

CEO Policy Monitoring Report 2nd Quarter Year 2025

Summary:

I certify that CU is in compliance with the General Limitations Policy.

The compliance of the Staff Treatment and Consumer Treatment Policies are by inspections. Forms reviewed and signed by Area Directors for Staff Treatment and by Senior Leadership for Staff Treatment and Consumer Treatment will be provided to the board by Melody Timinsky who collected the forms.

GENERAL LIMITATIONS POLICY

POLICY NUMBER: 01-001

POLICY TYPE: EXECUTIVE LIMITATIONS

The Chief Executive Officer shall ensure that every practice, activity, decision, or organization circumstance is lawful, prudent, and consistent with the highest level of business and professional ethics.

The Chief Executive Officer is free to choose any appropriate organizational means for maintaining compliance with this policy.

Interpretation: The CU Board of Directors holds the CEO accountable for maintaining the highest standards of business and professional ethics in the conduct of business at Communities Unlimited, Inc.

Report: COMPLIANCE

To the best of my knowledge and belief, I have not caused or allowed any practice, activity, decision, or organization circumstance that is either unlawful, imprudent, or in violation of accepted business and professional ethics. I strive to insure that in pursuit of Board established Ends, all staff act in the best interest of the families, businesses and communities we serve consistent with our corporate values that follow. CU continues to uphold the value of Diversity despite having to change its language externally.

Employees – We value the experience, skills, creativity, and hard work of our co-workers. We create a workplace where fair and equitable treatment, appropriate recognition, and an opportunity to grow are the norm. Our people are Communities Unlimited most important asset.

Communication – We demonstrate open, responsible, and respectful communication that encourages trust, cooperation and understanding.

Integrity – We bring the greatest degree of honesty, integrity, achievement, and personal responsibility to our work.

Diversity – We value multifaceted and diverse perspectives. We actively work to build a diverse workforce that reflects the communities we serve.

Stewardship – We operate in a fiscally responsible fashion with appropriate accountability and planning to improve consistent long-term performance and results.

Excellence – We will demonstrate excellence in everything we do, internally and externally, by providing the highest quality products and service while striving for 100% customer satisfaction.

Self-Determination – We value people who are working to help themselves. We encourage the active participation of our customers in the decisions that impact their lives.

Entrepreneurial Spirit – We value openness to change, innovation, reasonable risk-taking, and learning from mistakes as fundamental to our future success.

CONSUMER TREATMENT POLICY

POLICY NUMBER: 01-002

POLICY TYPE: EXECUTIVE LIMITATIONS

With respect to consumers or potential consumers, the Chief Executive Officer shall ensure that all conditions, procedures, or decisions are respectful, build trust, are minimally intrusive, and provide appropriate confidentiality.

The Chief Executive Officer is free to choose any appropriate organizational means for maintaining compliance with this policy, subject to the following limitations.

Interpretation:

As an organization, we treat each customer, with the same respect, courtesy, competence, and attention with which we would wish to be treated as consumers. Consequently, I have requested and received written assurance from each division director that, with respect to our customers or those applying to be customers, they have not failed to bring to my attention any conditions, procedures, or decisions that are unsafe, undignified, unnecessarily intrusive, or that fail to provide appropriate confidentiality or privacy. I am unaware of any adverse treatment of customers by CU staff and none of the directors have brought any of the above issues to my attention during the twelve-month reporting period ending April 30, 2023

Report: Compliance as discussed below

The Chief Executive Officer shall not:

1. Use methods of collecting, reviewing, transmitting, or storing consumer information that fail to protect against improper access to the material elicited.

Interpretation: The Chief Executive Officer shall protect against improper access the methods used to collect, review, transmit, or store consumer information.

Comment: **Compliance.**

Evidence of Compliance: We utilize both paper and electronic methods for collecting, reviewing, transmitting and storing customer information. We protect against improper access to the material using locked file cabinets, electronic passwords, and locked central filing room for financial and loan fund records. We utilize state of the art virus protection and multi-factor authentication to protect both individual laptops, computers and servers. Loan data is managed on a third-party cloud responsible for securing the data per contract with CU. We utilize encryption software when emailing social security numbers or other sensitive information.

2. Fail to operate facilities with appropriate accessibility and privacy.

Interpretation: The Chief Executive Officer will operate the facilities with appropriate accessibility and privacy.

Comment: **Compliance**

Evidence of Compliance: Every 2 years, USDA conducts an ADA compliance review and the building at 3 Colt Square Drive is certified as compliant. CU invested over \$37,000 in a new entry in order to address concerns identified by a USDA ADA audit two years ago. CU is now in compliance.

Our smaller field and home offices are not part of the review process since clients do not visit those offices. Instead, staff works with businesses and water systems at the latter's worksites.

We offer a reasonable level of privacy as our offices are configured to protect customer confidentiality and anonymity when appropriate.

3. Fail to establish with consumers a clear understanding of what may be expected and what may not be expected from the service offered.

Interpretation: The organization will provide consumers with a clear understanding of what may be expected and what may not be expected from the service offered.

Comment. **Compliance.**

Discussion: We provide consumers with a clear understanding of what may be expected and what may not be expected from the service offered. Customers are given written materials in addition to a verbal explanation of the service or product offered, applied for, or requested. Small businesses are provided with a scope of services document prior to engaging. Water and waste water systems are provided with a work plan outlining specific tasks to be undertaken. Consumers are provided with easy to read and understand loan documents in both English and Spanish.

In 2022, Communities Unlimited instituted a Limited English Proficiency Plan that was approved by the board to ensure that key documents are available in both English and Spanish and that translation services are available via phone for clients whose first language is not English and may feel more comfortable hearing information in their native language. The LEP Plan was reviewed by the board on February 15, 2023 and re-approved. There were no updates.

4. Fail to provide a way for consumers who believe they have not been accorded a reasonable interpretation of their rights under the policy to be heard.

Interpretation: The organization provides consumers with the means to come forward with their complaints and to make it easy for them to do so. Further, this policy directs the Chief Executive Officer to establish processes for addressing complaints in a prompt and fair manner.

Comment. **Compliance.**

Discussion: We have created the position of *Consumer Ombudsman* as the single point of contact for consumer complaints. Our Director of Research and Support Services functions as our Consumer Ombudsman. She has a separate mobile phone that is provided to our consumers. Visitors to our website can register a complaint via e-mail by simply clicking on *Consumer Ombudsman* located under the *Contact us* section of our website. The Ombudsman informs me of any complaints. I will call the client/community leader directly if needed to demonstrate our commitment to being fair and to customer satisfaction.

I have asked each senior leader to monitor this policy and sign off on a related document to ensure compliance.

CU has a program quality control process under the auspices of the Finance Team. Program managers identify clients that have received significant assistance. Using a standard set of questions, program assistants call these clients and enter the information in an online SurveyMonkey tool. Results are reviewed by the CFO and attached to the employees travel expense record corresponding to the client. Results are available for review by CEO. Positive responses are highlighted during All Hands Conference Calls and during employee evaluations. Concerns are shared with the employees supervisor and precipitate a conversation with the employee to hear their side of the issue. A joint strategy is then developed to address the problem by the consumer.

5. Discriminate in the provisions of services on the basis of race, creed, national origin, gender, age, sexual orientation, disability, or political affiliation.

Interpretation: The Chief Executive Officer shall ensure that CU does not discriminate in the provisions of services on the basis of race, creed, national origin, gender, age, sexual orientation, disability, veteran status or political affiliation.

Comment. **Compliance.**

Discussion: No customer discrimination complaints were received by the senior leadership team or me during the reporting period. I have not knowingly discriminated against any persons on the basis of the above categories and have received assurances from CU senior leaders that they have not and are unaware of any instances of discrimination by CU in the provision of services.

STAFF TREATMENT POLICY

POLICY NUMBER: 01-003

POLICY TYPE: EXECUTIVE LIMITATIONS

The Chief Executive Officer shall ensure that all paid and volunteer staff are treated fairly and respectfully.

The Chief Executive Officer is free to choose any appropriate organizational means for maintaining compliance with this policy, subject to the following limitations.

Interpretation: To the best of my knowledge and belief I have not caused or allowed any conditions that result in paid or volunteer staff being treated unfairly or unjustly during the twelve-month period ending April 30, 2023. Further, I have requested and received written assurance from each division director that they have not caused or allowed and are currently unaware of any condition that has resulted paid or volunteer staff to be treated unfairly or unjustly during the monitoring period. No grievances were filed by employees during the reporting period.

Report: Compliance as Discussed Below

1. Operate without written personnel policies that clarify rules for staff, provide for effective handling of grievances, and protect against wrongful conditions such as nepotism and grossly preferential treatment.

Interpretation: CU staff will operate with written personnel policies and the policies will be given to the staff.

Comment: **Compliance.**

Evidence of Compliance: The CU Employee Handbook last updated in September 20, 2022. It is posted on the Home site on Sharepoint, accessible to each staff person. The employee handbook includes written policies and procedures that clarify personnel rules for staff and provide for effective handling of grievances, and protect against wrongful conditions.

2. Discriminate against any staff member for non-disruptive expression of dissent.

Interpretation: Staff may express non-disruptive expression of dissent without fear of discrimination.

Comment: **Compliance.**

Evidence of Compliance: No individual staff member is discriminated against for expressing dissent in accordance with policies and procedures. As a practical matter, to the best of my knowledge and belief, no one has ever been discriminated against for disagreeing or expressing dissent of any nature. Rather I am creating a work

environment in which all staff members are safe to express their ideas and views on the current topic(s) under discussion in an effort to consider all the viewpoints prior to deciding on a course of action. Supervisors are trained to provide instructions to staff on delivering non-disruptive dissent.

3. Prevent staff from grieving to the board when (1) internal grievance procedures have been exhausted and (2) the employee alleges that board policy has been violated to his or her detriment.

Interpretation: The staff may grieve to the Board by following appropriate procedures or if they allege a board policy has caused detriment to the employee.

Comment: **Compliance.**

Evidence of Compliance: CU Employee Handbook includes a section on the grievance procedure. I am not aware of any employee grievances in FY 2021.

4. Fail to acquaint staff with their rights under this policy.

Interpretation: Employees will be informed of their right to grieve to the board.

Comment: **Compliance.**

Evidence of Compliance: Staff rights under this policy are outlined in the Employee Handbook. The Handbook is updated regularly and employees sign a form acknowledging that they have received, read, understand and agree to abide by the provisions of the CU Handbook.

5. Operate without an Affirmative Action Plan in compliance with Executive Order 11246.

Interpretation: CU will have a current Affirmative Action Plan.

Comment: **Compliance.**

Evidence of Compliance: CU is in compliance with Executive Order 11246. On December 16, 2022, the Human Resources Coordinator shared the results of CU's plan submitted for FY2022 with the board. He informed the board about Executive Order 11246 requiring CU to take affirmative measures or make good faith efforts to ensure proportionate and equitable representation of minorities & females at all levels of the organization. The board reviewed CU employee demographics and noted that the percentage of African American, Native American, Veterans and individuals exceed national population percentages. The report from Office of Federal Contract Compliance Programs (OFCCP) concluded that there are no groups with significant adverse impact. However, the report did show that women are not being promoted into first and mid-level management at a rate corresponding to the percentage of staff.

6. Discriminate in the hiring, promotion and treatment of staff on the basis of race, creed, national origin, gender, age, sexual orientation, disability or political affiliation; or

Interpretation: CU will not discriminate in the hiring, promotion and treatment of staff on the basis of race, creed, national origin, gender, age, sexual orientation, disability or political affiliation.

Comment: **Compliance.**

Evidence of Compliance: To the best of my knowledge and belief we have not, at any time during the last 12 months, discriminated in the hiring, promotion or treatment of any staff members on the basis of race, creed, national origin, gender, age, sexual orientation, disability, veteran status or political affiliation. Further, I have requested and received written assurance from each senior leader that they have not caused or allowed and are currently unaware of any act of discrimination on the part of CU during the last 12 months.

5. Fail to be proactive in the recruitment and hiring of a diverse staff.

Interpretation: CU will be proactive in the recruitment and hiring of a diverse staff.

Comment: **Compliance.**

Evidence of Compliance: The diversity chart last updated on September 2022 indicated that of the 83 full-time, 34% of employees are individuals of color and 46% of staff is female. 10.3% of staff are veterans and 6% of staff have a disclosed and recognized disability.

CU has promoted 12 individuals into first and mid-level management with 42% of them being people of color and 33% being female.

In 2023, we expanded the Operations Leadership Team to identify additional strong leadership capacity for the organization with the hopes that some of these individuals will eventually take on senior leadership roles. These supervisors not only manage staff, but are also responsible for securing grants and implementing activities aligned with those grants. Of the 14 members of the Operations Leadership Team, 4 are people of color and 5 are women.