The Oklahoma Association of Youth Services

Board of Directors Meeting

November 4, 2026

10:00 a.m. Join

Zoom:

https://us02web.zoom.us/j/85805131240

A meeting has been scheduled for the Board of Directors of the Oklahoma Association of Youth Services and is being held in accordance with the Oklahoma Association of Youth Services Bylaws.

Oklahoma Association of Youth Services, Inc.
Board of Directors' Meeting Agenda
November 4, 2026
10:00 a.m.

A meeting has been scheduled for the Board of Directors of the Oklahoma Association of Youth Services and is being held in accordance with the Oklahoma Association of Youth Services Bylaws. The meeting can be virtually accessed by joining the following Zoom link:

Join Zoom Meeting

https://us02web.zoom.us/j/85805131240

Both the agenda and minutes from this meeting will be available on the OAYS website (www.oays.org) following the meeting.

1. Call to order and introduction of guests
2. Roll call/establish quorum
3. Discussion or possible action to approve Board Meeting Minutes for October 8, 2026
4. Discussion or possible action regarding the Treasurer's Report
    i. Financials
    ii. Audit
5. Discussion or possible action regarding the Cluster Coordinator's Report
    i. Central
    ii. Northeast
    iii. Northwest
    iv. Southeast
    v. Southwest

6. Discussion or possible action regarding the Legislative Committee Report

7. Discussion or possible action regarding the Program Committee Report

8. Discussion or possible action regarding the CERC and CERC Leadership Committee Reports

9. Discussion or possible action regarding the Strategic Development Committee Report

10. Discussion and/or possible action to approve items as needed on the President's Report

11. Discussion and/or possible action to approve items as needed on the Executive Director's Report

    i. Discussion and possible action regarding proposed amendments to the OAYS Policy and Procedures Manual.

12. **Executive Session**

    i. Motion and vote to enter executive session to discuss identified confidential matters.

    ii. Motion and vote to return to regular session.

    iii. Discussion and possible action regarding matters considered during executive session.

13. New business not known at the time of posting this agenda

14. Adjourn

Oklahoma Association of Youth Services, Inc.

Board of Directors Meeting Minutes

October 8, 2026 | 9:03 a.m.

Sheraton Oklahoma City Downtown Hotel
Oklahoma City, Oklahoma
Hybrid Meeting

1. Call to Order and Introduction of Guests

President Courtney Dukes called the meeting to order at 9:03 a.m. No guests were introduced.

2. Roll Call and Establishment of Quorum

Roll call was conducted, and a quorum was established.

Board members identified through roll call and recorded votes included Courtney Dukes, Jim Harris, Shanna Rice, Kody Suanny, Amara Lett, Jana Emerson, Brenda Rose, and Mindy Bellack.

3. Approval of September 2, 2026, Board Meeting Minutes

Mindy Bellack made a motion to approve the September 2, 2026, Board of Directors Meeting Minutes. Shanna Rice seconded the motion.

There was no discussion. A roll-call vote was conducted, and the motion passed.

4. Treasurer's Report

Treasurer Shanna Rice presented the August 2026 financial statements and revisions to the Association's operating budget. The Treasurer reviewed the accounts receivable and payable reports and noted the Association's favorable financial position early in the fiscal year. The revised operating budget included several adjustments:

- Personnel and benefits expenses were updated to include the employer's share of payroll taxes.
- Health benefit projections were revised to reflect an employee's anticipated transition to Medicare and a taxable health benefit of $800 per month beginning in March 2027.
- Vision insurance coverage was added.
- Insurance expenses were increased to reflect an approximately 18% increase in premiums.

The Treasurer also reported that the FY2025 audit remained pending because requested corrections had not yet been completed by the auditor. The finalized report will be presented to the Board when available.

Brenda Rose made a motion to approve the financial statements and revised operating budget as presented. Kody Suanny seconded the motion.

There was no further discussion. A roll-call vote was conducted, and the motion passed.

5. President's Report

President, Courtney Dukes deferred her report to the Membership Meeting immediately following the Board meeting.

6. Executive Director's Report

Executive Director Dr. Peter Messiah deferred his report to the Membership Meeting immediately following the Board meeting.

7. New Business

No new business was presented.

8. Adjournment

There being no further business, the meeting was adjourned at approximately 9:12 a.m.

OAYS Policy Manual: Proposed Amendments and New Policies

Part A. Proposed amendments: Financial policies

1. Section 404(A): Accounting basis

Current policy	Proposed policy	Why it matters
The basis for accounting for this organization shall be the COST METHOD wherein revenue is recognized when received and expenditures are recognized when paid.	OAYS shall maintain its general-purpose financial records and prepare its financial statements in accordance with generally accepted accounting principles in the United States of America (U.S. GAAP), consistently applied. Revenue and expenses shall be recognized in accordance with the applicable accounting standards, rather than solely when cash is received or paid. Reports required by a funding source on a different basis shall be prepared as supplemental reports and reconciled to OAYS accounting records. This section takes effect at the start of the first OAYS fiscal year beginning after adoption. The Executive Director shall coordinate the conversion with OAYS's independent auditor.	We need to be more general in language so that it reflects our standard of financial record keeping in a consistent manner.

2. Section 404(B)(1)(b): Fund accounting and coding

Current policy	Proposed policy	Why it matters
All revenue and expenses shall be identified by source as established in the annual budget and code in the Chart of Accounts, which are approved annually by the Board of Directors. Revenue and expenses	All revenue and expenses shall be identified by source, fund, and account in accordance with the annual budget and chart of accounts approved by the Board of Directors. Transactions shall be recorded in the appropriate accounting period in accordance with Section 404(A). The Executive Director's designee shall code	The current text assigns coding to an Office Manager position and assumes paper checks and deposit slips. Naming the function instead of a job title keeps the policy accurate as staffing and electronic payments change. Keeping a stated monthly review preserves a specific, auditable Board oversight step.

Current policy	Proposed policy	Why it matters
are then entered into the computerized bookkeeping system by a data processing code assigned to each deposit and expense at the time deposit/payment is made. The Office Manager does coding of expenses when payment is made and of revenue when received and deposited. The Treasurer and Executive Director shall verify the codes at the time checks are signed and the Income Statement reviewed. The chart of account code is recorded on the check, deposit form and/or daily revenue list, which designates which fund and expense account, is to be credited or debited.	revenue, expenses, receipts, and disbursements to the appropriate accounts and maintain supporting documentation. The Treasurer and Executive Director shall review account coding and financial reports at least monthly. Independent review and segregation of duties shall be maintained in accordance with OAYS financial control requirements.	

3. Section 404: Financial controls and delegation

Current policy	Proposed policy	Why it matters
Fiscal Policies and Procedures have been established to give special consideration to internal accounting controls, separation of duties, safeguarding of assets, and the execution of transactions in accordance with directives of the Board of Directors of this Association. The functions of cash receiving, processing, recording, and bank reconciling shall be delegated to separate individuals within the administrative offices to the extent possible. The Treasurer of the Board of Directors will monthly check the record of all receipts and deposits.	The Executive Director shall be responsible for the administration of OAYS financial operations and may designate qualified individuals or contracted service providers to perform assigned accounting, bookkeeping, payroll, and financial reporting functions. Delegation of financial responsibilities shall not diminish the Executive Director's accountability for the administration of OAYS resources or the Board of Directors' responsibility for financial oversight. Financial procedures shall provide for appropriate separation of authorization, payment processing, recordkeeping, and account reconciliation functions. Where staffing limitations prevent complete separation of duties, compensating controls shall be established, including documented independent review of financial transactions and reconciliations. At a minimum, monthly financial reports shall be presented to the Treasurer and the Finance Committee, and an external accountant shall prepare the monthly account reconciliations. The Executive Director shall ensure that financial records and reports are maintained in accordance with OAYS accounting practices and applicable legal, contractual, and audit requirements. The Executive Director shall maintain a written	A small office cannot fully separate every financial duty, and auditors look for documented compensating controls where separation is incomplete. Naming OAYS's existing practice, monthly reports to the Treasurer and Finance Committee and reconciliations by an external accountant, puts those controls in writing. This language allows outsourced bookkeeping and payroll while making clear that delegation does not shift accountability. The written designee list gives the many "designee" references in this manual a concrete, reviewable meaning.

Current policy	Proposed policy	Why it matters
	list of the individuals and contracted providers designated to perform financial functions and shall provide it to the Treasurer annually and whenever it changes.	

Part A. Proposed amendments: Wage and hour, separation, and leave

4. Section 511(C): Office hours and overtime

Current policy	Proposed policy	Why it matters
The Association's Executive Director is responsible for the supervision of all staff and the daily operations of the Association office. Regular office hours and revisions thereof are at the discretion of the Executive Director in keeping with a high level of responsive service during generally acceptable normal operational hours. Overtime will not be paid to salaried employees.	The Executive Director is responsible for the supervision of all OAYS staff and the daily operations of the OAYS office. Regular office hours and revisions thereof are at the discretion of the Executive Director in keeping with a high level of responsive service during generally acceptable normal operational hours. Employees properly classified as exempt under the Fair Labor Standards Act (FLSA) and other applicable wage and hour laws are not eligible for overtime compensation. Nonexempt employees shall receive overtime compensation in accordance with Section 513. Payment on a salary basis does not, by itself, establish an exemption from overtime requirements.	Federal law decides overtime eligibility by salary level and job duties together, not by whether someone is paid a salary. The federal minimum for the standard exemptions is $684 per week ($35,568 per year), reaffirmed by the U.S. Department of Labor in May 2026, and the duties test applies on top of it. A salaried employee who fails either test is owed overtime, and back pay claims can reach two to three years plus an equal amount in damages.

5. Section 526(B): Compensation for workshop time

Current policy	Proposed policy	Why it matters
Staff shall not be paid additional wages for workshops that last more than their regular eight (8) hours per day.	Time spent by nonexempt employees attending required or otherwise compensable workshops, conferences, and training, including compensable travel time, shall be recorded and paid in accordance with Section 513 and applicable law. Exempt employees shall be compensated in accordance with their applicable salary requirements.	Under federal wage rules, training that is required, job-related, or held during working hours is generally paid work time, and so is much out-of-town travel time. The current sentence would deny nonexempt staff pay for hours they legally worked. OAYS staff attend trainings and conferences regularly, so this is a recurring exposure rather than a rare one.

6. Section 507(B)(1): Notice and forfeiture of benefits

Current policy	Proposed policy	Why it matters
(1) Termination by either party must be in the form of a two (2) week written notice. Failure, by an employee, to provide adequate notice will result in the forfeiture of any accrued benefits.	Employees are expected to provide at least two (2) weeks' written notice of voluntary resignation whenever practicable. Notice shall identify the employee's intended final date of employment. Failure to provide the requested notice may be considered in determining eligibility for reemployment and in documenting the circumstances of separation. Failure to provide notice shall not, by itself, result in forfeiture of earned wages or accrued leave otherwise payable under applicable law and OAYS policy. OAYS reserves the right to terminate	Oklahoma counts vacation pay earned under an employer's established policy as wages (40 O.S. § 165.1), and all wages are due by the next regular payday after separation, whatever the reason (40 O.S. § 165.3). Withholding earned leave as a penalty for short notice invites a wage claim with possible liquidated damages and attorney fees. The new language keeps a real consequence, rehire eligibility, without that exposure.

Current policy	Proposed policy	Why it matters
	employment with or without notice, subject to applicable law and established OAYS procedures. Payment of final wages and accrued leave shall be governed by applicable law and Section 514. Nothing in this provision limits OAYS's authority to take corrective or disciplinary action for employee misconduct.	

7. Section 507(B)(3): Discharge and accrued vacation

Current policy	Proposed policy	Why it matters
(3) The agency reserves the right to discharge any employee without notice, without severance pay and without accrued vacation pay for:	OAYS reserves the right to discharge an employee without notice or severance pay, subject to applicable law and established OAYS procedures. Final wages and accrued annual leave shall be paid as provided in Section 514 and applicable law. Grounds for discharge include:	Discharge is the situation most likely to produce a wage claim, because a discharged employee has the strongest reason to pursue one. Paying earned leave under the same rule used for every other separation removes that risk. The grounds for discharge stay as written, so OAYS keeps its full disciplinary authority.

8. Section 507: Abandonment of position

Current policy	Proposed policy	Why it matters
Abandonment of Position Policy The Policy of the Oklahoma Association of Youth Services states that employees must communicate their intent of absences, when possible,	Abandonment of Position Employees must notify the Executive Director's designee of an anticipated absence before their scheduled work time whenever possible. Notice shall be made by telephone or email and shall be communicated by the employee unless	An unexplained absence sometimes turns out to be a hospitalization, a disability, or protected leave. Treating it as an automatic resignation in those cases can become a disability or discrimination claim, so the contact effort protects OAYS as much as the employee. Written notice and documentation create the record OAYS needs if the separation is challenged, including in an unemployment

Current policy	Proposed policy	Why it matters
before their scheduled work time. If an employee fails to appear for work during a regularly scheduled workday or an assigned time extending beyond regular work hours for three consecutive days without proper notification, the employee's absence shall be interpreted as a voluntary resignation. The Association's executive director, or designee, will communicate with the employee and arrange for final payment for days worked. This policy supersedes prior leave policy in that the employee forfeits any additional compensation of accrued vacation/leave days. Proper notification of absence must be: to the employee's immediate supervisor or designee; made via telecommunications or email; communicated by the employee unless extreme measures prevent the employee from self-communicating.	extraordinary circumstances prevent personal communication. In that event, notice may be provided by a representative as soon as reasonably possible. An employee who fails to report for three (3) consecutive scheduled workdays or assigned workdays without proper notification may be considered to have voluntarily resigned through abandonment of position. Before determining that abandonment has occurred, the Executive Director or designee shall make reasonable efforts to contact the employee and determine whether an emergency, protected leave, accommodation need, or other circumstance prevented attendance or notification. The Executive Director or designee shall document the contact efforts, relevant circumstances, and separation decision and provide written notice to the employee. The employee shall receive all earned wages and any accrued leave compensation payable under applicable law and OAYS leave policies. Job abandonment shall not independently result in forfeiture of compensation otherwise payable.	claim.

9. Section 511(B): Absence notification

Current policy	Proposed policy	Why it matters
If the necessity for being absent for any reason can be anticipated, the employee shall notify the Executive Director's designee in advance. If an employee is unexpectedly absent due to illness or other emergency, the Executive Director's designee shall be notified as soon as it becomes apparent that employee cannot work, and they should be kept informed thereafter as to the probable duration of the absence. Failure to notify the Executive Director's designee on more than one (1) occasion of any absence shall be cause for discharge.	If an absence can be anticipated, the employee shall notify the Executive Director's designee in advance. If an employee is unexpectedly absent due to illness or another emergency, the employee shall notify the Executive Director's designee as soon as reasonably possible and keep the designee informed of the probable duration of the absence. If extraordinary circumstances prevent the employee from providing notice personally, a representative may provide notice. Failure to provide required notice may result in corrective action consistent with OAYS policy and applicable law. Potential abandonment of position shall be addressed under Section 507.	The current rule makes a second missed call-in automatic grounds for discharge, with no room for emergencies or disability-related absences. It also conflicts with the abandonment process in item 8, so the two sections could give different answers to the same situation. The new language keeps the notice requirement and handles lapses through ordinary corrective action.

10. Section 514: Annual leave payment upon separation

Current policy	Proposed policy	Why it matters
Upon termination of employment of three (3) months or more, vacation pay will be prorated on the basis of months of service with a ten-day limit for which the Association is responsible. When termination is "for cause" for employee misconduct, annual leave may be denied by the Executive Director with approval of the Board of Directors.	Upon separation from employment, accrued and unused annual leave shall be calculated in accordance with the OAYS accrual schedule, applicable eligibility requirements, and any limits expressly established by this policy. Employees who have completed at least three (3) months of employment shall be eligible for payment of accrued and unused annual leave, subject to a maximum payout of ten (10) days, unless applicable law or a written employment agreement requires otherwise. The calculation shall be based on the employee's accrued leave balance as of the final date of employment, less leave previously used or paid. The same calculation shall apply regardless of whether separation results from resignation, discharge, retirement, or abandonment of position. Final wages and any payable accrued leave shall be paid no later than the next regular payday, as required by 40 O.S. § 165.3.	Oklahoma Department of Labor rules allow an employer to set written conditions on leave payout, such as a service requirement or a cap, and to enforce them when stated in advance. The three-month service requirement and ten-day cap carry forward unchanged from the current policy. What changes is the removal of discretionary denial for cause. That clause allowed unequal treatment and carried the largest wage claim risk in the manual.

Part A. Proposed amendments: Accommodation, confidentiality, and workplace conduct

11. Section 518: Pregnancy, childbirth, parental leave, and lactation

Current policy	Proposed policy	Why it matters
518 MATERNITY LEAVE Maternity leave may be granted after six (6) months of employment. The individual will retain all employment rights and will be allowed to return to the same or a similar job when the leave is over. Employees wishing to work beyond the sixth (6th) month of pregnancy must submit a doctor's certificate stating the employee is capable of performing normal duties without adversely affecting the health of the mother or the unborn child. A total of six (6) month leave without pay may be granted, three (3) months before birth and three (3) months after. If a person fails to return by the end of the leave and does not have approval by the Executive Director, termination may occur. Staff returning from a maternity leave must submit a medical report from the attending	**518 Pregnancy, Childbirth, and Related Medical Conditions** OAYS shall not discriminate against an employee or applicant because of pregnancy, childbirth, or related medical conditions. OAYS shall provide reasonable accommodations for known limitations related to pregnancy, childbirth, or related medical conditions as required by applicable law, and may consider other reasonable adjustments. The Executive Director or designee shall discuss accommodation needs with the employee or applicant and identify appropriate adjustments. Adjustments may include additional breaks, modified schedules, temporary changes in duties, or leave. An employee shall not be required to stop working solely because of pregnancy or its stage, or to take leave when another reasonable accommodation is required and available under applicable law. **Pregnancy-related medical leave.** After six (6) months of employment, OAYS may grant up to twelve (12) weeks of unpaid leave for pregnancy, childbirth, or related medical conditions, including recovery from	The current policy grants a fixed six months, three before and three after birth, whether or not the time is medically needed. Leave after birth that is not tied to recovery works as bonding leave offered only to mothers, which invites a sex discrimination claim. The revised section ties leave to medical need and sets a twelve-week maximum, which matches the federal family leave standard without creating a parental leave benefit the law does not require. With fewer than 15 employees, OAYS is below the thresholds for Title VII, the Pregnancy Discrimination Act, and the Pregnant Workers Fairness Act, and below the 50-employee threshold for the Family and Medical Leave Act. Oklahoma has no private-sector family leave law. Available sources differ on whether the Oklahoma Anti-Discrimination Act reaches employers of OAYS's size, and state rules treat pregnancy discrimination as sex discrimination. For that reason, the revision removes the provisions most likely to be read as discriminatory and limits accommodation commitments to what the law requires. The lactation paragraph reflects the federal PUMP for Nursing Mothers Act, which applies through the FLSA. Employers with fewer than 50 employees may claim an undue hardship exemption, but only in limited cases.

Current policy	Proposed policy	Why it matters
physician certifying that person is physically able to resume her normal work. Employees on maternity leave will not accumulate benefits, nor will they lose those accumulated before the leave began.	childbirth, when medically necessary. The length and timing of leave shall be based on the employee's medical need rather than a fixed schedule. Accrued paid leave may be used in accordance with OAYS leave policies. Employees returning from approved leave shall be allowed to return to the same or a similar position, consistent with applicable law. Lactation. OAYS shall provide reasonable break time and a private space, other than a bathroom, that is shielded from view and free from intrusion, for an employee to express breast milk for up to one (1) year after the child's birth, consistent with federal law. The six-month service requirement and twelve-week leave limit shall not restrict any earlier, additional, or different accommodation or leave required by applicable law. Medical documentation and return-to-work certification may be requested only when permitted by applicable law and shall be maintained confidentially. Employees shall not lose benefits accrued before leave. Accrual of benefits during unpaid leave shall follow OAYS policies, benefit-plan terms, and governing law. Before ending employment for failure to return, OAYS shall review any request or	

Current policy	Proposed policy	Why it matters
	apparent need for an extension or accommodation. Accommodation and leave requests shall be coordinated by the Executive Director or designee. Requests concerning the Executive Director's own accommodation or leave shall be referred to the President of the Board of Directors.	

12. Section 503(C): ADA compliance

Current policy	Proposed policy	Why it matters
C. **American Disability Act Compliance** It is the policy of OAYS to be informed and comply with all the provisions of the American Disability Act [ADA]. To the extent required under this law, OAYS will try to make reasonable accommodation for all disabled persons as defined in the Act. Also, it is facility owners' responsibility to ensure the facility be brought up to the code requirement needed to comply with the law. The Safety Officer at Youth Services for Oklahoma County	OAYS is committed to providing equal access to its programs, services, activities, and employment opportunities in accordance with the Americans with Disabilities Act (ADA) and other applicable laws. The Executive Director or designee shall coordinate requests for reasonable accommodation, which OAYS shall provide as required by applicable law, and address accessibility concerns involving OAYS operations, meetings, training, and other sponsored activities. Facilities-related accessibility concerns shall be coordinated with the appropriate property owner, landlord, or facility operator, as applicable. For OAYS-sponsored meetings,	The current text hands compliance to a member agency's Safety Officer and a building OAYS does not control, so no one at OAYS is actually responsible. With fewer than 15 employees, OAYS is below the threshold for the ADA's employment provisions, but the ADA's public accommodation provisions reach conferences and trainings OAYS hosts regardless of size. Since events are OAYS's most public activity, planning accessibility up front costs far less than responding to a complaint afterward.

Current policy	Proposed policy	Why it matters
will be responsible to ensure that the facilities meet with ADA code requirements. If any employee or member agency perceives that OAYS is not in compliance with the provisions of the ADA code, he/she must submit a written complaint to the Executive Director with specific information on OAYS's "Incident Report" form. Once the Executive Director receives the complaint, it will be forwarded to Youth Services of Oklahoma County and appropriate corrective action shall be taken within 30 days. No corrective action will be taken if OAYS determines that there has been no infraction of the ADA requirements. However, the Executive Director will send a written notice to the complaining party of his determination not to take action on this matter within 30 days.	conferences, and trainings, OAYS shall select accessible venues and shall invite participants to request accommodations in advance, such as interpreters or materials in alternate formats. Individuals may submit accommodation requests or accessibility concerns to the Executive Director or designee. Requests involving the Executive Director may be referred to the President of the Board of Directors. OAYS shall maintain the confidentiality of disability-related information in accordance with applicable law.	

13. Section 523: Confidentiality and peer review records

Current policy	Proposed policy	Why it matters
Association staff must respect member agency confidentiality policies. The Association is considered a "Business Associate," under the HIPPA Privacy Rule. During peer reviews, member agencies disclose identifiable health information to perform key functions and obligations to the Association. Therefore, the Association and its representatives shall not use or disclose any confidential information outside of the Association's key functions and obligations.	OAYS recognizes its responsibility to safeguard confidential information obtained through OAYS operations, certification activities, peer reviews, technical assistance, and other authorized functions. OAYS employees, contractors, and individuals acting on behalf of OAYS shall comply with applicable confidentiality requirements, including those established by member agencies, contractual agreements, and governing federal and state laws. Agreements with OAYS contractors shall require compliance with applicable OAYS policies, including confidentiality, information security, artificial intelligence use, and harassment prevention, and shall include a business associate agreement when the work involves protected health information. When performing peer reviews or other authorized activities involving protected health information, OAYS shall comply with applicable requirements of the Health Insurance Portability and Accountability Act (HIPAA), including business associate obligations when such obligations apply. OAYS shall enter into a business associate agreement with each member agency that is a HIPAA covered entity before receiving	Federal HIPAA rules list accreditation as a business associate function, so peer review of member agencies that are covered entities makes OAYS a business associate. That status requires a signed agreement with each such agency; policy language alone does not satisfy it. Youth services files often contain juvenile and substance use records, which carry separate federal and state protections that reviewers need to know about.

Current policy	Proposed policy	Why it matters
	protected health information from that agency. Records protected by 42 CFR Part 2 (confidentiality of substance use disorder patient records), Oklahoma's juvenile records provisions in Title 10A, and Oklahoma's mental health confidentiality provisions in Title 43A shall be handled according to those laws, which may be more restrictive than HIPAA. Access to confidential records shall be limited to individuals with an authorized need to perform assigned responsibilities. Information obtained through peer reviews shall not be disclosed, copied, retained, or used for purposes unrelated to authorized OAYS functions, except as permitted or required by applicable law or governing agreements. The Executive Director or designee shall establish appropriate administrative procedures to protect confidential information and address suspected or confirmed breaches of confidentiality.	

14. Section 531: Alcohol, drug, and fitness for duty

Current policy	Proposed policy	Why it matters
Oklahoma Association of Youth Services, Inc. (the Association) intends to help provide a safe and drug-free work environment for our member agencies and our employees. With this goal in mind, we are establishing the following policy for existing and future employees of the Oklahoma Association of Youth Services, Inc. The Association explicitly prohibits: the use, possession, solicitation for, or sale of narcotics or other illegal drugs, alcohol, or prescription medication without a prescription on Company or member	**531 Alcohol, Drug, and Fitness for Duty** OAYS is committed to a safe, drug-free workplace for its employees and for the member agencies, youth, and families its staff serve. **Prohibited Conduct** While on duty, on OAYS or member agency premises, while operating an OAYS vehicle, or while otherwise performing OAYS business, employees shall not use, possess, sell, or be impaired by alcohol, illegal drugs, marijuana, or prescription medication not taken as prescribed. **Medical Marijuana** OAYS recognizes that Oklahoma law authorizes qualified individuals to obtain a medical marijuana patient license. Possession of a medical marijuana patient license does not authorize the use, possession, or impairment from marijuana while performing duties on behalf of OAYS and does not require OAYS to accommodate marijuana use in the workplace. OAYS shall not take action against an applicant or employee solely because the person holds a medical marijuana license. **Medications** Individuals using prescribed or over-the-counter medications are responsible for ensuring that such medications do not impair their ability to safely and	OAYS has never conducted drug testing, and no law requires it to. Oklahoma's Testing Act bars any testing until a detailed written policy is adopted, with ten days' notice to employees, and House Bill 3127 (effective November 1, 2026) ties action on a positive marijuana test to that kind of policy. Stating plainly that OAYS does not test avoids promising procedures that do not exist, and the conduct rules still let OAYS act on use, possession, or impairment at work. The 2023 policy authorizes random, for-cause, and post-accident testing that OAYS has never carried out under a compliant written program, and its "any detectable amount" rule and broad reputation clauses do not fit the medical marijuana statute. Replacing it removes authority OAYS could not lawfully use.

Current policy	Proposed policy	Why it matters
agencies premises or while performing an assignment; being impaired or under the influence of legal or illegal drugs or alcohol away from the Company or member agencies premises, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation; possession, use, solicitation for, or sale of legal or illegal drugs or alcohol away from the Company or member agencies premises, if such activity or involvement adversely affects the employee's work performance, the safety of the	effectively perform assigned duties. Testing. OAYS does not conduct drug or alcohol testing of applicants or employees, except where testing is required by federal law or a funding agreement. OAYS shall not begin testing unless the Board first adopts a written testing policy that complies with the Oklahoma Standards for Workplace Drug and Alcohol Testing Act, 40 O.S. §§ 551 through 565, including its notice requirements. Violations of this policy may result in corrective or disciplinary action, up to and including termination of employment, removal from volunteer or internship service, termination of a contractual relationship, or other appropriate action. OAYS shall comply with all applicable federal and Oklahoma laws, regulations, contracts, grant requirements, accreditation standards, and licensing requirements. Where such requirements are more restrictive than this policy, the more restrictive requirement shall govern. Nothing in this policy creates a contract of employment or alters the at-will employment relationship where recognized by law. Effective date. This section takes effect on November 4, 2026.	

Current policy	Proposed policy	Why it matters
employee or of others, or puts at risk the Company's reputation; and the presence of any detectable amount of prohibited substances in the employee's system while at work, while on the premises of the company or its member agency, or while on company business. "Prohibited substances" include illegal drugs, alcohol, or prescription drugs not taken in accordance with a prescription given to the employee. The Company will conduct drug and/or alcohol testing under any of the following circumstances. RANDOM TESTING: Employees may be selected at random for drug and/or		

Current policy	Proposed policy	Why it matters
alcohol testing at any interval determined by the Company. FOR-CAUSE TESTING: The Company may ask an employee to submit to a drug and/or alcohol test at any time it feels that the employee may be under the influence of drugs or alcohol, including, but not limited to, the following circumstances: evidence of drugs or alcohol on or about the employee's person or in the employee's vicinity, unusual conduct on the employee's part that suggests impairment or influence of drugs or alcohol, negative performance patterns, or excessive and unexplained absenteeism or		

Current policy	Proposed policy	Why it matters
tardiness. POST-ACCIDENT TESTING: Any employee involved in an on-the-job accident or injury under circumstances that suggest possible use or influence of drugs or alcohol in the accident or injury event may be asked to submit to a drug and/or alcohol test. "Involved in an on-the-job accident or injury" means not only the one who was or could have been injured, but also any employee who potentially contributed to the accident or injury event in any way. If an employee is tested for drugs or alcohol outside of the employment context and the results		

Current policy	Proposed policy	Why it matters
indicate a violation of this policy, or if an employee refuses a request to submit to testing under this policy, the employee may be subject to appropriate disciplinary action, up to and possibly including discharge from employment. In such a case, the employee will be given an opportunity to explain the circumstances prior to any final employment action becoming effective.		

15. Section 503(D): Harassment, discrimination, and retaliation

Current policy	Proposed policy	Why it matters
D. Sexual Harassment It is the policy of OAYS that sexual harassment of its employees or	**D. Harassment, Discrimination, and Retaliation Prevention** OAYS is committed to providing a safe, respectful, and inclusive workplace that is free from unlawful harassment, discrimination, and retaliation. This policy affirms OAYS's organizational values and obligations	The current policy covers only sexual harassment and routes most complaints through the Executive Director. The replacement covers all protected categories and retaliation, gives clear routes around the Executive Director and Board President, and protects bystanders. Courts weigh whether an employer had a working complaint process and reasonable training when deciding liability for a supervisor's

Current policy	Proposed policy	Why it matters
applicants for employment, in any form, is unacceptable conduct and will not be tolerated. Sexual harassment exists whenever submission to an unwelcome sexual advance, request for sexual favor, or other verbal or physical conduct of a sexual nature is an explicit or implicit term of condition of employment, or whenever submission to or rejection of the advance, request or conduct constitutes the basis of an employment decision affecting an individual. Sexual harassment also includes any demand or pressure for sexual favors, including expressly stating, implying, or threatening that	under applicable state and federal law and applies to all employees, interns, volunteers, contractors, and Board members. OAYS prohibits all forms of unlawful discrimination, harassment, and retaliation in the workplace or in any work-related setting. This includes, but is not limited to, conduct based on race, color, religion, gender, gender identity or expression, sex, sexual orientation, national origin, age, disability, marital status, veteran status, genetic information, or any other status protected by federal or Oklahoma law. OAYS strictly prohibits: (1) sexual harassment, including unwelcome sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature; (2) verbal, visual, or physical harassment based on a protected category; (3) bullying or intimidating behavior, even if not unlawful, that creates a hostile work environment; and (4) retaliation against individuals who file a complaint, participate in an investigation, or otherwise assert their rights under this policy or the law. This policy applies to all conduct occurring in the workplace, at work-related functions including conferences, training events, off-site meetings, and employee travel, in virtual or digital communications (for example, emails, messaging platforms, and video calls), and on social media when used for work purposes or in ways that affect the workplace. Harassment is unwelcome conduct based on a protected category that creates an intimidating, hostile,	harassment. With fewer than 15 employees, OAYS is below the threshold for Title VII and for the federal laws covering age and disability, so many of the categories listed here are OAYS's own commitments rather than federal requirements. Some federal protections apply at any size: race discrimination claims under 42 U.S.C. § 1981, military service protections under the Uniformed Services Employment and Reemployment Rights Act, and equal pay protections under the Equal Pay Act. The listed categories are worth keeping either way. A clear policy and complaint process helps OAYS defend against state law and personal injury claims, and member agencies, many of which are covered by federal law, look to OAYS's policies as a model.

Current policy	Proposed policy	Why it matters
cooperation of a sexual nature, or refusal thereof, will have any effect on the person's employment, job assignment, wages, promotion, or on any other terms or conditions of employment or future job opportunities. Sexual harassment may also include unwelcome sexual flirtations, advances or propositions, verbal abuse of a sexual nature, subtle pressure or requests for sexual activities, unnecessary touching of an individual, such as patting, pinching, or constant brushing against another's body, graphic verbal commentary about an individual's body, sexually degrading words used to describe an	or offensive work environment or interferes with an individual's work performance. Sexual harassment may include unwanted touching, advances, or propositions; sexually suggestive comments, jokes, gestures, or emails; display of sexual materials or inappropriate images; and conditioning employment or promotion on sexual favors. Retaliation is any adverse action taken against someone for reporting a violation of this policy, cooperating in an investigation, or exercising legal rights. OAYS encourages all employees to speak up if they witness harassment, discrimination, or retaliation. Reports from bystanders or witnesses are treated with the same seriousness and confidentiality as reports from direct targets. Witnesses will be protected from retaliation and supported throughout the reporting and investigation process. Employees who experience, witness, or become aware of conduct that may violate this policy are encouraged to report it promptly. Reports may be made to the employee's supervisor, the Executive Director or designee, or the President of the Board of Directors. Reports concerning the Executive Director may be made directly to the Board President. Reports concerning the Board President may be made to another disinterested Board officer. A person is not required to confront the subject of a complaint before reporting. Reports may be made verbally or in writing. Anonymous reports shall be reviewed to the extent possible.	

Current policy	Proposed policy	Why it matters
individual, a display in the workplace of sexually suggestive objects or pictures, sexually explicit or offensive comments, jokes or physical assault. Any individual who is determined, after an investigation, to have engaged in sexual harassment in violation of this policy will be subject to appropriate sanctions up to and including termination of employment. Guidelines for Sexual Harassment Complaints. Any employee or applicant who feels that he/she is or has been the victim of sexual harassment, including but not limited to the conduct listed above, by any supervisor,	A person implicated in a complaint shall not direct its review. The Board President or another disinterested Board officer shall coordinate review of complaints involving the Executive Director, with independent assistance as appropriate. All reports shall be taken seriously and investigated promptly, thoroughly, and impartially. OAYS shall protect the privacy of those involved to the extent reasonably possible, provide a fair process, and take appropriate corrective action when a violation is confirmed. Action affecting a Board member shall follow the bylaws and applicable law; employee, volunteer, and contractual actions shall follow OAYS procedures. Except for complaints involving the Executive Director or a Board officer, which shall be reviewed as provided above, investigations will be conducted by the Executive Director or designee or, when appropriate, by an external investigator with no conflict of interest. Retaliation against any person for filing a complaint, reporting a concern, or participating in an investigation is strictly prohibited. Anyone found to have engaged in retaliation will be subject to disciplinary action Employees and supervisors shall receive training upon hire and at least annually. Board members, interns, contractors, and volunteers acting for OAYS shall receive information appropriate to their roles. The Executive Director's designee shall maintain training records.	

Current policy	Proposed policy	Why it matters
management official or another employee, or by any other person in connection with his/her employment at OAYS should make a report of the matter to the Executive Director of OAYS or other designee of OAYS. An employee who is uncomfortable for any reason in bringing such matter to the attention of these persons, or who is not satisfied after bringing the matter to these persons' attention, should report the matter to the President of the Board of Directors or any other officer of the Board. Any questions about this policy or potential sexual harassment should also be brought to the attention of the same	All employees are required to sign an acknowledgment form confirming that they have read, understood, and agreed to comply with this policy. A copy of this policy will be provided during orientation and made available in the employee handbook and the OAYS shared drive. This policy complements OAYS's equal employment opportunity, anti-bullying, confidentiality, and grievance provisions. Reports under this policy may use the reporting channels established here without completing the ordinary grievance process. Nothing in this policy restricts reporting to a government agency, participation in a protected investigation or proceeding, or employees' legally protected right to discuss wages, hours, and other terms and conditions of employment. OAYS shall maintain complaint, investigation, training, and resolution records securely in accordance with applicable requirements and its records retention policy.	

Current policy	Proposed policy	Why it matters
persons. Any person who receives a complaint or report of sexual harassment must promptly bring it to the attention of the Executive Director of OAYS or other designee of OAYS. If the person is uncomfortable for any reason bringing it to the attention of the Executive Director, then they should promptly bring the complaint to the attention of the President of the Board of Directors or any other officer of the Board. OAYS will promptly and thoroughly investigate complaints or reports in as confidential a manner as possible under the circumstances.		

Current policy	Proposed policy	Why it matters
Following the investigation OAYS will take appropriate corrective action if warranted. There will be no retaliation by OAYS or any of its employees against any person who makes a good faith report pursuant to this policy, even if it turns out after investigation that there has not been a violation of this policy. This policy is a guideline for handling complaints and concerns. This policy is not intended to be contractual in nature and may be modified by OAYS with or without written notice.		

16. Section 522: Complaint procedures and protected reporting

Current policy	Proposed policy	Why it matters
Employees having a work-related grievance shall first attempt to resolve such grievance with the immediate person(s) involved before proceeding through the grievance procedure. I. No employee shall contact any member of the Board of Directors concerning a grievance at anytime other than as described above.	Employees with an ordinary work-related grievance are encouraged to seek informal resolution when appropriate. An employee is not required to confront a person accused of harassment, discrimination, retaliation, abuse, fraud, or other misconduct before using the reporting procedure applicable to that concern. I. Concerns governed by the OAYS Harassment, Discrimination, and Retaliation Prevention Policy, Whistleblower Protection Policy, Abuse Prevention and Response Policy, or accommodation procedures may be submitted through the reporting channels established in those policies without first completing the ordinary grievance process. Nothing in this manual prohibits good-faith reports to an appropriate governmental or regulatory authority or participation in a protected investigation or proceeding.	A blanket ban on contacting the Board can also be read as discouraging protected reports. The ordinary grievance steps stay in place for everyday workplace disputes.

Part A. Proposed amendments: OAYS functions and operations

17. Section 405: OAYS functions

Current policy	Proposed policy	Why it matters
405 PROGRAM COMPONENTS The OAYS office staff and resources provide support, management, training,	**405 PROGRAM COMPONENTS** OAYS is a statewide membership association. OAYS strengthens member agencies, designated as Youth Services Agencies, through advocacy, training, technical	The current section describes member programs as if OAYS delivered them, including a shelter count that goes out of date. That wording could suggest OAYS bears custodial or treatment responsibility for youth in member programs, which matters for liability and insurance. Program details belong in operational

Current policy	Proposed policy	Why it matters
consultation and technical assistance services to member agencies designated as "Youth Service Agencies." Efforts are focused on the development, implementation and operation of community-based delinquency prevention, diversion and treatment service programs that are developed according to identified needs. These services are delivered in following areas: A. Community Development and Behavioral Services. Description: Community Development and Behavioral Services primarily focus on is to provide a consistent statewide response to children, youth and families referred because of identified problems or needs. Standards based assessments, screening and intake will be	assistance, peer review and certification activities, coordination, communications, and other authorized functions consistent with its mission, Board-approved plans, and contractual obligations. OAYS may support statewide initiatives and administer grants or contracts within its approved authority. Responsibility for each activity shall be defined by the applicable agreement, work plan, and budget. Member agencies retain responsibility for the direct services, shelters, clinical programs, and other operations they conduct. Descriptions of member agency services do not assign their custody, treatment, residential supervision, or direct-service responsibilities to OAYS. Descriptions of specific programs, service models, agency counts, and service areas shall be maintained in the appropriate program, membership, or operational materials rather than fixed in this policy.	materials that staff can update without a Board vote.

Current policy	Proposed policy	Why it matters
completed and a service/treatment plan or referral will be initiated. B. Emergency Shelter. Description: Emergency youth shelters are short-term crisis-oriented community residential placements for youth (17) seventeen years old and under. (31) Thirty-one youth services agencies operate an emergency shelter program that serves the entire state. C. The Statewide First Offender Program. Description: The Statewide First Offender Program is a curriculum-based program designed to intervene and prevent community youth from further involvement in juvenile delinquent activity. The program acts as a screening and assessment process to identify youth and families needing additional services. The FTOP offers enrollment, assessment, screening and		

Current policy	Proposed policy	Why it matters
(12) twelve hours of group services. The sessions cover topics such as the Criminal Justice System, socialization, communication, anger management, conflict resolution, cultural sensitivity, value awareness, and controlling one's behavior. Parents are expected to be involved in this process and attend all sessions. D. Children At-Risk Services (CARS). Description: The CARS program is a fee-based service program aimed at reducing the risk of youth's recidivism, re-offense or institution recommitment from pre-adjudication through custody. OAYS members agencies are the primary service providers in this statewide system.		

18. Abuse Prevention and Response: OAYS scope and records

Current policy	Proposed policy	Why it matters
The Oklahoma Association of Youth Services (OAYS) is committed to creating a safe environment for all individuals in our care, with zero tolerance for any form of abuse, whether physical, emotional, verbal, sexual, or psychological. Any suspicion, allegation, or confirmed case of abuse will be handled with the utmost seriousness, and actions will be taken in accordance with this policy. Training must be renewed annually to ensure ongoing compliance and awareness. Participation records will be maintained by the Human Resources department or a designated abuse prevention coordinator.	OAYS is committed to maintaining a safe environment for individuals participating in OAYS-sponsored activities or interacting with OAYS employees, volunteers, contractors, and other authorized representatives. OAYS has zero tolerance for physical, emotional, verbal, sexual, or psychological abuse. Any suspicion, allegation, or confirmed case of abuse shall be addressed in accordance with this policy. This policy does not assign OAYS the custodial, treatment, or residential responsibilities of its member agencies. Internal reporting under this policy does not replace or delay the duty of every person in Oklahoma to report suspected child abuse or neglect promptly to Oklahoma Human Services, as required by 10A O.S. § 1-2-101. Training must be renewed annually to ensure ongoing compliance and awareness. Participation records shall be maintained by the Executive Director's designee.	This is a requirement from our liability insurance. OAYS does not have youth "in our care"; its member agencies do. Overstating the scope can enlarge OAYS's liability and blur who must act. The reporting sentence matters because Oklahoma places the child abuse reporting duty on every person, and failing to report is a crime, so no staff member should treat an internal report as enough. OAYS has no Human Resources department, so naming the designee makes the records requirement workable.

19. Company Vehicle Policy

Current policy	Proposed policy	Why it matters
OAYS is committed to maintaining a safe and efficient system for the use of organizational vehicles. Vehicles will be used exclusively for organizational purposes, maintained in safe working condition, and covered by appropriate levels of insurance. Only authorized drivers who meet the eligibility requirements set forth in this policy may operate OAYS vehicles. Organizational vehicles may only be used for approved business purposes, such as transportation for client services, attendance at professional meetings, or other official organizational duties. OAYS vehicles may be used for out-of-town trips if the travel is directly related to official OAYS business. Examples of authorized	OAYS is committed to maintaining a safe and efficient system for the use of OAYS vehicles. Vehicles shall be used for authorized OAYS business and the limited personal use expressly permitted by this policy, maintained in safe working condition, and covered by appropriate insurance. Only authorized drivers meeting this policy's eligibility requirements may operate OAYS vehicles. **Permissible Vehicle Uses** OAYS vehicles may be used for approved OAYS business, including membership services, peer reviews, training, technical assistance, professional meetings, conferences, and other official duties. Transportation of member agency representatives or other passengers must be authorized. Limited personal use remains governed by the Personal and Business Use of Organizational Vehicles provisions. **Business-Related Use for Out-of-Town Trips** OAYS vehicles may be used for approved out-of-town travel directly related to official OAYS business, including conferences, peer reviews, training, technical assistance, meetings, events, and authorized transportation of member agency representatives.	References to client transport describe a member agency's work, not OAYS's, and could imply OAYS staff transport youth. The Internal Revenue Service (IRS) treats personal use of an employer vehicle, including commuting, as a taxable fringe benefit (IRS Publication 15-B), so unreported use creates payroll tax exposure. An insurance policy that excludes personal use would leave OAYS uncovered for exactly the use this policy allows.

Current policy	Proposed policy	Why it matters
out-of-town business use include attending conferences, transporting clients, or participating in meetings or events on behalf of the organization.	**Taxes, Insurance, and Driver Conduct** Personal use of an OAYS vehicle, including commuting, shall be recorded and reported as taxable compensation as required by federal tax law. OAYS shall confirm annually that its vehicle insurance covers the personal use this policy permits. Drivers shall comply with Oklahoma law prohibiting texting while driving.	

Part B. New policies for Board consideration

OAYS has no current policy on any of the following six subjects.

20. Artificial and Augmented Intelligence Use

Current policy	Proposed policy	Why it matters
None	OAYS may use artificial or augmented intelligence (AI) only for purposes approved by the Executive Director or designee. Authorized uses may include administrative work, research, communications, training, reporting, and other OAYS functions. AI is a decision-support tool and shall not independently make final employment, financial, contractual, certification, or other consequential decisions. The Executive Director or designee shall keep a list of approved AI tools and the purposes for which each is approved. Personnel shall not use a new tool or materially expand an approved use without authorization.	Without a policy, staff may paste peer review or personnel information into consumer AI tools whose terms let the vendor keep or train on that data, which could breach HIPAA and OAYS's agreements with member agencies. The approved tool list and human verification keep a named person accountable for every use and every output. The National Institute of Standards and Technology's AI Risk Management Framework is a useful reference for the annual review.

Current policy	Proposed policy	Why it matters
	Confidential personnel information, member agency records, identifiable health information, financial account information, credentials, and other restricted information shall not be entered into an AI system unless that specific use and information category have been approved and appropriate agreements and safeguards are in place. For peer review information, OAYS shall use an approved protected-information system under the required agreements, or information formally de-identified in accordance with applicable requirements. Removing a name alone is not sufficient. Personnel shall not rely on de-identification when the remaining information can identify an individual or when another law or agreement restricts the proposed use. Substance use disorder records shall receive the protections required by applicable law and agreements. Public or consumer AI accounts shall not receive protected health information or other restricted OAYS information. Vendors authorized to process sensitive data shall be contractually limited to the approved purpose and prohibited from using OAYS data to train models unless specifically permitted by law, the governing agreements, and written OAYS authorization. A qualified person shall verify AI output for	

Current policy	Proposed policy	Why it matters
	factual accuracy, appropriate sources, bias, confidentiality, and fitness for its intended use before publication or reliance. The responsible individual retains accountability for the final work product. AI shall not replace professional judgment or independent review. Personnel shall receive training before using approved systems and at least annually thereafter. Suspected disclosure, harmful output, unauthorized use, or another AI-related incident shall be reported promptly to the Executive Director or designee. OAYS may suspend a tool or use while a concern is reviewed. The Executive Director or designee shall review approved tools, access, vendor terms, incident records, and safeguards at least annually and when material changes occur. Violations shall be addressed under applicable OAYS personnel, volunteer, or contractual procedures.	

21. Cybersecurity and Data Protection

Current policy	Proposed policy	Why it matters
None	OAYS shall maintain reasonable administrative, technical, and physical safeguards to protect its information systems, financial records, personnel information, member agency records, and other confidential information.	Since January 1, 2026, Oklahoma's breach law requires notice to the Attorney General within 60 days after notifying residents when 500 or more are affected. The same amendment shields entities that used reasonable safeguards and gave proper notice from civil penalties, so the safeguards documented here are a legal asset. As a business associate, OAYS must

Current policy	Proposed policy	Why it matters
	Access shall be limited to individuals whose assigned responsibilities require it. The Executive Director or designee shall authorize access, review permissions periodically, and promptly modify or revoke access when responsibilities, employment, or contractual relationships change. Multifactor authentication shall be used for systems containing sensitive information where supported. Users shall protect passwords, avoid shared credentials, lock unattended devices, and install authorized security updates. Where a system cannot support an expected control, the Executive Director or designee shall document an appropriate alternative safeguard or replacement plan. OAYS information may be accessed through personal devices only when authorized and subject to appropriate device security, access, storage, and deletion requirements. Confidential records shall not be stored in unapproved personal accounts, applications, or services. Employees, contractors, and other users shall promptly report suspected unauthorized access, lost devices, phishing, accidental disclosures, or other security incidents to the Executive Director or designee. Relevant evidence shall be preserved, and no user shall conceal an incident or independently delete affected records.	also tell member agencies when their records are involved.

Current policy	Proposed policy	Why it matters
	The Executive Director or designee shall coordinate containment, investigation, recovery, documentation, and required legal or contractual notifications, including notices under the Oklahoma Security Breach Notification Act (24 O.S. §§ 161 through 166) and notice to affected member agencies under business associate agreements. Access to an affected system may be suspended while risks are assessed. OAYS shall maintain protected backups, test recovery of essential records periodically, and maintain continuity procedures. Users shall receive security awareness training appropriate to their access and responsibilities. Security procedures, user permissions, vendor arrangements, and incident trends shall be reviewed at least annually and after a significant incident. Violations shall be addressed under applicable personnel or contractual procedures.	

22. Whistleblower Protection and Nonretaliation

Current policy	Proposed policy	Why it matters
None	OAYS is committed to maintaining a culture of transparency, accountability, and ethical integrity. This policy provides a mechanism for employees, volunteers, Board members,	IRS Form 990 asks every filing nonprofit whether it has a written whistleblower policy, so funders and the public can see the answer. Federal law protects employees of federal grantees and subgrantees who report fraud or misuse of grant funds, and requires that they be told of those rights

Current policy	Proposed policy	Why it matters
	contractors, and other individuals acting for OAYS to report suspected wrongdoing, fraud, or unethical conduct without fear of retaliation. **Scope and Applicability** Reportable concerns include suspected criminal conduct; fraud, waste, or abuse of OAYS or public funds; violations of law, regulation, or contract requirements; gross mismanagement; conflicts of interest; unsafe practices; and serious violations of OAYS policy or ethical standards. Reporting Procedures. Concerns may be reported to an uninvolved supervisor, the Executive Director or designee, or the President of the Board of Directors. Concerns involving the Executive Director may be reported directly to the Board President. Concerns involving the Board President may be reported to another disinterested Board officer. Reports may be verbal or written; anonymous reports shall be reviewed to the extent the information permits. OAYS shall make reporting contacts accessible to personnel. No report under this policy requires prior confrontation of the subject or completion of the ordinary grievance procedure. **Confidentiality** Information shall be shared only as reasonably necessary for a fair investigation, corrective action, or a legal obligation. OAYS cannot	in writing. Federal law also makes it a crime for any organization, nonprofits included, to retaliate against someone who gives truthful information to law enforcement about a possible federal offense (18 U.S.C. § 1513(e)).

Current policy	Proposed policy	Why it matters
	promise absolute anonymity or confidentiality but shall protect information to the extent reasonably possible. **Investigation and Follow-up** Concerns shall be reviewed promptly and impartially. An individual implicated in the concern shall not direct the review or determine its outcome. A disinterested Board officer or Board-designated reviewer shall oversee concerns involving the Executive Director. Findings may result in corrective action, personnel or contractual action, or referral to an appropriate authority. The reporting person shall be informed, when feasible and appropriate, that the matter has been addressed. **Protection from Retaliation** Retaliation against a person who reports a concern in good faith, participates in an investigation, or refuses to engage in unlawful conduct is prohibited. Good faith means the person reasonably believes the information reported is true; proof of a violation is not required. Retaliation concerns may be reported through any of the channels above. **False Reports** Knowingly false statements or deliberate fabrication may result in corrective action. An unsubstantiated report, an honest error, or disagreement with a reported concern does not,	

Current policy	Proposed policy	Why it matters
	by itself, establish a knowingly false report. **Notice, Records, and External Reporting** Personnel shall receive this policy during onboarding and annual policy review. Where OAYS receives federal funds, including funds passed through a state agency, employees shall also be informed in writing of their rights and remedies under 41 U.S.C. § 4712. Reports, investigations, and outcomes shall be documented and retained securely under the records retention policy. Nothing in this policy limits protected communications with a governmental or regulatory authority, required disclosures, or other rights under applicable law.	

23. Records Retention and Destruction

Current policy	Proposed policy	Why it matters
None	OAYS shall maintain accurate and secure records documenting governance, financial transactions, employment practices, contracts, grants, certification, peer review, and other authorized functions OAYS shall retain records for at least the periods required by law, contract, or grant conditions, including the following minimums. Payroll records shall be kept for three (3) years and time records for two (2) years. Form I-9	IRS Form 990 also asks whether a nonprofit has a written document retention and destruction policy. Stating the federal minimums directly in the policy meets the legal requirements without a separate schedule that would have to be written and maintained. The legal hold provision matters because destroying records to impede a federal investigation is a federal crime that applies to nonprofits (18 U.S.C. § 1519), and automatic email deletion counts if it is not suspended.

Current policy	Proposed policy	Why it matters
	employment eligibility records shall be kept for three (3) years after hire or one (1) year after separation, whichever is later. Records of federal awards shall be kept for three (3) years after submission of the final expenditure report, unless the award requires longer. HIPAA-related policies and documentation shall be kept for six (6) years. Tax and financial records shall be kept for at least seven (7) years. Records not covered by a legal or contractual requirement shall be kept as long as needed for OAYS business and then disposed of as provided in this policy. Articles of incorporation, adopted bylaws, approved Board and membership minutes, Board-approved policies and amendment histories, tax-exemption determinations, and final independent audit reports shall be retained permanently as OAYS governance records. Other records shall follow the retention periods in this policy. Amendments and superseded policies shall remain distinguishable from currently effective versions. Records relevant to an audit, investigation, claim, pending or reasonably anticipated litigation, or other preservation obligation shall not be destroyed, altered, or disposed of until the hold is released by the Executive Director after appropriate review. A hold overrides routine disposal and automatic deletion.	

Current policy	Proposed policy	Why it matters
	Confidential records shall be restricted to authorized users, stored securely, and destroyed using methods appropriate to their sensitivity. Authorized destruction shall be documented by category, date range, disposition date, method, and approving authority. Peer review reports shall be retained only as authorized by applicable agreements, law, and this policy; unnecessary copies of member agency records shall not be retained. The Executive Director or designee shall review these retention periods annually and communicate material changes to affected personnel.	

24. Executive Director Annual Performance Evaluation

Current policy	Proposed policy	Why it matters
None	Evaluation of the Executive Director The Board of Directors shall conduct an annual performance evaluation of the Executive Director through a consistent, objective, and documented process consisting of a midyear formative evaluation and an annual summative evaluation. At the beginning of each evaluation period, the Board, in consultation with the Executive Director, shall establish the evaluation	The Executive Director is the Board's one direct report. A midyear formative review leaves room to correct course, and a summative evaluation against criteria set in advance keeps the year-end judgment tied to what was actually expected. The closing bylaws sentence confirms the Board's authority over employment decisions is unchanged. The compensation sentence follows the IRS process for executive pay at tax-exempt organizations: comparability data, approval by unconflicted members, and contemporaneous documentation create a presumption that pay is reasonable. That presumption protects Board members and the executive from excise taxes on excess benefits.

Current policy	Proposed policy	Why it matters
	timetable, written criteria, measurable objectives, and organizational priorities. Criteria shall relate to the Executive Director's job description, Board-approved goals, financial stewardship, strategic leadership, membership services, contractual performance, and governance responsibilities. The Board President shall communicate the approved expectations to the Executive Director. Performance standards shall not be applied retroactively. Material changes to criteria or objectives during the evaluation period shall be made by Board action and communicated to the Executive Director in writing. **Formative Evaluation** At approximately the midpoint of the evaluation period, the Board President, acting on behalf of the Board, shall conduct a documented formative evaluation with the Executive Director. This review shall address progress toward established objectives, accomplishments, challenges, professional development needs, and any adjustments or support necessary to achieve organizational goals. Identified concerns shall be communicated constructively and accompanied by reasonable opportunities for improvement. Material performance concerns shall be addressed when they arise rather than reserved solely for the annual evaluation.	

Current policy	Proposed policy	Why it matters
	Summative Evaluation At the conclusion of the evaluation period, the Executive Director shall submit a written self-assessment addressing accomplishments, progress toward established objectives, organizational performance, operational challenges, financial and contractual results, and priorities for the following year. The Board shall conduct a summative evaluation based on the previously established criteria, the Executive Director's self-assessment, and relevant organizational evidence. Findings shall distinguish between performance within the Executive Director's authority and circumstances influenced by external factors, funding decisions, Board actions, or other conditions beyond the Executive Director's reasonable control. **Evaluation Findings and Documentation** The Board President shall coordinate the Board's collective assessment and meet with the Executive Director to discuss the findings. The Executive Director shall receive the written evaluation and may submit a written response within ten (10) working days for inclusion in the official evaluation record. The annual evaluation shall include mutually discussed priorities and performance objectives for the next evaluation period. Evaluation	

Current policy	Proposed policy	Why it matters
	records shall be maintained as confidential personnel records, subject to applicable law. **Compensation and Governance** Compensation shall be considered separately through the Board's established compensation and financial procedures. When setting the Executive Director's compensation, the Board shall rely on appropriate comparability data, obtain approval from Board members without conflicts of interest, and contemporaneously document the decision and its basis. The Board President shall coordinate the evaluation process on behalf of the Board. This policy does not authorize individual Board members to independently direct or supervise the Executive Director outside authority granted by the Board and the bylaws. This policy does not limit the Board's authority under the bylaws regarding the Executive Director's employment.	

25. Emergency Executive Succession and Continuity of Operations

Current policy	Proposed policy	Why it matters
None	This policy governs continuity of OAYS operations during an unexpected absence, incapacity, or vacancy affecting the Executive Director's ability to perform essential	In a small organization, a sudden executive absence can stop payroll, vendor payments, and contract reporting within days if no one else has authority or access. Placing the essentials in the policy, rather than in a separate plan, keeps that protection without creating a document that must be written and

Current policy	Proposed policy	Why it matters
	responsibilities. Existing written delegations may be used to continue routine operations within their authorized limits. The Board President shall promptly notify and consult the Board concerning any need for temporary executive leadership. The Board shall designate an Acting Executive Director when necessary and document the scope, duration, reporting relationship, compensation, and limitations of that appointment. The Acting Executive Director shall maintain essential member services, personnel administration, financial operations, contractual commitments, communications, and other functions authorized by the Board. Temporary authority does not include changing bylaws or Board policy, committing extraordinary expenditures, or changing compensation outside established authority without Board approval. At least one Board officer shall hold signatory authority on OAYS financial accounts and have access to OAYS's critical records, systems, and contacts. Access shall remain role-based, documented, and subject to existing financial and confidentiality controls. Signatory authority shall be updated promptly when an acting appointment begins or ends. The Executive Director and Board President	maintained.

Current policy	Proposed policy	Why it matters
	shall confirm annually that signatory authority and access arrangements are current. The Board shall review an acting appointment periodically and provide for return of the Executive Director or transition to permanent leadership as appropriate. Temporary delegations shall be ended or revised in writing when the transition is completed.	