



# **PARTICIPANT HANDBOOK**

336 W. Spruce Street  
Bethlehem, PA 18018

610-317-8000

[ViaNet.org](http://ViaNet.org)

**Effective September 1, 2020**

**Via Participant Handbook**  
Effective September 1, 2020



## TABLE OF CONTENTS

<b>WELCOME TO VIA</b> .....	3
<b>ABOUT VIA</b> .....	4
<b>VIA MISSION AND VALUES</b> .....	7
Via’s Mission and Values.....	7
Guiding Principles .....	7
Via’s Values .....	7
<b>RULES AND REGULATIONS</b> .....	8
<b>PROGRAM OPERATION INFORMATION</b> .....	9
<b>GENERAL HEALTH POLICY</b> .....	10
<b>GENERAL INFORMATION</b> .....	11
Dress Code .....	11
Holidays.....	12
Vacation .....	12
Inclement Weather and Emergency Closing.....	12
Personal Belongings.....	13
Cell Phones.....	13
Theft.....	13
Smoking.....	13
Gift Acceptance Policy .....	13
<b>IMPORTANT CONTACT INFORMATION</b> .....	14
<b>YOUR RIGHTS</b> .....	15
Participant Rights .....	15
Privacy Notice Rights.....	16
Protected Health Information.....	16
Non-Discrimination in Services and Your Civil Rights .....	16
Comments and/or Complaints.....	17
Federal Laws Protecting Persons with Disabilities.....	18
Anti-Harassment .....	18
Photographs, Videotapes and/or Other Images.....	19
Policy Prohibiting Retaliation.....	20



<b>HEALTH AND SAFETY</b> .....	21
Via’s Responsibilities .....	21
Occupational Safety and Health Act (OSHA).....	21
Service Location Violence .....	22
Substance Abuse Policy.....	23
Fire Safety .....	24
Smoking Regulations.....	24
Incident Reporting .....	24
Investigations .....	25
Participant Responsibilities Related to COVID-19.....	25
<b>YOUR INDIVIDUAL PLAN/INDIVIDUAL SUPPORT PLAN (ISP)</b> .....	27
Annual Individual Plan/ISP Meeting .....	27
Reports.....	27
Complaint Procedures.....	27
<b>YOUR HEALTH RECORD</b> .....	28
If You Want to Change the Information in Your Health Record .....	28
If You Want to Know Who Has Seen Your Health Information .....	28
If You Do Not Want Someone to See Your Health Information.....	28
Appeal Procedure for Health Record Requests .....	29
<b>YOUR COMPENSATION AND HOURS OF WORK</b> .....	30
Attendance.....	30
Pay Period, Payroll Procedures and Payroll Deductions.....	30



## WELCOME TO VIA

Welcome to Via of the Lehigh Valley. The purpose of this handbook is to acquaint you with the services available to you, review specific service policies and procedures, and ensure you are familiar with your rights and responsibilities as a participant in Via's services.

We wish for your experience at Via to be a meaningful and satisfying one. Via employees will be of tremendous assistance to you and will seek to provide you with road maps to achieve your goals. Open communication will help keep your team pointed in the right direction to help you achieve your dreams and aspirations.

If you have any questions or concerns about any of Via's services, we encourage you to express them. Being an active participant in planning your future will help ensure that the services you receive will surpass your needs and expectations.

All of us at Via look forward to working with you and wish you much success!

A handwritten signature in blue ink that reads "Lisa Walkiewicz". The signature is fluid and cursive, with the first letters of each word being capitalized and larger than the rest of the letters.

Lisa Walkiewicz, President and Chief Executive Officer



## ABOUT VIA

Via of the Lehigh Valley is a non-profit agency that provides services for children and adults with disabilities in Lehigh, Northampton, Carbon, Monroe, Pike, Bucks and Berks counties. Everyone deserves the chance to succeed, and, through the support of our community, Via has been providing opportunities for children and adults with disabilities since 1952.

### ***Employment Services***

Everyone should have the opportunity to be a part of the employed community. Via focuses on a person's abilities and provides support necessary for success. We offer several types of employment services that meet different needs and expectations, and our employees excel at creating innovative employment solutions for job seekers.

#### ***Community Employment***

Via helps adults work in integrated, competitive employment settings within their community, while providing ongoing support to ensure job stability.

#### ***ViaWorks Small Group Employment***

ViaWorks helps people enter the work force, be a part of the community and earn a paycheck. Teams work onsite at local companies, providing contract services for employers. This service teaches job skills in a supportive, hands-on environment.

#### ***School-to-Work Transition Services***

Via works with students, in partnership with their school districts and the Office of Vocational Rehabilitation, to create an employment plan and explore careers of interest. High school students can participate in paid work-based learning experiences at local businesses. Via focuses on the individual student, tailoring the experience to their career goals.

#### ***Via Business and Industrial Services (Prevocational Services)***

For more than 50 years, Via has specialized in contract packaging and assembly work, providing consistent high-quality work for businesses. Via employees help provide a safe and productive environment for individuals to enhance skills and gain work experience.

### ***Community Connections***

It is essential for people to be part of the communities in which they live. Via helps individuals gain access to different volunteer, educational and recreational opportunities – and helps people to access them independently. Via supports adults at different stages of their lives, from recent high school graduates transitioning into adulthood, to people of retirement age looking to stay active and maintain their personal networks.

Via connects people to their community through volunteer, recreational, social and educational activities. Participants take an active role in planning their schedules and developing goals and objectives for each activity. We work with people on a variety of life skills, such as using public transportation, understanding housing options, and managing money.



### ***Creative Expressions - Adult Training Services***

This service supports independence, growth, and self-expression through desirable activities during the day in order to meet personalized outcomes. Ratios consist of 1:1 and 1:2 or 1:3 staffing depending on the needs of each participant. Each participant develops a reliable daily and weekly schedule specifying where their time will be spent in both the community and facility.

In their local community, participants may engage in volunteer opportunities as well as visit musical events, restaurants, YMCA's, parks and trails, museums, movie theaters, seasonal exhibits/fairs and cultural events. While in the Via facility, monthly celebrations like birthdays, retirements, holidays, etc. are held. This service focuses on building self-advocacy skills, meeting health and wellness needs, engaging creativity, improving socialization skills, increasing culinary abilities, understanding stranger awareness and working to achieve a higher level of independence.

### ***Behavioral Support Services***

Behavioral Support Services promote the growth, development, and independence of individuals with disabilities who experience behavior challenges. Our Masters-level employees work with a person's natural support system and caregivers to develop a behavioral support plan that assists a participant in building positive behaviors to replace or reduce a challenging/dangerous behavior. This plan may include teaching coping skills, encouraging communication, increasing relationships, and/or using clinical interventions, etc.

### ***Autism Services***

Via provides adults on the autism spectrum with resources to connect with each other and community resources to explore their talents and potential. Vocational, educational and recreational services are available.

### ***Children's Services***

Children deserve a bright and happy start in life – including the opportunity to learn and socialize with their peers. At Via, we believe all children, regardless of age, experiences or challenges, deserve the best services and support possible to ensure their successful futures. To that end, Via provides specialized, focused services following industry best practices.

#### ***Early Intervention***

Via provides Speech, Physical and Occupational therapies, as well as Special Instruction for children from birth through three years old, addressing individual disabilities and delays, both in homes and in childcare settings. We respect and build on the family's strengths, values, diversity and competencies. Caregivers are included in the teaching process so therapy can continue across the child's daily routines.

#### ***Teen Experience***

Held during summer and winter break, Teen Experience includes job shadowing, career counseling, volunteering, and recreational and team-building activities. With the help of Via employees, teens develop life skills to plan their futures and gain independence upon graduation.



### ***Lehigh Children's Academy***

Lehigh Children's Academy provides quality care and education for children ages six weeks through kindergarten, and before and after school care for children ages up to 12 years old. We focus on creating learning opportunities through educational and recreational experiences that promote all areas of a child's growth and development. We work collaboratively with families every step of the way, from first feedings, to the first day of school and beyond. In our inclusive setting, we provide a developmentally appropriate educational environment for every young child that accounts for each individual's unique abilities and potential in an accepting, respectful climate.

Via of the Lehigh Valley is funded by:

- Centers for Medicare and Medicaid Services (CMS)
- Pennsylvania (PA) Department of Education (PDE)
- PA Department of Human Services (DHS)
- PA Keystone Standards, Training/Professional Development, Assistance, Resources, and Supports (STARS)
- PA Office of Child Development and Early Learning (OCDEL)
- PA Office of Developmental Programs (ODP)
  - Bureau of Supports for Autism and Special Populations (BSASP)
- PA Office of Vocational Rehabilitation (OVR)
- PA Department of Aging (PDA)
- PA Office of Long-Term Living (OLTL)
- SourceAmerica
- Private Grants and Donations
- Private Contracts

### ***Interested in Receiving Additional Service(s)?***

If you are interested in receiving additional service(s) from Via, please contact your Via Coordinator.



## VIA MISSION AND VALUES

### Via's Mission and Values

Our mission is to help the children and adults we serve reach their full potential through the provision of high-quality education and training, the development and retention of a rewarding career, the cultivation and growth of meaningful relationships, and equal access to an enriching community life.

### Guiding Principles

Via's implementation of its mission is based on the following:

- Every individual is valued and treated with dignity, respect and courtesy.
- Every individual is capable of growth and learning.
- Every individual is able to communicate needs, desires, feelings and personal choices through the experience of person-centered planning and approaches.
- Every individual has the right to be included as an active, valuable participant in the community.
- Every individual has a right to physical and mental access to the community.
- Every individual has a right to an advocate of their choice.

### Via's Values

**We Value People:** We believe people should be treated with dignity, respect, fairness and consideration in environments that are safe and comfortable, and that support individual advancement.

**We Value Growth:** We believe personal growth is encouraged by supporting each other's talents and potential.

**We Value Community:** We believe that the development of inclusive community support and resources enhance the quality of life.

**We Value Diversity:** We believe that an atmosphere of mutual respect for each other's differences adds quality to our services.

**We Value Shared Ideas:** We believe that when we listen to each other and share ideas, we use our collective experience and backgrounds to problem-solve and innovate.

**We Value Advocacy:** We believe that everyone is responsible for bringing about the change necessary to benefit those we serve to the fullest extent.

**We Value Teamwork:** We believe common goals are achieved when we work cooperatively by combining our individual strengths and skills.



## RULES AND REGULATIONS

1. Treat others with respect and common courtesy.
2. Adhere to all fire and safety procedures.
3. Obey all safety signs and engage in proper safety practices.
4. Immediately report any incidents, accidents or emergencies to an employee.
5. Help keep worksite and/or service location clean.
6. Eat only in designated areas.
7. Physical appearance should be neat and clean.
8. All Via sites and property are smoke free. Participants who wish to smoke must do so off of Via property. Any participant who requires assistance will be accompanied/assisted by employees.
9. The use of drugs and alcohol is strictly prohibited.
10. Be responsible for your personal belongings.

*These rules and regulations are important to follow if you or a family member receives services. Violation of these rules and regulations could impact Via's ability to deliver service(s) in the manner you prefer.*



## PROGRAM OPERATION INFORMATION

### ***Lunch***

Each participant is responsible for bringing a lunch daily. There are also scheduled break periods throughout the day.

### ***Transportation***

Participants are responsible for notifying their transportation provider when they are unable to attend. Arranged transportation must be round trip (where applicable). Transportation is arranged through authorization or private provider.

### ***Hours of Operation***

Via offices are open from 8:30 a.m. to 4:30 p.m., Monday through Friday. Service hours may vary for each individual, but are between the hours of 8:30 a.m. and 4:00 p.m.

### ***Attendance***

Advanced notice of medical appointments is requested to avoid any conflict with services. Each participant must sign in or out upon leaving for or returning from scheduled appointments.

### ***Medications***

No medications will be administered by Via employees. If assistance is needed with self-medication, notify your Via Coordinator to establish procedures.

### ***Emergency Closing***

In situations involving inclement weather, all participants are expected to receive service(s) as scheduled unless you are notified that Via of the Lehigh Valley is closed. When inclement weather or an emergency situation necessitates the closing of Via of the Lehigh Valley, it will be relayed through WFMZ for announcement. See page 12 for more information.



## GENERAL HEALTH POLICY

If you are not feeling well, please notify your Via Coordinator.

Participants should stay home or be sent home in the event that any of the following are observed:

- Diarrhea
- Vomiting
- Abnormally unsteady gait
- Excessive lethargy
- Fever

It is understood that a participant may not feel well and show none of the previously listed observation. Therefore, an illness is not limited to said observations. People are different and the typical state of health will vary from person to person.

A participant who has a fever is to remain home a minimum of 24 hour after being fever free without the use of fever-reducing medications.

A participant who has an infectious/contagious\* condition is to remain home a minimum of 24 hours after starting an antibiotic. Although the participant is generally no longer contagious after 24 hours it is up to the discretion of the participant and team if returning to work is advisable.

A participant who contracts a communicable disease\* requires a written statement from a physician to return to the program. This written statement must contain the diagnosis, any physical limitations, and precautions that must be taken in order to prevent spread of the disease to other individuals.

It is in the interest of all concerned to provide the best possible care to the people for whom we provide services.

Participants who are out sick for three (3) or more days will be required to have a doctor's excuse and any follow up information in order to best support the participant upon their return to programming.

*\*Infectious/Contagious—an illness in which an infection is present and is easily transmitted from person to person by casual skin contact or respiratory droplets when coughing or sneezing.*

*\*Communicable disease—an illness due to specific infectious agent, or its toxic by-products. This illness is passed by transmitting the infectious source of an infected person or an infected non-living object to a susceptible person, either directly or indirectly within the environment.*

### **COVID-19 Response**

Via is dedicated to planning and practicing everyday preventative actions that will help the agency respond to the pandemic outbreak. Refer to the Via Pandemic and Pandemic Response Plans, which outline how Via identifies potential risks and safeguards the health and safety of workers and participants served.



## GENERAL INFORMATION

### Dress Code

Dress according to the activity for the day. In general, please dress with cleanliness, comfort and safety in mind.

The following clothing and accessories are examples of (but not limited to) inappropriate clothing:

- Tank tops, tube, "muscle shirts" or halter tops.
- Shorts or skirts that are shorter than 3 inches above the knee.
- Sexually provocative or transparent clothing.
- Hats worn in the office environment, unless of a religious nature.
- Clothing with profanity, nude or semi-nude pictures, sexually suggestive slogans, cartoons or drawings or the promotion of illegal drugs.
- Clothing that is not clean or neat in appearance or is not free from holes or noticeable stains.
- Clothing that exposes the abdomen, chest or buttocks.

Although not prohibited, participants should take care in the selection of jewelry that is worn. For example, dangling earrings or neck chains could be broken or cause injury to the wearer in certain circumstances. Via will not be responsible for lost or damaged jewelry.

Additionally:

- Shoes must provide safe, secure footing and offer protection against hazards. Shoes offering full-foot coverage are required for safety reasons (no sandals, flip-flops, etc. are permitted).
- Dress keeping the weather in mind.
- Facial hair should be maintained in a neat and clean manner.
- Offensive body odor and poor personal hygiene is not professionally acceptable.
- Perfume, cologne and aftershave lotion should be used moderately or avoided as some individuals may be sensitive or allergic to strong fragrances.

Talk with your Coordinator if you have any questions about the dress code.

### ***For participants participating in volunteer and employment services:***

- If your job or volunteer work requires a uniform or name tag, please wear it according to specifications.
- Via reserves the right to request a participant to go home and change should their clothing be deemed inappropriate by their Coordinator. If the participant is employed, he/she will not be paid during this time.



## Holidays

Via services do not operate on the following holidays, although these days are subject to change. Please refer to the annual Holiday Schedule, which is distributed in January of each year.

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving
- Day After Thanksgiving
- Christmas Day

## Vacation

It is important that you inform your Via Coordinator of vacation time in a timely manner so that the team can plan accordingly. For planned vacations, please inform your Via Coordinator by email or phone at least one (1) week prior to the vacation.

For unplanned time off (sick or personal time), please contact your Via Coordinator prior to 8:30am, if possible.

## Inclement Weather and Emergency Closing

At times, emergencies such as severe weather, fires, power failure, or natural disasters, can disrupt Via's operations. In extreme cases, these circumstances may require the closing of a Via work location or service.

When inclement weather or an emergency situation necessitates the closing of a Via service location, it will be relayed through WFMZ for announcement. For prompt notification of closings, register for WFMZ Text Alerts at [www.WFMZ.com/stormcenter](http://www.WFMZ.com/stormcenter):

- Click on the link to get Stormcenter Update Text Alerts sent directly to your phone.
- Complete Step One by filling out your first name, last name and zip code, and check the box under Choose Message Format(s) to receive text messages.
- Follow the prompts that follow and enter your mobile phone number and service carrier.
- Scroll to Message Group 2 -- Via of the Lehigh Valley is listed alphabetically under "Business Notices & Closings." Press "continue" at the bottom of the page.
- You will receive an authentication code via text message. Complete Step Two by entering the code under "Activation" and click the box to accept the Terms and Conditions.

In situations involving inclement weather, all participants are expected to report to work or service as scheduled unless you are notified that your worksite or Via service location is closed. If Via is operating, but you have decided to stay home due to inclement weather, please call Via to notify your Coordinator at 610-317-8000.



## Personal Belongings

Participants are asked not to bring unnecessary personal belongings when they are receiving services from Via. Via is not responsible for lost or stolen participant property.

Via reserves the right to request that any personal item causing a distraction is put away.

Via does not hold money for participants for use during program hours. If you will be participating in activities that require money, please plan to bring it with you daily. Employees will assist in teaching how to conduct transactions and obtain receipts when necessary.

If you are missing or lost an item or money, please report it to your Coordinator.

## Cell Phones

Although participants are welcome to have cell phones for emergency contacts and independent communication, certain guidelines are in place to ensure that usage does not interfere with program requirements:

- Cell phones are not to be used during service hours unless it is an emergency.
- Get permission from an individual before you take his/her picture or video. Some individuals do not wish to have their pictures taken and that must be respected. Always get permission first.
- Via will assist with calls to primary caretakers if requested.

All other calls should be made outside of service and/or work hours and be made independently. Cell phones are your responsibility; please keep them in a safe place if you feel the need to bring one. Via is not responsible for lost or stolen property.

## Theft

It is not appropriate to take things that do not belong to you. Stealing at Via, on the job, at a volunteer site, from employees, co-workers or in the community is against the law and could result in disciplinary action or criminal prosecution.

## Smoking

All Via sites and property are smoke free. Persons who wish to smoke must do so off of Via property. Any individual who requires assistance will be accompanied/assisted by an employee.

## Gift Acceptance Policy

Per Via's *Code of Ethical Conduct*, no gifts that are offered by participants and/or families/caregivers — no matter the value—will be accepted by any Via employee, at any time, on or off Via property, unless they can be shared with the program/department.

Exempted from this policy are cards, thank you notes or other written forms of thanks and recognition.



## IMPORTANT CONTACT INFORMATION

In general, you should contact your Via Coordinator with any questions or issues at 610-317-8000:

Service	Employee Name	Extension	Email Address
Adult Transitional Facility	Lauren Goldberg	x473	L.Goldberg@ViaNet.org
Autism Services	Julianna Dueh	x483	J.Dueh@ViaNet.org
Behavior Support Services	Lauren Burlew	N/A	L.Burlew@ViaNet.org
Community Connections	Mariann Strausbaugh	x445	M.Strausbaugh@ViaNet.org
Community Connections	Samantha Matthews	x409	S.Matthews@ViaNet.org
ODP Community Employment	Skylar Eidem	X505	S.Eidem@ViaNet.org
OVR Community Employment	Kayla Ramirez	X508	K.Ramirez@ViaNet.org
Prevocational Services	Kirsten Baker	x485	K.Baker@ViaNet.org
Prevocational Services	Samantha Matthews	x409	S.Matthews@ViaNet.org
Prevocational Services	Yessica Gomez	X493	Y.Gomez@ViaNet.org
School-to-Work Transition	Michele Ebert	x504	M.Ebert@ViaNet.org
Small Group Employment	Kirsten Baker	x485	K.Baker@ViaNet.org
Small Group Employment	Matthew Wheeler	x480	M.Wheeler@ViaNet.org
SourceAmerica	Kirsten Baker	x485	K.Baker@ViaNet.org
SourceAmerica	Matthew Wheeler	x480	M.Wheeler@ViaNet.org

If your Via Coordinator is not available, please contact the Program Manager/Director of the service you receive at 610-317-8000:

Service	Employee Name	Extension	Email Address
Adult Transitional Facility	Chelsea Hamm	x499	C.Hamm@ViaNet.org
Autism Services	Chelsea Hamm	x499	C.Hamm@ViaNet.org
Behavior Support Services	Jen McCary	x468	J.Mccary@ViaNet.org
Community Connections	Chelsea Hamm	x499	C.Hamm@ViaNet.org
Community Employment	Cortney Lakis	x501	C.Lakis@ViaNet.org
Prevocational Services	Abby Knibbs	x477	A.Knibbs@ViaNet.org
Prevocational Services	Megan Tegyi	x482	M.Tegyi@ViaNet.org
School-to-Work Transition	Cortney Lakis	x501	C.Lakis@ViaNet.org
Small Group Employment	Sean Hartman	x419	S.Hartman@ViaNet.org
SourceAmerica	Sean Hartman	x419	S.Hartman@ViaNet.org



## YOUR RIGHTS

### Participant Rights

You have the right to:

- Not be discriminated against because of ethnicity, color, religious affiliation, disability, ancestry, national origin, age, gender or sexual orientation.
- Not be discriminated against in the provision of services, admissions, placement, referrals and communication with non-English speaking and nonverbal individuals.
- Not be discriminated against due to the need for physical accommodations.
- Be informed of your civil and legal rights and have the opportunity to lodge civil rights complaints.
- Not be subjected to abuse neglect or exploitation.
- Not be required to participate in research projects.
- Manage personal financial affairs.
- Participate in service planning that affects you.
- Privacy in bathrooms and during personal care.
- Receive, purchase and use personal property.
- Receive scheduled and unscheduled visitors, communicate, associate and meet privately with family and persons of the individual's own choice.
- Reasonable access to a telephone and the opportunity to receive and make private calls, with assistance when necessary.
- Unrestricted mailing privileges.
- Be informed of the right to vote and shall be assisted to register and vote in elections.
- Practice the religion or faith of the individual's choice.
- Be treated with dignity and respect.
- Make choices and accept risks.
- Refuse to participate in activities and services.
- Control your own schedule and activities.
- Choose a willing and qualified provider.
- Choose where, when, and how to receive needed services.
- Receive accurate, easily understood information that may help you to make more informed health care decisions.
- Voice concerns about the services being received.
- Assistive devices and services to enable communication at all times.
- Participate in the development and implementation of the individual plan.
- Access your record or designate someone to do so.
- Access to emergency services.
- Request a change of assigned employee.
- Be compensated in accordance with CFR Part 529 of the Federal Wage and Hour Regulation.
- File a complaint if you feel that your rights have been violated.



## Privacy Notice Rights

You have the right to:

- Talk to us, knowing what you tell us will be kept private.
- Choose how we can use your information.
- Choose the people we send your information to.
- Look at your record and ask for a copy.
- Ask to make changes (amendments) in your record.
- Get a list of people or organizations that your information has been sent to.
- Stop any previous authorizations that said we could release your information.
- File a complaint if we have violated any of your rights
  - if you are not happy with the outcome, you can file a report with the Secretary of the U.S. Department of Health and Human Services (see next page for more details).
- Receive a Privacy Notice that will explain these rights in detail.

## Protected Health Information

Your service information is protected by federal law under the Health Information Portability and Accountability Act (HIPAA). This means that your information will not be disclosed without your written permission. You will be asked to update who is permitted to receive your protected health information annually, but you may change this information at any time. Please inform your Via Coordinator if you wish to do so.

## Non-Discrimination in Services and Your Civil Rights

Admissions, the provisions of services, and referrals of participants shall be made without regard to race, color, religious creed, disability, ancestry, national origin (including limited English proficiency), age, or sex.

Program services shall be made accessible to eligible persons with disabilities through the most practical and economically feasible methods available. These methods include, but are not limited to, equipment redesign, the provision of aides, and the use of alternative service delivery locations. Structural modifications shall be considered only as a last resort among available methods.

Any participant (and/or their parent/caregiver/guardian) who believes they have been discriminated against, may file a complaint of discrimination. Refer to the "Complaints and/or Comments" section on the next page.

*Non-Discrimination requirements are important to follow if you or a family member receives services. Violation of these requirements could impact Via's ability to deliver service(s) in the manner you prefer.*



## Comments and/or Complaints

LET US KNOW HOW WE ARE DOING.

If you have any concerns about your service(s) and/or team member, or believe that your rights have been violated, please inform your Via Coordinator or any Via employee you feel comfortable with. Your complaint(s) will be kept confidential, taken seriously and investigated promptly.

### **Steps to File a General Complaint**

- You may either report your concern verbally to an employee or write it down and give the written complaint to an employee.
- For assistance to submit a complaint in writing, please ask an employee to assist you.
- Your complaint will be investigated and be resolved within 30 days of the date you submitted it.

If you are not happy with the way your complaint was handled, the employee will advise you to request a meeting with his/her immediate supervisor to review and discuss the complaint response. If you do not feel that these employees have helped you or you are afraid of these individuals, you can contact the following people:

Denise Pioli, Vice President of Services  
Via of the Lehigh Valley, Inc.  
336. W. Spruce Street  
Bethlehem, PA 18018  
(610) 317-8000

Lisa Walkiewicz, President/Chief Executive Officer  
Via of the Lehigh Valley, Inc.  
336. W. Spruce Street  
Bethlehem, PA 18018  
(610) 317-8000

If you do not agree with Via's response to your complaint, you may contact either people listed above. You may also contact your Supports Coordinator for assistance and/or the following agencies:

Department of Human Services  
Bureau of Equal Opportunity  
Room 223, Health & Welfare Building  
PO Box 2675  
Harrisburg, PA 17105

PA Human Relations Commission  
Harrisburg Regional Office  
333 Market Street – 8<sup>th</sup> Floor  
Harrisburg, PA 17101

U.S. Department of Health & Human Services  
Office for Civil Rights  
Suite 372, Public Ledger Building  
150 South Independence Mall West  
Philadelphia, PA 19106-9111



### ***American with Disabilities Act (ADA) Complaints***

- If you believe that you have been subjected to unequal treatment or discrimination prohibited by the ADA, you may file a written complaint with Human Resources.
- For assistance to submit a complaint in writing, please ask an employee to assist you.

Jill Pittenger, Vice President of Human Resources  
Via of the Lehigh Valley, Inc.  
336. W. Spruce Street  
Bethlehem, PA 18018  
(610) 317-8000

A complaint may also be filed by sending an email to [ADA.complaint@usdoj.gov](mailto:ADA.complaint@usdoj.gov). For questions about filing an ADA complaint, call: ADA Information Line: 800-514-0301 (voice) or 800-514-0383 (TTY). A formal complaint must be filed within 180 days of the alleged occurrence or when the alleged discrimination became known to the complainant.

### **Federal Laws Protecting Persons with Disabilities**

#### ***Americans with Disabilities Act 1990***

Prohibits discrimination against persons with disabilities. Disabilities are defined as mental or physical impairments which substantially limit one or more basic life activities.

#### ***Developmental Disabilities Act 1984***

Prohibits using federal funds in any residential program that does not meet certain criteria. These criteria includes individualized plans and prohibition of physical and chemical restraints.

#### ***Rehabilitation Act 1973***

Prohibits discrimination on the basis of handicap and requires employers and educational programs to make reasonable accommodations to meet the needs of persons with disabilities.

### **Anti-Harassment**

All participants will be treated with dignity and respect. Via strictly prohibits discrimination against, and harassment of, Via employees, participants or any other persons present on the Via's premises or conducting its business, on the basis of race, color, religion (creed), gender, gender expression, age, national origin (including limited English proficiency), disability, marital status, sexual orientation, veteran/military, protected activity under the anti-discrimination laws (ex. opposing unlawful discrimination or participation in the complaint process) or on any other basis protected by law. This policy prohibits discrimination and harassment by anyone.

Harassment is verbal, written or physical conduct that disparages or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that:



- Has the purpose or effect of creating an intimidating, hostile or offensive environment.
- Has the purpose or effect of unreasonably interfering with an individual's performance.
- Otherwise adversely affects an individual's opportunities.

Harassing Conduct includes:

- Using nicknames, slurs or negative stereotyping; threatening, intimidating or hostile acts.
- Disparaging jokes.
- Written or graphic material that denigrates or shows hostility or aversion toward an individual or group.
- Sexual harassment: The use of sexually degrading language; the display of sexually suggestive objects or pictures; repeated offensive or unwelcome sexual flirtations or advances; and repeated verbal abuse of a sexual nature.

*Anti-Harassment requirements are important to follow if you or a family member receives services. Violation of these requirements could impact Via's ability to deliver service(s) in the manner you prefer.*

No manager, supervisor or other employee may threaten or suggest, explicitly or implicitly, that a participant's refusal to submit to sexual advances will in any way influence decisions about that participant's employment, evaluations, compensation, assignments, advancement, or any other term or condition of participation. Offering, promising or granting favored treatment to a participant as a result of that participant's willingness to engage in, or engagement in, sexual conduct is also strictly prohibited. Further, seeking in any way to make the performance of a participant's job more difficult because of that participant's sex (or because of any other protected basis), or the refusal of that participant to submit to sexual advances, is strictly prohibited.

It is important to remember that these prohibitions apply not only to oral and written communications, but also include email, voicemail, internet communications and other technology assisted communications. It is also important to remember that these are only some examples of inappropriate behavior. If you are questioning as to whether or not something is inappropriate, do not do it.

### Photographs, Videotapes and/or Other Images

Via, at times, conducts photographing, videotaping and recording of other images of its employees and participants. The images are reproduced and are presented in various Via sponsored media, which include photographs, recorded productions, newsletters, brochures, handbooks, programs, Facebook, Instagram, YouTube and other social media and webpages.

The purposes of Via's publication and/or use of participants' images include community education, fundraising, participant service and training. The purpose of Via's publication and/or use of participants' images is not to seek to associate Via with the reputation, social standing or other values of participants' image or likeness. Participants are asked at their annual meeting if they wish to have their images published and/or used and are able to change their mind at any time.



### Policy Prohibiting Retaliation

Via will neither engage in nor tolerate unlawful retaliation of any kind against any person who makes a complaint of unlawful discrimination, harassment, whistleblowing, fraud (including all forms of billing fraud), or retaliation, serves as a witness or otherwise participates in the investigatory process.

Generally speaking, so long as an individual acts in good faith in making a complaint alleging unlawful discrimination, harassment or retaliation, serving as a witness or otherwise participating in the investigatory process, no adverse action can be taken against him or her because he or she made the complaint, served as a witness, or otherwise participated in the investigatory process.

Prohibited retaliation will be handled under this policy in the same manner and subject to disciplinary/corrective action to the same degree as any other violation of this policy.



## HEALTH AND SAFETY

### Via's Responsibilities

One of Via's most important responsibilities is to provide our participants with a safe and healthy environment, free from unsafe conditions and exposures to harmful substances. Via takes this responsibility very seriously.

Our ability to fulfill this responsibility successfully depends not only upon our establishment and enforcement of appropriate policies and standards for safety, but also upon your willingness to assist actively in the prevention and reporting of hazardous conditions and circumstances which may cause injury and/or illness to yourself, other participants, our visitors and employees. Safety is everyone's job.

Good housekeeping is especially important from a safety standpoint. You are responsible for maintaining your work/service areas in a clean, orderly and uncluttered fashion. Further, each of us shares in the obligation to keep common areas (for example: restrooms, hallways and storage areas) neat, clean and free from safety hazards.

During your first weeks of service, your immediate supervisor/Coordinator will acquaint you with the health, safety and security procedures specific to you. You also will be advised as to the location and use of safety equipment applicable to your duties and tasks. In addition, Via has posted on our bulletin boards important notices and reminders intended to inform you of safety rules, practices, and procedures to be followed in the event of an emergency situation which requires that our building be evacuated.

In general, you are responsible for:

- Reporting immediately all accidents and injuries, whether your own or to those suffered by others.
- Reporting hazardous practices or unsafe conditions to your immediate supervisor/Coordinator.
- Suggesting ways to eliminate safety hazards.

First Aid supplies (topical antiseptic, bandages, and disinfectants, etc.) are maintained at each location. Your supervisor/Coordinator will acquaint you with the location and content of these safety kits.

### Occupational Safety and Health Act (OSHA)

Via complies with the Occupational Safety and Health Act of 1970 (OSHA). The Act requires employers to furnish employees a place of employment, free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees. Likewise, employees must comply with all OSHA standards, rules, regulations and orders issued under OSHA that apply to their own actions and conduct on the job.



## Service Location Violence

Via is committed to maintaining a supportive environment that places as much importance on participant safety and health as providing quality services. We believe the prevention of service location violence is an important part of this commitment.

Our commitment to service location violence prevention reflects our concern for the safety and health of participants. It includes taking reasonable steps to prevent violence, direct or indirect threats of violence, harassment, intimidation and hostility, and threats of, actual damage to, or destruction of Via or personal property. Via is committed to maintaining a welcoming, supportive, service-oriented environment for all.

Service location violence prevention is everyone's job. Fulfilling this commitment depends not only on the establishment and enforcement of appropriate policies and procedures, but on everyone's willingness to assist in keeping our service locations safe.

Via has a number of prohibitions which are designed to prevent exposure to service location violence. More specifically, the following behaviors are absolutely prohibited:

1. Threatening to harm any participant, employee or community member that you come into contact within the course of your enrollment in services (regardless of when or where the prohibited behavior occurs). Prohibited threats can be written or oral, expressed or implied. The fact that a threatening comment may have been made "in jest" is not a defense.
2. Threatening to cause damage to or the destruction of Via's property or the property of any participant, employee or community member that you come into contact within the course of your enrollment in services (regardless of when or where the prohibited behavior occurs). Again, the fact that a threatening comment may have been made "in jest" is of no defense.
3. Possessing or concealing a weapon while on Via premises or anywhere else while receiving services from Via. For the purposes of this prohibition, a weapon is defined to include guns, rifles, firearms, knives, explosives, bombs, and any and all other tools or instruments capable of inflicting harm to a person or property. Via premises include buildings, parking lots, surrounding grounds, and motor vehicles. In the case of guns, rifles and other firearms, it is irrelevant that the person has a license (conceal carry permit) or that the gun, rifle or firearm has no ammunition in it.
4. Physically assaulting, attacking or intentionally causing injury to, or otherwise engaging in a fight or physical altercation with any participant, employee or community member with whom you come into contact in the course of your enrollment in services (regardless of when or where the prohibited conduct occurs). Inviting conflict, whether or not the conflict occurs on Via property or physical contact is involved, is considered unacceptable behavior.
5. Intentionally causing damage to or destruction of property belonging to Via or any participant or non-participant with whom you come into contact in the course of your enrollment of services (regardless of when or where the prohibited behavior occurs).



Any participant who violates the prohibitions set forth above will be required to have a team meeting in order to evaluate the service level and ensure Via is providing services in the safest manner possible.

A participant who violates this policy may also be subject to criminal prosecution.

We encourage you to speak with your Coordinator or any employee of Via immediately in any of the following situations:

- You feel you are being intimidated, threatened or harassed, verbally or physically, by another participant, employee or community member.
- You have been intimidated, threatened or harassed, verbally or physically, by a participant, employee or community member.
- You become aware of any other action, situation or occurrence which you believe may threaten your personal safety or well-being of those around you.
- You have any ideas as to how we can make our service locations safer.

We need your eyes and ears to help alert us to potential problems. Ensuring service location security is a responsibility that we all share.

### Substance Abuse Policy

Via is committed to providing a safe, healthy and productive environment, free of alcohol and drugs. In order to maintain such an environment, Via adopted a *Substance Abuse Policy and Procedure* (HR-18).

Via prohibits all participants from engaging in the illegal use of drugs while on Via's premises or while receiving service(s). The term "illegal use of drugs" includes the use, concealment, possession, sale, purchase, transportation or distribution of illegal drugs; the use, concealment, possession, sale, purchase, transportation or distribution of legal drugs without a proper prescription when the drug is available only by prescription; the misuse of legal or properly prescribed drugs; and the misuse of inhalants. Via also prohibits all participants from being under the influence of illegally used drugs while on Via's premises or while receiving service(s). No participant shall consume alcohol during breaks or lunch periods. "Under the influence" is defined as being unable to receive service(s) in a safe and productive manner or having a level of alcohol and/or illegal drug in the participant's body equal to or exceeding the medical and/or legal standard for impairment.

For the purpose of this policy, Via's premises include but are not limited to, vehicles, parking lots, sidewalks and all property surrounding and/or contiguous to Via buildings and leased/rented properties.

Participants who are properly utilizing medication prescribed by their physician are responsible for determining with their team whether the medication will have any adverse effects which may impair their ability to safely receive service(s) and perform his/her responsibilities. Participants should not report to Via service location(s) or their worksite if they are taking medication which may have such adverse effects. Participants, who are required to take prescribed medication during service provision should store the medication in its original, properly labeled container.



Participants who engage in activity prohibited by this policy, or who are aware of but fail to report such activity, will be subject to disciplinary action.

## Fire Safety

During your orientation, you will receive fire safety training (if applicable). Fire drills will be held at undisclosed times in order to allow for the safest and most timely exit in the event of an actual fire. Please review Via's Evacuation Plan to familiarize yourself with proper evacuation procedures. It is in the best interest of all participants for their own safety (as well as employees, visitors, family members, etc.) to be knowledgeable of fire safety.

## Smoking Regulations

Via is committed to providing a safe and healthy work environment for all members of the community, including employees, participants and guests, while respecting the individual rights of all members. This policy is intended to protect all persons from exposure to second-hand smoke and the effects of tobacco.

*Via's Smoke and Vape Free Workplace Policy and Procedure (HR-17)* applies to all Via employees, participants, onsite contractors, and visitors. Smoking and vaping are prohibited in all areas of Via's facilities/service locations, on the grounds of all Via's facilities/service locations, in agency vehicles, in employee vehicles when transporting participants receiving services and participant homes.

Violation of this policy may result in disciplinary action, up to and including termination of service(s).

## Incident Reporting

Via shares responsibility with other members of your team for your safety and well-being. As such, Via needs to know when serious events happen to you so we can help evaluate whether or not you are receiving the support(s) you need and whether appropriate actions have been taken to protect you.

No one is allowed to hurt you. Other words used for this are abuse and assault.

No one is allowed to neglect you, which means that you are not getting the care you need.

Here are some safeguards Via uses to help keep you safe:

- Via hires qualified employees.
- Via trains our employees on how to support you and keep you safe.

Your Via Coordinator can help you:

- Make decisions, say what you want and understand decisions.
- Help you if you have complaints or are feeling unsafe.
- Report incidents that affect your health, welfare and/or safety.



Via strives to minimize the risk of incidents (and “close calls”), but if they do occur, we have an incident management system to record, investigate and manage incidents in connection with providing our services to you. Incidents that affect your health, welfare and/or safety MUST be reported to Via if they occur while you are receiving Via supports and/or services.

Please tell us if:

- Someone hits you or hurts you.
- Someone touches you in a way that you do not want to be touched.
- Someone takes your things or your money without your permission.
- Anything else worries you.

Via follows the law and calls the police if needed.

If you have questions or need more information or training, please contact your Via Coordinator.

In cases of suspected abuse, neglect or exploitation, you may also contact the Protective Services Hotline at 1-800-490-8505 (to report suspected abuse, neglect, or exploitation) or the ODP Customer Service Line at 1-888-565-9435.

The more information you can provide, the better. This should include:

- The date (s), time(s), and location of the health or safety concern you observed or suspect.
- What you saw or suspected.
- The names of the people (employees and other individuals) that were involved or observed what happened.

## Investigations

Some incident reports will prompt an investigation. If you are contacted by a Via Certified Investigator, please make yourself available to meet with him/her in person as soon as possible. This will help Via take quick action to address a potential problem and make sure that it does not happen again.

## Participant Responsibilities Related to COVID-19

It is critical that participants NOT report to the facility/service location/work while experiencing illness symptoms such as fever, cough, shortness of breath, chills, muscle pain, sore throat, and new loss of taste or smell. Participants that develop emergency warning signs for COVID-19 should get medical attention immediately. Emergency warning signs include\*: Trouble breathing, persistent pain or pressure in the chest, new confusion, inability to arouse, or bluish lips or face.

*\* This list is not all inclusive. Consult a medical provider for any other symptoms that are severe or concerning.*



### ***Responsibility to Report Potential or Actual Exposure***

Via is required to report suspected and confirmed cases of COVID-19 amongst participants.

If a participant or family member/caregiver believes that he/she has been exposed to COVID-19, he/she will notify the Via Coordinator or Program Manager/Director immediately.

### ***Participant Responsibilities to Prevent Exposure***

- Wear a face covering at all times while inside the facility/worksite/service location.
- Do not share drinks with others. It is recommended to bring water and drinks from home to stay hydrated.
- Avoid touching the face with unwashed hands.
- Upon arrival at the facility/service location and prior to departing, clean hands. Hands should also be cleaned before putting on and removing face covers, eating, drinking, etc.
- Clean hands often by washing with soap and water for at least 20 seconds or using an alcohol-based sanitizer that contains at least 70% alcohol. Soap and water should be used preferentially if hands are visibly dirty.
- Cough and sneeze into the elbow.
- Use sanitizing wipes before and after touching shared surfaces.
- Wear appropriate Personal Protective Equipment (PPE) at the service location/worksite as required and do not share personal PPE.

### ***Participant Social Distancing Responsibilities***

- Stay away from close contact in the facility/service location – six (6) feet.
- Social distancing is required – six (6) feet minimum distance between individuals – unless participant safety requires deviation.
- Avoid using other individuals' phones, desks, offices or other work tools and equipment when possible.
- Clean commonly used equipment and surface with wipes before and after use.
- Avoid physical contact such as hand-shaking and other contact greetings.
- Avoid handing items to others.
- Follow directional signage when walking through the facility/service location so traffic is one way.

### ***Participant Lunches (if applicable)***

Participants are asked to bring a lunch that does not require heating and their own utensils and water. If they do bring food that needs heating, there will be designated staff heating up food in the microwave. The staff will be required to wear gloves when heating up the food.



## YOUR INDIVIDUAL PLAN/INDIVIDUAL SUPPORT PLAN (ISP)

If your service(s) is/are funded through the ODP, BSASP and/or Office of Long-Term Living (OLTL), then you are required to have an Individual Plan/ISP. The Individual Plan/ISP is a written plan of support and training services that addresses your support needs over a 12-month period. Please note that this requirement does not apply to individuals funded by OVR.

With support from your team, family/caregiver and/or individuals you select, you shall direct, to the extent possible, all aspects of Individual Plan/ISP development. Individual Plan/ISP meetings should occur at times and locations of your and/or your family/caregiver's choice.

### Annual Individual Plan/ISP Meeting

At a minimum, each year, you will attend an Individual Plan/ISP meeting with your Supports Coordinator, Via Coordinator, other individuals who provide service(s) to the you and your family/caregiver, etc. The purpose of this meeting is to review your needs, coordinate services and training, and develop and/or update your Individual Plan/ISP.

### Reports

As a result of the Individual Plan/ISP meeting, you will receive an Annual Assessment, a document which will assess your likes, dislikes, strengths and growth from year to year. The Assessment will also indicate areas for growth, and your interests for the upcoming year.

In addition to the Annual Assessment, your Coordinator will complete Quarterly Reports. These reports will review progress on goals that you have identified as important to yourself in the Individual Plan/ISP meeting. Additionally, there may be other reports that you receive based on the type of service(s) you choose to get from Via. This will be explained to you when you begin services.

### Complaint Procedures

Participants, their legal representatives, family/caregiver or advocates may file a complaint concerning a determination regarding the appropriateness of services proposed or provided as set forth in these rules.

1. Any employee can receive an oral or written complaint from you. Upon request, an employee will assist you in preparing a written complaint using the Complaint Form.
2. Complaints will be resolved no later than 30 days from the date the complaint is filed.

Please refer to page 17 of this handbook or the *Via Complaint Policy and Procedure (CG-01)* for more information on how to file a complaint.



## YOUR HEALTH RECORD

### If You Want to Change the Information in Your Health Record

1. Request the form entitled, “Participant Request to Amend or Add Health Information” from your Coordinator.
2. Fill out the form.
3. Submit the form to your Coordinator, who will forward it to his/her supervisor. A copy of the form will be filed in the Release/Request Section of your record.
4. If your request is approved, schedule a meeting with your Coordinator to obtain a copy of the page(s) you wish to change.
5. If your request is denied, the reason will be noted on the form. You may appeal this decision following the appeal procedure on the following page.
6. Write your corrections on the back of the copy, never cross-out original information or use correction fluid (i.e., Wite-Out®). Your comments will be filed in your record next to the original. All individuals who previously received a copy of your information will also receive a copy of the amendment.

### If You Want to Know Who Has Seen Your Health Information

1. Request the form entitled, “Participant Request for Accounting of Disclosures of Health Information from your Coordinator – this form will be filed in your record.
2. Fill out the form.
3. Submit this form to your Coordinator who will then forward it to the Vice President of Services who will respond to you within ten (10) days.
4. When the request is approved, you will receive a copy of the information and a copy will also be placed in your record.

### If You Do Not Want Someone to See Your Health Information

1. Request the form entitled, “Participant Request Form for Restriction of Uses/Disclosures of Private Health Information or for Confidential Communications” from your Coordinator.
2. Fill out the form.
3. Submit the form to your Coordinator who will then forward it to his/her supervisor.
4. The supervisor will then forward the form to the Vice President of Services.
5. The Vice President of Services will make the final decision and respond to you in writing. A copy of the request will also be forwarded to your Coordinator where it will be filed in the request/release section of your record.
6. If your request is approved, your information will be kept private from these individuals.
7. If your request is denied, you may appeal the decision following the appeal procedure on the following page.



## Appeal Procedure for Health Record Requests

If you are not entirely satisfied with how your health record request was handled, for whatever reason, you may appeal.

1. Request a meeting with the original employee's immediate supervisor – the supervisor must schedule the meeting within ten (10) business days of your request.
2. The supervisor will respond to your concern within five (5) business days after the meeting - the supervisor will forward the response to his/her Program Manager/Director and document the response in your record.
3. If you are still not happy with the outcome, you may request a meeting with the next managerial level (all the way up to the President/CEO).
  - a. Managers must schedule the meeting within ten (10) business days of your request.
4. The managers must respond to your concern within five (5) business days after the meeting.
5. If you are still not happy with the outcome you may:
  - a. If you are appealing the decision on a privacy complaint: File a complaint with the Secretary of the U.S. Department of Health and Human Services.
  - b. For all other appeals: Contact your appropriate county Administrator, documenting the steps that you went through in the Via appeal process.



## YOUR COMPENSATION AND HOURS OF WORK

**THIS SECTION APPLIES TO PARTICIPANTS RECEIVING VIA EMPLOYMENT SERVICES.**

### Attendance

Your regular and prompt attendance on each scheduled workday is important. Frequent occurrences of unscheduled absences, tardiness, and leaving early affects everyone.

Participants are responsible for maintaining a satisfactory attendance record and for giving their supervisor prompt notification of any required absence from work. Factors considered in the evaluation of participant's performance of their job responsibilities will be attendance and dependability.

Attendance, and actions taken for issues with attendance, are specific to individual departments at Via. Please work with your Coordinator to understand what could happen if you fail to comply with Via's attendance policy.

### Pay Period, Payroll Procedures and Payroll Deductions

Via is on a bi-weekly pay period. Each pay period begins at 12:01 a.m. on Sunday before pay day and continues through the next 14 consecutive days, ending at 12:00 midnight on Saturday.

Payroll will be distributed on the Friday following the close of the pay period. Via does not "hold back" any pay so the pay you receive assumes that you have worked a "regular" schedule during the period.

A statement of earnings and deductions is included on your pay stub/paycheck. This statement describes all deduction taken during the pay period including taxes.

In the event a payday falls on a holiday, payroll will be distributed the day before the regular payday, when possible.

Via is a Direct Deposit payer, meaning that participants' pay is automatically deposited into checking or savings accounts at their designated financial institution. Please note that, in most instances, your funds will be available on payday.

If you have any other concerns about your pay, please contact your Coordinator. Via will conduct an immediate inquiry of your concerns, disclosing only to those who have a need to know to investigate and/or to take corrective action.



Our mission is to help people reach their full potential through a rewarding career, meaningful relationships, and an enriching community life.

Via of the Lehigh Valley is a non-profit agency that provides services for children and adults with disabilities in Lehigh, Northampton, Carbon, Monroe, Pike, Bucks and Berks counties.

336 W. Spruce Street  
Bethlehem, PA 18018

610-317-8000  
[ViaNet.org](http://ViaNet.org)

The official registration and financial information of Via of the Lehigh Valley, Inc. may be obtained from the Pennsylvania Department of State by calling toll free, within Pennsylvania, 1 (800) 732-0999. Registration does not imply endorsement.