

OPERATING POLICIES, PROCEDURES AND GUIDELINES

YORK COUNTY FIRST STEPS TO SCHOOL READINESS PARTNERSHIP, A SOUTH CAROLINA NONPROFIT CORPORATION

June 11, 2001

I. General.

Section IV(d) of the Bylaws of York County First Steps to School Readiness Partnership, a South Carolina Nonprofit Corporation (the "Corporation") provides:

In order to implement the purposes of the Corporation within the guidelines of the Enabling Act, the Board of Directors may adopt, amend, or restate Operating Policies, Procedures and Guidelines as are in compliance with the Freedom of Information Act and are approved by the Office of South Carolina First Steps to School Readiness (the "Office of First Steps").

It is the intent of the Corporation that these Operating Policies, Procedures and Guidelines (the "Operating Guidelines") be carried out in accordance with the foregoing proviso. A copy of the South Carolina Freedom of Information Act is attached hereto as Exhibit A.

II. Board of Directors.

A. Solicitation, Nomination and Election of Category I Successor Directors.

Subsection VI(b)(1) of the Bylaws of the Corporation provides, in part, as follows:

Successor Directors in Category I shall be elected by majority vote of the members of the Board of Directors of the Corporation, in accordance with the composition described in Subsections

VI(b)(1)(A), (B) and (C) herein, and in accordance with the Operating Policies, Procedures and Guidelines of the Corporation.

In accordance with the above-stated provisions of the Bylaws, it is the intention of the Corporation that the following procedure for the solicitation, nomination, and election of Category I Directors be an open process, publicized county-wide, in full compliance with the Freedom of Information Act. This intent is in keeping with the purposes expressed in Section 59-152-60 of the South Carolina Code.

B. General Procedure.

At least forty-five (45) calendar days prior to the election discussed herein, there will be publicized in at least two (2) local/county media outlets (i.e., print and broadcast media), and there will be mailed to all county residents on the county partnership board's mailing list, a solicitation for nominations of successor Category I Directors.

- I. All print publicity and the mailing should include:
 - (a) a description of each sub-category of Category I Directors for which nominations are being sought, including the number of positions available in each sub-category and the qualification(s) required for each such position;
 - (b) a description of the process by which an interested person(s) could submit his name for nomination as a Category I Director or nominate another for a position as a Category I Director. A nomination form, which must be pre-approved by the Office of First Steps and which must include a mailing address for return of the form, may be included.
- II. All broadcast media should include a phone number in operation during regular business hours which a person could use to obtain more information about the nomination process.

The solicitation for nominations through media outlets must first take place at least fifteen (15) calendar days prior to the first meeting of the Nomination Committee, as described herein, for the purpose of reviewing nominations. A Nomination Committee consisting of at least five (5) Category I Directors, representing five (5) of the Category I Sub-categories, will review all nominations and select therefrom a slate of nominees, which slate will be presented to the full Board of Directors for the Board's review and consideration. The slate will be published in a newspaper of general circulation in the county one calendar week before the full board vote. At a public meeting, held in accordance with the South Carolina Freedom of Information Act, the full Board will give final consideration to the slate of nominees, to include any nominations made from the floor by attendees at the meeting. After due consideration of all nominations/nominees, the full Board will

elect successor Category I Directors, in accordance with the provisions of the Bylaws. The decision of the Board will be final.

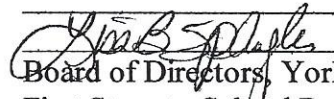
A copy of these Operating Policies, Procedures and Guidelines shall be delivered to Directors, Officers and Committee Members of the Corporation.

The following item is annexed hereto and made a part hereof:
Exhibit A: South Carolina Freedom of Information Act

CERTIFICATION

I CERTIFY that the Operating Policies, Procedures and Guidelines of York County First Steps to School Readiness Partnership, a South Carolina Nonprofit Corporation, effective as of the 11th () day of June, 2001, were duly adopted by the Directors of the Corporation at a Meeting of the Directors held on June 11, 2001.

Dated: June 11, 2001


_____, Secretary,
Board of Directors, York County
First Steps to School Readiness Partnership,
a South Carolina Nonprofit Corporation

APPROVED:

Marie-Louise Ramsdale, Executive Director,
South Carolina First Steps to School
Readiness Board of Trustees, a
South Carolina Nonprofit Corporation



York County First Steps Whistleblower Policy

Policy

York County First Steps employees must be able to submit a good faith complaint regarding accounting, internal auditing controls, or auditing matters ("Accounting Complaints") to the appropriate senior staff or volunteer Chairs, without fear of dismissal or other retaliation of any kind. An Accounting Complaint may be submitted, in writing, to any of the following individuals:

- Treasurer
- Chairperson of the Board of Directors
- Executive Director

Confidential, anonymous Accounting Complaints submitted to one of the above should describe the matter at issue in as much detail as possible.

Procedure Overview

- Accounting Complaints received by the Executive director or Chairperson will promptly be forwarded to the Treasurer, who will record the receipt of all Accounting Complaints.
- If the Treasurer is the subject of the Accounting Complaint, then the Executive Director or Chairperson may be substituted for the Treasurer in the stated procedures of this policy.
- The Treasurer will review and evaluate each Accounting Complaint and make an initial determination as to whether it should be investigated, and if so, may designate an appropriate York County First Steps employee(s) and/or York County First Steps volunteer(s) to conduct such investigation. In addition, the Treasurer has discretion to request, and the Board Chairman has the authority to direct, special handling or investigation of any Accounting Complaint, including the retention of outside counsel or advisors.
- The Treasurer shall also report on Accounting Complaints to the Executive Committee.
- The Treasurer, or designee, may contact persons submitting Accounting Complaints, if known and to the extent appropriate, to inform such persons of the results of any investigation and what, if any, corrective action has been recommended or taken.
- Records concerning Accounting Complaints will be retained by York County First Steps for not less than three (3) years after the Accounting Complaint has been received.
- When asked, employees shall fully and completely cooperate with such investigations. Failure to cooperate, or interfering with an investigation, shall subject employee(s) to immediate disciplinary action, up to and including termination.
- It shall be a violation of this Policy, and grounds for disciplinary action up to and including termination of employment for any York County First Steps employee to discharge, demote, suspend, threaten, harass, or in any other matter retaliate against a York County First Steps employee by reasons of his or her submission in good faith of an Accounting Complaint. However, if York County First Steps determines that the complaint was not made in good faith or that an employee provided false information to the investigator, said employee(s) may be subject to discipline, up to and including termination. This policy is not intended to, and does not create any rights, or any private right of action in any person.
- This Policy is effective November 6, 2008 as approved by the York County First Steps Partnership Board of Directors, and will apply to Accounting Complaints submitted under this Policy after its Effective Date.

York County First Steps Partnership Board

Code of Ethics

The policy of the York County First Steps Partnership Board is to comply with all governmental laws, rules and regulations applicable to the conduct of our business.

Furthermore York County First Steps, (YCFS), expects compliance with its standards of integrity throughout the organization and will not tolerate employees or directors who deal unscrupulously. YCFS directors, officers, and employees should deal fairly with one another and with the agencies partners and constituents.

It is expected that all transactions regarding YCFS business will be accurately reflected in its books and records. Any falsification of books and records or the creation of any off-the-record accounts is strictly prohibited. Employees are to be honest and forthcoming concerning all YCFS affairs.

Accountability

- Abide by the Articles of Incorporation, by-laws and policies of the York County First Steps Partnership Board.
- Exercise reasonable care, good faith and due diligence in organizational affairs.
- Fully follow all rules and policies concerning disclosure of conflict of interest.
- Remain accountable for prudent fiscal management to all state, local and federal governing entities; and to all board members, partners, employees and constituents.

Professional Excellence

- Maintain a professional level of courtesy, respect and objectivity in all activities of the York County Partnership Board.
- Assist others in upholding the highest standards of conduct.
- Perform all YCFS duties to the highest levels of excellence.

- Strive to assist others in maintaining the highest levels of excellence concerning YCFS business.
- Treat all partners, employees, directors and constituents with respect and dignity.
- Exercise all YCFS duties for the good of those involved rather than for personal gain or profit.

Equal Opportunity

- Respect and ensure the right of all YCFS constituents to appropriate and effective services without discrimination in regards to race, sexual orientation, gender, age, religion, national origin, political affiliation or disability, in accordance with all legal and regulatory statutes.

Confidentiality

- Respectfully comply with all known rules and laws with regard to confidential information of employees, directors and constituents.

Collaboration

- Promote collaboration, cooperation and diversity in all YCFS services, participation and actions.
- Respect the diversity of opinions as expressed by all YCFS directors, employees, partners and constituents and formally register dissent as appropriate.

Said Code of Ethics for York County First Steps Partnership Board was approved by majority vote of the board at a duly called and qualified meeting on the _____ day of March, 2007

Sara Castillo, Chair
York County First Steps Partnership Board

POLICY ON CONFLICTS OF INTEREST
S.C. FIRST STEPS TO SCHOOL READINESS
March 9, 2004

This policy is adopted in recognition of the fact that many First Steps county board members have ties to organizations in their communities that may provide goods or services funded by First Steps. From time to time, a board member may experience a conflict of interest (or the appearance of a conflict) while participating in decisions regarding the awarding of contracts or other partnership matters. It is the First Steps policy to deal with such conflicts as openly as possible.

A conflict of interest may occur when a county board or committee member, or a member of their immediate family, is deemed to have a financial interest in a transaction and, therefore, is an interested person, all as defined below.

Definitions:

1. Interested Person. Any board member, staff member or member of a committee with board delegated powers who has a direct or indirect financial interest, as defined below, is an interested person.
2. Financial Interest. A person has a financial interest if the person or an immediate family member:
 - Is a board member, officer or employee of the entity transacting, or offering to transact with First Steps; or
 - Would financially benefit in any way from the transaction(s) being considered.
3. Immediate Family Member: A person is an immediate family member if he or she is the father, mother, brother, sister, spouse or child of the First Steps board, or committee member.

A financial interest is not necessarily a conflict of interest. A person who has a financial interest will have a conflict of interest only if the board or committee decides that a conflict of interest exists. An interested person must disclose the existence of his or her financial interest and must be given the opportunity to disclose all material facts to the directors and/or committee members considering the proposed transaction or arrangement. After such disclosure and discussion the interested person should leave the board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

It is important for the board to have the full benefit of all areas of expertise represented on the board. Therefore, if it is determined that a conflict of interest exists the interested person may thereafter participate in discussions, provide information and answer questions regarding the transaction(s) in question, so long as those activities take place at public meetings. However, the interested person may not cast a vote and must not be present just prior to and during the time a vote is taken.

If a First Steps board or committee believes that a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose. If, after hearing the response of the member and making further investigation as needed, the

board or committee determines that the member has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate corrective action.

The minutes of the board and all committees with board-delegated powers shall contain the names of persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, action taken to determine whether a conflict of interest was present, and the board's or committee's decision as to whether a conflict of interest in fact existed.

NOTE: Section 59-152-60 (G) states: "...Prior to every vote taken by the (county) board, members must abstain from voting if the issue being considered would result in a conflict of interest. The abstention must be noted in the minutes of the meeting."

First Steps Board Member Disclosure Statement

Name: _____

Date: _____

1. *Do you have a reason for the way you are going to vote other than or in addition to the best interests of First Steps?* YES NO

If yes, please identify the reason.

2. *Do you or a family member, close friend, employer, business partner or client have an interest* in the result of this decision to be made by the Board?*
 YES NO

If yes, please identify the person or persons and describe your or their interest in the board's decision.

3. *Does either a board on which you serve or the organization it governs have an interest* in, or could either the board or governed organization obtain a gain or advantage from, the results of the decision made by the Board?* YES
 NO

If yes, please identify the board or organization and describe the interest or gain/advantage.

Signature: _____

*Interest is a direct or indirect interest that would create a personal or organizational benefit or loss. An interest includes gain or loss of funds, reputation, future advantages.

**YORK COUNTY FIRST STEPS
STAFF**

GRIEVANCE PROCEDURES

This is an appeals/grievance procedure to address staff issues concerning job performance, personnel actions, working conditions, or disagreements among staff members. In every instance, it is the desire of this board to have problems resolved directly at the level closest to the staff. However, if the parties involved cannot resolve the issue, the following process is available:

1. Verbal Notification – as the first step in resolving a grievance, an employee shall verbally express the grievance to the Executive Director.
2. If the employee is not satisfied with the resolution determined by the Executive Director, he/she should express the grievance to the Board Chair within a reasonable amount of time following the occurrence of the grievance. The employee shall receive a verbal response within ten working days.
3. Written Notification – if the grievance is not settled in Step 2, the grievance may, within five working days after the answer to Step 2, be presented to the Board Chair in written form. The grievance, at this time, shall be reduced to writing and signed by the grievant. The employee shall receive a written response within ten working days. The grievance and response will be placed in the employee's personnel file.
4. An employee who desires to appeal the decision of the Board Chair will submit a signed, written statement to the York County First Steps Executive Committee, detailing the grievance and the action taken by the Executive Director and Board Chair within ten calendar days of receiving the Board Chair's written response. If the Board Chair fails to provide a written response within ten working days, the employee may submit the grievance without waiting further for a written response.
5. The Executive Director and Board Chair will provide copies of all documents created through the grievance process and may provide a written response to the York County First Steps Executive Committee.
6. The issue will be considered by the York County First Steps Executive Committee. At the Executive Committee's discretion, a decision may be made based upon a review of the written documents or additional steps, including, but not limited to, discussing the issue with the employee and Executive Director.
7. The Executive Committee will affirm the decision of the Executive Director and the Board Chair unless there is a finding that the Executive Director abused his/her power or discretion.
8. The grievance procedure must be followed at all times.

The employee shall receive a written response from the Executive Committee within ten working days unless the Board Chair or designee determines further time is necessary in order to review and deliberate. The decision of the Executive Committee is final.