intimidation, bullying, or retaliation prohibited by this policy, or any student who has witnessed such discrimination, harassment, intimidation, bullying, or retaliation, should immediately report the circumstances in

accordance with the procedure set forth below. The School will investigate any conduct that violates this policy, even in the absence of a complaint, and take remedial action where appropriate.

A student may make a complaint, written or oral, to any of the individuals listed below:

- Their facilitator, school counselor, or other school personnel
- The school director of the School

Complaints may be submitted to the Principal by any of the following methods:

- By website <https://ileadexploration.org/general-inquiries> or <https://ileadav.org/contact-us>
- By email at info@iLEADexploration.org
- By phone at 657-231-8222 or 661-494-7442
- By mail at 3720 Sierra Hwy., Suite A, Acton, CA 93510

Any facilitator, school counselor, or other school employee that receives any complaints of misconduct, or personally observes, learns about from others, or reasonably suspects has occurred, shall report the same to the Principal, so that the School may attempt to resolve the claim internally. Any School personnel that witness an act of discrimination, harassment, intimidation, bullying, or retaliation shall take immediate steps to intervene when it is safe to do so.

Investigation and Disposition of Complaints

The School will conduct a prompt, thorough, and impartial investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The investigation, conducted by a qualified investigator(s) (who may be a School employee), will include an interview with the alleged student-victim and his/her parent(s)/guardian(s). It may also include interviews with the person who made the initial report, the complainant (if not the alleged victim), the alleged wrongdoer, and/or any other person who may have information regarding the incident, each of whom are encouraged to cooperate with any investigation. The investigator may also review any relevant documents.

The School will endeavor to complete its investigation within thirty (30) days of a report of discrimination, harassment, intimidation, bullying, or retaliation.

Confidentiality of the complaint and investigation will be kept by the School to the extent possible, but note that the investigation will not be completely confidential. The School shall ensure confidentiality with respect to a student's or family's immigration status.

The investigator (if a third party) will report his/her findings to the Principal and/or Board of Directors. Where the investigator concludes that a violation of this policy has occurred, the Principal and/or Board of Directors will take prompt and appropriate redial action, including disciplinary action. Depending upon the circumstances, disciplinary action may include, but is not limited to, suspension and/or recommendation for expulsion. Discipline for a violation of this policy is not progressive, so a first violation of this policy may warrant suspension or a recommendation for expulsion.

Every complaint will trigger the creation of an investigatory file. The investigatory file will consist of the initial complaint, the final investigative report, including a record of the remedial action to be taken, if any, and all documents created, used, or reviewed during the investigation.

At the conclusion of the investigation, the Principal shall notify the complainant of the manner in which it has resolved the matter. If, within 30 days after notification of resolution, the complainant does not agree with the resolution, the complainant may appeal the matter to the Board of Directors of the School by filing a notice of appeal stating the reasons for the appeal and specific disagreement with the School's resolution of the complaint. The Board of Directors will provide the student with a final decision of the School's resolution 5 days after the Board of Directors' next regularly scheduled board meeting. If the student does not agree with the final determination of the Board of Directors, the student may appeal to

the California Department of Education using the appeal process adopted in the School's Uniform Complaint Procedures.

Parental Notification:

Each year, the School shall notify parents and guardians of their children's right to a free public education, regardless of immigration status or religious beliefs. This information shall include information related to the "Know Your Rights" immigration enforcement established by the California Attorney General. The School shall also inform learners who are the victims of hate crimes of their right to report such crimes.

Sexual Harassment Poster

The School shall create a poster that notifies pupils of the applicable written policy on sexual harassment. The poster shall display, at a minimum, all of the following: 1) The rules and procedures for reporting a charge of sexual harassment; 2) The name, phone number and email address of an appropriate school official to contact to report a charge of sexual harassment; 3) The rights of the reporting pupil, the complainant, and the respondent and the responsibilities of the School in accordance with the School's written policy on sexual harassment.

This poster will be prominently and conspicuously displayed in each bathroom and locker room at the schoolsite. It may be prominently and conspicuously displayed in public areas at the schoolsite that are accessible to, and commonly frequented by learners, including, but not limited to classrooms, classroom hallways, gymnasiums, auditoriums, and cafeterias. The governing board of the School shall have full discretion to select the appropriate public areas to display the poster at the schoolsite.

Posting

This policy shall be posted on the School's internet website in a manner that is easily accessible to parents/guardians/students.

Overview of Employee Guidebook Changes - Empower

Page 17: Added clarification to the Facilitator Substitutes and when they move from “On-Call” to “Regular” employees. This was updated to clearly include our long-term subs for things like Holiday Pay.

Page 20: Politics and Religion - Language was added to allow for non-partisan events at the school such as voter information sessions.

Page 21: Revised Employee-Student Relations Policy. The policy has been reviewed by our legal counsel, and they have replaced it with the Policies for Promoting Safe Environments for Student Learning and Engagement. It is a separate policy outside of the Employee Guidebook. The new version is more comprehensive and meets the requirements of recent legislation. Rather than duplicating it in the Guidebook, we direct the reader to see the separate policy.

Page 30: We have updated the requirements for any employees who drive for business purposes. These changes limit the types of personal vehicles that an employee can drive for business purposes. It also has standards to be sure they are in safe operating condition. This doesn't apply to an employee's commute to a site, only when driving for business purposes.

Page 33: The “use of iLEAD Communication Equipment and Technology section has been completely overhauled by the IT department. It has been a few years since any major updates were done, and due to the speed of change that technology experiences, we felt it was better to update the entire section, rather than try to fix what was already there.

Page 47: Our internal procedure when an employee (or former employee) requests a copy of their employee file is to have them view it at HQ. We put that in writing in this version of the Guidebook.

Page 48-49: We cleared up some lingering questions regarding rest periods and meal breaks.

Page 50: We had to remove this section regarding voluntarily skipping breaks since it did not follow California law.

Page 58: We had to adjust the Paid Sick Leave (PSL) policy since we are moving to 11-month employees. All full-time employees who work 40 hours per week will continue

to earn 12 sick days per year. Any full-time employees scheduled to work 30-39 hours per week will receive a prorated number of sick days.

Page 59: We added a section called PSL Exhaustion to clearly define what happens when employees use all PSL and continue to call out sick.

Page 60: We added some clarity and detail into “non-contract” days. There was some confusion among employees on how and when they could use them.

Page 68: Bereavement Leave - Currently only salaried Exempt employees receive pay for bereavement days. They get 5 paid days for each qualifying death. All other full-time employees get 5 unpaid days. It felt inequitable that one group of employees received paid time off, but everyone else did not. The new version will now give 5 paid days to all employees, but only 5 total paid days per school year. They can take additional bereavement if there is another death, but those additional days will be unpaid.

Page 71: Jury Duty - Current policy gives indefinite time off to salaried Exempt employees, and they get paid for the whole week if they do any work at all. The new policy limits paid time off to 2 weeks.



Empower Generations

Employee Guidebook

Board Approved May 19~~5~~, 202~~6~~5

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INTRODUCTION

Welcome to Empower Generations!

We recognize that our greatest asset is our team of employees. We value the many talents and abilities of our employees and strive for an environment of teamwork, open communication, mutual support, and professionalism.

We designed this Employee Guidebook to provide you with general information about our policies, procedures and guidelines. We always strive to improve, and we encourage your ideas or suggestions. Please take some time to review this Guidebook and if you have any questions, please contact your Director or Human Resources.

The information contained in this Guidebook applies to all employees at Empower Generations (“Empower” or “School”). It is important that all employees read, understand and follow the provisions in this Guidebook. It is not intended to create any expectations of continued employment or as a contract between Empower and any of its employees.

This Guidebook supersedes any previously issued Guidebooks, policies, benefit statements and/or memoranda, whether written or verbal. Empower reserves the right to alter, modify, amend, delete and/or supplement any employment policy or practice with or without notice to you.

Once you have reviewed this Guidebook, please sign the employee acknowledgement form at the end of this Guidebook, keep one for your files and provide the other to Human Resources. This signed acknowledgement demonstrates to Empower that you have read, understand and agree to comply with the policies outlined in the Guidebook.

HIRING POLICIES AND PROCEDURES

AT WILL EMPLOYMENT

We hope to have a long and mutually beneficial relationship with you. Your employment with Empower is at-will and is voluntary and may be terminated by you or Empower at any time, with or without cause and with or without notice. Similarly, your status (for example, position, duties, salary, promotions, demotions, etc.) may be changed at-will, with or without cause and with or without notice at any time. Nothing in this Guidebook or in any document or statement shall limit Empower's right to terminate your employment at-will or limit Empower's right to transfer, demote, suspend, administer discipline, and change the terms and conditions of employment at its sole discretion. This Guidebook does not reflect a contract of employment, either express or implied, between you and Empower.

No Empower representative is authorized to modify this policy for any employee, unless in writing and approved in writing by the Governing Board of Directors.

OPEN DOOR POLICY

At some time or another, you may have a suggestion, complaint, or question about Empower, your job, your working conditions, or the treatment you are receiving. We welcome your concerns, suggestions, complaints, and questions, and encourage you to bring them to our attention. For issues other than prohibited harassment, discrimination, or retaliation, we ask that you take your concerns first to your supervisor, who will attempt to provide a solution or explanation. If the problem is still not resolved, you may present it to your Chief Executive Officer, preferably in writing, or to Human Resources by opening a Human Resources ticket in the self-service portal.

WORKPLACE ANTI-VIOLENCE POLICY

Empower is committed to providing a workplace that is free from acts of violence or threats of violence. In keeping with this commitment, Empower has established a strict policy that prohibits any employee from threatening or committing any act of violence in the workplace, while on duty, while on Empower-related

business, or while operating any vehicle or equipment owned or leased by Empower. This policy applies to all employees.

Workplace violence includes, but is not limited to, threats of any kind; threatening, physically aggressive, or violent behavior, such as intimidation or attempts to instill fear in others; other behavior that suggests a propensity toward violence, including belligerent speech, excessive arguing or swearing, sabotage, threats of sabotage of Empower property; defacing Empower property or causing physical damage to the facilities; and bringing weapons or firearms of any kind on Empower premises or while conducting Empower business on or off Empower property.

In order to achieve our goal of providing a workplace that is secure and free from violence, Empower must enlist the support of all employees. Compliance with this policy and Empower's commitment to a zero-tolerance policy with respect to workplace violence is every employee's responsibility.

Compliance with this anti-violence policy is a condition of employment. Due to the importance of this policy, employees who violate any of its terms, who engage in or contribute to violent behavior, or who threaten others with violence may be subject to disciplinary action, up to and including immediate termination.

If any employee observes or becomes aware of any of the above-listed actions or behavior by an employee, student, parent, visitor, or anyone else, he or she must immediately notify their supervisor or Human Resources. If these individuals are not available, report the incident to any other supervisor and report the incident to Human Resources as soon as possible. All reports will be investigated by Empower and appropriate corrective action will be taken.

If an employee becomes aware of an imminent act of violence, a threat of imminent violence, or actual violence, emergency assistance must be sought immediately. In such situations, the employee should contact law enforcement authorities by dialing 911. Immediately after contacting law enforcement authorities, the employee must report the incident to Human Resources.

Employees should immediately inform their supervisor or Human Resources about any workplace security hazards. If these individuals are not available, the employee should immediately inform any other supervisor so that appropriate action can be taken.

In certain circumstances, Empower may seek a workplace violence restraining order on behalf of one or more employees in furtherance of its commitment to providing a workplace that is free from acts of violence or threats of violence. Furthermore, employees should notify Human Resources if any restraining order is in effect or if a potentially violent non-work-related situation exists that could result in violence in the workplace.

Any person who violates this policy on Empower property may be removed from the premises as quickly and safely as possible, at the Empower's discretion, and may be required to remain off Empower premises pending the outcome of an investigation of the incident.

All reports of workplace violence will be taken seriously. If Empower determines that workplace violence has occurred, Empower will take appropriate corrective action and may impose disciplinary action, up to and including termination.

There will be no retaliation against any employee who brings a complaint in good faith under the Workplace Anti Violence Policy or who honestly assists in investigating such a complaint, even if the investigation

produces insufficient evidence that there has been a violation, or if the charges cannot be proven. However, disciplinary action may be taken against employees who, in bad faith, make false or frivolous accusations.

IMMIGRATION COMPLIANCE

Empower does not discriminate against any individual because of his or her national origin, citizenship or intent to become a U.S. citizen. It is, however, the policy of Empower to only employ those individuals who are authorized to work in the United States. Therefore, Empower requires each prospective employee to provide documents verifying his or her identity and authorization to be legally employed in the United States.

As a condition of employment, each new employee must properly complete, sign and date the first section of the USCIS Form I-9, on or prior to the first day employment commences and present documentation establishing identity and employment eligibility within three business days after he or she begins work. If the employee cannot verify his/her right to work in the United States within three business days of employment, Empower will be required to terminate his/her employment immediately.

Upon the expiration of a work authorization form, Empower will be required to terminate his/her employment immediately unless a renewal or extension is provided prior to the expiration date.

REASONABLE ACCOMMODATIONS, DISCRIMINATION, UNLAWFUL HARASSMENT, RETALIATION, AND COMPLIANT PROCEDURES

Empower adopted the following policies pursuant to the California Fair Employment and Housing Act and related state and federal laws regarding discrimination, unlawful harassment, and retaliation.

Empower is committed to providing a professional work environment free from discrimination, unlawful harassment, and retaliation. Accordingly, Empower has adopted the following policies, which are designed to prevent unlawful conduct in the workplace, encourage professional and respectful behavior in the workplace, promote the reporting of potential violations, and foster taking corrective action where appropriate, even if the violation does not rise to the level of unlawful conduct. All employees are expected to assume responsibility for maintaining a professional work environment in accordance with the following policies. As such, all employees who experience potential violations of the following policies are strongly encouraged to promptly report such violations so that Empower may have an opportunity to address and resolve any concerns. All other employees (particularly supervisors) are required to immediately report any potential violations of the following policies.

Empower is committed to responding to alleged violations of this policy in a timely and fair manner and to taking appropriate action aimed at ending the prohibited conduct.

REQUESTS FOR REASONABLE ACCOMMODATIONS: MEDICAL AND RELIGIOUS

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, Empower will make a good faith effort to provide reasonable accommodations for the known physical or mental limitations of an otherwise qualified applicant or employee with a disability, unless undue hardship would result to Empower. An applicant or employee who believes he or she requires an accommodation in order to perform the essential functions of the job should contact Human Resources and request such an accommodation by opening a Human Resources ticket in the self-service portal, and complete the Request for Reasonable Accommodation Form. Empower will analyze the situation, engage in an interactive process with the individual, and respond to the individual's request.

The individual is required to fully cooperate with Empower in seeking and evaluating alternatives and accommodations. Supervisors that become aware of information that an employee may need a reasonable accommodation to perform the essential functions of his or her job must report it to Human Resources. Empower will engage in the interactive process in compliance with applicable law. Empower may require medical verification of both the disability and the need for an accommodation.

Empower will not discriminate against any individual in regards to compensation or any term or condition of employment because of a conflict with an individual's religious beliefs or observance and any employment requirement. To the extent an employment requirement conflicts with an individual's religious beliefs or observance, Empower will explore potential reasonable accommodations and will make a good faith effort to implement reasonable accommodations unless an undue hardship would result. An applicant or employee who believes he or she requires a religious accommodation in order to perform any job requirement should notify Human Resources and request an accommodation.

Pregnancy and lactation accommodations may also be requested. Please refer to the Lactation and Pregnancy Disability Leave policies set forth herein for further information.

EQUAL EMPLOYMENT OPPORTUNITY (DISCRIMINATION)

Covered Individuals: This policy protects all employees of Empower as well as interns, volunteers, and potential employees (applicants). All employees of Empower are required to abide by this policy, regardless of position or status, including supervisors, management, and co-workers.

Discrimination: As used in this policy, "discrimination" means taking any adverse employment action against an employee or applicant in any aspect of employment, solely or in part based on the individual's protected category. Discrimination may include, but is not necessarily limited to, factoring an individual's protected

category in hiring, promotion, compensation, or other terms and conditions of employment unless otherwise permitted by law.

Adverse Employment Action: As used in this policy, “adverse employment action” may include, but is not necessarily limited to, the following: demotion; suspension; reduction in pay; denial of a merit salary increase; failure to hire or consider for hire; refusal to promote or consider for promotion; denial of employment opportunities; change of an employee’s work assignments; failure to provide a workplace accommodation when required (i.e., disability, pregnancy, religion, transgender); failure to provide a leave of absence when required (i.e., medical, pregnancy, workers’ compensation, military, domestic violence); or any other unequal treatment based on the individual’s protected category resulting in an adverse employment action.

Protected Categories: Empower’s policy prohibits discrimination based on race (which includes historically associated traits, such as hair styles and protective hair styles, e.g., braids, locks, and twists), religious creed (which includes religious dress and grooming practices), color, national origin (which includes, but is not limited to, national origin groups and aspects of national origin, such as height, weight, accent, or language proficiency), ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (which includes pregnancy, childbirth, breastfeeding, and related medical conditions), gender, gender identity, gender expression, age, sexual orientation, reproductive health decision making, military or veteran status (including state and federal active and reserve members as well as those ordered to duty or training), immigration/citizenship status (which includes undocumented individuals and victims of human trafficking) or related protected activities, protected medical leaves, domestic violence victim status, political affiliation, or any other consideration made unlawful by federal, state, or local laws, ordinances, or regulations. These categories include a perception that the individual has any of these characteristics or is associated with a person who has (or is perceived to have) any of these characteristics.

Scope of Policy: Empower is an equal employment opportunity employer and is committed to complying with all applicable laws providing equal employment opportunities. As such, Empower makes employment decisions, including, but not limited to, hiring, recruiting, firing, promotion, demotion, training, compensation, qualifications/job requirements, on the basis of merit and/or business necessity. Employment decisions are based on an individual’s qualifications as they relate to the job under consideration pursuant to legitimate business purposes.

If you believe you have been subjected to, witnessed, or have knowledge about discrimination, please follow the complaint procedure outlined below

UNLAWFUL HARASSMENT

Covered Individuals: This policy protects all employees of Empower as well as interns, volunteers, and potential employees (applicants). All employees of Empower are required to abide by this policy, regardless of position or status, including supervisors, management, and co-workers. In addition, this policy prohibits unlawful harassment by any third parties. Empower will take all reasonable steps to prevent or eliminate unlawful harassment by non-employees, including parents, students, vendors, contractors, and suppliers, who have workplace contact with our employees.

Protected Categories: Empower’s policy prohibits harassment based on race (which includes historically associated traits, such as hair styles and protective hair styles, e.g., braids, locks, and twists), religious creed (which includes religious dress and grooming practices), color, national origin (which includes, but is not limited to, national origin groups and aspects of national origin, such as height, weight, accent, or language proficiency), ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (which includes pregnancy, childbirth, breastfeeding, and related medical conditions), gender, gender identity, gender expression, age, sexual orientation, reproductive health decision making, military or veteran status (including state and federal active and reserve members as well as those ordered to duty or training), immigration/citizenship status (which includes undocumented individuals and victims of human trafficking) or related protected activities, protected medical leaves, domestic violence victim status, political affiliation, or any other consideration made unlawful by federal, state, or local laws, ordinances, or regulations. These categories include a perception that the individual has any of these characteristics or is associated with a person who has (or is perceived to have) any of these characteristics.

Unlawful Harassment: Prohibited unlawful harassment may include, but is not necessarily limited to, the following behavior pertaining to any of the above protected categories:

- *Verbal conduct* such as unwanted sexual advances including flirting, sexually suggestive innuendos, conversations regarding sexual activities, and sexual invitations or comments, racial slurs or epithets, sexist or misogynistic comments, ethnic insults or jokes, religious aspersions or mockery, disability insults or ridicule, homophobic epithets or slurs, transphobic comments or derision, derogatory comments regarding gender, gender identity or gender expression, disparaging remarks regarding military or veteran status, threats of deportation against applicants and employees and family members of applicants and employees, derogatory comments about immigration status or mockery of an accent of language or its speakers, negative remarks regarding marital status, or any other belittling, negative or derogatory comments regarding any protected characteristic (“hostile work environment” harassment).
 - *Disrespectful or unprofessional conduct* based on any of the protected categories listed above (“hostile work environment” harassment).
 - *Comments or conduct that consistently target one gender*, even if the content is not sexual (“hostile work environment” harassment).
 - *Visual conduct* such as derogatory and/or sexually oriented posters, photography, cartoons, objects, drawings, gestures, text messages, social media posts, instant messages, e-mails, letters, pictures, or gifts (“hostile work environment” harassment).
 - *Physical conduct* such as assault, unwanted touching, blocking normal movement, or interfering with work because of any protected basis (“hostile work environment” harassment).

- *Threats and demands to submit to sexual requests* as a condition of continued employment or to avoid some other loss and offers of employment benefits in return for sexual favors (“quid pro quo” harassment).

Sexually harassing conduct does need not to be motivated by sexual desire and may include situations that began as reciprocal relationships but later ceased to be reciprocal.

Scope of Policy: Empower is committed to providing a work environment free of unlawful harassment. This policy applies to all phases of employment, including, but not limited to, recruiting, testing, hiring, promotion, demotion, transfer, layoff, termination, rates of pay, benefits, and selection for training. In addition, this policy extends to conduct with a connection to an employee’s work, even when the conduct takes place away from Empower’s premises, such as a business or school trip, business or school-related social function, or social media activity (depending on the circumstances).

If you believe you have been subjected to, witnessed, or have knowledge about unlawful harassment, please follow the complaint procedure outlined below

RETALIATION

Covered Individuals: This policy protects all employees of Empower as well as interns, volunteers, and potential employees (applicants). All employees of Empower are required to abide by this policy, regardless of position or status, including supervisors, management, and co-workers.

Retaliation: As used in this policy, “retaliation” means taking any adverse employment action against an employee because he or she engaged in protected activity pursuant to this policy. Protected activity may include, but is not necessarily limited to, the following: opposing a practice or conduct the employee reasonably believes to be unlawful; reporting or assisting in reporting suspected violations of this policy; cooperating or participating in investigations or proceedings arising out of a violation of this policy; or engaging in any other activity protected by applicable law. Additionally, Empower prohibits retaliation against an employee who refuses to report to, or leaves, the workplace during an emergency condition (as defined by law) because the employee reasonably believes that the workplace or worksite is unsafe. An emergency condition means: (i) conditions of disaster or extreme peril to the safety of persons or property at the workplace or worksite caused by natural forces or a criminal act; or (ii) an order to evacuate a workplace, a worksite, a worker’s home, or the school of a worker’s child due to natural disaster or a criminal act.

Adverse Employment Action: As used in this policy, “adverse employment action” means conduct or an action that materially affects the terms and conditions of the employee’s employment status or is reasonably likely to deter the employee from engaging in further protected activity. Adverse employment actions may include, but are not limited to, the following: demotion; suspension; reduction in pay; denial of a merit salary increase; failure to hire or consider for hire; refusing to promote or consider for promotion because of reporting a violation of this policy; harassing another employee for filing a complaint; denying employment opportunities because of making a complaint or for cooperating in an investigation; changing an employee’s work

assignments because of engagement in activities protected under this policy; treating an employee differently such as denying an accommodation; not talking to an employee (the “cold shoulder”) when otherwise required by job duties; or otherwise excluding the employee from job-related activities because of engagement in activities protected under this policy.

Any retaliatory adverse action because of protected activity may be unlawful and will not be tolerated. If you believe you have been subjected to, witnessed, or have knowledge about retaliation, please follow the complaint procedure outlined below.

COMPLAINT PROCEDURE—DISCRIMINATION, UNLAWFUL HARASSMENT, RETALIATION

Duty to Report: At Empower, we encourage all employees to be vigilant and aware of how we are treating others. Each Supervisor has the responsibility to maintain a work place and educational environment free from any form of sexual or other unlawful harassment. All employees who believe they have been subjected to discrimination, unlawful harassment, and/or retaliation are strongly encouraged to promptly report the alleged violation(s) in accordance with the procedures set forth below. All employees (particularly supervisors) who believe they have witnessed or have knowledge of discrimination, unlawful harassment, and/or retaliation are required to immediately report the alleged violation(s) in accordance with the procedures set forth below. Immediate reporting allows Empower to quickly and fairly resolve any complaints in the workplace.

Title IX provides for separate processes and procedures for formal complaints of sexual harassment falling within the definitions provided in Title IX regulations. For those types of complaints, the School’s grievance procedures can be found in its Title IX policy posted to the website. Please contact the School’s Title IX Coordinator for further information.

In addition to reporting, any employee who experiences or witnesses conduct that the individual believes violates this policy is encouraged to tell the offending individual that the behavior is inappropriate and must be stopped, if the employee is comfortable doing so.

Where to Report Complaints to Empower: Submit a complaint to Administration, or your supervisor. If these individuals are not available, or in the event you believe that one of these individuals has engaged in inappropriate behavior in violation of these policies, submit a complaint to any other supervisor or to Human Resources by opening a Human Resources ticket in the self-service portal as soon as possible. There is no requirement to report your complaint to any designated supervisor within Empower. Select the individual with whom you feel the most comfortable discussing your complaint. Do not report your complaint to any individual who has allegedly engaged in the inappropriate behavior that is the subject of your complaint. If you have a complaint that involves the Chief Executive Officer, submit the complaint directly to the Chair of the Board of Directors.

Should a supervisor become aware of any conduct that may constitute unlawful harassment, discrimination, retaliation, or other prohibited behavior, the supervisor must report the conduct to Human Resources

immediately so that action may be taken to address and remediate such conduct. Supervisors who fail to report alleged violations may be subject to disciplinary action, up to and including termination.

Contents of Complaint: Your report should be specific and should include the names of the individuals involved, the names of any witnesses, and any supporting documentation. Employees may choose to submit their complaints verbally or anonymously, but to ensure that the issue is fully investigated, a written complaint is strongly recommended.

Response to Complaint (Investigation): Upon notice of conduct requiring an investigation, Empower will look into the facts and circumstances of the alleged violation, as appropriate. Empower will attempt to resolve the situation by promptly undertaking an effective, thorough, and objective investigation through the use of “qualified personnel” and using methods that provide all parties with “appropriate due process.” Empower’s investigation methods will vary depending on the nature of the complaint, the allegations, the witnesses, and other factors. All complaints will be handled as confidentially as possible and information will be disclosed only as it is necessary to complete the investigation and resolve the matter.

Empower may investigate conduct in the absence of a formal complaint if Empower has reason to believe that an individual has engaged in conduct that violates Empower policies or applicable law. Further, Empower may continue its investigation even if the original complainant withdraws his or her complaint during the course of the investigation.

All employees are required to fully cooperate with Empower’s investigation, which includes, but is not limited to, providing all pertinent information in a truthful manner, submitting pertinent documents in their possession, not interfering with the investigation in any manner, and maintaining an appropriate level of discretion regarding the investigation. Failure to do so may result in disciplinary action, up to and including termination.

During the investigation, Empower will provide regular progress updates, as appropriate, to those directly involved. Empower will strive to complete its investigation as efficiently as possible in light of the allegations and will reach any conclusions based on the evidence collected and credibility of the witnesses. At the completion of its investigation, Empower will inform the complainant(s) and the accused of its findings and decisions to the extent permitted by applicable law.

Corrective Action: If Empower determines that violations have occurred, Empower will take appropriate corrective action in accordance with the circumstances involved, including appropriate action to deter future conduct.

Examples of potential corrective action include, but are not limited to, written or verbal disciplinary action, suspension, reassignment, demotion, or termination, among others. In addition, the offending individual may be legally liable for his or her conduct, depending on the circumstances. Due to privacy protections, Empower is not able to fully disclose its entire decision regarding corrective action to the complainant.

No Retaliation: There will be no retaliation against any employee who brings a complaint in good faith or who honestly assists in investigating such a complaint, even if the investigation produces insufficient evidence that there has been a violation, or if the charges cannot be proven. Please refer to Empower’s Retaliation Policy above for further information.

How to Report Complaint to Government Agencies: Employees who believe that they have experienced unlawful conduct under these policies may also file a complaint with the local office of the California Department of Fair Employment and Housing (“DFEH”) or the U.S. Equal Employment Opportunity Commission (“EEOC”). The DFEH and the California Fair Employment and Housing Council (“FEHC”) as well as the EEOC can also order an employer to hire, reinstate, or promote a victim of discrimination, unlawful harassment, and/or retaliation or make other changes in Empower’s policies. The address and phone number of the local DFEH and EEOC offices can be found online.

TRAINING REQUIREMENTS

Empower requires all employees to abide by California’s training requirements, which includes training within six months of hire and retraining every two years thereafter. Employees who fail to complete this required training will be subject to disciplinary action, up to and including termination.

ANTI-BULLYING POLICY

In addition to Empower’s commitment to providing an environment free from unlawful harassment, discrimination, and retaliation, Empower prohibits workplace bullying.

Any employee who believes that he or she has been bullied, is being coerced to participate in bullying or who has information about bullying conduct by a coworker, supervisor, agent, parent, vendor or other third party not employed by Empower should provide a written or verbal report to Human Resources, his or her supervisor, or any other member of Administration.

If the employee’s supervisor is the individual about whom the employee has a complaint, or concern, the employee should make a report to Human Resources.

Empower will look into any complaints of workplace bullying. Empower will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible. If a complaint of bullying is substantiated, appropriate disciplinary action, up to and including discharge, may be taken. Empower will not tolerate retaliation against any employee who makes a good faith complaint regarding workplace bullying.

WHISTLEBLOWER POLICY

In accordance with applicable law, Empower prohibits retaliation against any employee because of the employee's refusal to participate in an activity that would result in a violation of a state or federal statute, or a violation or noncompliance with a state or federal rule or regulation, or for disclosing information to a government or law enforcement agency, where the employee has reasonable cause to believe that the information discloses a violation of a state or federal statute, or a violation or noncompliance with a state or federal rule or regulation. Empower also prohibits any retaliation against an applicant or employee, and does not discriminate against any applicant or employee, based on that applicant or employee's "whistle-blowing" activity against a former employer.

Employees who have concerns about practices that are believed to be illegal or violate Empower's policies are encouraged to report them to their supervisor or Human Resources. Employees who come forward with credible information on practices believed to be illegal or violations of Empower policy will be protected from retaliation.

Any Employee who reasonably believes that he or she is a victim of retaliation may also call a State of California "whistle-blower hotline" to report the retaliation: (800) 952-5665.

EMPLOYEE CLASSIFICATION

Empower's employees are classified in the following categories: Exempt or Non-Exempt, Full-Time or Part-Time, or Regular or Temporary/On Call. All employees are either exempt or non-exempt according to provisions of applicable wage and hour laws. An employee will not change from one status to any other status or classification simply because of the number of hours that the employee is scheduled to work or the length of time spent as an employee.

Because all employees are employed at-will and hired for an unspecified duration, these classifications do not guarantee employment for any specific length of time. Employment is at the mutual consent of the employee and Empower. Accordingly, either the employee or Empower can terminate the employment relationship at-will, at any time, with or without cause or advance notice.

Exempt: Exempt employees are those employees with job assignments that meet exemption tests under state and federal law making them exempt from overtime pay requirements. Exempt employees are compensated on a salary basis and are not entitled to overtime pay.

Non-Exempt: Non-exempt employees are those employees with job assignments that do not meet exemption tests under state or federal law. These employees are paid on an hourly basis and are entitled to overtime wages

for overtime worked in accordance with the law. Non-exempt employees may have to work hours beyond their normal schedules as work demands require.

Non-exempt employees are required to take meal and rest periods in the manner described in this Guidebook.

Full-Time: Full time employees are those employees who are regularly scheduled to work at least 30 hours in a week.

Part-Time: Part time employees are those employees who are regularly scheduled to work less than 30 hours in a week.

Regular: Regular employees are those who are hired to work on a regular schedule. Regular employees may be classified as full-time or part-time.

Temporary/On Call: These are positions that work schedules of no particular hours or duration. Employees who occupy these positions may also be expected to work an on-going but irregular schedule OR to work short-term temporary schedules OR to work on-call. The status of a temporary employee may change only if the employee is notified of the change in status, in writing, by the School Director or the employee's supervisor. **Facilitator Substitutes are considered On-Call until they have completed 10 consecutive school days covering the same assignment, at which time they become reclassified as Regular employees for the duration of that assignment.**

Unless otherwise required by law, Part-Time and Temporary/On Call employees are not entitled to benefits provided by Empower. If you have any questions about your classification, please consult with Human Resources.

FAMILIAL AND RELATED CONFLICT OF INTEREST

Empower wants to preserve a working environment that has clear boundaries between personal and professional relationships. All employees must avoid situations involving actual or potential conflicts of interest.

Some situations such as the ones described below can create conflicts of interest requiring Empower to take the employee's relationship with another employee, parent, student, vendor, or contractor into account.

An employee should not be in a supervisory role with another employee who is a relative (e.g., sibling, parent, spouse, domestic partner, etc.). Supervisors should avoid situations that result in actual or perceived conflicts of interest with supervised employees and situations of actual or perceived favoritism.

A supervisor should avoid forming special social relationships or dating employees under his or her direct supervision, or with other employees that would create actual or perceived conflicts of interest or situations of

actual or perceived favoritism. If such a relationship arises, both employees should notify Human Resources so that appropriate measures can be taken to prevent conflicts of interest or favoritism.

If a staff member forms a special social relationship or begins dating a parent of an Empower student, the staff member must immediately notify Human Resources so that appropriate measures may be taken to address the situation.

An employee involved in any relationships or situations that he or she believes may constitute a conflict of interest, should immediately and fully disclose the relevant circumstances to his or her immediate supervisor, or any other appropriate supervisor, for a determination about whether a potential or actual conflict exists. If an actual or potential conflict is determined, Empower may take whatever corrective action appears appropriate according to the circumstances. Failure to disclose facts related to a potential or actual conflict of interest may constitute grounds for disciplinary action.

Failure to comply with this policy and the School's Anti-Nepotism Policy may result in disciplinary action, up to and including termination.

FINANCIAL CONFLICT OF INTEREST

While employed by Empower, employees owe a duty of loyalty to Empower and are required to avoid any situation that presents an actual or potential conflict of interest. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of Empower's business dealings.

Improper personal gain may result not only where an employee or relative has a significant ownership interest in a company with which Empower does business but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Empower. The receipt of occasional flowers, candy or gifts worth less than \$250.00 from students, parents, or vendors fall outside the intent of this policy and acceptance of such items is permissible. However, employees must obtain written approval from Human Resources before accepting any item worth in excess of \$250.00 from students, parents, or vendors.

Failure to comply with this policy and the School's Conflicts of Interest Policy may result in disciplinary action, up to and including termination.

CERTIFICATION AND LICENSURE OF INSTRUCTIONAL STAFF

Each of Empower's core academic teachers is required to hold a Commission on Teacher Credentialing certificate, permit, or other document required for the teacher's certificated assignment in accordance with applicable state and federal law. If an instructional staff employee believes that he or she is assigned to teach in a subject in which he or she does not have subject matter competence, the employee should immediately report the same to the Administration. A staff member who is required to meet State and federal certification, expertise, and related requirements must maintain such qualifications as a condition of employment at Empower. Expenses incurred for updating and/or maintaining the required credentialing certificates, licenses or related permits are borne by the employee.

Maintaining Learners' Grades

All teachers are required by California Education Code Section 49066 to maintain systematic and accurate records of learner grades. Grade records must reflect each learner's academic progress based on clearly communicated and standards-aligned criteria. Teachers must ensure that grading is timely, consistent, and based on objective evidence of student achievement. Grade records should be up to date and updated at least biweekly in the designated student information system and be available for review by learners, parents/guardians, and school leadership upon request. Additionally, grade books should include documentation that supports how final grades were determined, such as assignment scores, rubrics, and notes on participation or performance. Maintaining accurate records not only supports transparency and fairness but also ensures that each learner's educational progress can be appropriately monitored and supported. **All records of grades will be stored and maintained in the manner and duration as defined in the Records Retention Policy.**

TUBERCULOSIS TESTING

No person shall be employed by the School unless he or she provides proof of having submitted to a tuberculosis ("TB") risk assessment within the past 60 days and that no risk factors have been identified. If TB risk factors are identified, or as an alternative to the assessment, the applicant must submit proof that a qualified professional has determined he or she is free of infectious TB following testing and examination. The examination, if required, shall consist of an approved intra-dermal tuberculin test or any other test for tuberculosis infection that is recommended by the federal Centers for Disease Control and Prevention ("CDC") and licensed by the federal Food and Drug Administration ("FDA"). If the test is positive, the test shall be followed by an X-ray of the lungs. Each employee shall cause to be on file with the School a certificate from a qualified professional showing the employee was assessed or examined and found free of risk factors or of infectious TB (as applicable). A person who transfers employment from another school can meet these requirements by providing: (a) a certificate from a qualified professional that shows he or she was found to be free of infectious TB within 60 days of initial hire or (b) a verification from the prior school employer that the person has a certificate on file showing the person is free from infectious TB.

An employee who has no identified risk factors or who tests negative for TB shall undergo the TB risk assessment and, if risk factors are identified, the examination, at least once every four years or more often if recommended by the local health officer.

The risk assessment, and examination if necessary, is a condition of initial employment, and the expense incident thereto shall be borne by the applicant. The School shall reimburse current employees for the cost, if any, of the tuberculosis risk assessment and the examination.

The County Health Department may provide skin testing to employees at regular intervals at no cost to the employee. The availability of this testing may be announced by Empower.

CPR Certification

Effective July 1, 2025 certain new hires in teaching positions must possess, and will need to demonstrate, CPR Certification at the time of hiring. These new hire include employees working with the following teaching credentials:

- Short-Term Staff Permit (STSP)
- Provisional Internship Permit (PIP)
- Temporary Permit to Substitute (TPSL)
- Career Technical Education (CTE)

Failure to provide certification at the time of hiring will result in immediate withdrawal of the employment offer and/or termination of employment.

POLITICS AND RELIGION

Public schools, as government institutions, cannot endorse or promote any particular religion or political party.

Empower will not host employer-sponsored meetings regarding opinions about religious or political matters. Political matters include, but are not limited to, elections for political office, political parties, legislation, regulation, and the decision to join or support any political party or political or labor organization. **However, iLEAD may from time to time host non-partisan events such as voter information sessions, town halls, etc.**

Employees will not be retaliated against for reporting or not attending unauthorized meetings regarding opinions about religious or political matters.

CRIMINAL BACKGROUND CHECKS

As a condition of employment, Empower requires all applicants for employment to complete fingerprinting and background checks consistent with legal requirements. Empower will not employ any applicant until the Department of Justice completes its check of the state criminal history file as provided by law. Empower shall also request subsequent arrest notification from the Department of Justice and take all necessary action based upon such further notification to the extent permitted by law.

Human Resources and/or the Administration shall, on a case-by-case basis, determine whether a volunteer will have more than limited contact with pupils or consider other factors requiring a criminal background check for such a volunteer.

EMPLOYEE-STUDENT RELATIONS POLICY

iLEAD is committed to maintaining safe, respectful, and professional relationships between employees and learners. All employees are expected to exercise sound judgment, uphold appropriate boundaries, and act in a manner that supports a safe and positive learning environment at all times.

The School has adopted a comprehensive policy, **Policies for Promoting Safe Environments for Student Learning and Engagement**, which outlines expectations regarding professional boundaries, appropriate conduct, communication, and reporting responsibilities. All employees are required to review and comply with this policy.

Maintaining appropriate boundaries is essential to protecting students, employees, and the integrity of the School. Employees with questions or concerns should consult their supervisor or Human Resources.

BOUNDARIES DEFINED¶



For the purposes of this policy, the term “Boundaries” is defined as acceptable professional behavior by employees while interacting with a student. Trespassing beyond the Boundaries in interactions with students is deemed an abuse of power and a betrayal of public trust.¶



UNACCEPTABLE AND ACCEPTABLE BEHAVIOR¶¶



Some activities may seem innocent from an employee's perspective, but some of these can be perceived as flirtation or sexual insinuation from a student or parental point of view. The purpose of the following lists of acceptable and unacceptable behaviors is not to restrain innocent, positive relationships between employees and students but to prevent relationships that could lead to, or may be perceived as inappropriate, sexual misconduct, or "grooming." Grooming is defined as an act or series of acts by a sexual predator to gain physical and/or emotional control by gaining trust (of staff and/or family and a minor) and desensitizing the minor to various forms of touching and other intimate interaction.¶¶

Employees must understand their own responsibilities for ensuring that they do not cross the Boundaries as written in this policy. If a student specifically requests that he or she not be touched, then that request must be honored. Violations could subject the staff member to discipline up to and including termination. Disagreeing with the wording or intent of the established Boundaries will be considered irrelevant for any required disciplinary purposes. Thus, it is critical that all employees study this policy thoroughly and apply its spirit and intent in their daily activities. Although sincere, professional interaction with students fosters Empower's mission of academic excellence, employee student interaction has Boundaries regarding the activities, locations, and intentions.¶¶



The following is an illustrative list of unacceptable behavior, which includes, but is not limited to:¶¶



- Giving gifts to an individual student that are of a personal and intimate nature (including photographs); or items such as money, food, outings, electronics, etc. without the written pre-approval of the School Director. It is recommended that any such gifts be filtered through the School Director along with the rationale therefor.¶¶
- Kissing of ANY kind¶¶
- Massage (Note: Prohibited in athletics unless provided by massage therapist or other certified professional in an open public location. Coaches may not perform massage or rub-down. Permitted in special education only as instructed under an IEP or 504 plan.)¶¶
- Full frontal or rear hugs and lengthy embraces¶¶
- Sitting student on one's lap (grades 3 and above)¶¶
- Touching buttocks, thighs, chest or genital area¶¶
- Wrestling with students or other staff member except in the context of a formal wrestling program¶¶
- Tickling or piggyback rides¶¶
- Any form of sexual contact¶¶
- Any type of unnecessary physical contact with a student in a private situation¶¶

- Intentionally being alone with a student away from Empower¶¶
- Furnishing alcohol, tobacco products, or drugs to a student or failing to report knowledge of such items¶¶
- “Dating” or “going out with” a student¶¶
- Remarks about physical attributes or physiological development of anyone. This includes comments such as “Looking fine!” or “Check out that [body part].”¶¶
- Taking photographs or videos of students for personal use or posting online¶¶
- Undressing in front of a student¶¶
- Leaving campus alone with a student¶¶
- Sharing a bed, mat, or sleeping bag with a student¶¶
- Making, or participating in, sexually inappropriate comments¶¶
- Sexual jokes or jokes/comments with sexual double entendre¶¶
- Seeking emotional involvement (which can include intimate attachment) with a student beyond the normative care and concern required of an educator or caretaker¶¶
- Listening to or telling stories that are sexually oriented¶¶
- Discussing inappropriate personal troubles or intimate issues with a student¶¶
- Becoming involved with a student so that a reasonable person may suspect inappropriate behavior¶¶
- Giving students a ride to/from Empower or school activities without the express, advance written permission of the Chief Executive Officer or the Executive Director and the student’s parent or legal guardian¶¶
- Being alone in a room with a student with the door closed¶¶
- Allowing students in your home without signed parent permission for a preplanned and precommunicated educational activity that must include the presence of another educator, parent, or other designated school volunteer¶¶
- Excessive attention toward a particular student¶¶
- Sending e-mails, text messages, instant messages, social media messages, or letters to students if the content is not about Empower activities and not in accordance with applicable Empower policies or in violation of Empower’s Social Media Policy¶¶
- Being “friends” with a student on any personal or non-Empower social media website¶¶
- Communicating with students or parents/guardians in violation of Empower’s Social Media Policy¶¶
- Engaging in inappropriate and/or unprofessional communications with students on Empower’s social media¶¶
- Using profanity with or to a student¶¶

- Involving students in non-educational or non-school related issues, including, but not limited to, the employee's employment issues¶¶

¶¶

The following is an illustrative list of acceptable and recommended behavior, which includes, but is not limited to:¶¶

- Pats on the shoulder or back¶¶
- Side hugs¶¶
- Handshakes¶¶
- “High fives” and hand slapping¶¶
- When age appropriate, touching face to check temperature, wipe away a tear, remove hair from face, or other similar types of contact¶¶
- Placing TK through second grade students on one's lap for purposes of comforting the child for a short duration only¶¶
- Holding hands while walking with small children or children with significant disabilities¶¶
- Assisting with toileting of small or disabled children in view of another staff member¶¶
- Touch required under an IEP or 504 Plan¶¶
- Reasonable restraint of a violent person to protect self, others, or property. Restraint should not be used as discipline or punishment, or as a behavior control if less restrictive options are available. Also, prolonged physical restraint is not permitted unless absolutely necessary. Only trained personnel should use behavioral restraints or seclusion.¶¶
- Obtaining parents' written consent for any after school activity on or off campus (exclusive of tutorials)¶¶
- Obtaining formal approval (Empower and parental) to take students off Empower's property for activities such as field trips or competitions including parent's written permission and waiver form for any sponsored after-school activity whether on or off campus¶¶
- E-mails, text messages, phone conversations, and other communications to and with students must be professional and pertain to Empower activities or classes, and communication should be initiated via Empower-based technology and equipment¶¶
- Keeping the door wide open when alone with a student¶¶
- Keeping reasonable and appropriate space between you and students¶¶
- Stopping and correcting students if they cross your own personal boundaries¶¶
- Keeping parents informed when a significant issue develops about a student¶¶
- Keeping after-class discussions with a student professional and brief¶¶

- Asking for advice from senior staff or administrators (such as Human Resources) if you find yourself in a difficult situation related to Boundaries¶¶
- Involving your supervisor if conflict arises with a student¶¶
- Informing Human Resources about situations that have the potential to become more severe (including but not limited to: grooming or other red flag behaviors observed in colleagues, written material that is disturbing, or a student's fixation on an adult)¶¶
- Making detailed notes about an incident that could evolve into a more serious situation later¶¶
- Recognizing the responsibility to stop unacceptable behavior of students and/or coworkers¶¶
- Asking another employee to be present if you will be alone with any student who may have severe social or emotional challenges¶¶
- Asking another employee to be present, or within close supervisory distance, when you must be alone with a student¶¶
- Giving students praise and recognition without touching them in questionable areas¶¶
- Keeping your professional conduct a high priority during all moments of student contact¶¶
- Asking yourself if any of your actions that go contrary to these provisions are worth sacrificing your job, your career, and the reputation of Empower¶¶

This policy does not prevent: 1) touching a student for the purpose of guiding them along a physical path; 2) helping them up after a fall; or 3) engaging in a rescue or the application of Cardio Pulmonary Resuscitation (CPR) or other emergency first-aid. Nor does it prohibit the use of reasonable force and touching in self-defense or in the defense of another. Restraining a child who is trying to engage in violent or inappropriate behavior is also allowed. Only such force as necessary to defend one's self, another person, or the child or to protect property is legally permitted.¶¶

Excessive force is prohibited.¶¶

¶¶

REPORTING VIOLATIONS¶¶

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When any employee becomes aware of an employee having crossed the Boundaries specified in this policy, he or she must promptly report the suspicion to the School Director or Human Resources. If the allegation also constitutes a reportable event under California Penal Code section 11666, the employee shall comply with the requirements under California Penal Code section 11166. All reports shall be kept as confidential as possible. Prompt reporting is essential to protect students, the suspected employee, any witnesses, and Empower as a whole. Employees must also report to the Administration any awareness of, or concern about, student behavior that crosses Boundaries or any situation in which a student appears to be at risk for sexual abuse.¶¶

¶¶

~~INVESTIGATING¶~~



~~The School Director and Human Resources will promptly investigate any allegation of a violation of the Employee Student Relations Policy, using such support staff or outside assistance as deemed necessary and appropriate under the circumstances.¶~~

~~Throughout this fact finding process, the investigating administrator, and all others privy to the investigation, will protect the privacy interests of any affected student(s) and/or employee(s), including any potential witnesses, to the fullest extent possible.¶~~



~~VIOLATIONS¶~~



~~Violations of this policy may result in disciplinary action, up to and including termination. When appropriate, violations of this policy may also be reported to authorities for potential legal action.~~

CHILD ABUSE OR NEGLECT REPORTING

If, within your professional capacity or within the scope of your employment, you observe or gain possession of knowledge that a child has been a victim of child abuse or sexual abuse or neglect, or you reasonably suspect it, California Penal Code section 11166 requires you to immediately report this information or suspicion to a child protective agency or the police. An employee who knows or reasonably suspects a child has been the victim of child abuse or neglect shall report the instance to the Los Angeles County Department of Children and Family Services (800) 540-4000 <https://dcfs.lacounty.gov/contact/report-child-abuse/>. If the circumstance falls under a different county, please call (800) 540-4000 and request contact information for the appropriate county. The phone call is to be followed by a written report prepared by the employee within thirty-six (36) hours, which may be sent by fax or electronically. The reporter should not contact the child's parents. Empower employees are required to report instances of child abuse or neglect when the employee has a "reasonable suspicion" that child abuse or neglect has occurred. Reasonable suspicion means that it is objectively reasonable for a person to entertain a suspicion, based upon facts that could cause a reasonable person in a like position, drawing, when appropriate, on the person's training and experience, to suspect child abuse or neglect. It does not require certainty that child abuse or neglect has occurred nor does it require a specific medical indication of child abuse or neglect.

Reporting the information regarding a case of possible child abuse or neglect to your supervisor, an Empower Director, an Empower counselor, coworker or other person shall not be a substitute for making a mandated report to **The Los Angeles County Department of Children and Family Services**. In addition, employees

must also complete annual training as required by law. Employees who have any questions about these reporting requirements should contact Human Resources.

DRUG AND ALCOHOL-FREE WORKPLACE

Our employees are our most valuable resource, and we are committed to providing a safe working environment to protect our employees and others, and to minimize the risk of accidents and injuries. It is Empower's policy to maintain a drug and alcohol-free workplace. No employee may use, possess, offer for sale or be under the influence of any illegal drugs or alcohol during working hours, including lunch and break periods, in the presence of pupils (in person or virtually), at an Empower-related event or function, or on Empower property at any time. It is expected that all employees will assist in maintaining a work environment free from the effects of alcohol, illegal drugs or other intoxicating substances.

For purposes of this policy, "illegal drugs" includes, but is not limited to, substances that are prohibited by law (such as cocaine, heroin, etc.), controlled substances, and prescription drugs (if they are not prescribed for the person using them and/or not being used as prescribed). "Marijuana" means and includes medical marijuana, marijuana vaping or other recreational marijuana use.

"Drug paraphernalia" means any accessory for the use, possession, manufacture, distribution, dispensation, purchase, or sale of illegal drugs. "Under the influence" means that the employee is affected by alcohol, prescription medication that impairs cognitive or physical functions, marijuana and/or illegal drugs in any detectable manner.

Empower prohibits the following:

- Use, possession, purchase, or offer for sale of illegal drugs, marijuana, drug paraphernalia or alcohol during working hours, including meal and break periods, or in the presence of pupils (in person or virtually);
- Use, possession, purchase, or offer for sale of illegal drugs, marijuana, drug paraphernalia, or alcohol on School property at any time;
- Use, possession, purchase, or offer for sale of illegal drugs, marijuana, drug paraphernalia, or alcohol while attending a School function or event;
- Storing alcohol (if unauthorized), illegal drugs, marijuana or drug paraphernalia in a locker, desk, automobile, or other repository on the School's premises;
- Refusing to submit to an inspection or testing when requested by the School;
- Being under the influence of illegal drugs, marijuana, prescription medication that impairs cognitive or physical functions and/or alcohol during working hours, while on the School's premises and/or attending a School function or event, or while interacting with pupils virtually;

- Conviction under any criminal drug statute for a violation occurring in the workplace; or
- Failure to keep all prescribed medicine in its original container.

Engaging in any of the activities above shall be considered a violation of Empower's policy and the violator will be subject to discipline, up to and including termination. Empower complies with all federal and state laws and regulations regarding drug use while on the job.

This policy will not be construed to prohibit the use of alcohol at social or business functions sponsored by Empower where alcohol is served or while entertaining donors and prospective donors of Empower. However, employees must remember their obligation to conduct themselves appropriately at all times while at Empower-sponsored functions or while representing Empower.

Any employee who is convicted of a violation of any criminal drug statute for a violation occurring in the workplace shall notify Empower no later than five days after such conviction.

PRESCRIPTION DRUGS

The proper use of medication prescribed by your physician is not prohibited; however, we do prohibit the misuse of prescribed medication. Employees' prescription drug use or nonprescription medication may affect their job performance, such as by causing dizziness or drowsiness.

It is the employee's responsibility to determine from his/her physician whether a prescribed drug may impair safe job performance and to notify a supervisor of any job restrictions that should be observed as a result. An employee is not required to reveal the name of the medication or the underlying medical condition. If you are required to take any kind of prescription or nonprescription medication that will affect your ability to perform your job, you are required to report this to Human Resources. Human Resources will determine if it is necessary to temporarily place you on another assignment or take other action as appropriate to protect your safety and the safety of other employees and students.

DRUG TESTING

Empower may require a test by intoxilyzer, blood test, urinalysis, medical examination, or other drug/alcohol screening of those persons whom Empower reasonably suspects of using, possessing, or being under the influence of an illegal drug or alcohol. Such testing will be conducted if two or more employees observe an employee acting in such a manner to raise suspicion that the employee is under the influence of an illegal drug, marijuana or alcohol or is acting in such a manner that they may harm themselves or another employee or students.

Any refusal to submit to such testing will be considered a positive screen. An employee's consent to submit to such a test is required as a condition of employment, and an employee's refusal to consent may result in disciplinary action, including termination for a first refusal or any subsequent refusal. Empower shall determine the manner in which such testing is conducted with the goal being to ensure that the test results are accurate.

Such a test may be required of employees involved in any work-related accident or unsafe practice where the safety of the employee or other employees were jeopardized. Periodic retesting may also be required following positive test results or after any violation of this policy or rehabilitation.

COUNSELING AND REHABILITATION

Employees should be aware that participation in a rehabilitation program will not necessarily prevent the imposition of disciplinary action, including termination, for violation of this policy. Employees who undergo voluntary counseling or treatment and who continue to work, if any, must meet all established standards of conduct and job performance.

Compliance with this Drug and Alcohol Abuse Policy is a condition of employment at Empower. Failure or refusal of an employee to cooperate fully, sign any required document, submit to any inspection, or follow any prescribed course of substance abuse treatment will result in discipline, up to and including termination.

Because the use, sale, purchase, possession, or furnishing of an illegally obtained substance is a violation of the law, Empower may report such illegal drug activities to an appropriate law enforcement agency.

HEALTH, SAFETY AND SECURITY POLICIES

Empower is committed to providing and maintaining a healthy and safe work environment for all employees. Accordingly, Empower has instituted an Injury and Illness Prevention Program designed to protect the health and safety of all personnel. The Injury and Illness Prevention Program is kept by the Administration and is available for your review.

All employees are expected to know and comply with Empower's general safety rules and to follow safe and healthy work practices at all times. Please immediately report to your supervisor any potential health or safety hazards and all injuries or accidents.

In compliance with Proposition 65, Empower will inform all employees of any known exposure to a chemical known to cause cancer or reproductive toxicity.

Empower has also developed guidelines to help maintain a secure workplace. It is important for all employees to be aware of unknown persons loitering in parking areas, walkways, entrances, exits and service areas. Report any suspicious persons or activities to security personnel or to your supervisor. Secure your desk or office at the

end of the day. When called away from your work area for an extended length of time, do not leave valuable or personal articles around your workstation that may be accessible. You should immediately notify your supervisor when keys are missing or if security access codes, identification materials, or passes have been breached. The security of the facilities, as well as the welfare of our employees and our students, depends upon the alertness and sensitivity of every individual. Employees shall not be prohibited from accessing their mobile device or other communication device for seeking emergency assistance, assessing the safety of the situation, or communicating with a person to confirm their safety during an emergency condition. An emergency condition means: (i) conditions of disaster or extreme peril to the safety of persons or property at the workplace or worksite caused by natural forces or a criminal act; or (ii) an order to evacuate a workplace, a worksite, a worker's home, or the school of a worker's child due to natural disaster or a criminal act.

EMPLOYEES WHO ARE REQUIRED TO DRIVE

Employees who are required to drive their own vehicle on approved Empower business will be required to ~~maintain~~**show proof of** a current, valid license and proof of current, effective insurance coverage. **The School may request proof of license and insurance at any time.** To the extent permitted by law, Empower retains the right to transfer to an alternative position, suspend, or terminate an employee whose license is revoked or who fails to maintain personal automobile insurance coverage. Employees who drive their own vehicles on approved Empower business will be reimbursed at the per mile rate established by the Internal Revenue Service. As a condition of employment, employees who drive their own vehicle on approved Empower business are required to use good judgment.

Employees must ensure that any personal vehicle used for iLEAD business is:

- **Currently registered** in accordance with applicable state laws;
- **Maintained in safe operating condition**, including functioning brakes, lights, tires, and safety equipment; and
- **Free of known mechanical defects** that could pose a safety hazard.

iLEAD reserves the right to verify compliance with these requirements at any time. The use of any vehicle that does not meet legal or safety standards for business-related travel is strictly prohibited.

Prohibited Vehicles:

For safety and liability reasons, employees are **forbidden from using motorcycles, motorized scooters, e-bikes, or any other two- or three-wheeled motorized or electric vehicles** for work-related travel or transportation of students, materials, or any other business purposes.

Pursuant to applicable law and safety standards, employees whose job responsibilities include regular or occasional driving and who are issued a cell phone for business use must refrain from using their phone while driving unless they are using a hands-free device. Safety must come before all other concerns.

Thus, unless an employee is using a hands-free device in a safe-manner, he or she must safely pull off to the side of the road and safely stop the vehicle before placing, accepting, or continuing a call. Sending or reviewing text messages while driving is also prohibited.

Employees whose job responsibilities do not specifically include driving as an essential function, but who use a cell phone for business purposes, whether issued by Empower or not, are also expected to abide by the provisions above. Under no circumstances are employees allowed to place themselves, students, or others at risk to fulfill business needs.

When transporting learners, additional procedures and requirements apply. These additional procedures and requirements will be provided as needed, and upon request, by the facilities department.

Any employee who fails to comply with this policy will be deemed to have engaged in grossly negligent conduct beyond the course and scope of his or her employment. As a result, any employee who is charged with a traffic violation or incurs any other form of liability resulting from a violation of this policy will, to the extent allowed by applicable law, be solely responsible for any such liability. Violations of this policy will be subject to disciplinary action, up to and including termination.

SMOKING

All School buildings and facilities are non-smoking facilities. Smoking is prohibited on the School's premises or within twenty (20) feet of a School building and within 25 feet of a school playground, whichever is farther. This includes, but is not limited to, nicotine and non-nicotine cigarettes including herbal cigarettes and marijuana, cigars, pipes as well as e-cigarettes and vaping. Employees who wish to smoke must limit their smoking to tobacco products during meal and rest periods off premises. Smoking while interacting with pupils (in-person or virtually) is strictly forbidden at all times.

HOUSEKEEPING

Empower strives for a clean, safe and sanitary environment. All employees are expected to keep the premises orderly and to clean up after themselves, which includes leaving their work areas, common areas, the kitchen and the refrigerator neat and clean. Employees who work in open areas should not eat at their desks.

PARKING

Employees may use Empower parking facilities as may be available and as directed by Empower. Empower is not responsible for any loss or damage to employee vehicles or contents while parked on School property.

EMPOWER PROPERTY & INSPECTIONS

Empower is committed to providing a work environment that is safe and free of illegal drugs, alcohol, firearms, explosives and other improper materials. Additionally, Empower provides property and facilities to its employees to carry out business on behalf of Empower. Desks, files, copiers, storage areas, work stations, file cabinets, lockers, and supplies, both office and household, are Empower property and must be maintained according to Empower rules and regulations. They must be kept clean and are to be used only for work-related purposes.

Accordingly, employees do not have a reasonable expectation of privacy when using any Empower property or facilities. In accordance with these policies, all Empower facilities and property may be inspected by Empower at any time, with or without prior notice to the employee. Empower reserves the right to deny entry to any person who refuses to cooperate with any inspections by Empower. Any employee who fails to cooperate with inspections may be subject to disciplinary action, up to and including dismissal.

Prior authorization must be obtained before any Empower property may be removed from any Empower premises. All Empower property must be immediately returned upon request, when the employee is on an extended leave of absence, and/or upon termination of the employment relationship.

For security reasons, employees should not leave personal belongings of value in the workplace. Employees are responsible for the security of their personal belongings. Empower is not responsible for any lost or stolen personal items at work, on Empower premises, or during Empower-related functions.

Terminated employees should remove any personal items at the time they leave the Empower. Personal items left in the workplace by previous employees are subject to disposal if not claimed at the time of the employee's termination, unless the parties have arranged otherwise. Empower will make reasonable efforts to help terminated employees collect any personal items left behind during the usual business hours of Monday through Friday, 8am to 4pm.

SOLICITING/CONDUCTING PERSONAL BUSINESS WHILE ON DUTY

In order to maintain and promote efficient operations, discipline, and security, Empower maintains rules applicable to all employees that govern solicitation, distribution of written material, and entry onto the premises and work areas. All employees are expected to comply with these rules, which will be strictly enforced. Any employee who is in doubt concerning the application of these rules should immediately consult with his or her supervisor. These rules are:

1. No employee shall sell merchandise or solicit or promote support for any cause or organization during his or her working time or during the working time of the employee(s) at whom such activity is directed. As used in these rules, working time excludes meal and break periods.
2. No employee shall distribute or circulate any written or printed material, other than those approved by management for business purposes, in work areas at any time or during his or her working time or during the working time of the employee(s) at whom such activity is directed.
3. No employee shall enter or remain in Empower work areas for any purpose except to report for, be present during, and conclude a work period. Non-exempt employees must not begin work and clock in at his or her working area more than 10 minutes before they are scheduled to begin and must stop work and clock out from his or her work area no later than 10 minutes after their work scheduled for the day is completed. Work area does not include Empower parking lots, gates, or other similar outside areas unless an employee is assigned to work in such areas.
4. Under no circumstances will non-employees be permitted to solicit or distribute written material for any purpose on Empower property.
5. Non-employees must sign in at the front office before entering Empower property.

Violations of this policy may result in disciplinary action, up to and including termination.

~~TECHNOLOGY & AI USE OF EMPOWER COMMUNICATION EQUIPMENT AND TECHNOLOGY~~

USE OF iLEAD TECHNOLOGY

iLEAD is committed to protecting our facilitators, staff, and learners. One of the ways we ensure this protection is by maintaining safe boundaries for technology use. iLEAD's Technology includes, but is not limited to: computers, laptops, e-mail, telephones, cellular phones, VoIP, tablets, smart watches, smart glasses, any AI-driven gadget or wearable, text messaging, instant messaging, video conferencing, voicemail, facsimiles, and connections to the Internet and other internal or external networks.

All iLEAD-owned technology remains the property of iLEAD and is provided to the employee to carry out business on behalf of the school, unless previously authorized for non-business use. Employees have no expectation of privacy in any communications made using iLEAD-owned equipment and technology. Communications, including any attached message or data, made using iLEAD-owned technology is subject to review, inspection, and monitoring at any time by iLEAD. All communications and information transmitted by, received from, or stored in these systems are iLEAD records and the property of iLEAD.

Electronic communications are a professional means of business communication. iLEAD requires all users to conduct themselves in a professional manner, aligned with our core values. All technology should be handled with the same care, judgment, and responsibility expected in any formal professional communication. Special care must be taken when posting any information on the Internet because of the potentially broad distribution of and access to such information.

iLEAD prioritizes the safety of our learning community, minors and adults, by implementing technology protection measures designed to mitigate potential harm. These systems are configured to prevent access to visual depictions that are obscene, child sexual abuse material (CSAM), and/or content that is harmful to learners. These measures comply with the Children's Internet Protection Act (CIPA) and utilizes a filtering system that categorizes and blocks inappropriate content to protect the integrity of our systems.

Employees are required to safeguard their passwords to limit unauthorized use of computers by others in accordance with the Acceptable Technology & Equipment Use Agreement. The use of passwords to limit access to these systems is intended to prevent unauthorized access to voicemail, e-mail, and computer systems, files, and records. Additionally, these systems are subject to inspection, search, and/or monitoring by iLEAD for any number of reasons. As a result, employees do not have an expectation of privacy in this regard. Employees who do not safeguard their passwords from unauthorized use, or who allow a learner to access computers in violation of the Acceptable Technology & Equipment Use Agreement, will be subject to discipline, up to and including termination.

~~Empower has a commitment to protect our employees and our students. One of the ways to protect our employees and students is to monitor and limit technology use within safe boundaries. Empower's electronic communications systems ("Communications Systems") includes, but is not limited to, computers, laptops, e-mail, telephones, cellular phones, tablets, PDAs, text messaging, instant messaging, video conferencing, voice mail, facsimiles, and connections to the Internet and other internal or external networks. All Empower-owned Communications Systems remain the property of Empower and are provided to the employee to carry out business on behalf of Empower, unless previously authorized for non-business use. Employees have no expectation of privacy in any communications made using Empower owned equipment and technology. Communications (including any attached message or data) made using Empower owned communications~~

~~equipment and technology are subject to review, inspection and monitoring at any time by Empower. All communications and information transmitted by, received from, or stored in these systems are Empower records and the property of Empower. Electronic communications are a means of business communication. Empower requires all users to conduct themselves in a professional manner. Users should conduct all electronic communications with the same care, judgment, and responsibility that they would use when sending letters or memoranda written on Empower letterhead. Special care must be taken when posting any information on the Internet because of the potentially broad distribution of and access to such information.¶¶~~

~~Protecting our students and the children at Empower is one of our top priorities. In order to do so, Empower uses technology protection measures that protect against Internet access (by both minors and adults) to visual depictions that are obscene, child pornography and/or with respect to use by minors, images harmful to minors. These measures may include, but are not limited to, installing a blocking system to block specific internet sites, setting Internet browsers to block access to adult sites, using a filtering system that will filter all Internet traffic and report potential instances of misuse and using a spam filter.¶¶~~

~~Employees are required to safeguard their passwords to limit unauthorized use of computers by minors in accordance with the Student Internet Use Policy and Agreement. The use of passwords to limit access to these systems is only intended to prevent unauthorized access to voicemail, e-mail, and computer systems, files, and records. Additionally, these systems are subject to inspection, search, and/or monitoring by Empower for any number of reasons. As a result, employees do not have an expectation of privacy in this regard. Employees who do not safeguard their passwords from unauthorized student use, or that allow a student to access computers in violation of the Student Internet Use Policy and Agreement, will be subject to discipline, up to and including termination.~~

USE OF ARTIFICIAL INTELLIGENCE (“AI”) TOOLS

At iLEAD, we recognize that Artificial Intelligence (“AI”) is a powerful machine-learning tool that can enhance our mission of cultivating Lifelong Learners and Design Thinkers. We embrace the potential of AI to support innovative instruction and administrative efficiency while remaining committed to its responsible, ethical, and legal use.

Ethics and Standards of Conduct

Our use of AI must always align with iLEAD’s core values. We use AI as a tool for inquiry and creativity, not as a replacement for critical thinking or professional judgment. AI must never be used to engage in plagiarism. We expect all employees to model academic integrity by citing AI assistance in any professional or instructional materials. AI tools must never be used for obscene, harmful, or inappropriate purposes.

Data Privacy and Security (FERPA/SOPIPA Compliance)

Protecting the privacy of our community is non-negotiable. Family Educational Rights and Privacy Act (FERPA) is a federal law that protects the privacy of student education records, whereas Student Online

Personal Information Protection Act (SOPIPA) is a California state law that prohibits online service providers from using K-12 student data for targeted advertising or profiling. Employees are strictly prohibited from inputting Personally Identifiable Information (PII), including learner names, addresses, IDs, or confidential records, into any public or unauthorized AI system. Employees must only use AI tools reviewed by iLEAD for data security and privacy compliance.

Human-in-the-Loop and Verification

We recognize that AI can "hallucinate" or generate biased and inaccurate information. Employees retain full responsibility for any content they produce or distribute, even if it was assisted by AI. You must verify all AI-generated outputs for factual accuracy and bias before they are used in a classroom or shared with the community.

Authorized Tools and Accountability

Because the AI landscape is evolving rapidly, iLEAD reserves the right to designate which AI tools are acceptable for school use. Any disregard for these safety, privacy, and integrity guidelines will result in disciplinary action, up to and including termination of employment. ~~Artificial Intelligence ("AI") is a machine learning system capable of complex tasks and can be a valuable tool to enhance learning. Empower Generations recognizes the inevitable reality that AI is improving at an exponential rate, and is quickly becoming embedded in all facets of everyday life. Empower Generations has chosen to embrace this new technology and is committed to teaching and supporting the responsible use of AI to both employees and Learners.~~ ¶

¶ ~~AI use must align with Empower Generations' core values, and adhere to Empower Generations' standards of conduct. AI must not be used for plagiarism, and all sources, including AI, must be cited. AI should not be solely relied upon for fact-checking, and users are prohibited from using AI for obscene, harmful or inappropriate purposes or for sharing confidential information.~~ ¶

¶ ~~As AI tools are quickly evolving and becoming more accessible, Empower Generations reserves the right to limit or designate types of AI tools which are acceptable for use by employees and Learners. Any disregard of these guidelines will result in disciplinary action, up to and including possible termination of employment.~~

PROHIBITED USE

iLEAD Technology is provided solely for the purpose of conducting iLEAD business. Incidental and occasional personal use is permitted, provided such use is brief, does not disrupt iLEAD business, and does not involve high-bandwidth activities (e.g., streaming, crypto-mining, gaming). Such activities are restricted because they consume disproportionate network resources, directly degrading the connection speed and system performance required for educational and operational tasks by the learning community. Users do not have any expectation of personal privacy in any matters stored in, created, received, or sent over iLEAD technology.

Software, Intellectual Property, and Proprietary Materials

Users must strictly adhere to all copyright laws and licensing agreements governing software, cloud-based applications, and AI platforms. The unauthorized uploading, downloading, copying, or installation of software, including AI plugins and extensions, is prohibited without prior written approval.

All original works, including curriculum, designs, data, and records created by an employee during their employment or through the use of iLEAD resources, are the exclusive property of iLEAD. This ownership extends to all content or data generated through iLEAD-provided technology and AI platforms. Consequently, employees are prohibited from the unauthorized use, distribution, or removal of these proprietary materials. Users must not export iLEAD information, proprietary software, or AI-generated data to personal cloud storage or external accounts, as these files remain institutional property.

Content Restrictions

Employees are strictly prohibited from using iLEAD's Technology to view, generate, or distribute visual images or audio representations that are obscene, constitute Child Sexual Abuse Material (CSAM), and/or are harmful to minors.

Harassment and Discrimination

Employees are strictly prohibited from using iLEAD Technology to view, generate, or distribute visual images or audio representations that are obscene or constitute Child Sexual Abuse Material (CSAM). iLEAD Technology must not be used in any way that is disruptive, harassing, or offensive to others. Users are strictly prohibited from delivering or generating messages or synthetic media such as AI-generated deepfakes that are harassing or offensive. This includes the use of AI tools to create defamatory material or to intentionally violate the privacy of others.

Institutional Integrity and Student Privacy

iLEAD Technology must not be used for personal gain, profit, or in any manner contrary to the best interests of the institution. Employees must not use iLEAD's technology for the unauthorized disclosure, use, or dissemination of student Personally Identifiable Information (PII) or records. Employees should not attempt to gain access to another employee's digital accounts or messages without express permission. It is strictly prohibited to use credentials assigned to another employee to create the appearance that a message came from that individual. ~~The Communications Systems is provided solely for the purpose of conducting Empower business. Incidental and occasional personal use of the Communications Systems is permitted, but such communications must not disrupt Empower business, and users do not have any expectation of personal privacy in any matters stored in, created, received, or sent over the Communications Systems. Users must respect all~~

~~copyrights and licenses to software and other online information, and may not upload, download, or copy software or other material through the Communications Systems without the appropriate prior written authorization. Employees are not permitted to use Empower's Communications Systems to view visual images that are obscene, child pornography and/or images harmful to minors.¶¶~~

~~The e-mail system and Internet access is not to be used in any way that may be disruptive, harassing or offensive to others, illegal or harmful to morale. Users of the Communications Systems are strictly prohibited from using the Communications Systems to deliver a message that is harassing or offensive on the basis of a protected category as defined in the Discrimination, Unlawful Harassment, Retaliation and Complaint Procedures policy herein or any other consideration made unlawful by federal, state, or local laws, ordinances, or regulations. Empower has policies against discrimination, harassment, and retaliation, and those policies apply to the use of the Communications Systems. Users are also prohibited from using the Communications Systems for transmitting or making accessible annoying, offensive, defamatory, or harassing material or intentionally damaging or violating the privacy of information of others.¶¶~~

~~The e-mail system and Internet access is not to be used in any manner that is against the policies of Empower, contrary to the best interest of Empower or for personal gain or profit of the employee against the interests of Empower. Employees must not use Empower's communications equipment and technology for the unauthorized disclosure, use and dissemination of personal information regarding students.¶¶~~

~~Users must not alter, copy, transmit, or remove Empower information, proprietary software, or other files without proper authorization from Empower.¶¶~~

~~Employees should not attempt to gain access to another employee's email files or voicemail messages without the latter employee's express permission. Each employee is responsible for the content of the messages sent out using Empower's Communications Systems. It is strictly prohibited to use any Communications Systems assigned to another employee to send messages to create the appearance that they are from that employee, unless the latter employee expressly authorizes such use. Anyone who receives an electronic communication for which he or she is not the intended recipient must immediately inform the sender that the message was sent improperly and must delete the message from their e-mail and voice mail mailboxes.~~

CONFIDENTIALITY AND PRIVILEGES

All information stored within the iLEAD's Technology is intended to be kept confidential. iLEAD has taken industry-standard steps to ensure data security and integrity; however, absolute security of digital communications cannot be guaranteed. Care must be exercised when transmitting sensitive, privileged, or students' Personally Identifiable Information (PII) electronically.

Users are cautioned that data transmitted over the Internet or processed through third-party AI platforms may be monitored or intercepted by external systems en route to its destination. Employees must prioritize the use of iLEAD-approved secure channels when forwarding sensitive institutional or student information. To ensure data privacy and security, employees may only use iLEAD-adopted secure AI platforms through their official

institutional accounts, such as ChatGPT for Education or Gemini for Education (via iLEAD Educational Plus accounts). The use of personal or unvetted public AI accounts for work-related tasks is strictly prohibited. The confidential or privileged status of information must be disclosed to outside contacts where appropriate, and users should remain aware that the use of unvetted public technology tools may inadvertently waive institutional privileges or violate privacy mandates. ~~Information stored on the Communications Systems is intended to be kept confidential within Empower. Empower has taken all reasonable steps to assure confidentiality and security. Like other means of communication, however, it is not possible to guarantee complete security of electronic communications either within or outside Empower, and care should be exercised when sending or receiving sensitive, privileged, or confidential information electronically. For example, information sent through the Internet can be monitored by external systems en route to its final destination. All users must keep this in mind when forwarding sensitive, confidential, and/or privileged information. Where appropriate, this fact should be disclosed to outside contacts.~~

ACCESS AND DISCLOSURE

To protect the security and integrity of its systems and devices, iLEAD reserves the right to monitor, access, retrieve, download, copy, audit, or delete any information stored in, created, received, or sent via any iLEAD-managed platform, iLEAD-managed networks, or company-owned device. This oversight may be conducted without prior notice or specific user consent and includes both manual administrative review and the use of automated security and productivity tools.

Although iLEAD entrusts you with the use of unified communications (i.e., voice, video conferencing, messaging), cloud-based storage, AI-integrated platforms, and company-owned devices, these items are installed and maintained at great expense to iLEAD and are intended for business purposes. At all times, they, and all data contained within them, remain iLEAD property. You are advised that electronic files, records, and communications within the iLEAD Technology are not private. You should not use this equipment or these systems for personal use.

Privacy and Security Boundaries, such as passwords, biometric access, and multi-factor authentication, serve solely to prevent unauthorized access by third parties. These systems are subject to inspection, search, and/or monitoring by iLEAD for a variety of reasons, including, but not limited to, security audits, threat detection, and compliance with student data privacy laws (FERPA/CIPA). As a result, employees do not have an expectation of privacy in this regard.

An employee's conduct must exercise professional care, discretion, and integrity in all digital communications when representing iLEAD. You should realize that digital interactions carry the following risks:

- May be saved and read by third parties (including authorized service providers and vendors).
- Are generally archived and may be retrieved via institutional backup or "Vault" systems even after a user attempts to delete them.
- May be accessed by authorized service personnel.

- May be examined by management without notice.

There will be times when iLEAD, in order to conduct business, will utilize its ability to access your digital accounts, cloud files, or other iLEAD property. iLEAD may also inspect the contents of your unified communications, computers, or software to monitor conduct and/or job performance.

iLEAD reserves the right to use and disclose any electronic communication on any iLEAD-managed platform, iLEAD network, or company-owned device without the permission of or any prior notice to any user, including disclosure to law enforcement officials or in response to legal discovery requests. ~~Empower, as owner of the Communications Systems, to protect the integrity of its systems from unauthorized or improper use, reserves the right upon authorization of the Administration, to monitor, access, retrieve, download, copy, listen to, or delete anything stored in, created, received, or sent over its Communications Systems without the permission of or prior notice to any user.~~¶¶

~~Although Empower entrusts you with the use of voice mail, e-mail, computer files, software, or similar Empower property, you should keep in mind that these items have been installed and maintained at great expense to Empower and are only intended for business purposes. At all times, they remain Empower property. Likewise, all records, files, software, and electronic communications contained in these systems also are Empower property. You are advised that electronic files, records, and communications on Empower computer systems, electronic communication systems, or through the use of Empower telecommunications equipment are not private. Although they are a confidential part of Empower property, you should not use this equipment or these systems for confidential messages. The use of passwords to limit access to these systems is only intended to prevent unauthorized access to voice mail, e-mail, and computer systems, files, and records. Additionally, these systems are subject to inspection, search, and/or monitoring by Empower for any number of reasons. As a result, employees do not have an expectation of privacy in this regard. Accordingly, these systems and equipment should not be used to transmit personal messages, except in necessary situations or when exceptions are specifically sanctioned by management. Voice mail messages and e-mail messages should be routinely deleted when no longer needed. Empower is not responsible for costs incurred when employees use Empower telephones or e-mail systems for personal matters.~~¶¶

~~You should be advised to use voice mail and e-mail as cautiously as you would use any more permanent communication medium such as a memorandum or letter. You should realize that e-mail messages:~~¶¶

- ~~• May be saved and read by third parties.¶¶~~
- ~~• May be retrieved even after “deletion.”¶¶~~
- ~~• May be accessed by authorized service personnel.¶¶~~
- ~~• May be examined by management without notice.¶¶~~

~~There will be times when Empower, in order to conduct business, will utilize its ability to access your e-mail, voice mail, computer files, software, or other Empower property. Empower also may inspect the contents of your voice mail, e-mail, computers, computer files, or software to monitor job performance, for training or quality control purposes, or when Empower suspects that Empower property is being used in an unauthorized manner.~~¶¶

~~Empower reserves the right to use and disclose any electronic communication on its Communications Systems without the permission of or any prior notice to any user, including disclosure to law enforcement officials.~~

TECHNOLOGY DEVICE AGREEMENT

When an employee is provided with school-owned technology, they will be required to review and accept the following terms:

1. Exclusive Device Use: ~~Any device(s)~~The MacBook ("Device") issued to you is the property of the ~~schoolCompany~~ and is designated for your exclusive use for business-related purposes. You understand and agree that the ~~dDevice~~ must not be utilized by any other individuals under any circumstances. You bear the responsibility for maintaining the ~~dDevice~~ in good working order.
2. Password Security: You agree to maintain the confidentiality of all passwords associated with the ~~dDevice~~ and any software issued to you by the ~~schoolCompany~~. These passwords must never be shared, either internally within the ~~schoolCompany~~ or externally, under any circumstances.
3. Damage or Theft Reporting: You agree to promptly report any damage, loss, or theft of the ~~dDevice~~ to the IT department as soon as reasonably possible, and in any event, within 48 hours of such an occurrence. Failure to report may lead to you being held accountable for replacement costs.
4. Return Upon Separation: Upon separation of employment for any reason, you agree to immediately return the ~~dDevice~~ and all accompanying chargers and accessories to an authorized representative from the IT department, HR department, or your Director. The ~~dDevice~~ should be in good working order, excluding normal wear and tear. Unauthorized persons should not receive or handle returned devices. Failure to return the ~~dDevice~~ to the appropriate personnel may result in legal action for the recovery of the ~~dDevice~~ or its value.
5. Software Use: All software installed by the ~~schoolCompany~~ on the ~~dDevice~~ is to remain on the ~~dDevice~~. Unauthorized installation or deletion of software may result in disciplinary action.
6. Software Licensing and EULAs: Employee acknowledges the importance of adhering to software licensing laws and agrees to comply with all relevant regulations and licensing requirements. In addition, the employee shall review and comply with all software licensing agreements and end-user license agreements ("EULAs") associated with the software installed on the ~~dDevice~~.
7. Home Network Management: You understand that the management and security of your home network, when using the ~~dDevice~~ for remote work or otherwise, is your responsibility. The ~~schoolCompany~~ will not be held accountable for issues arising from your home network.
8. Privacy: You acknowledge that you have no expectation of privacy in anything you create, store, send, or receive on the ~~dDevice~~. The ~~schoolCompany~~ reserves the right to monitor any and all activities on the ~~dDevice~~.

9. Compliance with Laws, Policies, and Guidebook: You agree to use the ~~d~~Device in accordance with all applicable local and federal laws and regulations, as well as the ~~school's~~~~Company's~~ policies and guidelines as stipulated in the board-approved Employee Guidebook.

DISCIPLINE FOR VIOLATIONS OF POLICY

Any individual who identifies a misuse of iLEAD Technology or a potential security breach should immediately notify Human Resources or the Technology Department. Violations of any provision of this policy, including unauthorized disclosure of student data or improper use of AI platforms, will be subject to disciplinary action. Depending on the nature and severity of the infraction, such action may include immediate termination of employment.~~Any person who discovers misuse of the Internet access or any of Empower's Communications Systems should immediately contact Human Resources. Any user who violates any part of this policy will be subject to discipline, up to and including immediate termination.~~

POLICY MAY BE AMENDED AT ANY TIME

The pace of technological change and growth in electronic communications is rapid. This policy applies to all present and future electronic communications systems and devices and to improvements and innovations to existing systems and devices and to completely new technologies, devices, and systems. Empower reserves the right to amend this policy at any time.

EMPLOYEE BLOGS AND SOCIAL NETWORKING

SCOPE

In light of the explosive growth and popularity of social media technology in today's society, Empower has developed the following policy to establish rules and guidelines regarding the appropriate use of social media

by employees. This policy applies to situations when you: (1) make a post to a social media platform that is related to Empower; (2) engage in social media activities during working hours; (3) use Empower equipment or resources while engaging in social media activities; (4) use your Empower e-mail address to make a post to a social media platform; (5) post in a manner that reveals your affiliation with Empower; or (6) interact with Empower students or parents/guardians of Empower students on the Internet and on social media sites. For the purposes of this policy, the phrase “social media” refers to the use of a website or other electronic application to connect with other people, including, but not limited to, Facebook, TikTok, Twitter, Pinterest, LinkedIn, YouTube, Instagram, and Snap Chat, as well as related web-based media, such as blogs, wikis, and any other form of user-generated media or web-based discussion forums.

Social media may be accessed through a variety of electronic devices, including computers, cell phones, smart phones, PDAs, tablets, and other similar devices.

This policy is intended to supplement, not replace, Empower’s other policies, rules, and standards of conduct. For example, Empower policies on confidentiality, use of Empower equipment, professionalism, employee references and background checks, workplace violence, unlawful harassment, and other rules of conduct are not affected by this policy.

You are required to comply with all Empower policies whenever your social media activities may involve or implicate Empower in any way, including, but not limited to, the policies contained in this Guidebook.

STANDARDS OF CONDUCT

You are required to comply with the following rules and guidelines when participating in social media activities that are governed by this policy:

- Comply with the law at all times. Do not post any information or engage in any social media activity that may violate applicable local, state, or federal laws or regulations.
- Do not engage in any discriminatory, harassing, or retaliatory behavior in violation of Empower policy.
- Respect copyright, fair use, and financial disclosure rules and regulations. Identify all copyrighted or borrowed material with proper citations and/or links.
- Maintain the confidentiality of Empower’s trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know how, and technology. Do not post internal reports, policies, procedures, student names or information, or other internal School related confidential communications. This prohibition applies both during and after your employment with Empower
- While it is acceptable to engage in limited and incidental social media activities at work, such social media activities may not interfere with your job duties or responsibilities. Do not use your Empower authorized e-mail address to register on social media websites, blogs, or other online tools utilized for personal use.
- Be knowledgeable about and comply with Empower’s background check procedures. Do not “research” job candidates on the Internet or social media websites without prior approval from Human Resources.

- Be knowledgeable about and comply with Empower’s reference policy. Do not provide employment references for current or former employees, regardless of the substance of such comments, without prior approval from Human Resources.
- We encourage you to be fair and courteous to fellow employees, students, parents, vendors, suppliers, or other people who work on behalf of the School. We also encourage you to avoid posting statements, photographs, video, or audio that could be reasonably viewed as malicious, obscene, threatening, or intimidating, that disparage employees, students, parents, vendors, suppliers, or other people or organizations who are affiliated with or work on behalf of the School, or that might constitute harassment or bullying.
- Make sure you always try to be honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Please do not post any information or rumors that you know to be false about the School, fellow employees, students, parents, vendors, suppliers, people or organizations who are affiliated with or working on behalf of the School, or competitors.
- Never represent yourself as a spokesperson for the School unless authorized to do so. If you publish social media content that may be related to your work or subjects associated with the School, make it clear that you are not speaking on behalf of the School and that your views do not represent those of the School, fellow employees, students, parents, vendors, suppliers, or other people or organizations who are affiliating with or working on behalf of the School. It is best to use a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of the School.”
- Never be false or misleading with respect to your professional credentials.

CREATING AND USING EMPOWER SOCIAL MEDIA

Employees are only permitted to communicate and connect with students on social media that is owned and operated by Empower. Employees are only permitted to communicate and connect with students’ parents or guardians regarding Empower-related matters on social media that is owned and operated by Empower. All communications with parents or guardians regarding Empower-related matters on non-Empower or personal social media may result in disciplinary action, up to and including termination. Any communication whatsoever with students on non-Empower or personal social media may result in disciplinary action, up to and including termination.

The IT Department, in addition to Human Resources and members of the Administration, are responsible for approving requests for Empower social media, monitoring Empower social media for inappropriate and unprofessional content, and maintaining the social media account information (including, but not limited to, username and password). Empower has final approval over all content and reserves the right to close the social media account at any time, with or without notice. Any inappropriate or unprofessional communications may result in disciplinary action, up to and including termination.

To set up a social media account that is owned and operated by Empower in compliance with this policy, employees must adhere to the following procedures:

- Request and obtain permission to create an Empower social media account from the Chief Executive Officer.
- Contact the IT Department to set up the social media account. Provide the IT Department with the username and password that you would like assigned to the account. If you change the username and/or password, you must immediately update this information with the IT Department. Failure to do so may result in disciplinary action, up to and including termination.

Any social media created and/or used in violation of this policy may result in disciplinary action, up to and including termination.

SOCIAL MEDIA ACCOUNTS MAINTAINED BY iLEAD

iLEAD maintains accounts on various social media platforms. As an employee of iLEAD, your image, likeness, or work product may from time to time be used in iLEAD social media posts. Upon termination of employment, iLEAD will not recognize requests to delete historical posts in social media platforms, unless required by law.

ACCESS

Employees are reminded that Empower's various electronic communications systems, including, but not limited to, its electronic devices, computers, telephones, e-mail accounts, video conferencing, voice mail, facsimiles, internal and external networks, computers, cell phones, smart phones, PDAs, tablets, and other similar devices, are the property of Empower. All communications and information transmitted by, received from, or stored in these systems are Empower records.

As a result, Empower may, and does, monitor its employees' use of these electronic communication systems, including for social media activities, from time to time. Empower may monitor such activities randomly, periodically, and/or in situations when there is reason to believe that someone associated with Empower has engaged in a violation of this, or any other, Empower policy. As a result, employees do not have a reasonable expectation of privacy in their use of or access to Empower's various electronic communications systems.

DISCIPLINE

Any violation of this Social Media Policy may result in disciplinary action, up to and including immediate termination.

RETALIATION IS PROHIBITED

Empower prohibits retaliation against any employee for reporting a possible violation of this policy or for cooperating in an investigation of a potential violation of this policy. Any employee who retaliates against another employee for reporting a possible violation of this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

QUESTIONS

In the event you have any questions about whether a particular social media activity may involve or implicate Empower, or may violate this policy, please contact Human Resources.

Social media is in a state of constant evolution, and Empower recognizes that there will likely be events or issues that are not addressed in these guidelines. Thus, each Empower employee is responsible for using good judgment and seeking guidance, clarification, or authorization before engaging in social media activities that may implicate this policy.

PARTICIPATION IN RECREATIONAL OR SOCIAL ACTIVITIES

To encourage teamwork at Empower, we encourage participation in recreation and social activities sponsored or supported by Empower. Please note that employee participation is strictly voluntary and employees have no obligation to participate in recreational or social activities and no employee has work-related duties requiring such participation. An employee's participation in social and recreational activities is at the employee's own risk and Empower disclaims any and all liability arising out of the employee's participation in these activities.

PERSONNEL FILES AND RECORD KEEPING PROTOCOLS

At the time of your employment, a personnel file is established for you. Empower strives to keep accurate and up to date personnel records. Please keep Human Resources advised of changes that should be reflected in your personnel file. Such changes include: change in name, home address, email address, telephone number, marital status, number of dependents and person(s) to notify in case of emergency. Prompt notification of these changes is essential and will enable Empower to contact you should the change affect your other records.

You have the right to inspect certain documents in your personnel file **in person at the iLEAD California HQ located at 29477 The Old Road, Castaic, CA, 91384**, as provided by law, in the presence of an Empower representative, at a mutually convenient time. A request for information contained in the personnel file must be in writing and directed to Human Resources.

Current and former employees, or employee representatives, may also request inspection in writing. Please contact Human Resources to schedule a convenient time. You may request copies from your file of all documents. Empower may charge the requesting employee or employee representative for the actual cost of reproduction of personnel file documents. If you desire, you may add a written statement to your file explaining any disputed item.

Access to information in personnel files is restricted. Only authorized managers and management personnel will have access to your personnel file. However, Empower will cooperate with—and provide access to your personnel file to—law enforcement officials or local, state or federal agencies or as otherwise required in accordance with applicable law.

HOURS OF WORK, OVERTIME AND ATTENDANCE

WORK HOURS AND SCHEDULES

Empower's normal working hours are from 8:00 a.m. – 4:30 p.m., Monday through Friday. The work schedule for full-time non-exempt employees is normally 40 hours per week. Your supervisor will assign your work schedule, which may fall outside of the normal working hours. Employees are expected to be punctual and ready to start work at their scheduled time.

OVERTIME

All non-exempt employees are required to obtain approval from their supervisor prior to working overtime. Failure to obtain such approval may subject an employee to discipline, up to and including termination. Overtime compensation will be paid in accordance with all state and federal laws. Exempt employees are not entitled to overtime pay.

For purposes of calculating overtime, Empower's standard workweek begins on Saturday at 12:00 a.m. (midnight), and ends on Friday at 11:59 p.m. Empower's standard workday is 12:00 a.m. (midnight) to 11:59 p.m. each day.

Only those hours that are actually worked are counted to determine an employee's overtime pay. Compensated holidays, for example, are not hours worked. Any overtime must be preauthorized in writing by your supervisor.

MEAL AND REST PERIODS

Meal Periods: All non-exempt employees must take an uninterrupted meal period of at least 30 minutes for each work period in excess of 5 hours in accordance with this policy. **This requirement also applies when the employee is traveling for work-related purposes.** Further, all non-exempt employees must take a second uninterrupted meal period of at least 30 minutes for each work period in excess of 10 hours in accordance with this policy. Employees must begin their first meal period within five hours of starting work. For example, if the employee begins working at 7:00 a.m., then the employee must clock out to begin his or her meal period no later than 12:00 p.m. (noon). Further, employees must begin their second meal period (if applicable) within ten hours of starting work. For example, if the employee begins working at 7:00 a.m., then the employee must clock out to begin his or her second meal period no later than 5:00 p.m.

An employee whose work period is 5 to 6 hours may waive, in writing, his or her right to a first meal period. Further, an employee may waive his or her right to a second meal period for a work period as long as the employee does not work more than 12 hours and did not waive his or her first meal period for that work period. Empower offers written Meal Period Waiver Agreements that govern an employee's entire employment, which are voluntary and may be revoked at any time, to document the employee's waiver of first and second meal periods.

Employees are eligible for the following number of meal periods:

Length of Workday in Hours	# of Meal Periods	Explanation
0 to ≤ 5	0	An employee who works 5 hours or less in a workday is not entitled to a meal period.
> 5 to ≤10	1	An employee who works more than 5 hours in a workday, but who does not work more than ten hours in a workday, must take a 30-minute uninterrupted meal period, unless the employee works six or fewer hours and voluntarily waives his or her first meal period.
> 10	2	An employee who works more than ten hours in a workday must take a second uninterrupted 30-minute meal period, unless the employee works 12 or fewer hours, did not waive the first meal period, and voluntarily waives his or her second meal period.

Employees must take their meal periods according to the following schedule:

Which Meal Period	When
First Meal Period	An employee's first meal period must begin within 5 hours of starting work (in other words, by the end of the fifth hour of work or 5 hours and 0 minutes on the clock). By way of example, if an employee clocks in 8:30 a.m., then the employee must clock out and start his or her meal period no later than 1:30 p.m.
Second Meal Period	An employee's second meal period must begin within ten hours of starting work (in other words, by the end of the tenth hour of work or 10 hours and 0 minutes on the clock). By way of example, if an employee clocks in 8:30 a.m., then the employee must clock out and start his or her second meal period no later than 6:30 p.m.

During meal periods, employees are absolutely prohibited from performing work of any kind or any amount. Employees are excused from all duties and are free to leave the premises. Non-exempt employees must record the exact start and stop times of each meal period through Empower's timekeeping system so that Empower may monitor time records for compliance. Employees may not join together required meal periods to take a longer break.

Rest Periods: All non-exempt employees are ~~required, authorized, permitted, and strongly encouraged~~ to take a 10-minute rest period every 4 hours worked or major fraction thereof. ~~This requirement also applies when the employee is traveling for work-related purposes.~~ Ordinarily, this amounts to two 10-minute rest periods per 8-hour workday. The first rest period should be taken roughly in the middle of the 4-hour work period prior to lunch, and the second rest period should be taken roughly in the middle of the 4-hour work period following lunch. You do not need to record the times of these rest periods. You will be paid for the time spent on your rest periods.

Employees are eligible for the following number of rest periods:

Length of Work Period in Hours	# of Rest Periods	Explanation

0 to < 3.5	0	An employee whose work period is less than 3.5 hours is not entitled to a rest period.
≥ 3.5 to ≤ 6	1	An employee whose work period is 3.5 hours up to and including 6 hours is eligible to take one rest period.
> 6 to ≤ 10	2	A non-exempt employee whose work period is more than 6 hours up to and including 10 hours is eligible to take two rest periods.
> 10 to ≤ 14	3	A non-exempt employee whose work period is more than 10 hours up to and including 14 hours is eligible to take three rest periods.

During your rest periods, employees are absolutely prohibited from performing work of any kind or any amount. You are excused from all duties. In addition, please understand that you may not join together required rest periods in order to take a longer break. Also, you may not miss a required meal or rest period in order to start work later or leave work earlier.

Any employee who misses a meal or rest period or who experiences a late, short, or interrupted meal period—for any reason—must immediately report this issue to his or her supervisor and accurately enter their time in the time keeping system. The employee must fill out all fields on the form, including providing a thorough explanation for the non-compliant meal or rest period. The employee must complete and turn in this form to his or her supervisor on the same workday that he or she experienced the non-compliant meal or rest period.

~~If an employee voluntarily chooses to miss a meal or rest period or take a late, short, or interrupted meal period (e.g., I chose to take my lunch later in the day or I chose to refuse an “authorized” meal period at the time provided by Empower), the employee is not entitled to premium pay (one additional hour of pay).~~ If an employee involuntarily experiences a missed meal or rest period or a late, short, or interrupted meal period (e.g., my supervisor asked me to handle a parent call or meeting that caused me to miss or take a late meal period), the employee is entitled to premium pay. Employees must report the reason for the non-compliant meal or rest period to their supervisor, and accurately enter their time in the time keeping system.

Non-exempt employees are required to take their meal and rest periods in accordance with this policy. If you encounter any challenges with taking meal or rest periods in accordance with this policy, please immediately contact your supervisor or Human Resources.

Failure to comply with Empower’s policy regarding meal and/or rest periods can lead to discipline, up to and including termination.

LACTATION ACCOMMODATION POLICY

Employees have the right to reasonable time and access to a private area during the workday to express milk. In compliance with state and federal law, Empower provides a supportive environment to enable nursing mothers to express breast milk during the work day.

If the lactation break time cannot run concurrently with rest and meal periods already provided or additional time is needed for the employee, the lactation break time will be unpaid. Where unpaid breaks or additional time are required, the employee should work with their Supervisor regarding scheduling and reporting the extra break time as unpaid in Empower's time reporting system.

Because exempt employees receive their full salary during weeks in which they work and they are not normally required to identify break and meal times, all exempt employees who need lactation accommodation breaks do not need to report any extra break time as "unpaid."

A private location to express breast milk will be provided in close proximity to the employee's work area. The employee's normal work area may be used if it allows the employee to express milk in private. In certain circumstances, a temporary location, multipurpose room, or shared space may be provided in accordance with applicable law. The location will also meet the following requirements: not be a bathroom; be free from intrusion; be shielded from view; be safe, clean, and free of hazardous materials; contain a surface to place a breast pump and personal items; contain a place to sit; and have access to electricity or alternative devices, including, but not limited to, extension cords or charging stations, needed to operate an electric or battery-powered breast pump. In addition, Empower shall provide access to a sink with running water and a refrigerator suitable for storing milk in close proximity to the employee's work area. If a refrigerator cannot be provided, Empower may provide another cooling device suitable for storing milk, such as an Empower-provided cooler. Employees should discuss with their Supervisor the location for storage of expressed milk. Employees may also provide their own portable small storage unit or cooler for keeping expressed breast milk cold.

To request the above, please contact your Supervisor or Human Resources. Empower will respond accordingly, generally within two business days.

If any employee believes that they have experienced retaliation or discrimination as a result of conduct protected by this policy, the employee may file a complaint with their supervisor and/or the Labor Commissioner's Office. For more information, contact the Labor Commissioner's Office by phone at 833-526-4636 or visit a local office by finding the nearest one on their website: www.dir.ca.gov/dlse/DistrictOffices.htm. The Labor Commissioner's Office provides an interpreter at no cost to the employee, if needed.

PAY DAYS

Employees who are paid a predetermined salary will have paydays scheduled on the 15th and the last day of each month. All other employees (i.e., those on an hourly basis, etc.) will have paydays scheduled on a bi-weekly basis paid, every other Friday, of each month (see the ADP/WorkforceNow home page for the schedule). Empower reserves the right to modify its payroll practice as it deems necessary. Each paycheck will include earnings for all reported work performed through the end of the payroll period. In the event that a regularly scheduled payday falls on a weekend or holiday, employees will receive their pay on the last day of work before the holiday. Employees are required to report any overpayment of wages to the Payroll Department. Any discrepancies or shortages in the calculation of wages should be reported as soon as possible after payday.

ATTENDANCE POLICY

Empower strives for a healthy and positive work environment. Good attendance and punctuality are an important part of the day-to-day operations. Excessive absenteeism and/or tardiness might place a burden on fellow employees and Empower.

Employees are expected to adhere to regular attendance and to be punctual. If you find it necessary to be absent or late, you are expected to arrange it in advance with your supervisor to the extent possible. If it is not possible to arrange your absence or tardiness in advance, you must notify your supervisor no later than one-half hour before the start of your workday or as soon as reasonably practicable, if you are absent or tardy in accordance with Empower's sick leave policy. Because voice mail messages may go unheard for significant periods of time, leaving a voice mail message is not a sufficient method of notifying your supervisor—you must personally contact your supervisor in a timely manner. If you are required to leave work early, you must also personally contact your supervisor and obtain his or her permission.

If you are a teacher and need a substitute for any absence other than those taken under Empower's sick leave policy, you are responsible for communicating with the designated contact for your specific site and submitting a request for the designee to arrange for a substitute. This request must be submitted in advance. If you are absent from work longer than one day please communicate this with your supervisor or designated contact.

Excessive unexcused absenteeism and tardiness will not be tolerated and will lead to disciplinary action, up to and including termination. Except as otherwise provided by law, if you fail to report for work without any notification to your supervisor and your absence continues for a period of three consecutively scheduled workdays, Empower will, in most cases, consider that you have abandoned your employment and have voluntarily resigned.

TIME RECORDS

To ensure compliance with all applicable laws, non-exempt employees must accurately record all hours worked. This means non-exempt employees must record their time whenever they begin, cease, or resume working during the course of a workday. While you need not record when you begin or end your rest periods, you must record when you begin and end your meal periods. Under no circumstances may one employee record time for another employee. Non-exempt employees are expected to clock in and out, in real time, using the ADP/WorkforceNow timekeeping system. While occasional “missed punches” can be corrected by submitting an edit request, this method of recording your hours worked on a regular basis is unacceptable and will result in discipline up to and including potential immediate termination.

Exempt employees may also be expected to record their time worked and report absences from work due to personal needs or illness as directed. If instructed by your supervisor, you will be expected to record time worked on a timesheet for each pay period. Recording inaccurate time on your timesheet or recording time on another employee’s time sheet is a violation of Empower policy and may result in discipline, including immediate termination. Employees are strictly prohibited from working “off the clock” or failing to record all time worked. Falsification of any timecard may result in disciplinary action, up to and including termination.

PROFESSIONAL LEARNING

As a commitment to our team’s professional growth, Empower holds minimum days on certain designated days to allow for professional learning, collaboration opportunities and meetings. All staff, including Facilitators, Care Team, Student Support, etc. are required to attend the meetings and/or work days that apply. If a staff member is unable to attend, they must notify their supervisor by requesting the time off in the time and attendance system. Various professional learning opportunities will be offered throughout the year. Staff is required to attend all professional learning opportunities prior to the start of the school year. Staff is encouraged to visit other charter schools (as appropriate), attend applicable conferences, and conduct a research activity/presentation and other approved professional learning activities.

STANDARDS OF CONDUCT

PERSONAL APPEARANCE

Empower encourages all employees to maintain professionalism in appearance and in behavior. Employees are expected to wear clothes that are neat, clean and professional while on duty. Employees are expected to appear well groomed and appear within professionally accepted standards suitable for the employee's position, and must at all times wear shoes. Your supervisor will inform you of any specific dress requirements for your position.

PROHIBITED CONDUCT

Empower expects that all employees will conduct themselves in a professional and courteous manner while on duty. Employees engaging in misconduct will be subject to disciplinary action up to and including termination of employment. The following is a list of conduct that is prohibited by Empower. This list is not exhaustive and is intended only to provide you with examples of the type of conduct that will not be tolerated by Empower.

- Unexcused absence and/or lack of punctuality
- Release of confidential information without authorization
- Violation of Empower's Drug and Alcohol-Free Workplace policy
- Theft or embezzlement
- Willful destruction of property
- Falsification, fraud or omission of pertinent information when applying for a position
- Any willful act that endangers the safety, health or wellbeing of another individual
- Horseplay
- Any act of sufficient magnitude to cause disruption of work or gross discredit to Empower
- Misuse of Empower property or funds
- Possession of firearms, or any other dangerous weapon, while acting within the course and scope of your employment with Empower
- Acts of discrimination or unlawful harassment based on gender, ethnicity or any other basis protected by applicable law or policies
- Failure to comply with Empower's safety procedures
- Insubordination such as a failure to follow a supervisor's legitimate and legal direction.
- Failure to follow any known policy or procedure of Empower or gross negligence that results in a loss to Empower
- Violations of federal, state or local laws affecting the organization or your employment with the organization

- Unacceptable job performance
- Dishonesty
- Failure to keep a required license, certification or permit current and in good standing
- Recording the work time of any other employee, or allowing any other employee to record time on your time record or falsifying any time record
- Poor attendance, including, but not limited to, habitual tardiness and/or absenteeism, leaving early without permission, absence from work without permission, and abuse of time during work hours, to the extent permitted by law.
- Unauthorized use of Empower equipment, materials, time or property
- Working unauthorized overtime or refusing to work assigned overtime
- Failure to take meal and/or work breaks
- Intentionally supplying false information in order to obtain a leave of absence or other benefits from Empower.
- Sleeping or malingering on the job
- Unfit for service, including the inability to appropriately instruct or associate with students.
- Performing unauthorized work on Empower time.
- Unauthorized use of cameras or other recording devices on Empower's premises.
- Making false or malicious statements about any employee or Empower.
- Using abusive, profane, threatening, indecent, or foul language and/or having inappropriate physical contact with students, parents, or other employees at any time on Empower's premises or while performing duties on behalf of Empower.
- Violation of the Employee-Student Relations policy
- Violation of any safety, health, security, or other Empower policies, rules, or procedures.

Although employment may be terminated at will by either the employee or Empower at any time, without following any formal system of discipline or warning, Empower may exercise discretion to utilize forms of discipline that are less severe than termination. Examples of less severe forms of discipline include verbal warnings, written warnings, demotions and suspensions. While one or more of these forms of discipline may be taken, no formal order or procedures are necessary. This statement of prohibited conduct does not alter or limit the policy of employment at will. Either you or Empower may terminate the employment relationship at any time for any reason, with or without cause, and with or without notice.

CONFIDENTIAL INFORMATION

It is important to Empower to protect and preserve its trade secrets and confidential information. Confidential information includes, but is not limited to, all parent and student information, parent and student lists, lesson plans, techniques and concepts, marketing plans, design specifications, design plans, strategies, forecasts, bid plans, bid strategies, bid information, contract prices, new products, software, computer programs, writings, and all know-how and show-how whether or not protected by patent, copyright, or trade secret law.

Personal, private information about other employees and personnel matters are also confidential, if learned as a part of the employee's job performance. This policy also encompasses any and all identifying or confidential information of all former and current students which is protected under the Family Educational Rights and Privacy Act.

Empower devotes significant time, energy, and expense to develop and acquire its trade secrets and confidential information. As an employee of Empower you will, during the course of your employment, have access to and become familiar with various trade secrets and confidential information that are owned by Empower. An employee shall not, directly or indirectly, disclose or use any of the foregoing information other than for the sole benefit of Empower, either during the term of your employment or at any other time thereafter. This information shall not be disclosed except through normal channels and with authorization. Any and all trade secrets or confidential information shall be returned to Empower during extended leaves of absence or upon termination of employment.

During your employment with Empower, you will not be permitted nor required to breach any obligation to keep in confidence, proprietary information, knowledge, or data acquired during your former employment.

You must not disclose to Empower any confidential or proprietary information or material belonging to former employers or others. Employees must refer any person seeking school records or information to Human Resources for handling. Empower prohibits audio or video recordings in the workplace, during working hours, without authorization of Empower due to privacy and confidentiality concerns and protections. Failure to comply with this policy may result in disciplinary action, up to and including termination.

OUTSIDE EMPLOYMENT

All newly hired employees are required to inform Empower of any existing employment or consulting relationship with another person or entity outside of Empower. All employees are required to inform Empower, before accepting any employment or consulting relationship with another person or entity while employed by Empower. While Empower does not uniformly prohibit outside employment, employees will not be permitted to accept outside work that is competitive with Empower, that creates a conflict of interest, or that interferes with

the employee's work for Empower or that reflects negatively on either the employee or Empower. Employees will not render services in person or by electronic means, paid or otherwise, for any other persons or entity during work hours with Empower.

Employees understand that violating this rule may result in a report to the Commission on Teacher Credentialing, as well as disciplinary action up to and including termination.

EXPENSE REIMBURSEMENTS

Empower will reimburse employees for reasonably necessary expenses incurred in the furtherance of Empower's business. In order to be eligible for reimbursement, employees must follow the protocol set forth in Empower's current 'Fiscal Policies & Procedures' regarding expense reimbursements. In general, all expenses must have been previously approved by the supervisor. All receipts pertaining to the reimbursement must be original and detailed, and should be submitted with a completed and approved Reimbursement Request Form, in a timely manner, to the Business Office for payment process.

EMPLOYEE BENEFITS AND LEAVES OF ABSENCE

Empower is happy to provide eligible employees with a wide range of benefits. The description of Benefits that follows is only a brief summary for your general information. For details and exact information, please see the Benefits Guidebook located on the home page of ADP/WorkforceNow.

PAID SICK LEAVE

Empower enacted this policy in accordance with the California Healthy Workplaces, Healthy Families Act to provide paid sick leave ("PSL") to eligible employees.

ELIGIBLE EMPLOYEES

All employees (including full-time, part-time and temporary employees) who work more than 30 days within a year in California are eligible to accrue PSL beginning on the first day of employment under the accrual rate and caps set forth in this policy.

PERMITTED USE

Eligible employees may use their accrued PSL to take paid time off for the diagnosis, care, or treatment of an existing health condition of (or preventative care for) the employee or the employee's family member.

For purposes of this policy, "family member" means a child, parent, spouse, registered domestic partner, grandparent, grandchild, or sibling of the employee as well as any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship or a designated person. "Child" means a biological child, a foster child, an adopted child, a step-child, a child of a registered domestic partner, a legal ward, or a child of a person standing in loco parentis. "Parent" means a biological, foster, or adoptive parent, a step-parent, or a legal guardian of the employee or the employee's spouse or registered domestic partner. "Spouse" means a legal spouse, as defined by California law. "Designated person" means a person identified by the employee at the time the employee requests paid sick days. Only one individual may be a "designated person" per 12-month period. Employees may also use their PSL to take time off from work for reasons related to domestic violence, stalking, or sexual assault.

ACCRUAL RATE, MAXIMUM, AND CARRYOVER

Accrual for non-exempt employees will be calculated based on actual hours worked. Accrual of PSL for eligible exempt employees will be calculated based on a 40-hour workweek or the employee's normal workweek if the employee normally works less than 40 hours. PSL accrues on an as-worked basis and does not accrue during any non-working time or unpaid leave of absence. Accrued but unused PSL will carry over from year to year, subject to a maximum carry over cap as described below.

All Regular Full-Time Exempt and Non-Exempt Employees: Empower provides full-time employees who are scheduled to work 40 hours per week with up to 12 days (or 96 hours) of PSL each school year at an accrual rate of 1 day (or 8 hours) per month beginning immediately upon hire or upon the beginning of the school year, whichever occurs first. Full-time employees who are considered "11-Month" employees will only accrue PSL from August through June at a rate of 1.091 days per month, and will not accrue in July. Full-time employees who are scheduled for fewer than 40 hours per week will be provided with a prorated number of hours at the end of each month based on the total number of hours actually worked that month. All unused PSL will carry over from year to year.

All Other Employees: Eligible employees will accrue one hour of PSL for every 30 hours worked beginning immediately upon hire or upon the beginning of the school year, whichever occurs first. There is a cap on PSL accrual. Employees may accrue up to a maximum accrual of 80 hours of PSL. Once the employee's PSL reaches the maximum, further accrual of PSL is suspended until the employee has reduced the PSL balance below this limit. In such a case, no PSL will be earned for the period in which the employee's PSL was at the maximum. Accrued but unused PSL will carry over from year to year, subject to this maximum accrual.

When an employee is unable to perform their duties and is sent home due to illness, they will be required to use any accrued PSL to cover the remaining working hours for that day.

For STRS eligible employees: To the extent permitted by applicable law, unused sick leave may be counted as additional service credit upon retirement with the California State Teachers Retirement System (“STRS”) for those employees who are eligible to participate in such benefits in the year in which they earn the sick leave.

Employees who are not eligible for STRS when they earn sick leave may not apply unused sick leave toward any future STRS benefits if those employees later become eligible.

Unused sick leave will be transferred to any subsequent California public school when requested in writing by the former employee and/or employing district/school to the extent permitted by applicable law. Moreover, incoming employees may transfer unused sick leave from any prior California public school when requested in writing by the incoming employee and verified by the former California public school employer to the extent permitted by applicable law. Such transferred sick leave is only available for credit to STRS and is not credited to the employee’s sick leave balance at Empower.

LIMITS ON USE

Eligible employees may use accrued PSL beginning on the 90th day of employment, and PSL may be taken in minimum increments of two hours, up to and including their total normal scheduled hours in a workday. For example, an employee who is normally scheduled to work five (5) hours per day may take two (2) hours, four (4) hours, or the full five-hour day. If an ~~exempt~~ employee is absent~~absents himself or herself~~ from work for part or all of a workday for a reason covered by this policy, he or she will be required to use accrued PSL to make up for the absence. In any event, employees may not use PSL to receive pay for more hours than they were scheduled to work on the day the leave is taken.

NOTIFICATION

The employee must provide reasonable advance notification, orally or in writing, of the need to use PSL, if foreseeable. If the need to use PSL is not foreseeable, the employee must provide notice as soon as practicable.

PSL EXHAUSTION

The school provides ample PSL so that employees can care for themselves and their family members. Employees who exhaust their accrued PSL will not be paid for the hours missed unless otherwise required by law. Excessive absenteeism will result in corrective action up to and including potential termination of employment.

TERMINATION

Employees will not receive pay in lieu of accrued but unused PSL. Accrued but unused PSL will not be paid out upon termination.

NO DISCRIMINATION OR RETALIATION

Empower prohibits discrimination or retaliation against employees for using their PSL.

NON-CONTRACT DAYS OFF

Certain Exempt employees may be eligible for paid days off designated as non-contract days. Requests for non-contract days should be submitted to the supervisor via ADP/WorkforceNow with as much advance notice as possible. Non-contract days do not accrue, do not carry over from school-year to school-year, and are not paid out upon termination of employment. **Non-contract days are intended to be used in full-day increments. However, at the discretion of the supervisor, an employee may request half-day increments up to four (4) times per school year.**

Employees who directly work with school staff, and have been designated as having non-contract days, must use non-contract days during school breaks when the employee is not required to support staff and/or learners.

Employees are not required to use non-contract days for federal holidays observed by the school. However, employees who take this time off will be required to use non-contract days for any additional school holidays that are in addition to observed federal holidays. For example, if the school board has approved a “winter holiday” that spans from December 23rd to January 3rd, the employee will be required to use non-contract days for all weekdays during that time, except for December 25th and January 1st. A calendar outlining the required non-contract days will be provided to each employee at the start of each school year. This calendar is subject to change at the supervisor’s discretion based on the needs of the school.

For CalSTRS eligible employees, you are required to work all of your designated contract days to receive one year of creditable service for CalSTRS purposes.

INSURANCE BENEFITS

INSURANCE

Full-time employees are entitled to insurance benefits offered by Empower. These benefits will include medical, dental, and vision. Empower will have a defined contribution towards the employee’s insurance premiums that are Empower sponsored insurance plans. This amount will be determined on an annual basis, and can be found in the Benefits Guidebook located on the home page of ADP/WorkforceNow. The employee’s portion of monthly premiums will be deducted from the employee’s paycheck on a pre-tax basis.

Full-time employees may also be covered under an insurance policy that includes Life, Short-Term Disability, and Long-Term Disability at no cost to the full-time employee. Additional voluntary insurance plans paid entirely by the employee, may be offered through Empower, and premiums will be deducted from the employee's paycheck on a post-tax basis.

If medical insurance premium rates increase, employees may be required to contribute to the cost of increased premiums to retain coverage. Failure to timely request and pay for such coverage will result in the loss of coverage.

DISABILITY INSURANCE (WAGE SUPPLEMENT)

All employees are enrolled in California State Disability Insurance ("SDI"), which is a partial wage-replacement insurance plan for California workers.

Employees may be eligible for SDI when they are ill or have non-work related injuries. Employees may also be eligible for SDI for work related injuries if they are receiving workers' compensation at a weekly rate less than the SDI rate.

Specific rules and regulations relating to SDI eligibility can be found at www.edd.ca.gov/disability.

FAMILY LEAVE INSURANCE (WAGE SUPPLEMENT)

Eligible employees are covered by California's Paid Family Leave ("PFL") benefit. Paid Family Leave does not provide employees with a protected leave of absence. Rather, Paid Family Leave provides only partial wage replacement benefits when an employee has been approved for a leave of absence. In order to obtain approval for leave of absence for the reasons set forth below, the employee must contact Human Resources. Leave to care for certain family members may be covered by applicable law for certain eligible employees. Leave that is not covered by applicable law may or may not be approved by Empower, in Empower's sole discretion. Nothing in this policy guarantees that Empower will provide additional leaves of absence other than those already required by applicable law.

The PFL fund is administered by the California Employment Development Department ("EDD"), not Empower, which means that employees must apply to the EDD to receive this benefit. Through the PFL fund, the EDD will provide eligible employees with a wage supplement for a maximum of six weeks within a 12-month period.

PFL benefits may be available from the EDD for a leave of absence for the following:

- For the birth or placement of a child, as defined by the PFL law, for adoption or foster care within one year of the birth or placement of the child; or
- To care for an immediate family member (spouse, registered domestic partner, child or parent, grandparent, grandchild, sibling, ~~and~~ parent-in-law, ~~and~~ one (1) "designated person", as defined by the PFL law) who is seriously ill and requires care.

- To participate in a qualifying event because of a family member's (i.e. a spouse, registered domestic partner, parent or child) military deployment to a foreign country

PFL benefits will be coordinated with an otherwise authorized leave of absence. In such circumstances, the use of PFL benefits and/or paid time off during the leave period will not extend the length of the leave beyond what is required by applicable law and/or Empower policy.

PFL leaves will run concurrently with any CFRA leaves.

Employees are not required to use any accrued Vacation Time prior to receiving PFL benefits.

WORKERS' COMPENSATION INSURANCE

Eligible employees are entitled to Workers' Compensation Insurance benefits when suffering from an occupational illness or injury. This benefit is provided at no cost to the employee. See below for a further description of making a claim for Workers' Compensation Insurance benefits.

If you are injured while on the job, you must:

- **Emergency**
 - 1st Call 911
 - 2nd ~~School Director (or designee)~~ ~~Call Rick Crunelle to notify @ 1-818-281-9721 and he~~ will call 1-877-480-3947 to alert Berkley, the workers' compensation insurance provider
- **Not Emergency**
 - 1st Call - Injured Person calls the workers' compensation hotline 1-877-480-3947
 - 2nd ~~Notify Human Resources of the injury~~ ~~Call Rick Crunelle to notify @ 1-818-281-9721~~

If medical treatment is needed in a non-emergency situation, you must call the workers' compensation provider at 877-480-9721 and they will direct you to a local medical provider.

The supervisor will complete the Accident/Incident Investigation Form, and will coordinate with any witnesses to complete the Witness Statement Form.

UNEMPLOYMENT COMPENSATION

Empower contributes a significant amount of money each year to the California Unemployment Insurance Fund on behalf of its employees. Under certain circumstances, you may be eligible for unemployment insurance benefits.

LEAVES OF ABSENCE

At Empower, we understand employees may experience personal or medical matters during their time of employment here. If an employee has a need for a Leave of Absence, please notify your supervisor and follow the guidelines outlined below.

Under certain circumstances, Empower may grant leaves of absence to employees. Employees must submit requests for leaves of absence in writing to Human Resources by opening a Human Resources ticket in the self-service portal as far in advance as possible. To open the lines of communication, while on leave, we ask employees to keep in contact with Human Resources and notify Human Resources if the date to return to work changes. If an employee's leave expires and the employee fails to return to work without contacting Human Resources, it will be presumed that the employee abandoned his/her position with Empower and employment may be terminated. If an employee is unable or unwilling to return to work at the expiration of his/her leave of absence, his/her employment may be terminated as permitted by law.

This Guidebook summarizes leave that may be available to employees. Most leave policies have differing requirements for eligibility, duration, benefits, etc.

Therefore, employees should contact Human Resources to request specific information relating to a particular leave policy. Employee benefits, including, but not limited to, paid sick leave, do not accrue during a leave of absence unless otherwise required by law or by applicable Empower policies. While out on a leave of absence, employees may not accept employment with another school employer or person unless agreed to in advance in writing by Human Resources. Acceptance of employment in violation of this policy will be considered an abandonment of the employee's position with Empower, and employment may be terminated.

FAMILY AND MEDICAL LEAVE ACT (FMLA)/ CALIFORNIA FAMILY RIGHTS ACT (CFRA)

Under the Family and Medical Leave Act ("FMLA") and California Family Rights Act ("CFRA"), eligible employees may request a family and medical leave of absence under the circumstances described below. Eligible employees are those who have been employed by Empower for at least 12 months (not necessarily consecutive) and have worked at least 1250 hours during the 12 months immediately prior to the family and medical leave of absence for purposes of FMLA leave, an eligible employee must also be employed at a worksite where there are 50 or more employees of Empower within 75 miles. Ordinarily, you must request a planned family and medical leave at least 30 days before the leave begins. If the need for the leave is not foreseeable, you must request the leave as soon as practicable. You should use Empower's request form, which is available on the home page of ADP/WorkforceNow, or upon request from Human Resources. Failure to comply with this requirement may result in a delay of the start of the leave.

A family and medical leave may be taken for the following reasons:

1. the care of an employee's newborn child (i.e., baby bonding) or a child placed with the employee for foster care or adoption. Leaves for these reasons must be completed within 12 months of the birth or placement of the child;
2. the care of the employee's spouse, child, parent, grandparent, grandchild, sibling, registered domestic partner, or designated person¹ with a "serious health condition";
3. the "serious health condition" of the employee (including serious health condition resulting from an on-the job illness or injury) that makes the employee unable to perform any one or more of the essential functions of their job. For FMLA leave only, a serious health condition also includes a disability caused by pregnancy, childbirth, or related medical conditions, which runs concurrently with the Company's separate pregnancy disability policy;
4. (FMLA ONLY) the care of the employee's spouse, child, parent, or next of kin who is a member of the Armed Forces, including a member of the National Guard or Reserves, and who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness: or
5. any qualifying exigency as defined by the applicable regulations arising out of the fact that the employee's spouse, child, registered domestic partner or parent is on active duty (or has been notified of an impending call or order to active duty) in the Armed Forces in support of a contingency operation.

A "serious health condition" is one that requires inpatient care in a hospital or other medical care facility or continuing treatment or supervision by a health care provider. You may take a leave under paragraph (2) above only if due to a serious health condition, your spouse, child, parent, parent-in-law, grandparent, grandchild, sibling, registered domestic partner, or designated person (as may be applicable for FMLA/CFRA purposes) requires your care or assistance as certified in writing by the family member's health care provider. If you are seeking a leave under paragraph (3) above, you must provide Empower with a medical certification from your health care provider establishing eligibility for the leave, and you must provide Empower with a release to return to work from the health care provider before returning to work. Employees requesting FMLA leave must provide the required medical certification in a timely manner, generally within 15 days of the request. If additional time is needed due to circumstances beyond their control, employees should notify Human Resources as soon as possible. Failure to provide certification within a reasonable timeframe may result in a delay or denial of FMLA leave. You may obtain the appropriate forms from Human Resources.

FMLA/CFRA leave is unpaid and may be taken for up to 12 workweeks during the designated 12-month period (with the exception of FMLA qualifying leaves to care for a member of the Armed Services who has a serious illness or injury, which may be taken for up to a total of 26 workweeks of leave during a single 12-month period). The 12-month period will be defined as a "rolling twelve months" looking backward over the preceding 12 months to calculate how much family and medical leave time has been taken and therefore determine the amount of leave that is available. FMLA qualifying leaves to care for a member of the Armed Services who has a serious illness or injury will be calculated on the 12-month period looking forward. All time

¹ Designated person means any individual related by blood or whose association with the employee is the equivalent of a family relationship. Only one individual may be a "designated person" per 12-month period.

off that qualifies as family and medical leave will be counted against your state and federal family and medical leave entitlements to the fullest extent permitted by law.

You may choose to use any accrued PSL during unpaid family and medical leave that is due to your own serious health condition. If mutually agreed upon between Empower and the employee, PSL may be used for the care of a qualifying family member or designated person or in connection with the birth, adoption or foster care of a child. However, receiving compensation for PSL may potentially reduce or disqualify you from receiving wage replacement from the state (such as State Disability or Paid Family Leave).

Benefit accrual, such as PSL and holiday benefits, will be suspended during the approved leave period and will resume upon return to active employment. During FMLA/CFRA leave, group health benefits will be maintained as if you were continuously employed, unless you choose to suspend your coverage during your leave. However, you must continue to pay your share of applicable premiums (for yourself and any dependents) during the leave. Upon your request for a leave of absence, Human Resources will provide you with a form that will outline your options regarding payment for your benefits while on leave.

If you do not return to work on the first workday following the expiration of an approved FMLA/CFRA leave, you will be deemed to have resigned from your employment. Upon returning from such a leave, you will normally be reinstated to your original or a comparable position and will receive pay and benefits equivalent to those you received prior to the leave, as may be required by law. In certain circumstances under FMLA leave, “key” employees may not be eligible for reinstatement following a family and medical leave. Empower will provide written notice to any “key” employee who is not eligible for reinstatement.

An absence for less than two (2) weeks due to sickness or injury will not be counted as FMLA/CFRA.

FMLA will run concurrently with any leave covered by State Disability Insurance or Pregnancy Disability Leave.

CFRA will run concurrently with any Paid Family Leave, and in some cases will run concurrently with FMLA.

PROCEDURES FOR REQUESTING AND SCHEDULING FMLA/CFRA LEAVE

An employee should request FMLA/CFRA leave by completing a Leave of Absence Application (available on the home page of ADP/WorkforceNow or from Human Resources) and submitting it to your supervisor and to Human Resources. As mentioned above, employees should provide not less than 30 days’ notice of their intent to take FMLA/CFRA leave or if such notice is not possible, employees should provide notice as soon as is practicable, for foreseeable childbirth, placement or any planned medical treatment for the employee or his/her qualifying family member. If an employee needs intermittent leave or leave on a reduced leave schedule that is foreseeable based on planned medical treatment for the employee or a family member, the employee may be transferred temporarily to an available alternative position for which he/she is qualified that has equivalent pay

and benefits and that better accommodates recurring periods of leave than the employee's regular position. If an FMLA/CFRA leave request is granted, Empower will notify the employee in writing that the leave will be counted against the employee's FMLA/CFRA leave entitlement. This notice will explain the employee's obligations and the consequences of failing to satisfy them.

PREGNANCY DISABILITY LEAVE

Empower provides pregnancy disability leaves of absence without pay to eligible employees who are temporarily unable to work due to a disability related to pregnancy, childbirth, or related medical conditions. Employees should make requests for pregnancy disability leave to their supervisor at least 30 days in advance of foreseeable events and as soon as possible for unforeseeable events. A health care provider's statement must be submitted, verifying the need for such leave and its beginning and expected ending dates. Any changes in this information should be promptly reported to Empower. Employees returning from pregnancy disability leave must submit a health care provider's verification of their fitness to return to work.

Empower will make a good-faith effort to provide reasonable accommodations and/or transfer requests when such a request is medically advisable based on the certification of a healthcare provider. When an employee's health care provider finds it is medically advisable for an employee to take intermittent leave or leave on a reduced work schedule and such leave is foreseeable based on planned medical treatment because of pregnancy, Empower may require the employee to transfer temporarily to an available alternative position. This alternative position will have an equivalent rate of pay and benefits and must better accommodate recurring periods of leave than the employee's regular job.

Eligible employees are normally granted unpaid leave for the period of disability, up to a maximum of four months (or 17 1/3 weeks or 693 hours) per pregnancy. Pregnancy disability leave runs concurrently with FMLA, so any time off will count against your FMLA allotment. Employees will be required to use any accrued sick time during any unpaid portion of pregnancy disability leave. Benefit accrual, such as sick leave and holiday benefits, will be suspended during the approved pregnancy disability leave period and will resume upon return to active employment. Group health benefits will be maintained during the approved pregnancy disability leave as if you were continuously employed. However, you must continue to pay your share of applicable premiums (for yourself and any dependents) during the leave.

Additionally, you may choose to suspend your medical, dental, and vision benefits during your leave. Human Resources will provide you with a form to select how your benefits will be handled.

So that an employee's return to work can be properly scheduled, an employee on pregnancy disability leave is required to provide Empower with the expected date of return when the leave is first requested, and at least one week's advance notice of the date she intends to return to work.

When an approved pregnancy disability leave ends, the employee will be reinstated to the same position, unless the position has ceased to exist because of legitimate business reasons. An employee has no greater right to reinstatement to the same position or to other benefits and conditions of employment than if she had been continuously employed in this position during the pregnancy disability leave or transfer. If the same position is

not available, the employee will be offered a comparable position in terms of such issues as pay, location, job content, and promotional opportunities, if one exists. An employee has no greater right to reinstatement to a comparable position or to other benefits or conditions of employment than an employee who has been continuously employed in another position that is being eliminated.

If you have any questions regarding pregnancy disability leave, please contact Human Resources.

UNPAID LEAVE OF ABSENCE AFTER PROTECTED LEAVE HAS ENDED

In an effort to comply with its duty to accommodate employees with qualifying disabilities, if the employee does not qualify for FMLA or CFRA, or has exhausted their annual allotment, Empower may provide leaves of absence without pay when an employee is temporarily unable to work due to a mental or physical disability, certified in writing by his or her health care provider, unless such leave would cause an undue hardship to Empower. Employees granted unpaid medical leave have no right to guaranteed reinstatement **unless otherwise required by law**.

Benefit accrual, such as paid sick leave, and holiday benefits, will be suspended during an unpaid medical leave period and will resume upon return to active employment. Unless otherwise required by law, Empower does not continue to pay premiums for health **and welfare** insurance coverage (**including but not limited to medical, dental, vision, and life**) for employees on unpaid medical leave once their FMLA and/or CFRA job protection ends. However, if eligible, you may self-pay the premiums under the provisions of COBRA.

DISCRETIONARY UNPAID LEAVE OF ABSENCE (NON-MEDICAL)

Under emergency circumstances for personal or other non-medical reasons, you may need to be temporarily released from the duties of your job with Empower. It is the policy of Empower to allow its eligible employees to apply for, and be considered for, certain specific leaves of absence not otherwise set forth in this Guidebook. However, this policy is intended only for extreme circumstances, and must be approved by the School Director.

Failure to return to work as scheduled from an approved leave of absence, or failure to inform Human Resources of an acceptable reason for not returning as scheduled, will be considered to have abandoned his/her employment.

All requests for leaves of absence shall be submitted in writing to Human Resources. Each request shall provide sufficient detail, including the reason for the leave, the expected duration of the leave, and the relationship of family members, if applicable.

Regular full-time employees must have completed one year of service to be eligible to request an unpaid personal leave of absence of no more than thirty (30) calendar days. During that time, you may remain covered under Empower's medical plans subject to plan eligibility and requirements and must continue to pay your portion of the applicable premiums. Any non-medical leaves of absence that last longer than 30 days will be considered a break in employment.

A request for a personal leave will be evaluated on a number of factors, including anticipated operational and staffing requirements during the proposed time of absence. In the case where the initial 30 calendar days are insufficient, consideration may be given for an extension of 30 more days if your manager is informed in writing.

If you are on leave for more than 30 days your insurance benefits will be suspended. However, you may continue those benefits by paying the full costs of your insurance benefits through COBRA. Empower will resume payments when you return to active employment.

Employees do not continue to accrue sick leave or holiday benefits while they are on unpaid discretionary leaves of absence. Further, employees have no guaranteed reinstatement of employment following the expiration of any leave of absence granted under this Discretionary Unpaid Leave of Absence policy.

LONG-TERM DISABILITY

One of the benefits that may be provided by Empower is Long-Term Disability Insurance. Empower employees who are on a leave of absence, and qualify for long-term disability benefits will be required to provide a doctor's note defining the estimated date for returning to work. If no note is provided, or if the return date is indefinite, or if the return date is unreasonably distant (at the discretion of the School Director), employment with Empower will be terminated.

FUNERAL/BEREAVEMENT LEAVE

Full-time Empower employees who have worked with Empower for at least **thirty (30)** days may be eligible for up to 5 working days **of bereavement leave** off upon the death of a family member. ~~Regular exempt full-time employees will receive this time with pay. For all other employees, the time off will be unpaid. Bereavement leave must be completed within three months of the date of the death of the family member, but need not be consecutive.~~

Regular full-time employees are eligible for up to five (5) days of paid bereavement leave per school year. While eligible employees may take up to five (5) days of bereavement leave for each qualifying death, no more than five (5) total days per school year will be paid. Any additional bereavement leave taken within the same school year will be unpaid.

Upon request, employees must provide documentation of the death of the family member within 30 days of the first day of the leave. "Documentation" may include, but is not limited to, a death certificate, a published obituary, or written verification of death, burial, or memorial services from a mortuary, funeral home, burial society, crematorium, religious institution, or governmental agency.

For purposes of this policy, an employee's family member includes a spouse, child, parent, sibling, grandparent, grandchild, domestic partner, or parent-in-law. "Child" means a biological, adopted, or foster child, a stepchild, a legal ward, a child of a domestic partner, or a person to whom the employee stands in loco parentis. "Parent"

means a biological, foster, or adoptive parent, a parent-in-law, a stepparent, a legal guardian, or other person who stood in loco parentis to the employee when the employee was a child. “Sibling” means a person related to another person by blood, adoption, or affinity through a common legal or biological parent. “Grandchild” means a child of the employee's child. “Grandparent” means a parent of the employee's parent.

Bereavement leave as stated above must be approved by the employee's supervisor. Employees may use accrued vacation(if applicable) or paid sick leave for unpaid portions of their leave. If the employee does not have accrued vacation or paid sick leave, the absence will be without pay.

This Bereavement leave policy also applies to leave due to “reproductive loss”. Reproductive loss includes situations like miscarriage or stillbirth, unsuccessful assisted reproduction, failed surrogacy or failed adoption. Supporting documentation will not be required when the leave is related to reproductive loss.

MILITARY LEAVE OF ABSENCE

All employees who leave Empower for active military service or military reserve duty will be placed on an unpaid military leave of absence. Employees are entitled to reinstatement upon completion of such military service or duty, provided an application for reinstatement is made within 90 days of discharge, or as otherwise provided by law.

Time spent on military leave counts for purposes of determining “length of service.” However, you will not accrue sick leave or receive holiday pay during military leave.

FAMILY MILITARY LEAVE

Qualified employees are eligible for up to 10 days of unpaid leave when their spouse or registered domestic partner is on leave from military deployment. A qualified employee is one who regularly works more than 20 hours per week and whose spouse or registered domestic partner is a member of the Armed Forces, National Guard, or Reserves and is on leave from deployment during a period of military conflict.

If you are eligible for such leave, please submit a written request for leave to Human Resources within two business days of receiving official notice that your spouse or registered domestic partner will be on leave from deployment. You will also be required to provide written documentation certifying that your spouse or registered domestic partner will be on leave from deployment.

The employee may take this time off without pay unless otherwise required by applicable law. However, employees who need time off to participate in a qualifying event resulting from a family member's deployment to a foreign country may be eligible for Paid Family Leave benefits through the California Employment Development Department.

DRUG AND ALCOHOL REHABILITATION LEAVE

Empower will reasonably accommodate an employee who voluntarily enters and participates in an alcohol or drug rehabilitation program, including potentially providing unpaid leave to participate in the program, provided that the accommodation does not impose an undue hardship on Empower. Empower will not pay for the costs incurred in attending a rehabilitation program. An employee who wishes to identify him or herself as an individual in need of the assistance of an alcohol or drug rehabilitation program may contact Human Resources. Empower will take all reasonable steps necessary to maintain the employee's privacy in this situation. The employee may use paid sick leave, if any, during requested leave.

Nothing in this policy shall prohibit Empower from refusing to hire or from discharging an employee who, because of his or her current use of alcohol or drugs, is unable to perform his/her duties or cannot perform the duties in a manner that would not endanger his/her health or safety or the health or safety of others. This policy in no way restricts Empower's right to discipline an employee, up to and including termination of employment, for violation of Empower's Drug and Alcohol Abuse Policy.

TIME OFF TO ATTEND CHILD'S SCHOOL DISCIPLINE

Any employee who is a parent or legal guardian of a child that has received written notice from the child's school requesting his or her attendance at a disciplinary conference is entitled to take unpaid leave to attend the conference. Please contact your supervisor to determine eligibility and scheduling before taking any leave to attend a disciplinary conference.

To be eligible for time off to attend a child's school, the employee must present the school's letter, which requests the employee's appearance at the school, to his or her supervisor at least two days before the requested time off (if advanced notice is provided). This type of leave will be unpaid.

TIME OFF TO ATTEND CHILD'S SCHOOL ACTIVITIES

If you are the parent or guardian of a child who is in school up to grade 12, or who attends a licensed day care facility, you may take up to 40 hours of unpaid leave per year to participate in the activities of the school or day care facility, to find, enroll or reenroll your child in a school or with a licensed child care provider and/or to address a child care provider or school emergency. You may take no more than eight hours off for this purpose in any one calendar month. Unless it is to address an emergency, you should schedule this time off with your supervisor in advance.

You may be asked to provide documentation from the school or day care facility that you participated in the activity to confirm your attendance at its facility for reasons covered under this policy on the specific date and time that you took the leave. This time off is unpaid.

TIME OFF FOR JURY AND WITNESS DUTY

Empower encourages employees to serve on jury or witness duty when called. An employee must notify their supervisor of the need for time off for jury or witness duty as soon as a notice or summons from the court or a subpoena is received. Any jury pay or mileage may be kept by the employee. Non-exempt employees who are called for jury/witness duty will be provided time off without pay. Exempt employees receive up to two weeks of paid jury duty leave. Any time off beyond this is unpaid. However, notwithstanding the cap, the employee will receive their salary for any week where they perform some work, provided the work time is authorized by their supervisor.

Employees who are instructed not to work during jury duty must follow the directive or they may be subject to disciplinary action. ~~will receive their regular salary unless they do not work any hours during the course of a workweek.~~

Verification from the court clerk of having served may be required and you will be expected to report or return to work for the remainder of your work schedule on any day you are dismissed from jury or witness duty.

In the event that the employee must serve as a witness within the course and scope of his or her employment with Empower, Empower will provide time off with pay.

RIGHTS FOR VICTIMS OF CRIME OR ABUSE

Right to Time Off:

If you are the victim of stalking, domestic violence, sexual assault, or a crime that caused physical injury or that caused mental injury and a threat of physical injury, or if your immediate family member is deceased because of a crime, you are permitted to be absent from work to seek relief related to the crime or abuse. Relief includes, but is not limited to, obtaining a temporary restraining order, a restraining order, or other injunctive relief to help ensure the health, safety, or welfare of you or your child. You are permitted to take leave for this purpose whether or not any person is arrested for, prosecuted for, or convicted of committing the crime. All employees can also take time off from work to get medical attention or services from a domestic violence shelter, program, or rape crisis center, or receive psychological counseling or safety planning related to domestic violence, sexual assault, or stalking.

Employees may use available accrued PSL. Otherwise, the time off is unpaid. In general, employees are not required to provide documentation for time off under this policy. However, employees shall provide reasonable advance notice of their intent to take time off, unless advance notice is not feasible. If employees are unable to provide advance notice for time off under this policy, they can provide certification of their absence (such as a police report, court order, or health care provider certification, or other documentation that reasonably verifies that the crime or abuse occurred and your absence was for an authorized purpose) within a reasonable time period thereafter.

Empower will not discriminate or retaliate against employees or their family members for taking time off for the following purposes:

- Obtaining or attempting to obtain relief, such as a restraining order.
- Seeking medical attention or recovering from injuries.
- Seeking services from a domestic violence shelter or similar organization.
- Seeking psychological counseling or other mental health services.
- Participating in safety planning.
- Relocating or securing a new residence.
- Providing care to a family member who is recovering from injuries.
- Assisting a family member to seek civil or criminal legal services.

If employees provide reasonable advance notice or provide documentation within a reasonable time period thereafter for an unscheduled absence, they will not be subject to any disciplinary action for time off under this policy.

Right to Reasonable Accommodation for Victims of Domestic Violence, Sexual Assault or Stalking:

Employees have the right to ask Empower for help or changes in their workplace to make sure they are safe at work. Empower will work with its employees to see what changes can be made. Changes in the workplace may include putting in locks, changing shifts or phone numbers, transferring or reassigning the employee, or help with keeping a record of what happened to the employee. Empower may ask the affected employee for a signed statement certifying that this request is for a proper purpose and may also request proof showing the need for an accommodation. Empower will maintain confidentiality regarding any requests for accommodations under this policy.

Prohibition on Retaliation and Discrimination: Empower is committed to ensuring employees are not treated differently or retaliated against because of any of the following:

- The employee is a victim of a crime or abuse.
- The employee asked for time off to get help
- The employee asked Empower for help or changes in the workplace to ensure safety at work.

Right to File a Complaint: If any employee believes that he or she has experienced retaliation or discrimination as a result of conduct protected by this policy, the employee may file a complaint with his or her supervisor and/or the Labor Commissioner's Office.

For more information, contact the Labor Commissioner's Office by phone at 833-526-4636 or visit a local office by finding the nearest one on its website: www.dir.ca.gov/dlse/DistrictOffices.htm. The Labor Commissioner's Office provides an interpreter at no cost to the employee, if needed.

TIME OFF FOR VICTIMS OF CRIME

If you are the victim—or an immediate family member (i.e., spouse, registered domestic partner, child, step-child, sibling, step-sibling, parent, step-parent, or the child of a registered domestic partner) of the victim—of a violent felony, serious felony (as defined by the California Penal Code), or felonies related to theft or embezzlement, you are permitted to be absent from work to attend judicial proceedings related to the crime.

You must provide your supervisor with written notification for each scheduled proceeding, unless advance notice is not possible. This time off is unpaid. The types of verification Empower may require for an unscheduled judicial processing include: documentation evidencing the judicial proceeding from any of the following entities: the court or government agency setting the hearing; the district attorney or prosecuting attorney's office; or the victim/witness office that is advocating on behalf of the victim.

TIME OFF FOR EMERGENCY DUTY/TRAINING FOR VOLUNTEER FIREFIGHTERS, RESERVE PEACE OFFICERS OR EMERGENCY RESCUE PERSONNEL

If you are a registered volunteer firefighter, reserve peace officer, or emergency rescue personnel (including an officer, employee or member of a disaster medical response entity sponsored or requested by the state) who intends to perform emergency duty/training during work hours, please alert your supervisor so Empower is aware of the fact that you may have to take time off to perform emergency duty/training. In the event any employee needs to take time off for this type of emergency duty/training, a supervisor must be notified before leaving work. All time off for these purposes is unpaid.

Registered volunteer firefighters, reserve peace officers or emergency rescue personnel are eligible to take temporary unpaid leaves of absence for fire or law enforcement training not to exceed 14 days per calendar year. In the event you need to take time off for this type of emergency duty/training, you must notify your supervisor and Human Resources in advance.

If you feel you have been treated unfairly as a result of taking or requesting emergency duty/training, you should contact your supervisor or any other manager, as appropriate.

CIVIL AIR PATROL LEAVE

Empower will not discriminate against an employee for membership in the Civil Air Patrol. Additionally, Empower will not retaliate against an employee for requesting or taking Civil Air Patrol leave, which is unpaid.

Empower will provide not less than 10 days per year of leave but no more than 3 days for a single emergency operational mission unless the emergency is extended by the entity in charge of the operation and Empower approves the leave. Employees must have been employed by Empower for at least 90 days immediately preceding the commencement of leave, and must be duly directed and authorized by a political entity that has the authority to authorize an emergency operational mission of the California Wing of the Civil Air Patrol.

Employees must request leave with as much notice as possible in order to respond to an emergency operational mission of the California Wing of the Civil Air Patrol.

Leave under this policy is unpaid. Following leave under this policy, an employee must return to work as soon as practicable and must provide evidence of the satisfactory completion of civil air patrol service. If the employee complies with these requirements, the employee will be restored to their prior position or to a position with equivalent seniority status, pay, and other benefits, unless the employee is not restored because of conditions unrelated to the exercise of the leave rights by the employee.

TIME OFF TO VOTE

Empower encourages all employees to fulfill their civic responsibilities and to vote in all public elections. Most employees' schedules provide sufficient time to vote either before or after working hours.

Because polls are generally open from 7:00 a.m. until 8:00 p.m., employees generally are able to find time to vote either before or after their regular work schedule. If you do not have sufficient time outside of working hours to vote and have not requested an absentee ballot, you may receive up to two hours of paid time off to vote. Any additional time off will be without pay.

Employees must request time off from their supervisor at least two working days before election day so that the necessary time off can be scheduled at the beginning or end of the work shift, whichever provides the least disruption to normal work schedules.

If approved for time off, you will not incur any attendance infractions for missing work to vote. Employees must submit a voter's receipt on the first working day following the election to qualify for paid time off.

WORKERS' COMPENSATION LEAVE

Empower will grant you a workers' compensation disability leave in accordance with state law if you incur an occupational illness or injury. As an alternative, Empower may offer you modified work. Leave taken under the workers' compensation disability policy runs concurrently with family and medical leave under both federal and state law (if eligible) and is unpaid (although certain wage replacement benefits may be available).

An employee who sustains a work-related injury or illness should inform his or her supervisor and Human Resources immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage.

LEAVE FOR BONE MARROW AND ORGAN DONORS

Pursuant to California law, Empower will provide up to five business days of paid leave within a one-year period to an employee who donates bone marrow to another person. In addition, Empower will also provide up to 30 business days of paid leave within a one-year period and up to 30 business days of unpaid leave within a one-year period to an employee who donates an organ to another person. This one-year period is measured from the date the employee's leave begins and shall consist of 12 consecutive months.

Empower requires that bone marrow donors use up to five days of available accrued sick time during the course of the leave. Organ donors must use up to ten days of available accrued PSL time during the course of the leave.

To qualify for this leave, an employee must have been employed for at least 90 days prior to the commencement of the leave and must provide Empower with written verification of his or her status as an organ or bone marrow donor and the medical necessity for the donation. During such leave, Empower will continue coverage under its group medical insurance plan, if applicable. However, employees must continue to pay their portion of the applicable premiums. Employees should give Empower as much notice as possible of the intended dates upon which the leave would begin and end.

ADULT LITERACY LEAVE

Pursuant to California law, Empower will reasonably accommodate any eligible employee who seeks to enroll in an adult literacy education program, provided that the accommodation does not impose an undue hardship on Empower. Empower does not provide paid time off for participation in an adult literacy education.

EMPLOYMENT EVALUATION AND SEPARATION

EMPLOYEE REVIEWS AND EVALUATIONS

To encourage open communication with employees and supervisors, Empower supports an annual performance review. Empower strives to conduct employee performance reviews annually. The frequency of performance evaluations may vary depending upon length of service, job position, past performance, changes in job duties or recurring performance problems.

There are several advantages to work planning:

- It helps you and your supervisor establish priorities among different work activities. It sets standards or goals that can help you increase your own productivity by providing a focus on your efforts in relation to goals.

- It provides an opportunity for you to share your ideas on doing your job better.
- It establishes expectations in advance, together with the results that will be used to determine success, which will help to ensure that your performance is judged fairly.

The performance evaluations are intended to make you aware of your progress, areas for improvement and objectives or goals for future work performance. Favorable performance evaluations do not guarantee increases in salary or promotions or retention of your job. Salary increases and promotions are solely within the discretion of Empower and depend upon many factors in addition to performance. After the review, you will be required to sign the evaluation report simply to acknowledge that it has been presented to you, that you have discussed it with your supervisor, and that you are aware of its contents. The evaluation system in no way alters the employment at-will relationship. Failure by Empower to conduct a performance review will not prevent Empower from terminating your employment.

DISCIPLINE AND INVOLUNTARY TERMINATION

Violation of Empower's policies and rules may warrant disciplinary action, which may take multiple forms, including verbal warnings, written warnings, suspensions or termination. Empower's disciplinary system is informal and Empower may, in its sole discretion, utilize any form of discipline it deems appropriate under the circumstances, up to and including termination of employment upon the first offense.

VOLUNTARY TERMINATION

Either the employee or Empower may terminate the employment relationship at any time, with or without notice and with or without cause. We hope that you will enjoy your employment with Empower. However, if you decide to resign, while it is not required, Empower requests that you give as much advance notice as possible (preferably two weeks) to allow Empower to plan for your departure.

Empower values its employees and is committed to providing a positive, rewarding and productive work environment. As a result, we appreciate your honest feedback during your exit interview. Upon resignation you will be provided an Employee Exit Checklist and Survey, and an exit interview may be scheduled on the last day of work with Human Resources. The purposes of the exit interview are to review eligibility for benefit conversion, to ensure that all necessary forms are completed, to collect any Empower property (including keys, equipment, documents and records) that may be in the employee's possession, to review the employee's obligations regarding confidential information, and to provide the employee with the opportunity to make any constructive comments and suggestions on improving the working environment at Empower. Final pay will be provided in accordance with state law.

RETURN OF PROPERTY

Employees are required to return Empower property that is in their possession or control in the event of termination of employment, resignation, or layoff, or immediately upon request. We may also take all action deemed appropriate to recover or protect Empower property.

REFERENCES / EMPLOYMENT VERIFICATIONS

All requests for references and employment verifications must be promptly directed to Human Resources. When contacted for a reference or employment verification, Empower will only provide information concerning dates of employment and the title of the last position held. Other employment information will only be provided if accompanied by a signed release from the employee or by a court order. Employees outside of Human Resources are not permitted to provide any employment verification.

In accordance with California law, including Assembly Bill (AB) 2534, which strengthens compliance with educational policies related to employment procedures and educator evaluations, Empower is committed to upholding transparency and accountability in our hiring of certificated staff.

Applicants for certificated positions must provide a comprehensive list of all previous employment with school districts, county offices of education, charter schools, and state special schools. This list should include sufficient details to enable prospective employers to contact former employers regarding any past allegations, investigations, or disciplinary actions related to egregious misconduct.

Any intentional withholding of information regarding previous employers will result in disciplinary action up to and including termination.

All offers of employment are contingent on the results of this background check. Empower reserves the right to withdraw an offer of employment, or to terminate employment at any time based on the results of the background check.

ACKNOWLEDGEMENT OF GUIDEBOOK AND AT WILL EMPLOYMENT

I acknowledge that I have received the Employee Guidebook. I have read the Guidebook and understand the contents of the Guidebook. I agree to abide by all of Empower's policies.

I understand and agree to my at-will employment status as described in the Guidebook, summarized as follows:

- This Guidebook does not in any way reflect a contract of employment, either express or implied between Empower and me.
- Empower is an at-will employer. I am free to terminate the employment relationship with Empower at any time; Empower, in its sole discretion, also reserves the right to modify or terminate the employment relationship with me for any or no reason at any time. Specifically, Empower may modify all terms of employment including any policy or practice and/or my hours, wages, working conditions, job assignments, position title, compensation rates and benefits in its sole discretion.
- Nothing in this Guidebook creates, or is intended to create, a promise or representation of continued employment or guaranteed terms and conditions of employment for me. Further, there is no agreement,

express or implied, written or verbal, between me and Empower for any specific period of employment, for continuing or long-term employment, or for guaranteed terms and conditions of employment.

I understand that no supervisor or representative of Empower has the authority to enter into any agreement, express or implied, for employment for any specific period of time, or to make any agreement for employment other than at will. I understand that only the Board of Directors has the authority to make any such agreement and then only in writing signed by the Board of Directors.

Employee's Name: _____

Employee's Signature: _____

Dated: _____

[TO BE PLACED IN EMPLOYEE'S PERSONNEL FILE]



Empower Generations Obsolete Equipment and Materials

Board Approved:

This list of obsolete equipment and materials is no longer needed for school purposes and will be sold and/or disposed of in accordance with Education Code Sections 17545 and 17546.

Education Code 17545 authorizes the sale for cash of any property belonging to the school if the property is not required for school purposes, or it should be disposed of for the purpose of replacement, or it is unsatisfactory or not suitable for school use.

Education Code 17545 and 17546 provides for procedures to implement such a sale, public or private, conducted by staff, other public agencies, or by contract with a private auction firm.

List of items attached below

Chromebook: LR0B7B45
Chromebook: LR0B7CYL
Macbook Air: FVHX3MRQJ1WK
iPad: GCGVK1Z6HLFD
iPad: GCGVK3P7HLFD
iPad: GCGVK2L9HLFD
iPad: GCGVK2WNHLFD
Mac Mini: C07PV3FTG1HW
Chromebook: LR0B7EL8



EMPLOYMENT - NEW HIRES

Rodriguez, Karen

Custodian (Backfill)

5/08/2026

RESIGNATIONS/TERMINATIONS

Hutson, Eva

Custodian

4/13/2026

STATUS CHANGE

N/A

Empower Generations - Payment Register Summary

Location: 115--Empower Generations

Period: 04/23/2026 - 05/13/2026

Created on: 05/14/2026



GL Account #	GL Account Description	Total
3401	Health & Welfare Benefits - Credentialed positions	\$2,917.96
3402	Health & Welfare Benefits - Classified positions	\$160.02
4305	Educational Supplies (Classroom, Project, SpEd, Etc)	\$488.11
4325	Custodial Supplies	\$544.80
4340	Office Supplies	\$108.25
4430	IT Equipment & Supplies	\$81.70
5310	Professional Dues, Memberships, and Subscriptions	\$1,270.00
5510	Utilities - Electricity	\$607.93
5610	Rent - Facilities Rent and CAM Charges	\$14,307.91
5801	Professional Services - Service Fees	\$23,042.36
5804	Professional Services - Auditing & Tax Preparation	\$3,375.00
5806	Professional Services - Consultant Fees	\$45.00
5808	Professional Services - Legal Fees	\$152.00
5853	Student Services Expenditures - Student & Group Activities	\$675.00
5854	Student Services Expenditures - Electives & Enrichment	\$900.00
9310	Prepaid Expenditures (Expenses)	\$1,401.22
9535	Retirement Liability	\$12,108.15
9536	403b Payable	\$600.00
9548	Credit Card Payable - EG	\$543.87
Total		\$63,329.28