



VALLEY FORGE
PUBLIC SERVICE ACADEMY
CHARTER SCHOOL

EXHIBIT 32 – Human Resource Policies

Book: Policy Manual

Section: 3000 Employees

Title: Creating a Position

Code: 3001

Status: Active

Adopted: September 24th 2025

Authority

Positions for administrative, professional and support employees shall be established by the Board of Trustees (Board) in order to provide the effective leadership and management necessary to operate the Charter School and to provide quality educational programs and services, consistent with the needs and resources of the Charter School.[\[1\]](#)

The need for creating positions shall be determined by the Board, based on the recommendation of Business Manager, in accordance with the Charter School application and written Charter. The Board reserves for itself the final determination of the number and type of staff positions deemed necessary for effective management and operation of the Charter School.

The initial salary or salary range for a new position shall be determined by the administration and approved by the Board when creating the position, based upon the recommendation of the Chief Staff Officer and supporting documentation.[\[2\]](#)

In the exercise of its authority to create a new position, the Board shall give primary consideration to the following:

1. Effective management of Charter School programs.
2. Number of students enrolled.

3. Special needs of students.
4. Operational needs of the Charter School.
5. Financial resources of the Charter School.

The Chief Staff Officer shall be responsible for recommending a new or additional administrative, professional or support position.

Delegation of Responsibility

Recommendations for a new or additional position shall include:

1. Job description clearly stating the duties for which the position was created.
2. Title that conforms with the appropriate certificate if certification is required.
3. Supporting data and other rationale relevant to the recommendation.

The Board may, through the Business Manager or designee, seek the advice of administrative staff when creating a new position or increasing the number of employees in existing positions.

The Business Manager or designee shall be responsible to maintain a comprehensive and up-to-date job description for all positions in the Charter School. Job descriptions shall be prepared in accordance with all applicable federal and state laws and regulations.[3]

Legal

1. 24 P.S. 1716-A

2. Pol. 3028

3. Pol. 1004

24 P.S. 1724-A

Book: Policy Manual

Section: 3000 Employees

Title: Background Clearances

Code: 3004.1

Status: Active

Adopted: September 24th 2025

Authority

Prospective employees, contractors, volunteers and others who will have routine, direct contact with students and/or others under age eighteen (18) while on EEACS premises or during off-premises school activities must obtain and maintain current PA mandated background clearances. The procedure and requirements will vary somewhat according to the nature of the applicant.[1][2][3]

Prospective employees and independent contractors are subject to requirements of the Pa. School Code §111, while volunteers and certain others are subject to 2014 Act 153.[\[4\]\[5\]](#)

An important additional category, aside from EEACS direct employees, contractors and volunteers are those individuals belonging to outside organizations that contract for use of the school facilities. If an activity will cause such individuals to have potential contact with EEACS students or others under eighteen (18), proof of current clearances will be required. In that case, the responsibility for obtaining and approving clearances rests with the outside employing or sponsoring organization, but EEACS will require proof of the current individual clearance status.[6]

Guidelines

It is necessary to determine the correct category for each individual in order to properly determine their background clearance requirements.

Employees and Independent Contractors -

Prospective employees and independent contractors must obtain, at their expense, and provide Human Resources with the following prior to start of employment or active work.

PA State Criminal Record Check (Section 1-111 of the Pennsylvania School Code, Act 34) - This form can be accessed from the PA State Police website at <https://epatch.state.pa.us>. **Cost: \$10.00.**

Child Abuse Clearance (Section 6301 et seq. of the Child Protective Services Law, Act 151) - This form can be accessed from the PA Department of Human Services website at <https://www.compass.state.pa.us/cwis/public/home>. **Cost: \$10.00.**

FBI Federal Criminal Background Check - To initiate this background check, applicants must register online at <https://www.dhs.pa.gov/KeepKidsSafe/Clearances/Pages/FBI-Fingerprinting.aspx> under the PA Department of Education. No other agency registration will be accepted. **Cost: \$28.75.**

Note: Existing Clearances, current within the past twelve (12) months are acceptable.

Sexual Misconduct/Abuse Disclosure Release - This form applies to prospective school entity employees and independent contractors who work with them. All applicants who will have direct contact with children must complete this form. It must be completed by the following organizations:[\[7\]](#)

1. The applicant's current employer (regardless of whether the employer was a school entity and/or where the applicant had direct contact with children);
2. All former employers of the applicant that were school entities; and
3. All former employers where the applicant was employed in a position where s/he had direct contact with children.

Separate Sexual Misconduct/Abuse Disclosure Release forms must be submitted for each previous employer that falls within the categories above. Under Act 168, the hiring entity is responsible for obtaining verification of data from each previous employer.

Volunteers -

Prospective EEACS volunteers as next defined, must obtain and provide Human Resources with the requirements below prior to start of any volunteer service.

A **volunteer** is an individual eighteen (18) or older who agrees to provide services to EEACS without compensation. These may be parents/guardians, community members and others. The voluntary service may occur on premises or during other school activities, trips and events. This applies to any volunteer who will have direct contact with students or children age eighteen (18) and under.[3]

PA State Criminal Record Check (Section 1-111 of the Pennsylvania School Code, Act 34) - This form can be accessed from the PA State Police website at <https://epatch.state.pa.us>. (Select Volunteer.) **Cost: Waived for Volunteers.**

Child Abuse Clearance (Section 6301 et seq. of the Child Protective Services Law, Act 151) - This form can be accessed from the PA Department of Human Services website at <https://www.compass.state.pa.us/cwis/public/home>. **Cost: Waived for Volunteers.**

FBI Federal Criminal Background Check - To initiate this background check, applicants must register online at <https://www.dhs.pa.gov/KeepKidsSafe/Clearances/Pages/FBI-Fingerprinting.aspx> under the PA Department of Education. No other agency registration will be accepted. **Cost: \$28.75.**

Note: For volunteers only, in lieu of the FBI check, if a resident of PA for the current ten (10) or more consecutive years, a Disclosure Statement Application For Volunteers form can be substituted if all responses are acceptable.

Human Resources has specific responsibility for administration of all background clearances. Any related questions should be directed to Human Resources.

DISCLOSURE STATEMENT APPLICATION FOR VOLUNTEERS

Required by the Child Protective Service Law 23 Pa. C.S. Section 6344.2 (relating to volunteers having contact with children).

I swear/affirm that I am seeking a volunteer position and AM NOT required to obtain a clearance through the Federal Bureau of Investigation, as: the position I am applying for is unpaid; and I have been a resident of Pennsylvania during the entirety of the previous ten-

year period.

I swear/affirm that I have not been named as a perpetrator of a founded report of child abuse within the past five (5) years as defined by the Child Protective Services Law.

I swear/affirm that I have not been convicted of any of the following crimes under Title 18 of the Pennsylvania consolidated statutes or of offenses similar in nature to those crimes under the laws or former laws of the United States or one (1) of its territories or possessions, another state, the District of Columbia, the Commonwealth of Puerto Rico or a foreign nation, or under a former law of this Commonwealth.

- Chapter 25 (relating to criminal homicide)
- Section 2702 (relating to aggravated assault)
- Section 2709 (relating to stalking)
- Section 2901 (relating to kidnapping)
- Section 2902 (relating to unlawful restraint)
- Section 3121 (relating to rape)
- Section 3122.1 (relating to statutory sexual assault)
- Section 3123 (relating to involuntary deviate sexual intercourse)
- Section 3124.1 (relating to sexual assault)
- Section 3125 (relating to aggravated indecent assault)
- Section 3126 (relating to indecent assault)
- Section 3127 (relating to indecent exposure)
- Section 4302 (relating to incest)
- Section 4303 (relating to concealing death of child)
- Section 4304 (relating to endangering welfare of children)
- Section 4305 (relating to dealing in infant children)
- Section 5902(b) (relating to prostitution and related offenses)
- Section 5903(c) (d) (relating to obscene and other sexual material and performances)
- Section 6301 (relating to corruption of minors)
- Section 6312 (relating to sexual abuse of children), or an equivalent crime under federal law or the law of another state

I have not been convicted of a felony offense under Act 64 1972 (relating to the controlled substance, drug device and cosmetic act) committed within the past five (5) years.

I understand that I shall not be approved for service if I am named as a perpetrator of a founded report of child abuse within the past five (5) years or have been convicted of any of the crimes listed above or of offenses similar in nature to those crimes under the laws or former laws of the United States or one (1) of its territories or possessions, another state, the

District of Columbia, the Commonwealth of Puerto Rico or a foreign nation, or under a former law of this Commonwealth.

I understand that if I am arrested for or convicted of an offense that would constitute grounds for denying participation in a program, activity or service under the Child Protective Services Law as listed above, or am named as perpetrator in a founded or indicated report, I must provide the Human Resources Director or designee with written notice not later than seventy-two (72) hours after the arrest, conviction or notification that I have been listed as a perpetrator in the statewide database.

I understand that if the person responsible for employment decisions or the administrator of a program, activity or service has a reasonable belief that I was arrested or convicted for an offense that would constitute grounds for denying participation in a program, activity or service under the Child Protective Services Law, or was named as perpetrator in a founded or indicated report, or I have provided notice as required under this section, the person responsible for employment decisions or administrator of a program, activity or service shall immediately require me to submit current clearances obtained through the Department of Human Services, the Pennsylvania State Police, and the Federal Bureau of Investigation, as appropriate. The cost of clearances shall be borne by the employing entity or program, activity or service.

I understand that if I willfully fail to disclose information required above, I commit a misdemeanor of the third degree and shall be subject to discipline up to and including denial of a volunteer position.

I understand that the person responsible for employment decisions or the administrator of a program, activity or service is required to maintain a copy of my clearances.

I hereby swear/affirm that the information as set forth above is true and correct. I understand that false swearing is a misdemeanor pursuant to Section 4903 of the Crimes Code.

Legal

1. Pol. 3004
2. Pol. 6006
3. Pol. 7016

4. 24 P.S. 111

5. 23 Pa. C.S.A. 6301 et seq

6. Pol. 5007

7. 24 P.S. 111.1

Book: Policy Manual

Section: 3000 Employees

Title: Assignment and Transfer

Code: 3009

Status: Active

Adopted: September 24th 2025

Authority

The assignment and transfer of employees within the Charter School shall be determined by the management, supervisory, instructional and operational needs of the Charter School.

The Board of Trustees (Board) shall approve the initial assignment of all employees at the time of employment and when such assignments involve a transfer from one school to another or supervisor to another, or involve a move to a position requiring a certificate or credentials other than those required for the employee's present position.[1]

The need for new or updated criminal history record checks, reporting forms and child abuse clearances as a result of a transfer shall be determined in accordance with law and regulations.[\[2\]](#)[\[3\]](#)[\[4\]](#)[\[5\]](#)[\[6\]](#)

Delegation of Responsibility

The Chief Staff Officer or designee shall provide a system of assignment or reassignment for Charter School employees that includes consideration of requests for voluntary transfers.

1. Vacancies shall be publicized to all appropriate employees.

2. Before new employees are sought, requests for transfer to a vacant position will be considered.
3. Employees shall be informed of their assignments as early as possible preceding the school year in which the assignment will be effective.
4. This policy shall not prevent reassignment of an employee during the school year for good cause, as determined by the Chief Executive Officer and/or Board.

Book: Policy Manual

Section: 3000 Employees

Title: Complaint Process

Code: 3026

Status: Active

Adopted: September 24th 2025

Authority

It is the intent of the Board of Trustees (Board) to establish reasonable and effective means of resolving conflicts among employees to reduce potential areas of complaints, and to establish and maintain clear two-way channels of communication between supervisory personnel and Charter School employees.

The Board adopts this policy to facilitate proper and equitable solutions to complaints by employees at the lowest appropriate level, and to establish an orderly procedure for pursuing solutions.

There shall be no reprisals of any kind taken against any employees or their representatives because of support of or participation in a complaint.

Definition

Complaint - any unresolved problem or interpretation of federal or state laws and regulations; Board policies, rules, processes or written administrative procedures.

Guidelines_

Complaints should be discussed in a private, informal conference between the parties involved. At least one (1) private meeting should take place between the parties before the complaint process is invoked.

A complainant may be represented or accompanied by anyone s/he chooses at any higher level of the complaint process.

If the same, or substantially the same, complaint is made by more than one (1) employee against one (1) respondent, only one (1) employee, on behalf of self and the other complainants, may process the complaint through the prescribed procedure. Names of all complainants shall appear on all documents related to settlement of the complaint.

In the event a complaint is filed late in the school year, both parties shall endeavor to expedite the process so that the complaint process may be completed as soon after the school term as practicable.

The time limits provided in this policy may be extended by mutual agreement of the parties. Any decision not appealed within the time limits from one level to the next level shall be considered settled on the basis of the last decision and not subject to further appeal.

All documents, communications, and records relevant to a complaint shall be filed in a separate file and not kept in the personnel file of any of the participants.

Level One - Immediate Supervisor

Within ten (10) days after the occurrence giving rise to the complaint, and following an informal conference as outlined above, the complainant shall present the written complaint to his/her immediate supervisor.

This statement shall include:

1. Clear, concise expression of the complaint.

2. Board policy, administrative procedure, law or regulation of which there is an alleged violation.
3. Circumstances on which the complaint is based.
4. Person(s) involved.
5. Remedy sought.

Copies of this statement may be sent to any individuals who were present at the informal conference.

Within ten (10) days, the immediate supervisor shall communicate a written decision to the employee. If the supervisor does not respond within the time limit, the complainant may appeal to the next level.

Either party to the complaint shall have the right to request a personal conference in order to resolve the problem. Either party may request the presence of one (1) conferee.

In cases where the Chief Staff Officer is the complainant's immediate supervisor, the complainant shall file his/her complaint with the Chief Staff Officer as required by Level One, but may appeal directly to the Board as permitted by Level Three.

Level Two – Chief Staff Officer

Within ten (10) days after receiving the decision of the immediate supervisor at Level One, the complainant may appeal the decision in writing to the Chief Staff Officer. The written appeal shall be accompanied by a copy of the decision at Level One.

Within ten (10) days after delivery of the appeal, the Chief Staff Officer shall investigate the complaint, giving all persons who participated in Level One a reasonable opportunity to be heard.

Within ten (10) days after delivery of the appeal, the Chief Staff Officer shall submit a written decision, together with the supporting reasons, to the complainant and the individuals involved.

Level Three - Board

Within ten (10) days after receiving the decision of the Chief Staff Officer, the complainant may appeal the decision in writing to the Board.

The Board shall schedule the matter for a hearing to be held at the next regularly scheduled Board meeting. The complainant and his/her conferee may be present at the hearing.

Within thirty (30) days of the hearing, the Board shall submit its written decision, together with supporting reasons, to the complainant. A copy shall be furnished to the individuals involved.

The decision of the Board is final.

Legal

24 P.S. 1716-A

24 P.S. 1724-A

Book: Policy Manual

Section: 3000 Employees

Title: Paid Time Off

Code: 3036

Status: Active

Adopted: September 24th 2025

Authority

The Board of Trustees (Board) shall provide Paid Time Off (PTO) for eligible employees, in accordance with the employee handbook and this policy.

Guidelines

Full-time, regular employees may be eligible for Earned PTO days each school year. Part-time, regular employees may be eligible for a prorated amount of PTO depending on the number of days or hours worked.

Part-time, regular employee eligibility and PTO will be determined individually on a consistent, prorated basis. In no event shall any PTO be advanced or paid if not then earned.

The policy below outlines ten-month and twelve-month employees.

Ten-Month Employees - Earned Paid Time Off

Ten-month employees may earn up to ten (10) PTO days per year. PTO days are earned one (1) day per month for ten-month employees beginning September 1st of each school year. In no event shall any PTO be advanced or paid if not then earned.

Ten-month employees are eligible to use five (5) sick days and five (5) personal days for a total of ten (10) days of PTO.

Sick days are intended for health-related issues in which an employee suddenly cannot work due to illness or when their health is inhibiting work performance. Examples of uses of sick time are:

- Experiencing contagious illness (i.e., the flu).
- Experiencing non-contagious illness (i.e., a migraine).
- Injured.
- Hospitalized.

Personal days are for incidents that can be planned ahead or do not fall into the sick day definition. An employee may not use more than three (3) consecutive days of personal time. Examples of uses of personal time are:

- Family emergency.
- Illness of a relative.
- Personal obligation (i.e., taking a pet to the vet).
- Out of town commitment/event.

At the end of the contract year, unused sick time for returning employees will "carry-over" into the following school year. An employee can "bank" up to a maximum of sixty (60) days of sick time.

Unused personal time for returning employees will be paid out at a rate of \$120 a day.

The request of personal time must be made in advance by two (2) weeks, and are subject to approval by the CEO or Designee

Employees who voluntarily terminate employment before the last day of the school's operating year or June 30th of that year (whichever is to occur first), will not be entitled to any payment for accumulated personal time. Such departing employees may not extend employment by using personal time.

Employees who voluntarily terminate, with prior notice, and complete their full contractual obligations, if having accumulated a positive personal day balance, shall be eligible to exercise the cash out option as described above.

In the event of involuntary termination, due to other than a reduction in staff, such employees shall not be reimbursed for any then unused accumulated personal days.

In the event of involuntary termination due to a reduction in staff, an affected employee, if having unused personal time, shall be eligible to exercise the cash out option as described above.

Employees will not be granted permission to utilize PTO during the following periods:

- The one-week period before school opens;*
- The first two (2) weeks of school;
- The last week of school;*
- During standardized testing or school testing periods.

Notes –

*An employee (contracted or not) who incurs unauthorized absence, during Professional Development/Orientation prior to the opening day of school or within the last week of the school year will be subject to discipline up to and including possible termination.

Regarding paid holidays, irrespective of any accrued PTO, employees must work the day before and the day after a holiday in order to be eligible for payment for the holiday. Any exception must have the prior approval of the CSD.

The CEO has the authority to grant exceptions for family emergencies. Employees are encouraged to schedule personal events, vacations and weddings during the summer months or other school breaks in order not to disrupt the continuity of instruction. All requests for personal time are subject to submission of a Time-Off Request Form and prior CEO or Designee approval.

This policy applies to all eligible full-time employees and part-time employees, if applicable.

Time-Off Requests -

Time-Off Request Forms must be completed two (2) weeks in advance for personal time off and submitted to the appropriate supervisor or member of Administration.

Sick Day Requests -

The Board reserves the right to require any employee claiming paid or unpaid sick leave to submit sufficient proof, including documentation from a licensed physician, certified registered nurse practitioner or a licensed physician assistant, of the employee's illness, disability or need to quarantine.

Misuse of sick leave shall be considered a serious infraction subject to disciplinary action.

Any employee who calls out sick MUST contact the appropriate supervisor or administrator at the number provided by Administration by 7:00 a.m. If, when calling the appropriate supervisor or administrator at the number provided the employee does not receive an answer, the employee must leave a message including name, date, time and details known at that time. Text messages and/or email messages in lieu of a call to the appropriate supervisor or administrator are not acceptable.

If an employee takes three (3) or more consecutive sick days, the employee must provide a physician's signed certification of illness or disability to Human Resources upon return to work.

Late Arrival to Work -

If an employee will be late in arriving to work, the employee must call the appropriate supervisor or administrator at the number provided by Executive Administration to advise what time the employee expects to arrive at work. If, when calling the appropriate supervisor or administrator at the number provided the employee does not receive an answer, the employee must leave a message including name, date, time, reason for delay and expected time to arrive at work.

Failure to abide by this policy may result in disciplinary action.

Twelve-Month Employee - Earned Paid Time Off

Full-time, regular employees may be eligible for Earned Paid Time Off (PTO) days each year. Part-time, regular employees may be eligible for a prorated amount of paid time off depending on the number of days or hours worked. Specific guidelines and procedures shall apply as follows.

Earned Paid Time Off -

Twelve-month employees may earn up to eighteen (18) PTO days per year. PTO days are earned one and one-half (1 1/2) days per month for twelve-month employees beginning September 1st of each school year. In no event shall any PTO be advanced or paid if not then earned.

Unused PTO days for returning employees will "carry-over" into the following school year subject to a maximum reset at September 1st of each school year. No carry over days will reset beyond the maximum. For twelve-month employees, the maximum reset shall be up to thirty-two (32) PTO days.

Employees who have accumulated more than the maximum reset amount by the end of a school year shall have an annual “cash out” option available. That option will allow a maximum payment for up to five (5) days of accumulated excess PTO days. Only full days may be cashed out and each will be compensated at \$120.00 per day via payroll.

PTO days used for personal reasons must be requested in advance, and are subject to approval by the team leader or supervisor.

Employees who voluntarily terminate employment before the last day of the school’s operating year or June 30th of that year (whichever is to occur first) will not be entitled to any payment for accumulated PTO days. Such departing employees may not extend employment by using PTO time.

Employees who voluntarily terminate, with prior notice, and complete their full contractual obligations, if having accumulated more than the maximum PTO reset amount, shall be eligible to exercise the cash out option as described above.

In the event of involuntary termination, due to other than a reduction in staff, such employees shall not be reimbursed for any unused accumulated PTO days.

******Regarding paid holidays, irrespective of any accrued PTO, employees must work the day before and the day after a holiday in order to be eligible for payment for the holiday. Any exception must have the prior approval of the CEO.

The CEO has the authority to grant exceptions for family emergencies. Employees are encouraged to schedule personal events, vacations and weddings during the summer months or other school breaks in order to avoid disruption of instruction. All requests for personal time off are subject to submission of a Time-Off Request Form and prior team leader/supervisor approval. The CEO will submit requests to the Board President as necessary.

This policy applies to all eligible full-time employees and part-time employees, if applicable.

Time-Off Requests -

Time-Off Request Forms must be completed two (2) weeks in advance for personal time off and submitted to the CEO or Designee

Sick Day Requests -

Any employee who calls out sick MUST contact their supervisor at the number provided by 7:00 a.m. If, when calling their supervisor at the number provided, the employee does not receive an answer, s/he must leave a message including name, date, time and details known at that time. Text messages and/or email messages in lieu of a call to the team leader or supervisor are not acceptable.

If an employee takes three (3) or more consecutive sick days, s/he must provide a physician's signed certification of illness or disability to their team leader or supervisor upon return to work.

Late Arrival to Work -

If an employee will be late in arriving to work, s/he must call their team leader or supervisor at the number provided to advise what time the employee expects to arrive at work. If, when calling their team leader or supervisor at the number provided, the employee does not receive an answer, s/he must leave a message including name, date, time, reason for delay and expected time to arrive at work.

Failure to abide by this policy may result in disciplinary action.

Records

The Charter School's personnel records shall show the attendance of each employee; and the days absent shall be recorded, with the reason for such absence noted.

A record shall be made of the unused sick leave days accumulated by each Charter School employee, which shall be reported to the employee.

