

ASSET TRAVEL COMPENSATION POLICY

ABA services are generally provided in the client's home. While there are exceptions such as center based services or services provided at alternate locations, the expectation is that direct care services will be provided in the client's home. ASSET staff involved in the delivery of ABA services should have an expectation that they will be required to drive to client's homes on a daily basis to conduct ABA sessions. Wherever ABA services are delivered is considered to be the employee's "place of work". Since services are delivered primarily in the client's home, the client's home is considered to be the employee's place of work.

All ASSET staff whether administrative or direct care are required to commute to and from their place of work. When direct care staff drive to their first appointment of the day, this is considered commuting to their place of work just like any employee of any company who drives or commutes to and from work. Direct care staff who have only one home session on a given day do not qualify for additional compensation because they are simply commuting to and from their place of work.

While employees do not receive additional compensation for commuting to and from their place of work and many employers do not compensate for employee drive time, ASSET does compensate direct care staff in the following ways.

- Staff will receive compensation that covers "intraday" travel .
- Staff will be provided additional compensation for driving to distant client's homes who live 30 miles or more from the staff's primary office or residence, whichever is closer.
- Staff will receive gasoline reimbursement

For the purposes of this policy there are three distinct types of drive time:

Commute Drive Time - is defined as drive time to the first client's home session of the day within 30 miles of the behavior coach's primary office or residence, whichever is less and from the last client's home session that is within 30 miles of the coach's primary office or residence. ASSET defines its normal operating area to be within 30 miles of the coach's primary office or the coach's residence, whichever is less. All driving within ASSET's normal operating area that is not intraday travel is commute drive time.

Intraday Drive Time - is defined as a drive time from one client direct care session to additional client direct care sessions within the same business day. For example, if it takes 30 minutes to drive from client A's home to client B's home and 15 minutes to drive from client B's home to client C's home and this is done within the same business day, this equals 45 minutes of intraday drive time. If direct care staff conducted only one home session during a given day there would be no intraday drive time for that day because the employee is simply driving to and from their place of work. Intraday drive time does not reduce the

targeted billable hours of direct care staff. Intraday drive time is not to be entered by direct care staff. ASSET's administrative staff will calculate intraday drive time based on data collected from Google Maps Navigation Software and by conducting an audit of the employee's employment record. Specifically, administrative staff will review employee's work record to determine the number, time and locations of direct care sessions conducted daily. The number, time and locations of all direct care sessions is easily accessible from an audit of ASSET's cloud based behavior therapy software. Once audited, qualifying intraday travel will be added to the employee's time record for compensation by the designated administrative staff.

Distant Client Drive Time - is defined as qualifying drive time for clients who live more than 30 miles from the employee's primary ASSET office or the employee's residence, whichever is less and is also approved by ASSET's administrative team. Distant client drive time is reserved exclusively for direct care staff assigned distant clients. In order to receive distant client drive time compensation, the following conditions must exist.

1. Client must live more than 30 miles from direct care staff's primary office or residence.
2. If the distant client is the first or last client session of the day, commute drive time of 30 minutes to and or from the client's home will be deducted to calculate qualifying distant drive time.
3. Distant client is approved by designated administrative staff who will be responsible for entering drive time into the employee's employment record for compensation.

In addition to the aforementioned drive time compensation, the company will reimburse community direct care staff \$100 per month and center direct care staff hired after March 2017 \$50 per month to cover gas expenses. This amount will be increased by 25% for each client assigned to the behavior coach that resides 30 miles or more from the coach's primary office or residence whichever is less. The 25% increase for distant clients applies to behavior coaches not managers and supervisors.

Frequently Asked Questions

1. **Why do direct care staff not get paid to drive to client's homes at the beginning or end of the work day?** The client's home is considered as the employee's place of work. Employees do not get paid to drive to their place of work. This is comparable to administrative, retail, food service or hospital employees driving to and from their place of work. It is the employee's responsibility to get to and from their place of work. However, if ASSET direct care staff go from one home session to a second or third home session within the same work day they will be compensated for it as intraday drive time.
2. **What happens if a coach drives to a coffee break or some other location between sessions, does this count as intraday drive time?** No, this does not count towards intraday drive time because it is the employee's choice. Only the time from the one session to another session counts as intraday drive time.
3. **Does intraday drive time reduce target billable hours?** Intraday drive time does not reduce target billable hours. Intraday drive time will be added to direct contact hours and case management activities by designated admin staff and added to employee's paycheck.
4. **Does distant client drive time reduce target billable hours?** Intraday drive time does not reduce target billable hours. The one exception to this is in extremely rare circumstances when an employee's distant client drive time exceeds both 7.5 hours per week and also make it impossible for employee to conduct additional direct contact sessions within the same day.
5. **Why does the company use Google Maps to calculate drive time and not take into account traffic delays?** After experimenting with several methods of tracking drive time, the company elected to

come up with a reliable and consistent way to track drive time that is not highly variable or that require constant input or modifications by direct care staff. Some employers pay no compensation for travel or only minimum wage for drive time instead of the employee's regular hourly wage. Instead of reducing drive time compensation to minimum wage, ASSET elected to compensate employees at their regular hourly wage for all qualifying intraday travel.

6. **What if the commute to or from my first or last session of the day takes longer than 30 minutes?**
The 30 minute commute allocation used for distant clients should not be confused with the 30 mile operating area for commuting purposes.
7. **Why is there a distinction between gas reimbursement for community behavior coaches, center coaches and engagement managers?** The gas reimbursement is designed to assist with gas expenses and is in proportion to the relative amount of driving required by the position. Community coaches generally conduct 9 to 12 home visits per week (36 to 48 per month). In contrast center coaches generally conduct 3 home visits per week and engagement managers average 4 to 5 home visits per week.
8. **When is it okay for employees to enter their own drive time into the company's time tracking software?** Employees should never enter their own drive time into the company's time tracking software. In all cases, a designated member of the company's administrative staff will audit the employee's travel record and add the appropriate travel time.