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April 26, 2021

**Via Electronic Mail Delivery – [cela@fec.gov](mailto:cela@fec.gov)**Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination & Legal Administration  
1050 First Street, NE  
Washington, DC 20463

Re: MUR 7891

Dear Mr. Jordan:

My name is C. Edward Watson, II of Foulston Siefkin LLP and I represent National Lead For America, Inc., dba Lead For America. I write in response to the above-referenced complaint filed by Randal D. Schreiner. The complaint alleges that Lead For America failed to report in-kind contributions to the Dan Feehan campaign and the Friends of the Dan Feehan campaign committee (collectively the "Feehan Campaign"). Dan Feehan was the 2020 Democratic candidate to Congress in Minnesota's First Congressional District. Specifically, the complaint alleges that Lead For America compensated Monali Bhakta, a participant in the Lead For America fellowship program, for her work on the Feehan Campaign. These allegations are erroneous. While Ms. Bhakta did, in fact, work on the Feehan Campaign, she was not compensated by Lead For America (or any of its affiliates) for such work. Instead, the Minnesota Democratic-Farmer-Labor Party ("MDFLP"), an organization not affiliated with Lead For America or its local affiliate, Lead For Minnesota ("LFM") hired and paid her directly for her work on the Feehan Campaign. The public records reflect that MDFLP reported Ms. Bhakta's compensation to the FEC.

As a matter of background, Lead For America is a nonprofit organization that connects recent graduates, local governments, and nonprofits to improve capacity building and for leadership development. In this connection, Lead For America recruits, trains, and places these recent college graduates into two-year volunteer fellowships in high-impact civic leadership

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roles. LFM recruited Ms. Bhakta into the fellowship program and then facilitated the relationship between Ms. Bhakta and her host, the Region Nine Development Commission.

In May 2020, Lead For America notified Ms. Bhakta that she had been selected as a fellow (“Lead For America Fellow”). *See* Affidavit of Monali Bhakta (“Bhakta Affidavit”), ¶2 attached hereto as Exhibit A. Her fellowship was to be from August 1, 2020, through July 31, 2022. Bhakta Affidavit, ¶4. As a Lead For America Fellow, Ms. Bhakta’s responsibilities included developing diversity, equity, and inclusion (“DEI”) initiatives in south central Minnesota through the LFM program where she was assigned to work. Bhakta Affidavit, ¶5. Most of her time she conducted a listening tour throughout the region to gather relevant information on the DEI topic. *Id.*

Lead For America Fellows receive: (a) a living stipend calibrated to the community’s living wage to cover their living expenses, (b) graduate-level MPA/MPP training, and (c) leadership and equity training. Bhakta Affidavit, ¶¶ 2-3 & 7. The living stipend is not the same as payroll compensation or salary, and there is no direct correlation between the living stipend and the hours worked in any particular time period. *See* Affidavit of Anna Pollock (“Pollock Affidavit”), ¶6, attached hereto as Exhibit B. Ms. Bhakta’s monthly living stipend was \$1,672.00. Bhakta Affidavit, ¶7; Pollock Affidavit ¶7.

The complaint (and the attached picture of Ms. Bhakta’s LinkedIn page) do not present a complete picture regarding the scope and circumstances surrounding Ms. Bhakta’s participation both as a Lead For America Fellow assigned to the Region Nine Development Commission, and her work on the Feehan Campaign. The two positions were unrelated.

When Ms. Bhakta served as a Lead For Minnesota Fellow, she was also a paid employee of the MDFLP. A copy of her signed MDFLP employment handbook, which sets forth the terms of her MDFLP employment is attached hereto as Exhibit C. As mentioned above, the MDFLP assigned Ms. Bhakta to the Feehan Campaign. Bhakta Affidavit, ¶9. Her Feehan Campaign job duties included working phone banks, text banks, volunteer recruitment, attending fundraisers, and engaging in outreach efforts with different groups across the district. *Id.* As the clip of Ms. Bhakta’s Linked-In page attached to the complaint shows, prior to her employment with the MDFLP and her tenure as a Lead For America Fellow, she was an intern for the Feehan Campaign.

Ms. Bhakta began her MDFLP employment on or about July 14, 2020, about one month before she began serving as a Lead For America Fellow. The MDFLP paid Ms. Bhakta \$15.00 per hour. Bhakta Affidavit, ¶9. We were able to verify that she was paid by the MDFLP from publicly available records. Specifically, the MDFLP included Ms. Bhakta’s bi-weekly payroll compensation on its 2019-2020 FEC Form 3 report, attached hereto as Exhibit D. Ms. Bhakta’s MDFLP employment ended in November 2020 immediately following the federal election. *Id.*

Ms. Bhakta’s Lead For America fellowship was entirely separate from her work on the Feehan Campaign. Prior to beginning her fellowship, Ms. Bhakta disclosed to Ms. Pollock,

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Deputy Director, Lead For Minnesota, that she had accepted a job with the MDFLP and that she would be working on the Feehan Campaign. Pollock Affidavit, ¶8; Bhakta Affidavit, ¶10. When Ms. Bhakta disclosed to Ms. Pollock the fact of her MDFLP employment, Ms. Pollock told Ms. Bhakta that she could not record any of her time working on the Feehan Campaign, as time she was obligated to work to meet her fellowship requirements. Bhakta Affidavit, ¶10; Pollock Affidavit, ¶9.

The Lead For America fellowship takes great care to ensure that the fellows are not engaging in partisan activity while performing their fellowship duties. Pollock Affidavit, ¶10. The LFMN Member Agreement specifically provides that while the Member is “accumulating service or training hours” the fellows are prohibited from “engaging in partisan political activities or other activities designed to influence the outcome of any public office” and “participating in or endorsing events or activities that are likely to include advocacy for or against political parties, platforms, political candidates, proposed legislation, or elected officials.” Bhakta Affidavit, ¶4. These prohibitions were not meant to prevent her from being politically active in her community during the fellowship altogether. Pollock Affidavit, ¶10. It just required that she could not engage in her political activity at the same time she performed fellowship tasks, i.e., she could not work the phone banks for the Feehan Campaign and conduct listening tour activities on the same telephone call. Pollock Affidavit, ¶12.

Ms. Bhakta confirms that she did not perform any political or partisan tasks while she was also performing work for her fellowship. Bhakta Affidavit, ¶12. She states that during the campaign season, she did most of her fellowship work on the weekends, and that once the Feehan Campaign ended, she had planned to increase her time fulfilling her fellowship obligations. Bhakta Affidavit, ¶¶6, 10; Pollack Affidavit, ¶11. However, approximately six weeks after the campaign ended, Ms. Bhakta elected to terminate her relationship with Lead For America and took a permanent job with the Minnesota Private College Council. Pollack Affidavit, ¶15.

Ms. Bhakta’s LinkedIn page is ambiguous at best. While it accurately highlights her experience as a Lead For America Fellow, it also shows her affiliation with the MDFLP, a fact that the complaint does not highlight. How she was paid and by whom is simply not indicated on her LinkedIn page. Thus, one cannot conclude from the LinkedIn page alone that Lead For America made an unreported in-kind contribution to the Feehan Campaign. One must consider the totality of the facts as set forth above.

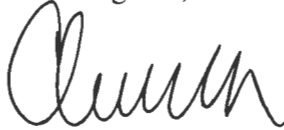
In summary, Ms. Bhakta’s fellowship was not connected in any way with her work at the Feehan Campaign. MDFLP employed Ms. Bhakta for her efforts on behalf of the Feehan Campaign. MDFLP reported Ms. Bhakta’s salary to the FEC, as required. Ms. Bhakta’s employment with the MDFLP ended in early November 2020 following the election. After Ms. Bhakta’s MDFLP employment ended, she continued as a Lead For America Fellow for six more weeks.

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Neither Lead For America nor any of its affiliates compensated Ms. Bhakta for her work at the Feehan Campaign. She received a living stipend for her work at the Region Nine Development Commission. And while she did not complete her fellowship, she did engage in activities in furtherance thereof, i.e., the DEI listening tour. The listening tour regarding DEI topics was unrelated to the Feehan Campaign. Neither Lead For America nor its local affiliate Lead For Minnesota had any FEC reporting obligations regarding the fellowship.

The facts are clear. No action should be taken against Lead For America and the above referenced complaint as it relates to Lead For America should be dismissed. If you have any questions or seek additional information, please contact me at cewatson@foulston.com or (316) 291-9589.

Kindest regards,

A handwritten signature in black ink, appearing to read 'C. Watson', with a stylized, cursive script.

C. Edward Watson, II

Attachments

cc. Christal Dennis, Paralegal

## AFFIDAVIT OF MONALI BHAKTA

STATE OF MINNESOTA    )  
   )  
 COUNTY OF RAMSEY     )

I, Monali Bhakta, being of lawful age, do upon my oath state and declare as follows:

1. My name is Monali Bhakta and I reside at [REDACTED], Shakopee, Minnesota, 55379.

2. In 2020, Lead for America, Inc. dba Lead for America selected me to participate in its two year fellowship program ("Lead for America Fellowship"). I served with the Lead for America Minnesota affiliate, Lead for Minnesota.

3. Specifically, Lead for America approved my fellowship in May 2020. I signed my Fellowship Agreement on June 5, 2020. *See* Lead for America Fellowship Agreement attached hereto as Exhibit 1. The Fellowship Agreement confirmed that I would be designated as a hometown fellow cohort and set forth my goals, responsibilities, and duties.

4. In conjunction my fellowship, I also signed the Lead for Minnesota Member Agreement (2020-2021). *See* Lead for Minnesota Member Agreement ("LFMN Member Agreement") attached hereto as Exhibit 2. The LFMN Member Agreement established my initial term of service – August 1, 2020 through July 31, 2021. It also verified my assignment that I would serve as a Lead for Minnesota fellow ("LFMN Fellow") at the Region Nine Development Commission site in Mankato, Minnesota. My first day of work was August 14, 2020.

5. My fellowship responsibilities focused on assisting the Region Nine Development Commission with its diversity, equity and inclusion efforts. The goal was to create a diverse economic system in Minnesota. My initial charge was to organize and execute a listening tour of my hometown by talking with a comprehensive cross-section of key community stakeholders to learn about the needs of the community.

6. During the fall 2020, I fulfilled my fellowship responsibilities on the weekends. Due to the COVID-19 pandemic, most of my work was performed virtually.

7. The Lead for America Fellowship provided me a monthly stipend of \$1,672.00, and a promise that after successful completion of service, I would receive an education award of up to \$6,195.00.

8. While I served as a LFMN Fellow, I was also employed by the Minnesota Democratic-Farm-Labor- Party ("MDFLP"). I began my MDFLP employment in mid-July 2020, prior to beginning my position as a LFMN Fellow. I was paid approximately \$15.00 per hour.

9. Before I began my work as a LFMN Fellow, I informed Anna Pollock, Deputy Director, Lead for Minnesota, that I had been hired by the MDFLP and that I had been assigned to work on the Dan Feehan Campaign. My campaign duties included staffing the phone and text banks, recruiting volunteers, and attending fundraisers. I told her that during the fall I anticipated that I would be juggling my time and responsibilities with the fellowship and my employment.

10. Knowing that the campaign would end in the fall, Ms. Pollock said to me that no matter what outside employment I had, I would be required to fulfill all of my Lead for America Fellowship duties, and that I would have to make up any lost time later in the year if necessary.

11. Ms. Pollock also reminded me that I could not report any of my campaign hours to Lead for Minnesota. She made sure I understood that my Lead for America Fellowship responsibilities and my campaign work would have to be handled separate.

12. I did not mix my campaign work with my fellowship duties. As mentioned, earlier, I did most of my campaign work during the work week and I did a majority of my Lead for America Fellowship work on the weekends. My employment with the MDFLP ended on November 3, 2020, the day of the election.

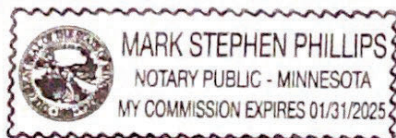
13. I continued with the LFMN Fellowship for about six more weeks and resigned in late December 2020, so that I could take a permanent position as an Advocacy Associate for the Minnesota Private College Council in St. Paul, Minnesota.

FURTHER AFFIANT SAITH NOT.

Monali Bhakta

Monali Bhakta

Subscribed and sworn in my presence this 20 day of April, 2021



Mark Stephen Phillips  
Notary Public

My commission expires: 01/31/2025

**AFFIDAVIT OF ANNA POLLOCK**

STATE OF MINNESOTA    )  
   )  
 COUNTY OF WASECA     )

I, Anna Pollock, being of lawful age, do upon my oath state and declare as follows.

1. My name is Anna Pollock. I am the Deputy Director and Program Coordinator, Lead for Minnesota ("LFMN"), which is a local affiliate of Lead for America, Inc. dba Lead for America. In my capacity as the LFMN Deputy Director, I have leadership responsibilities regarding the operation of LFMN.

2. In Spring 2020, Lead for America selected Monali Bhakta as one of several Lead for Minnesota fellows ("LFMN Fellow") for the then upcoming term. Her fellowship was to set to begin on August 1, 2020 and extend through the end of July 2022. For the first year of the fellowship, we assigned Ms. Bhakta a position at the Region Nine Development Commission, one of the host governmental entities located in South Central Minnesota. The Region Nine Development Commission addresses community and economic development issues in the region.

3. As the LFMN Fellow assigned to the Region Nine Development Commission, Ms. Bhakta's mission centered on creating a diverse economic system and building capacity within the area and bridging cultural leaders to make diversity, equity and inclusivity a core part of communities within the region.

4. As an LFMN Fellow, Ms. Bhakta's first order of business was to conduct a listening tour of her hometown. The listening tour required talking with a comprehensive cross-section of key community stakeholders to learn more about the needs of the community, to identify critical workforce challenges, and to reground in the community's landscape.

5. Ms. Bhakta reported to her first day of work at the fellowship in mid-August, 2020. We expected the listening tour along with other assigned tasks to take most of the fall.

6. Lead for America pays its fellows a monthly stipend designed to cover basic living expenses while the fellow works with the host organization. Broadly speaking, each fellow is expected to work full-time every week. The amount the fellow receives as their monthly stipend, however, does not directly correlate to the hours that the fellow works in any given week or month. The main goal of the fellowship is for the fellow to fully participate in the designated program at their host site, which in this instance was the Region Nine Development Commission, and to complete all of the education and training designed for the fellowship.

7. Ms. Bhakta's fellowship stipend was set at \$1,672.00 per month.

8. Prior to her beginning her fellowship, Ms. Bhakta informed me that she had accepted a position with the Minnesota Democratic-Farm-Labor-Party ("MDFLP") and that she would be working on the Dan Feehan Congressional Campaign ("Feehan Campaign") through the end of the 2020 election cycle. Ms. Bhakta expressed that she intended to continue her fellowship while she was employed by MDFLP.

9. While having other paid employment is not prohibited by Lead for America policies and under the terms of the fellowship agreement, I made it clear to Ms. Bhakta that she could not commingle her fellowship work with her work on the Feehan Campaign. I specifically told her that none of her hours worked on the Feehan Campaign could be recorded as hours to fulfill her fellowship obligations.

10. The policy that I articulated was not designed to prevent or discourage Ms. Bhakta from working on the Feehan Campaign. Instead, it was to ensure that Lead for America met its obligations to AmeriCorps and that none of Ms. Bhakta's living stipend would be attributable to political activity for the Feehan Campaign.

11. Additionally, it was important for Ms. Bhakta to understand that while she may have had financial needs that could not be met by her fellowship stipend, the fellowship had specific goals that had to be met within the first year of her fellowship and that Lead for America expected her to meet those obligations even if she had to work extra hours following the conclusion of her work for the Feehan Campaign.

12. I never observed Ms. Bhakta working on Feehan Campaign assignments while she was performing her fellowship tasks.

13. No one from Lead for America or its local affiliate Lead for Minnesota ever engaged with anyone from MDFLP or the Feehan Campaign to commit that Ms. Bhakta would be permitted to work or volunteer for the Feehan Campaign while she was performing her fellowship duties.

14. I explicitly expressed to Ms. Bhakta that her obligations to Lead for America, its local affiliate Lead for Minnesota, and to Region Nine Development Commission were wholly separate from any extracurricular employment with the MDFLP. Allowing her to continue her fellowship while she was separately employed by the MDFLP, in no way was meant to be a financial or any other type of political contribution to the MDFLP or the Feehan Campaign specifically.

15. Ms. Bhakta did not complete her LFMN Fellowship. She resigned in late December 2020 to take another job in the area with Minnesota Private College Council in St. Paul, Minnesota.

16. After she resigned, her stipend ended.

FURTHER AFFIANT SAITH NOT.

  
Anna Rollock

Subscribed and sworn in my presence this 19<sup>th</sup> day of April, 2021



  
Notary Public

My commission expires: 01-31-2026

MINNESOTA DFL

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# EMPLOYEE MANUAL

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VERSION 2.0

EXHIBIT  
C

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## Welcome to the Minnesota DFL

Since 1944, the Minnesota DFL has symbolized the highest ideals and aspirations of our Party, Minnesotans from all walks of life coming together to advocate for the common good.

Together, we work every day to build a better Minnesota for all Minnesotans. Everything we do in connection with our work at the Minnesota DFL will be, and should be, measured against the highest possible standards. Every employee is valued; we fully expect that you will continue to grow into a more skilled and productive member of our organization each day. Our hope is that you will immediately connect with our core values by providing excellence in service. When you do, you strengthen our collective understanding of what it means to be a DFL'er.

## Excellence In Service

### Show respect and courtesy in every encounter

- Stop what you are doing and extend a warm welcome
- Greet everyone with a smile, make eye contact, use their name whenever possible and ask how you may assist them
- Listen intently and ask questions to confirm your understanding
- Respond to requests and take responsibility for addressing the needs of others
- Practice courteous telephone etiquette

### Show empathy when you are communicating

- Acknowledge the person, situation and feelings
- Avoid excuses; deliver your promise
- Keep everyone well informed; clearly communicate the plan of action
- Offer options; invite involvement in resolving requests
- Guide the guest through our system to the appropriate resources.

### Show cooperation, professionalism and pride in your job

- Be honest; promise only what you can deliver
- Respond quickly to requests and ensure tasks are completed accurately and on time
- Respect the confidentiality of all members of the party and colleagues
- Talk positively about other employees and departments especially in the presence of members of the party and guests
- Create a positive environment in your appearance, attitude and behavior.

### Leadership Starts With You

- Inspire, engage and lead by example
- Foster a safe, ethical environment where everyone feels comfortable sharing ideas, opinions and raising concerns
- Intentionally build and promote diversity and inclusion at all levels
- Proactively seek, give, and apply feedback
- Motivate through clear objectives and expectations
- Encourage and celebrate success

## INTRODUCTION

This manual will help you understand how the Minnesota DFL works, how we treat others and your responsibilities as an employee. It was prepared to ensure you are aware of what you can expect from the Minnesota DFL and, what the organization will expect from you. All employees are encouraged to familiarize themselves with the Employee Manual, as it will answer many common questions concerning employment with the Minnesota DFL related to:

- Policies and work rules
- Workplace safety and standards
- Performance feedback
- Job expectations
- Compensation and employee benefits
- Time away and acknowledgment forms

Always consult the most current version of this Manual provided by the Human Resources representative or whoever is onboarding you. These policies cannot anticipate every situation or answer every question about employment. When you have questions that may not be covered in this Manual, consult your direct Supervisor.

The Minnesota DFL reserves the right to change, revise, supplement, or eliminate any of the policies, procedures and/or benefits described in this handbook at any time, for any reason, and without prior notice. Our Employee Manual is updated as policies change. Every effort will be made to notify employees when an official change in policy or procedure has been made.

## **1.0 - Minnesota DFL EMPLOYMENT BASICS**

### **1.1 - Employment Contract Disclaimer**

The Minnesota DFL will not enter into employment contracts with any employee. The Minnesota DFL Employee Manual is not a contract of employment nor is it intended to create contractual obligations for the organization of any kind.

### **1.2 - Employment at Will**

Your employment at the Minnesota DFL is “at-will” which means that either party may terminate the employment relationship at any time, for any reason, with or without notice. The Minnesota DFL does not offer any form of guaranteed employment. This employment at-will relationship exists regardless of any other written statements or policies contained in this Handbook, any other documents or any verbal statement to the contrary.

### **1.3 - Diversity and Inclusion**

To accomplish a diverse and inclusive culture at the Minnesota DFL, we strive to provide opportunities for everyone where all employees are treated with equality, dignity and respect. Our behavioral expectations reinforce the importance of ensuring all employees feel included, valued, accepted, and encourages the diversity of people and thought. All employees are responsible for creating a welcoming environment and leading by example at every level in the DFL. We want you to be comfortable and proud to bring your true self to work each and every day in contributing to our organization's success.

### **1.4 - Equal Employment Opportunity**

Employment at the Minnesota DFL is based solely upon individual merit and qualifications directly related to professional competence. Our organization also complies with federal and MN state Equal Employment Opportunity laws and regulations. These require that all people, regardless of race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, individuals with disabilities, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law, have equal opportunities for hire, promotion, and with regard to all terms and conditions of employment.

### **1.5 - Americans with Disabilities**

The Americans with Disabilities Act (ADA) requires employers with 15 or more employees to not discriminate against applicants and individuals with disabilities and, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position. The Minnesota DFL complies with all federal and MN state laws concerning the employment of persons with disabilities to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC).

Furthermore, it is the organization’s policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, compensation, training or other terms, conditions and privileges of employment.

### **1.6 - Confidentiality Standards**

The protection of confidential information is vital to the interests and the success of the Minnesota DFL. It is the responsibility of each employee to maintain confidentiality related to campaign strategy, computer programs, compilations of volunteer and donor information, internal party documents, strategic plans and procedures and other confidential information not generally known outside of the DFL Party Headquarters. Employees who improperly use or disclose information will be subject to corrective action up to and including termination.

All employees of the Minnesota DFL are required to read and sign a Confidentiality Agreement. This form is located in the Minnesota DFL Required Forms section of this manual - Acknowledgement Form 2 of 4 - Attachment A).

## 1.7 - Personal & Personnel Information - Data Changes

It is important that the DFL maintain current employee information in our personnel records. It is the responsibility of each employee to promptly notify the Minnesota DFL of any changes related to their personnel file. If any personal data has changed please notify the Comptroller or Human Resources representative.

Personal information may include:

- mailing addresses
- telephone numbers
- changes related to the number and names of dependents
- changes in family status
- individuals to be contacted in the event of an emergency

## 1.8 - Employee Requests for Access to Personnel Files

The Minnesota DFL maintains a personnel file for each employee. While each employee has the right to view and request a copy their own personnel file, personnel files are the property of the Minnesota DFL and access to the information they contain is restricted. Per the Minnesota DFL's Confidentiality Policy, only management personnel of the Minnesota DFL who have a legitimate reason to review information in a file are allowed to do so.

**Reviewing Your Personnel File:** Employees who wish to review their own file should submit a request in writing to the Chair of the Minnesota DFL or the Executive Director. Within seven working days of receipt of the written request, employees will be permitted to review their own personnel files at the DFL Headquarters office and in the presence of an individual appointed by the Minnesota DFL to maintain the files.

Requests to review personnel files more than once every six months may be denied at the discretion of the State Party Chair. During a review, documents cannot be removed from the personnel file by anyone other than the individual with delegated authority by the Minnesota DFL to maintain employee personnel records.

**Requesting a Copy of or Documents in your Personnel File:** If an employee would like a copy of any document in their own personnel file, they must submit a request in writing to the Minnesota DFL or the Executive Director.

## 1.9 - External Requests for Employee Information or Verification

The DFL may be required to share information with law enforcement concerning illegal prohibited conduct. The organization may also be required to furnish employee information to comply with or to satisfy other legal requirements, including, but not limited to, requests for information from courts and administrative agencies.

All inquiries or requests must be referred to the HR Representative or Comptroller.

## 2.0 - WORKPLACE RULES AND POLICIES

### 2.1 - Employee Conduct and Work Rules

To ensure orderly operations and provide the best possible work environment, the Minnesota DFL expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are a list of **examples** of infractions of rules of conduct that result in corrective action, up to and including termination of employment:

- Theft or inappropriate removal or possession of property
- Unprofessional conduct or conduct demonstrating dishonesty
- Working under the influence of alcohol or illegal drugs
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty or while operating employer-owned (leased) vehicles or equipment
- Fighting or threatening violence in the workplace
- Disruptive activity in the workplace
- Negligence or improper conduct leading to damage of employer-owned or constituent-owned property
- Insubordination or other disrespectful conduct
- Smoking in prohibited areas
- Harassment or discrimination against employees, visitors or constituents
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
- Excessive absenteeism or any absence without notice
- Unauthorized absence from workstation during the workday
- Unauthorized use of telephones, communication system, or other employer-owned assets
- Unauthorized disclosure of Party business or confidential information
- Violation of personnel policies
- Unsatisfactory performance or conduct

### 2.2 - Misconduct

Misconduct is defined as any intentional, negligent or indifferent conduct, on or off the job, that (1) shows a serious violation of the standards of behavior the DFL has the right to reasonably expect of the employee, or (2) shows a substantial lack of concern for the employment.

**Important:** Employment with the Minnesota DFL is at the mutual consent of the Minnesota DFL and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

### 2.3 - Personal Appearance and Dress Code Standards

The personal appearance of the staff at the Minnesota DFL is important in the image that we project to our members and partners. Employees are expected to dress in “business casual” Monday through Thursday and Fridays are designated as casual dress days. Jeans may be worn, but only on Fridays.

### 2.4 - Work Schedules

Work schedules for employees vary throughout our organization. The workday begins at 9:00 a.m. and ends at 5:00 p.m. Occasionally, employees will be asked to work evening or weekend hours to accomplish the work of the DFL. In every case, employees are expected to do what is necessary to meet deadlines and fulfill their objectives.

## 2.5 - Attendance

To maintain a safe and productive work environment, the Minnesota DFL expects employees to be reliable and punctual in reporting for scheduled work. Unscheduled absences and tardiness place a burden on other employees and interfere with the efficient support of our constituents.

In the rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their Supervisor as soon as possible in advance of the anticipated tardiness or absence.

### Types of absences:

**Scheduled Absence:** A pre-approved absence from work is considered a scheduled absence. Employees are expected to schedule planned absences as far in advance as possible.

**Protected Absence:** A protected absence is not subject to corrective action and is protected by a specific Minnesota DFL policy or federal and state laws such as the Family and Medical Leave Act (FMLA), Americans with Disabilities Act (ADA), or applicable paid sick time laws.

This includes but is not limited to:

- Time away for approved Family or Medical Leave
- Other paid time away, including bereavement, jury duty, or testifying in court
- Qualified military time away including training or active duty leave
- Other state or local protected time away

## 2.6 - Personal Relationships and Fraternization

Employees are expected to exercise good judgment in their relationships with each other. If a personal relationship creates a conflict, the appearance of a conflict of interest, favoritism, or is affecting your work, notify your Supervisor immediately.

Supervisors must also avoid any relationship or activity that may be perceived as affecting their ability to remain objective in supervising employees or providing work.

Employees (including Senior Leaders or Supervisors) must not take part in any hiring selection, evaluation, or payment decisions that involves a personal relationship.

If a personal relationship is creating an actual or potential conflict of interest, the Minnesota DFL will take the appropriate action to manage the conflict in alignment with the Minnesota DFL's Conflict of Interest, Outside Employment and Activities Policy.

For additional information about this policy, refer to the Conflicts of Interest, Outside Employment and Activities Policy in the Policy section of the Manual.

## 2.7 - Sexual Harassment Policy

The Minnesota DFL is committed to ensuring our workplace is free from sexual harassment and, all employees must cultivate a safe and respectful workplace.

Sexual harassment is defined under the Minnesota state law as any unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact, or other verbal or physical conduct or communication of a sexual nature, when:

- Submission to the conduct or communication is made a term or condition of obtaining employment.
- Submission to or rejection of the conduct or communication is used as a factor in decisions affecting an individual's employment.
- The conduct or communication substantially interferes with an individual's employment or creates an intimidating, hostile, or offensive employment environment, and the employer knows or should know of the existence of the harassment and failed to take timely and appropriate action (*MN Stat. Sec. 363A.03*).

Sexual harassment also may be in the form of nonsexual, offensive conduct that is directed at an employee because of their gender and is not limited to conduct motivated by sexual attraction. It may occur between members of the opposite sex, members of the same sex and can be physical and psychological in nature.

Our actions should always reflect our high standards. Therefore the Minnesota DFL's policy goes further than federal, state, or local law to define sexual harassment as:

- **Written sexual harassment:** Suggestive or obscene written communication (letters, emails, texts, messages, social media posts)
- **Verbal sexual harassment:** Comments, propositions and derogatory comments, slurs, jokes and comments about an individual's body or appearance including comments made on a recording device.
- **Physical sexual harassment.** Assault, stalking behaviors, any unwanted or inappropriate touching, body contact or any physical touching that makes you feel uncomfortable, encroaching on another's personal space (e.g., standing or sitting too close).
- **Visual sexual harassment.** Gestures, staring; inappropriate display of sexually explicit objects, pictures, cartoons, or posters (hard copy or electronic format)

### **Confidentiality and Anonymity**

The Minnesota DFL is committed to maintaining the anonymity (when requested and as permitted by law) and the confidentiality of the reporting party, throughout the report lifecycle and for as long as records are maintained. Information related to reports are shared only with those who have a legitimate need to know, law enforcement agencies when required by law, court order or other legal mandate.

If another employee tells you that your actions are making them uncomfortable, you have the responsibility to listen, understand how your behavior is affecting others, and immediately stop the behavior.

### **Reporting Sexual Harassment**

We value your safety and there are a variety of ways to tell us when something's wrong. All employees are required to come forward with reports immediately to ensure appropriate action can be taken to correct the problem promptly. This includes incidents experienced by DFL employees that occur at non-sponsored DFL events or locations.

The Minnesota DFL offers multiple channels to raise a confidential concern. Employees can choose to speak to (or, in writing) a direct Supervisor with whom they are comfortable with, DFL State Party Chair, or the Executive Director about a potential issue. Choose the reporting option you are most comfortable using. Whichever option you choose, your confidentiality will be protected:

- A Supervisor, DFL State Party Chair or the Executive Director
- Email: [reporting@dfi.org](mailto:reporting@dfi.org)

**Important:** If you are experiencing a life-threatening event or critical situation, or you or others are at serious risk of harm, please call 911 for assistance. If you have experienced violent behavior, please reach out to the law enforcement agency where the incident occurred or call 911 for assistance.

### **Supervisors**

Supervisors or those in a similarly situated role are the first line of defense against sexual harassment and have an even greater responsibility to ensure employees feel comfortable coming forward with questions and concerns about sexual harassment. If an employee reports a concern, Supervisors have a special responsibility to listen and act.

When informed of incidents of alleged sexual harassment, it is a mandatory requirement for Supervisors to immediately submit a report to initiate a prompt investigation in compliance with the DFL's Policy on Handling Reports.

Supervisors or those in a similarly situated role in the DFL, are prohibited from taking retaliatory actions against employees and must take proactive steps to mitigate risks and guard against retaliatory conduct by watching for signs of retaliation against an employee and promptly report any observed conduct that may potentially violate this policy.

Supervisors who permit or tolerate sexual harassment or retaliation, including the failure to immediately report such misconduct, are in violation of this policy and the DFL's Policy on Handling Reports and the Non-Retaliation Policy.

For additional information about policy, refer to the DFL's Sexual Harassment Policy in the Appendix section of the Employee Manual.

## **2.8 - Discrimination, Bias and Harassment Policy**

At the Minnesota DFL, we believe everyone is important, deserves respect and that we should treat one another with fairness and dignity. An environment that embraces everyone's differences is critical to our employees' ability to be their best and ultimately the success of the Minnesota DFL.

Discrimination, bias and harassment of any employee based on an individual's race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law is strictly prohibited.

In the judgement of the DFL, the prohibited conduct defined in this policy may take the form of written, verbal, physical, or visual harassment and may include but is not limited to epithets, slurs, derogatory comments, or jokes, intimidation, bullying, negative stereotyping, threats, or assault or written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of the characteristics identified above.

Harassment can be physical and psychological in nature. An aggregation of incidents can constitute as harassment even if one of the incidents considered on its own would not be harassing. The DFL's policy may be violated even if the person did not intend to give offense or believed that their conduct was welcome.

In addition to sexual harassment, discrimination, bias and harassment may also occur when unwelcome conduct:

- Unreasonably interferes with an individual's work performance.
- Creates an intimidating, hostile, or offensive work environment.

Discrimination, bias and harassment in any form is against the DFL's policy and will not be tolerated on DFL property, in organization vehicles, via communication systems, during DFL-sponsored events, or in connection with DFL business or activities.

### **Employees**

If an employee believes they have been discriminated against or harassed or are aware of the harassment (this is called "bystander intervention") of others that potentially violates this policy, they are required to report it as soon as possible to a direct Supervisor, the DFL State Party Chair, or the Executive Director. This includes incidents experienced by DFL employees at non-sponsored DFL events or locations.

### **Supervisors**

Any Supervisor or someone in a similarly situated role who receives a complaint about this kind of behavior is required to immediately report the matter to the DFL State Party Chair, Executive Director or HR representative.

Any violations of this policy that affects a job applicant or an active employee's tangible job benefits, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile or offensive working environment is also prohibited.

For additional information about this policy including reporting, refer to the DFL's Discrimination, Bias and Harassment Policy in the Appendix section.

## 2.9 - Conflicts of Interest

We act in the best interest of the Minnesota DFL. All employees must avoid activities or relationships that conflict with the Minnesota DFL's interests or adversely affect the reputation of our organization. When presented with a situation involving an actual or potential conflicts of interest, DFL employees should consider whether this may raise a reasonable question about the appearance of impropriety or, lead an outside observer to believe a conflict of interest exists. The appearance or perception of a conflict of interest could cause reputational harm to the Minnesota DFL.

The DFL defines a conflict of interest as an actual or potential action or inaction during the discharge of an employee's duties that might affect their judgment or, appears to interfere with their responsibility for objective and unbiased decision-making on behalf of the organization.

A personal conflict of interest is a situation in which an employee's personal finances, relationships, outside employment or activities may interfere with an employee's ability to perform their duties, obligations or to act in the best interest of the Minnesota DFL.

When considering a course of action, ask whether the action you're considering could create a possible conflict. If you have any doubts about what you should do, ask the following questions:

1. Would I feel ok if others knew about it?
2. Am I willing to be held accountable for this decision?
3. Is this consistent with our Minnesota DFL values?

If "Yes" is the answer to all of these questions, it's probably safe to move forward. A "No" or "Not Sure" should cause you to stop and reconsider. Remember, always ask your Supervisor or the Executive Director if you're not sure.

It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. The types of situations that may lead to conflicts of interest are:

- Working for unendorsed political campaigns or candidates using DFL resources.
- Performing outside work during DFL business hours using DFL resources or intellectual property.
- Accepting employment or compensation or engaging in any business or professional activity that might require disclosure of confidential DFL information.
- Using confidential information for non-DFL related work, personal financial gain or benefit.
- Accepting or soliciting a gift, favor, or other benefits that is intended to, or might appear to, influence an employee's decision-making, independent judgment or professional conduct.
- Taking part in an evaluation or making a decision for someone with whom you have a romantic, intimate or close personal relationship.
- Exerting undue influence on or favoring someone because of a romantic, intimate or close personal relationship in order to influence an outcome or gain from it.
- Recruiting, hiring or supervising someone (or having a role with significant influence) while involved in a romantic, intimate or close personal relationship.

Just because a relative, spouse/significant other, or close friend is employed at the Minnesota DFL does not mean there is a conflict of interest. Some conflicts of interest may also be in violation of the law. A conflict of interest can exist even if there are no improper acts as a result of it. The right thing to do in that situation is to disclose the potential conflict of interest to your Supervisor or the Executive Director to determine the appropriate action to appropriately manage the conflict of interest.

## **Disclosure of Conflicts of Interest**

A conflict of interest is not necessarily a problem in itself but could become a problem if measures are not promptly reported or managed. In some instances, disclosure may be enough. In other cases, it may be appropriate to obtain prior approval. Discuss the matter with your direct Supervisor, the DFL Executive Director or State Party Chair to determine the appropriate action to remove or appropriately manage the conflict of interest.

All employees must disclose actual or potential conflicts or any relationships that may create the appearance of a conflict of interest to their direct Supervisor or the Executive Director as soon as practicable so that safeguards can be established to protect all parties. Failure to make required disclosures or resolve conflicts of interest satisfactorily can result in corrective action up to and including termination.

Supervisors must avoid any relationship or activity that may be perceived as affecting their ability to remain objective in managing or providing work direction to employees. If a personal relationship creates a potential conflict of interest, the appearance of a conflict of interest, or favoritism, this must be immediately escalated to the Executive Director or the DFL State Party Chair. This includes being the hiring Manager or similarly situated person for a position for which your relative or close friend is being considered.

### **2.10 - Outside Employment**

The Minnesota DFL recognizes that some employees may have other employment outside the DFL. Employees are expected, however, to use good judgment so that outside employment does not pose any conflict of interest or appearance of conflict of interest with those of the Minnesota DFL. Outside employment should not detract from nor interfere with job performance at the Minnesota DFL. Employees may not receive any income or material gain from individuals outside the Minnesota DFL for materials produced or services rendered while performing their jobs.

If the Minnesota DFL determines that an employee's outside work interferes with job performance, the employee may be asked to terminate the outside employment if they wish to remain with the Minnesota DFL.

### **2.11 - Outside Activities**

All employees are encouraged to participate in outside activities however, personal interests or outside activities that conflict, or appear to conflict, with the interests of the Minnesota DFL must be avoided. Generally, this means not engaging in activities that compete with DFL time, when acting on behalf of the DFL, or allows the employee to personally gain financially.

### **2.12 - Non-Retaliation Policy**

The Minnesota DFL does not permit any retaliation against any employee who in good faith reports suspected unethical or illegal conduct.

Reporting "in good faith" means you are coming forward honestly with information that you sincerely believe or have reasonable cause to believe is true without motive or malice for personal benefit.

Retaliation means subjecting an employee to harmful conduct in response to an employee engaging in a protected activity, including but not limited to any conduct that has a material adverse effect on an employee's compensation, working conditions, or work environment.

Retaliation of any kind against an employee who makes a good faith report or participates in an investigation of a possible violation of the DFL's Code of Conduct, policies, or the law is inconsistent with our values and is not tolerated. This includes reporting sexual or other forms of harassment, discrimination, bias, workplace violence, health and safety issues or other inappropriate behavior.

All employees are required to come forward with complaints immediately to ensure appropriate action can be taken to correct the problem promptly. The DFL will not knowingly permit or allow retaliation against anyone who reports prohibited behavior, participates in an internal or external review, investigation or files an administrative charge or lawsuit alleging violations of any DFL policy.

## Supervisors

Supervisors or those in a similarly situated role have an even greater responsibility to create the kind of workplace where employees feel comfortable coming forward with questions and concerns. Supervisors are prohibited from taking retaliatory actions against employees and, must also guard against retaliatory conduct by proactively watching for signs of retaliation and reporting any observed conduct that may potentially violate this policy.

Taking any action against any employee who in good faith reports or provides information about an incident of alleged prohibited behavior is unacceptable and a possible violation of this policy.

## Reporting Retaliation

We want all employees to feel comfortable raising concerns without fear of retaliation. Regardless of who you contact, your concern will be handled appropriately.

If an employee believes they have been retaliated against for reporting improper conduct or behavior, report it as soon as possible. If an employee is uncomfortable for any reason in reporting retaliation to their direct Supervisor or someone in a similarly situated role, report your concern to the State Party Chair, the DFL's Executive Director or HR representative.

For additional information about this policy, including examples of retaliation, how to report and the protections offered, refer to the DFL's Non-Retaliation Policy and Policy on Handling Allegations in the Appendix section.

**Note:** Any questions regarding this policy and any of our policies should be directed to the Minnesota DFLS's State Party Chair or Executive Director.

## 2.13 - Working with an Illness or Disability

The Minnesota DFL is committed to maintaining a healthy and productive work environment and this includes complying with Minnesota state safety standards and taking necessary precautions to protect the safety and well-being of all employees.

We also recognize the valuable contributions that can be made by employees with disabilities and those who are subject to a life-threatening or terminal illness. Our organization is committed to providing any of these employees an opportunity to work, if they're medically able to work and can safely meet performance standards. At the same time, we are committed to protecting privacy by keeping personal medical information confidential.

If you are an employee with a disability, work with your Supervisor to communicate your needs to ensure your onboarding experience and transition into the DFL work environment is smooth as possible.

## 2.14 - Medical Work Accommodations

Under the Minnesota Human Rights Act, individuals with a disability are protected from discrimination in employment. Our commitment to our employees also means that the Minnesota DFL complies with the Americans with Disabilities Act that also broadly prohibits discrimination on the basis of disability and, requires reasonable accommodation of a qualified individual with a disability.

The Minnesota DFL collaborates with employees to explore reasonable work accommodations that will enable them to successfully perform their jobs within the position's expectations and enjoy equal benefits, without imposing an undue hardship to the organization.

Your Supervisor will work with you to ensure that you can perform your job within standards. All employees are expected to meet the performance standards of your regular job duties, with or without accommodations.

If you need to request a medically-related work accommodation, you should advise your Supervisor either verbally or in writing that you have a request. Employees are not required to, nor should they feel obligated to, share or disclose any private health information to Supervisors, subordinates, or peers. If you prefer to discuss your request with someone other than your Supervisor, you can contact the Executive Director directly.

Supervisors, including hiring personnel, who receive requests for work accommodations from employees or job seekers, should contact the Minnesota DFL Executive Director or State Party Chair to discuss the request.

If the Minnesota DFL believes a reasonable accommodation cannot be identified or there is undue hardship to the organization, the outcome will be discussed with the employee before declining the request.

For information related to disability protections under MN state law, the reasonableness of an accommodation or undue hardship, consult with your direct Supervisor or Human Resources representative. Further information can also be obtained by contacting the MN Department of Human Rights at 651.539.1100 or toll free at 1.800.657.3704, or online at [mn.gov/mdhr](http://mn.gov/mdhr).

## **2.15 - Accommodations for Nursing Mothers**

To request a private, lockable facility other than a bathroom as a nursing mother, consult with your direct Supervisor to discuss arrangements to accommodate your request.

## **2.16 - Workplace Policy on Drugs and Alcohol**

The Minnesota DFL adheres to and complies with the requirements of the MN Drug-Free Workplace Act. This ensures that we protect the safety, health and well-being of our employees and others in the workplace, and they are able to perform their jobs efficiently, safely and in a professional manner.

Consistent with the Drug-Free Workplace Act, the Minnesota DFL has absolutely no tolerance for the use of, solicitation, distribution, dispensation, sale, transfer, possession of illegal drugs or controlled substances in the workplace or while performing work on behalf of the Minnesota DFL. Also prohibited is the misuse of or unauthorized use of legal prescription and over-the-counter drugs, or the use of those drugs in a manner or dosage that is not prescribed. Any illegal or controlled substance found on DFL premises may be turned over to law enforcement for investigation.

Employees are also prohibited from working or reporting to work when impaired by, or under the influence of alcohol or drugs. The consumption or possession of alcohol during prior to or during working hours, on the property of the Minnesota DFL is also strictly prohibited. Any employee who is unfit to work because of alcohol or drug use may be sent home.

**Important:** Exceptions to this policy are allowed only with the explicit approval by the State Party Chair. Consumption of alcohol to the point of intoxication or where the employee endangers their own safety or the safety of others is expressly prohibited, under any circumstances.

The standards outlined in this policy applies to all Minnesota DFL employees, contractors, temporary workers, interns, visitors, guests, vendors, customers, clients or any other person on the premises of the Minnesota DFL.

Violations of this policy will result in corrective action, up to and including immediate termination of employment and/or required participation in a substance abuse rehabilitation or treatment program. These policy violations may also have legal consequences.

For additional information on how to report concerns confidentially, or protections in place against retaliation, refer to the Minnesota DFL's Non-Retaliation Policy in the policy appendix section of this Manual.

## 2.17 - Smoke Free Environment

Minnesota's Clean Air Act prohibits smoking in all places of employment and the ban also includes vehicles used in part or whole for work purposes, during the hours of operation if more than one person is present. In complying with this law, the Minnesota DFL provides a safe and healthy work environment, employees are not permitted to use tobacco products, including smokeless tobacco or electronic smoking devices within 15 feet of the building. Smoking or vaping is allowed only in designated outdoor areas. This policy applies to all employees and visitors.

## 2.18 - Information Security

It is mandatory that all Minnesota DFL employees follow the requirements documented that helps to secure internal, confidential and restricted DFL information. These requirements are:

- Protect Minnesota DFL information
- Use DFL assets only for DFL-business purposes
- Use DFL communication systems in an appropriate and safe manner

Failure to act in ways that protects DFL information, assets, and communication systems or failure to cooperate with inquiries or investigations may result in corrective action, including termination of your employment.

The following are examples of prohibited activities:

- Hacking, including any attempt to gain unauthorized access to computing resources.
- Posting or storing proprietary content in unapproved or personal websites, blogs, chat rooms, mobile applications, or other social media websites.
- Downloading or sharing content that may contain viruses or malware.
- Viewing, storing, downloading, or sharing images or other content perceived as offensive, racist, or harassing.

## 2.19 - Reporting Information Security Incidents

Every employee is required to immediately report anything that may violate the Minnesota DFL's Information Security Policy or place the organization's information, assets, and communication systems at risk. Employees must notify their Supervisor or the Executive Director if they detect any unauthorized use or attempted misuse of personal authenticators, terminal sessions, or equipment. If any mobile computing device is lost, stolen, or confiscated including a personal device used for DFL business, report this immediately.

## 2.20 - Leaders and Supervisors

In addition to the employee responsibilities, DFL leaders and Supervisors are also expected to:

- Understand the information security threats to the organization and manage the associated risks properly.
- Support employees in complying with information security requirements to appropriately protect DFL information, assets, and communication systems.
- Ensure that employees complete all required Information Security protocols

## 3.0 - TECHNOLOGY

### 3.1 - Computer and Email Usage

The Minnesota DFL has established the following policy with regard to the use of computers, email, internet, and telecommunications resources and services. All computer users must use the computer resources in an efficient, effective, ethical and lawful manner, in furtherance of the Minnesota DFL's interests and consistent with the Minnesota DFL's policies.

The following policies, rules and conditions apply to all Minnesota DFL users of computer, telecommunication resources and services, wherever they are located. Violations of these policies may result in corrective action, up to and including termination of employment, and responsibility for resulting costs, expenses, damages and/or civil or criminal legal proceedings.

The Minnesota DFL intends to honor the policies set forth below but reserves the right to change them at any time as may be determined under the circumstances.

### 3.2 - Computers and Passwords

1. All computer systems and associated applications and data they contain – including PCs, laptops, tablets and associated peripherals such as monitors/LCDs and printers – are the property of the Minnesota DFL and are given to employees to assist them in the performance of their jobs.
2. The Minnesota DFL has the right to monitor or access the data on any computer system at any time for any reason and use it for any purpose. As such, users should not have any expectation of privacy in anything created on Minnesota DFL equipment or accounts, including email, and should expect such equipment, accounts or email to be subject to search to ensure compliance with this policy.
3. All employees agree to be security aware at all times to prevent the loss, theft or compromise of computers and/or data. Any employee that discovers computer equipment missing or stolen, or suspects that sensitive information may have been compromised, should notify their Supervisor immediately.
4. Allowing unauthorized access to any Minnesota DFL computer system by anyone other than a Minnesota DFL employee or authorized contractor is prohibited. This includes family members or guests of home-based users that have a Minnesota DFL computer set up for them for the purpose of working from home.
5. Passwords are to be kept confidential and should not be disclosed to anyone other than Information Technology Support for troubleshooting purposes, in which case the user should change their password upon problem resolution.

### 3.3 - Software and Applications

1. Downloading or installing any non-approved, non-company software of any kind on any Minnesota DFL computer is strictly prohibited. To install any program or new software, a request for authorization and prior approval must be obtained from the Executive Director.
2. Tampering with or disabling the settings for anti-virus/anti-spyware software, except under the direction of IT Support is prohibited.
3. All software installed on any Minnesota DFL computer must comply with any licensing agreements when required by the respective software manufacturer. In many cases, installing a licensed software application on more than one computer is illegal, unless specified otherwise in the manufacturer's licensing agreement.

### 3.4 – Email

1. The Minnesota DFL maintains an electronic mail system that allows end-users to send and receive email within the Minnesota DFL, and also to send and receive email to entities outside the Minnesota DFL via the internet. This system is provided by the Minnesota DFL to assist in the conduct of business within the Minnesota DFL and is to be used in a professional, ethical and lawful manner.

2. The email software and hardware are property of the Minnesota DFL. All messages and any attachments sent or received on or through the Minnesota DFL electronic mail system are and remain the property of the Minnesota DFL. They are not the private property of any employee.
3. The Minnesota DFL reserves and intends to exercise the right to review, audit, intercept, access and disclose for any purpose, any email message with associated attachments received or sent over the electronic mail system.
4. The use of the email system is reserved solely for the conduct of business at the Minnesota DFL and may not be used to solicit or proselytize for personal commercial ventures, solicit any non-company business, further religious causes, for personal gain or profit, for commercial or personal advertisements, solicitations, or promotions.
5. Use of the email system for personal emails that are not work related should be done in such a way that does not interfere with an employee's productivity, and so long as it does not violate any of the other policies contained in this document.
6. The electronic email system is not to be used to create or forward any content whatsoever that is offensive or disruptive. Among those that are considered offensive are those that contain sexual implications, racial slurs, gender-specific comments, or that offensively addresses someone's age, physical attributes, sexual orientation, religious or political beliefs, national origin or disability.
7. Emails that contain fraudulent, abusive, intimidating, harassing, embarrassing, indecent, profane or obscene language or content are prohibited.
8. The electronic mail system shall not be used to send or receive any copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization from either the copyright holder or author of the information, as appropriate.
9. Notwithstanding the Minnesota DFL's right to retrieve, read and disclose any electronic mail messages and associated attachments, such messages should be treated as confidential by other employees and accessed only by the intended recipient. Employees will not attempt to access, read, tamper with, delete, or respond to any email that was not intended specifically for them, nor shall any employee send any email message from any other user's email account or under the name of another user, unless authorized to do so by that user.
10. The confidentiality of any message should not be assumed. An employee's email is private only in the sense that other employees are not authorized to retrieve or read email that is not specifically intended for them.

### **3.5 - Internet Usage**

The Minnesota DFL provides access to the internet for the benefit of the organization and its members. It allows employees to connect to information resources throughout the world.

1. Every employee has a responsibility to maintain and enhance the Minnesota DFL's public image and to use the internet in a productive, professional, ethical, and lawful manner.
2. The use of the internet is reserved solely for the conduct of business at the Minnesota DFL and may not be used to solicit or proselytize for personal commercial ventures, solicit any non-DFL business, further religious causes, for personal gain or profit, for commercial or personal advertisements, solicitations, or promotions.
3. Concerning prompts for web updates to currently installed, approved software, users may usually approve these updates and allow them to install. If there are questions, the user should contact technical support.
4. The Minnesota DFL's internet may not be used at any time for online games or gambling, online auctions and/or bidding, or any other similar activities unless authorized by the State Party Chair.
5. Casual use of the internet for personal reasons or enjoyment shall be done only during breaks, lunch hours, or unpaid time, so long as such use does not violate any of the established internet use policies in this document. In no case shall personal use of the internet interfere with an employee's productivity.

6. Each employee is responsible for the content of all information they place on or send over the internet. All messages communicated over the internet should have your real name attached, not an assumed name.
7. Fraudulent, abusive, intimidating, harassing, embarrassing, indecent, profane, or obscene communications via the internet are prohibited. Among those that are considered offensive are those that contain sexual implications, racial slurs, gender-specific comments, or that offensively addresses someone's age, physical attributes, sexual orientation, religious beliefs, national origin or disability.
8. Under no circumstances shall any employee access any web site that contains pornographic materials or content of any kind in any format.
9. The internet shall not be used to send or receive any copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization from the copyright holder or author, as appropriate.
10. The Minnesota DFL reserves and intends to exercise the right to review, audit, intercept, access and disclose for any reason, any and all information accessed by, or downloaded from the internet by any employee.

## **4.0 - DFL INTELLECTUAL PROPERTY and INVENTIONS**

Any products, inventions, processes or procedures that are developed by employees are the sole property of the Minnesota DFL; this includes, but is not limited to, computer software, databases and mailing lists. Employees will be required to assign all rights to such items to the Minnesota DFL.

Employees may be required to sign a detailed written agreement in compliance with this policy. The policy does not apply to any invention for which no DFL equipment, supplies, facility or trade secret information was used and which was developed entirely on the employee's own time and which does not relate to the business of the Minnesota DFL or the DFL's actual or demonstrably anticipated research or development, or which does not result from work performed for the Minnesota DFL.

As a condition of employment, employees should recognize that a violation of this policy could cause irreparable harm to the Minnesota DFL and that the Minnesota DFL could seek an injunction or other applicable legal relief in the case of a violation of this policy.

### **4.1 - Use of Minnesota DFL Equipment and Supplies**

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using equipment provided by the Minnesota DFL, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

We ask all employees to take care of equipment and property and to report any problems to the Supervisor immediately. If you have not used a piece of equipment before, please ask your Supervisor for instructions including any codes that are needed to operate a specific piece of equipment.

The Minnesota DFL prohibits the use of DFL equipment and supplies for personal use unless authorized by a Supervisor. The improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in corrective action, up to and including termination of employment.

The use of Minnesota DFL paid postage for personal correspondence is not permitted.

### **4.2 - Telephone Usage**

Employees are asked to limit personal phone calls and the use of cell phones for personal business. We understand that there are times when no other choice is available. Please use a conference room or other private space when making cell phone calls so as not to disturb other employees.

- To ensure effective telephone communications, employees should speak in a courteous and professional manner.
- Confirm information received from the caller and hang up only after the caller has done so.
- Whenever possible employees of the Minnesota DFL are expected to return calls in a timely manner (within 24 hours.)
- It is recommended that employees change their voicemail message if they are going to be away from the office, including the date of return and referring callers to someone else on the staff.

### **4.3 - Social Media**

The Minnesota DFL encourages your online engagement. On social media, the power of words and their impact can either lift us up or diminish what we can achieve together. What we say and how we say it matters. Don't post anything that's discriminatory, defamatory or would constitute a threat, intimidation, harassment or bullying. Using social media to intentionally intimidate, defame, embarrass, or cause harm to another person when you are an employee or representative of the DFL may be a violation of the DFL's policies.

As social media becomes an increasingly present part of our daily lives, professional and personal boundaries can be hard to maintain. When used appropriately, social media can be a powerful tool to increase organizing, awareness, and foster a sense of community for those of us engaged in promoting, supporting and advocating DFL candidates, issues, and values. We want you to feel comfortable when representing the DFL online while maintaining your individuality.

Your right to freedom of expression and your private life is very much your own and is respected however, consider the following when using social media:

- When you speak out on public issues or in a public forum as an individual (not as an employee or representative of the DFL or in a similarly situated role), clearly state when any opinions you express are your own and do not reflect those of the Minnesota DFL.
- When interacting on social media as an employee or representative of the DFL, use good judgment and treat all communication the same as you would in a professional environment.
- When posting on social media using a DFL-affiliated account or in the execution of any DFL-related activities, you are expected to do so with courtesy, respect, and professionalism.

**Important:** Any violation of the DFL's Social Media Policy is subject to corrective action up to and including termination, as outlined in Section 7.3 of the Employee Manual.

This policy is a living document that will continue to evolve as technology evolves. The Minnesota DFL expressly reserves the right to determine, within its sole discretion, which level of corrective action is appropriate in each individual situation.

## 5.0 - WORKPLACE HEALTH AND SAFETY

### 5.1 - Building Security

The safety and security of all employees, visitors, the Minnesota DFL's physical space and assets is the shared responsibility of everyone who works at the DFL. All employees are asked to ensure the following:

- Enter and exit the building using the main entry door.
- When possible, check in and out with DFL personnel in the main reception area during office hours.
- Employees or visitors are not allowed to enter the building using secondary or emergency access doors, unless authorized to do so.
- The main entrance to the Minnesota DFL will always remain locked and is monitored by video.
- Doors leading to the secure areas of the building should not be left unbolted, unlocked, or propped open. This also applies to emergency exit doors.
- Do not allow anyone you are unfamiliar with to access the building through any security doors without first checking their identity or purpose.

### 5.2 - Emergency Preparedness

All employees should be prepared to follow the Minnesota DFL's emergency plans when needed. Ask your Supervisor if you have any questions about your responsibilities to know what to do when an emergency occurs.

Do **not** wait for someone else to tell you what you need to know. You are expected to understand what to do in an emergency within the building, including:

- Where the fire or evacuation alarms are and how to use them.
- The sounds and signaling methods of fire and evacuation alarms.
- The pathway to alternative exits from every room or area in the building.
- Whom to contact in an emergency and how to contact that person.
- Where to gather outside the building to ensure that everyone is safe.
- Act immediately. Do **not** hesitate by looking around to see what others are doing when an alarm sounds or there are signs of danger.

Communicate to your Supervisor any need you have for during an emergency (for example, use of a wheelchair).

### 5.3 - Office Closings During Emergencies

At any time, emergencies such as severe weather, fires, or power failures may disrupt operations and require closing the DFL office until conditions are safe for employees to return to work in the building. In the event of such an emergency, Supervisors will make every effort to contact employees. If an employee is in doubt about coming to work, they should try to contact their Supervisor about conditions at the office.

### 5.4 - Workplace Violence and Prevention

The Minnesota DFL has a zero-tolerance policy for any type of workplace violence committed by or against employees. Under no circumstances will the Minnesota DFL tolerate physical violence or threatening behavior in the workplace, at DFL work-related events, when traveling on DFL-related business or at another location. Threatening behavior through personal communication (electronic or in-person) is also prohibited. Any such misconduct is subject to corrective action up to and including termination of employment.

### 5.5 - Firearms and Weapons

Possessing firearms and weapons on DFL premises is dangerous and is strictly prohibited. Employees are not permitted to carry, either openly or in a concealed manner, any weapon, such as a knife or firearm, during work hours or while acting in any capacity for the Minnesota DFL. This DFL policy applies to all employees and visitors even though a person may carry a pistol in a public place if they are in possession of a "permit to carry" (MN Statute 624.417).

## 5.6 - Active Shooter Events

The Minnesota DFL wants all employees to be safe at work. If a dangerous or violent event should ever occur, the Minnesota DFL will have a clear plan for what employees should do as well as help employees be aware of, and able to recognize the signs of potential violent situations.

- Be aware of and know the Minnesota DFL's Emergency Safety Plan
- If you see something, say something right away (if possible)
- Be aware of your environment and any possible dangers
- Know where to go, where the emergency exits are located

If a Supervisor can be safely notified of the need for assistance without endangering the personal safety of the employee or others, such notice should be given.

Supervisors must ensure that individuals with a disability understand the DFL's Safety Plan for access and functional needs during an emergency.

## 5.8 - Personal Situations

Employees must notify their direct Supervisor or the Executive Director immediately if they are in or know of any of the following situations:

- Are receiving threatening or harassing telephone calls, emails, voicemails, or other messages at work.
- Are a target of unwanted pursuit by someone who has been seen at or near the workplace.
- Incidents of violence, or threats where there's a possibility that the other party will seek out the employee at work or where the other party is another employee.
- An employee has obtained a restraining order, making their workplace a restricted area.

**Resource:** If you're experiencing domestic or family problems and need assistance, call the National Domestic Violence Hotline at 1-800-799-SAFE. (This is not a DFL-sponsored service.)

## 5.9 - Reporting Health Hazards or Safety Issues

All employees are expected to work safely and to report safety and health hazards to their Supervisor immediately. Supervisors or those in a similarly situated role are responsible for following up on reported safety and health hazards and implementing appropriate safety practices.

All employees are expected to report any work-related accident, injury, safety or health issues to their Supervisor without fear of retaliation. Your Supervisor will share with you any important health and safety information needed to perform your job.

## **6.0 - COMPENSATION**

### **6.1 - Pay Periods**

All employees are paid bi-weekly on every other Friday.

### **6.2 - Required Deductions**

The law requires that the Minnesota DFL make certain deductions from every employee's compensation. Among these are applicable federal, state and local income taxes and wage levies. The Minnesota DFL must also deduct Social Security and Medicare taxes on each employee's earnings up to a specified limit.

The Minnesota DFL restricts unauthorized deductions from your pay. For authorizations stipulated by a court order (garnishment notice), the DFL is legally required to begin withholding according to the terms of the order to deduct the appropriate amounts from the employee's wages per pay period.

### **6.3 - Voluntary Deductions**

The Minnesota DFL also allows eligible employees to voluntarily authorize deductions from their paychecks to cover the costs of participation in programs and benefits offered at the Minnesota DFL.

### **6.4 - Overpayments, Pay Discrepancies and Questions about Your Pay**

In the unlikely event that there is an error in the amount of pay, you should promptly bring the discrepancy to the attention of your Supervisor who will take it immediately to the Comptroller. You are responsible for notifying your Supervisor of any overpayment. Failure to report discrepancies or to make appropriate repayment arrangements is a violation of DFL policies and may result in corrective action or termination of employment and you will not be eligible for rehire until the amount is repaid in full.

If you have questions concerning why deductions were made from your paycheck or how they were calculated, you should request assistance from your Supervisor.

### **6.5 - Mileage Reimbursement**

The Minnesota DFL expects employees to pay for their own transportation to and from the workplace. Mileage will be reimbursed for employees only for authorized trips which are over 50 miles. Employees may be asked to perform tasks which require them to drive under 50 miles to complete the task, in those instances there will be no mileage reimbursement. Misuse or inappropriate mileage reimbursement may result in corrective action up to and including termination.

## 7.0 - PERFORMANCE MANAGEMENT

### 7.1 - Employee Performance Reviews

Performance recognition and feedback meetings between Supervisor and employee are conducted to provide both Supervisors and employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches to meeting goals that have been set.

Supervisors and employees are strongly encouraged to discuss job performance and goals on an on-going basis in addition to the Annual Review Process.

The Minnesota DFL Party requires that participation of all Full-Time staff in the annual Performance Review process. Employee compensation is reviewed annually and is tied to the performance review. Failure to participate in the annual review process could lead to corrective action, up to and including termination.

### 7.2 - Disputing A Performance Review

If an employee disputes any information related to their performance contained in their personnel file, the employee should first submit a request in writing to the Comptroller or Human Resource representative to revise or remove the disputed information.

If the employee and the Minnesota DFL cannot reach an agreement on revision or removal, the employee may submit a written position statement, not exceeding five pages. This will be included with the disputed information in the employee's personnel record.

### 7.3 - Corrective Action

To maintain an orderly, respectful and efficient workplace, the Minnesota DFL may take appropriate corrective action to address workplace or performance issues.

Corrective action will be determined and administered on a case-by-case basis however, it does not require that the corrective action be administered or follow each progressive step. There may be situations where certain misconduct or violations of the policies of the Minnesota DFL may result in corrective action without any prior verbal or written warning.

**Note:** The Minnesota DFL expressly reserves the right to determine, at its sole discretion, which level of corrective action is appropriate in each individual situation. The progressive discipline policy is a guideline only. The Minnesota DFL reserves the right to omit any of the below steps when terminating an employee.

<b>Progressive Corrective Action</b>	
<b>Step 1: Verbal Warning</b>	<p>When it has been determined that an employee's behavior requires corrective action, the Supervisor and the employee will participate in a formal conversation that clearly identifies the problem. The employee and Supervisor will determine a solution.</p> <p>This conversation should be documented, dated, signed and place in the confidential employee file.</p>
<b>Step 2: Written Warning</b>	<p>If the desired change does not occur as a result of step one, the Supervisor and employee will again participate in a discussion which clearly describes the problem and create an action plan which defines the responsibilities of employee and Supervisor.</p> <p>The warning will outline the behaviors that need to change, the Supervisor's efforts to support the change and a timeframe within which the behavior change must become effective. This action plan should be documented, dated, signed and placed in the confidential employee file.</p>
<b>Step 3: Suspension or Demotion</b>	<p>If the desired change in performance is not accomplished through the written warning, and depending on the nature of the performance issue, the employee may be suspended (with or without pay) or demoted to a different position.</p> <p>Suspension or demotion may not be appropriate in many cases where the desired change has not been affected through warnings to the employee.</p>
<b>Step 4: Termination</b>	<p>Depending upon the nature of the performance issue or conduct, or if other avenues of corrective action have failed to accomplish the desired changes in performance or behavior, employment may be terminated. Nothing in this policy alters the "employment at will" status of all employees.</p>

## 8.0 - EMPLOYEE HEALTH: BENEFITS PROGRAM

### 8.1 - Medical and Dental Benefits Program

Medical coverage helps protect you and your eligible dependents against the catastrophic costs of major illness or injury. It also helps you manage the routine healthcare expenses that we all incur from year to year. The plan provided by the Minnesota DFL is designed to provide broad coverage for both routine and more serious expenses. All eligible employees have coverage effective on the thirtieth day of employment with the Minnesota DFL.

The details of the medical benefit program are outlined in separate summary plan descriptions. Copies of the medical benefit plan description will be sent to you directly by the medical benefit plan provider. If you have not received a copy, or have lost or misplaced a copy previously provided, call the insurance provider to obtain new ones.

All employees may also receive Social Security, workers' compensation and unemployment compensation benefits in accordance with applicable laws.

Dental coverage provided by the Minnesota DFL covers basic care that includes office visits and dental cleaning. A detailed description of coverage is available in the plan description booklet provided to you online.

### 8.2 - Life Insurance

Life insurance is provided to assist your family members financially in the event of your death. The Minnesota DFL provides life insurance protection at no cost to eligible employees.

### 8.3 - SIMPLE Retirement Plan

The DFL SIMPLE Retirement Plan provides eligible employees with an opportunity to save for retirement on a tax-advantaged basis. If employees decide to contribute pre-tax earnings, the Minnesota DFL matches contributions to your SIMPLE account up to 3% of earnings. Employees are eligible to participate in the SIMPLE Retirement Plan after one year of employment.

Questions regarding participation in the Retirement Plan should be directed to the Comptroller.

### 8.4 - COBRA

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) and state insurance continuation law gives employees and their qualified beneficiaries the opportunity to continue health and life insurance coverage under the Minnesota DFL's health plan when a "qualifying event" would normally result in the loss of eligibility.

There are seven qualifying events that are classified as COBRA triggering events. These are as follows:

1. termination of a covered employee's termination (other than for gross misconduct)
2. a reduction of covered employee's hours of work causing a loss of coverage
3. the covered employee's death
4. a divorce or legal separation from the covered employee
5. a dependent child of the covered employee ceases to be a dependent under the terms of the plan
6. the covered employee becomes entitled to Medicare
7. an employer bankruptcy (retiree plans only)

Under COBRA, the employee or beneficiary pays the full cost of coverage at the group rate of the Minnesota DFL plus an administration fee. The Minnesota DFL provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under the Minnesota DFL's health insurance plan.

## 9.0 - TIME AWAY

### 9.1 - Holiday, Vacation and Leave Programs

Minnesota DFL Time Away programs provides a variety of options to accommodate employee needs and life events including time off for vacation, illness, caring for a family member, the birth or adoption of a child, the loss of a family member, jury duty and more.

Employees are expected to use one of the Time Away programs to account for any time away from work during their regularly scheduled work hours unless otherwise provided by state or local law.

### 9.2 - Paid Vacation

Full-time and part-time employees of the Minnesota DFL are eligible for paid vacation. Full-time and part-time employees of the Minnesota DFL are eligible for paid vacation days that will be negotiated at your time of hire.

- Employees are eligible to take vacation time after six months of employment unless approved by the Executive Director or State Party Chair.
- Vacation time must be scheduled and approved in advance by the Executive Director or DFL State Party Chair.

To administer the vacation program fairly, the following guidelines have been established:

- An observed DFL holiday which falls on a normal business day during your vacation is not counted as a vacation day.
- If you are hospitalized during your vacation or have an excuse from a healthcare professional, those days may be charged to sick leave, if available.
- Requests for additional vacation time, without pay, will be considered by the Executive Director/State Party Chair.

### 9.3 - Personal Holidays

Personal holidays are intended to be used for observance of religious holidays recognized or practiced by employees who are not included in the DFL's observed holiday schedule but have personal significance to employees based on recognized religious, cultural, community, or diversity observances.

- Personal holidays are separate and distinct from paid time off and do not accrue.
- Unused personal holidays cannot be carried over into the next year and are not paid out as a part of a lump-sum payout during a leave or at termination of employment.
- All personal holidays must be taken in the year they are granted.
- Employees who wish to use a personal holiday must provide advance notice and obtain their Supervisor's approval, which is subject to DFL business needs.

### 9.4 - Schedule of Common Holidays Observed by the Minnesota DFL

The Minnesota DFL provides up to 10 observed paid holidays per year for eligible employees. The holiday schedule is as follows:

New Year's Day	Veteran's Day
Martin Luther King Jr. Day	Thanksgiving Week
Memorial Day	Christmas Eve Day
Independence Day	Christmas Day
Labor Day	New Year's Eve Day

**Note:** When holidays fall on a Saturday or Sunday, they are "observed" on the following weekday.

## 9.5 - Leaves of Absence

The Minnesota DFL offers several leave of absence options to eligible employees who may need to take extended time away (paid or unpaid) from work to care for planned and unplanned life events.

Leave Types	Description
Administrative Leave	Time away initiated by the Minnesota DFL.
Sick Leave	Time away, on a continuous or intermittent basis, to attend to or care for a covered family member's or your own medical condition.
Military Leave	Time away for an employee's own enlistment, call to military active duty, or active duty training.
Military Exigency Leave	Time away to attend to matters when a qualifying family member is called to active duty military service.
Leave for Military Families	Time away for a covered service member who was injured or killed while engaged in active service.
Bereavement	Time away due to the death of a covered family member.
Parental Leave	Time away on a continuous basis for the birth of or adoption of a child.
Personal Leave	Time away for personal reasons that are not covered under another type of leave of absence.
School Conference or Activity Leave	Time away to attend school conferences or classroom activities for their minor children.
Jury Duty	Time away to fulfill an obligation or serve as a member of a jury in a legal proceeding.
Elections	Time away for employees to vote in any general, statewide or special election.

## 9.6 - Requesting a Leave of Absence

Employees may request a leave of absence, without pay, in consultation with the Executive Director/State Party Chair. During a leave of absence, employees will not be eligible for any of the benefits of an employee, although employees may remain on the health care policy at their own expense.

An employee should prepare a request for leave **in writing**, stating the reason for the leave, the length of the leave and specific start and end dates for the leave of absence. Documentation of the reason for the leave may be requested by the Executive Director/State Party Chair.

If an extension of the approved leave is needed, the request for an extension should be submitted to the Executive Director/State Party Chair in the same manner. If, at the end of a leave of absence, the employee does not return to work, their employment will be terminated as of the last day of the approved leave.

## 9.7 - Sick Leave

The following guidelines are provided to ensure Sick Leave is used appropriately:

- If you are ill and need to take a sick day, you must contact the Executive Director and your supervisor before 9:00 a.m.

- If you are leaving the office early because of illness, please inform the Executive Director and your supervisor.
- If you are pre-scheduled for a doctor's appointment or medical procedure during regular business hours, please inform the Executive Director and your supervisor.
- If you are absent because of an extended illness or disability, you may be required to provide verification from a physician.
- Disabilities related to pregnancy or birth of a child will be treated as all other disabilities for purposes of the DFL's sick leave and disability policies.
- Employees may use sick leave to care for a sick or injured spouse, domestic partner, child or parent.

### **9.8 - Parental Leave**

The Minnesota DFL provides eligible full-time employees a maximum of 8 weeks paid leave and any additional time off will be unpaid for the birth or adoption of a child. Part-time employees will receive a maximum of 12 weeks unpaid leave for the birth or adoption of a child.

Parental leave must begin within six weeks of the birth or adoption. If a newborn child remains in the hospital longer than the mother, leave may begin within six weeks of the time that the child leaves the hospital. Employees should make every effort to notify their Supervisor about the start date and the anticipated return date of parental leave.

Upon return from parental leave, every effort will be made to return employees to the responsibilities they had prior to the leave however, employees are not guaranteed a return to the same position held prior to the leave.

Medical and life insurance benefits will continue for employees while on parenting leave.

Parental leave is unpaid for part time employees; however, employees may substitute paid vacation for any part of parenting leave.

### **9.9 - School Conference/Activity Leave**

Employees of the Minnesota DFL are provided personal leave time per year to attend school conferences or classroom activities for their minor children.

Employees are asked to schedule school conferences and activities during non-work hours if at all possible. If events must be scheduled during work time, employees should notify their Supervisors at their earliest convenience.

School leave is paid time for exempt employees. School leave is unpaid for non-exempt employees however accrued paid vacation time may be used.

### **9.10 - Military Leave**

Employees will be granted military leave to the extent required by law. If an employee is in the military reserve or National Guard and is required to spend time on active duty, the Minnesota DFL will pay the difference between military pay and the employee's DFL salary for a period of up to 10 days per calendar year. Longer military leaves will be negotiated with the State Party Chair.

### **9.11 - Leave for Military Families**

The Family and Medical Leave Act of 1993 is a United States labor law requiring covered employers to provide employees with job-protected and unpaid leave for qualified medical and family reasons. As part of FMLA Leave, eligible employees are entitled to up to 12 weeks of leave because of any qualifying exigency arising out of the fact that a spouse, son, daughter, or parent of the employee is on active duty, or has been notified of an impending call to active duty status, in support of a contingency operation.

A qualifying exigency might include:

- Short-notice deployment
- Military events and related activities
- Childcare and school activities
- Financial and legal arrangements
- Counseling
- Rest and recuperation
- Post-deployment activities
- Additional activities when the employer and employee agree to the leave

In addition to other types of FMLA Leave, an employee who is the spouse, son, daughter, parent or next of kin of a covered service member who is recovering from a serious illness or injury sustained in the line of duty on active duty is entitled to up to 26 weeks of unpaid leave in a single 12 month period to care for the service member. This type of leave may not exceed 26 weeks when combined with other types of FMLA Leave in any single 12-month period.

### **9.12 - Military Family Leave under Minnesota Law**

Under Minnesota law, employees may take up to the (10) days leave of absence without pay when the employee's parent, child, grandparents, siblings, or spouse is injured or killed while engaged in active service as a member of the United States Armed Forces. The employee must provide notice prior to taking leave. This leave will be included in calculating the military family leave offered pursuant to the FMLA, if applicable.

In addition, an employee may take up to one (1) day leave of absence without pay when the employee's grandparent, parent, legal guardian, sibling, child, grandchild, spouse, fiancé, or fiancée has been ordered into active service in support of a war or other national emergency for the purposes of attending a send-off or homecoming ceremony. The employee must provide notice prior to taking. Leave. This leave will be included in calculating the military family leave offered pursuant to the FMLA, if applicable.

### **9.13 - Jury Duty**

If employees are contacted to serve jury duty, the Minnesota DFL will pay the difference between the amount paid for jury duty (excluding travel compensation) and the employee's regular DFL salary. In order to be compensated, employees must present copies of vouchers indicating the amount of jury duty compensation received. Regular employee benefits will be continued during the period of jury duty. Employees are expected to report to work on any regular work day when services as a juror are not required.

### **9.14 - Bereavement Leave**

Employees classified as exempt are eligible to request time away with pay for bereavement. If a family member passes away, contact your Supervisor to request bereavement time off. Your Supervisor may approve one maximum time away not exceeding three days per occasion.

The Minnesota DFL recognizes that family structures can be unique and diverse. If you have a loss that falls outside of the family member designation, consult with your Supervisor who is encouraged to support team members during this time in their lives. Bereavement leave will be granted for the death of an immediate family member (spouse, domestic partner, mother, father, child, grandchild, grandparent, sister, brother, mother-in-law, father-in-law, step-parent, step-child, step-sibling, parent of a domestic partner, or any other relative who resides with the employee). If an extended absence is required, a personal leave may be granted by the Executive Director/State Party Chair.

### **9.15 - Voting in General, Statewide, or Special Elections**

Employees may leave work, with pay, for the period necessary to vote in general, statewide or special elections and are asked to notify their Supervisors when leaving the building to vote.

## **10.0 - LEAVING THE Minnesota DFL**

### **10.1 - Voluntary Termination or Resignation**

If you decide to leave your job at the Minnesota DFL, notify your Supervisor two weeks in advance, preferably in writing to confirm your last working day and the reason(s) for leaving your role.

### **10.2 - Job Abandonment**

The Minnesota DFL considers the following situations as job abandonment, which is a voluntary termination of your employment:

- If you're absent from work without notifying your Supervisor for three or more consecutive scheduled workdays, unless otherwise designated by state or local law, you'll be considered to have abandoned your job.
- In some situations, if you don't report to work at the end of an approved leave, it may result in job abandonment.

## Minnesota DFL Required Forms

**Important:** All new employees are required to sign the Minnesota DFL Employee Acknowledgment, Confidentiality Agreement and Attachments B and C to indicate that they have read, acknowledge, and will abide by the provisions summarized in this Employee Manual. Refusal to complete these forms are grounds for corrective action, which may include termination of your employment.

### Minnesota Democratic-Farmer-Labor Party Forms 1 of 4

## EMPLOYEE ACKNOWLEDGEMENT FORM

The Minnesota DFL Employee Manual provides important information about the Minnesota DFL, and I understand that I am responsible for knowing and understanding everything in these documents. I also understand that the Minnesota DFL's interpretation of all policies prevails.

I have entered into my employment relationship with the Minnesota DFL voluntarily and acknowledge that there is no specified length of employment. Accordingly, either I or the Minnesota DFL can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described in the Minnesota DFL Employee Manual are subject to change, I acknowledge that revisions may occur, except to the Minnesota DFL's policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the State Party Chair, or such designee, of the Minnesota DFL can adopt any revisions to the policies in the Employee Manual.

Furthermore, I acknowledge that this Manual is not a contract of employment. I have received the Manual and all Benefit Summary Plan Descriptions. I also understand that it is my responsibility to read and comply with the policies contained in this Manual, the Benefit Summary Plan Descriptions and any revisions made to them. I understand that I may also receive copies of certain documents relating to my employment, including my personnel records, consistent with the provisions of this Manual.

I also hereby acknowledge that I have received, read and understand the Minnesota DFL's Drug Free Workplace Policy which is part of this handbook. I understand that any violation of the Policy and Work Rules contained in the Policy is subject to corrective action up to and including discharge.

Monali Bhakta  
Employee Signature

7/14/2020  
Date

Monali Bhakta  
Employee's Name (printed)

**Minnesota Democratic-Farmer-Labor Party**  
**Forms 2 of 4 - Attachment A**

**CONFIDENTIALITY AGREEMENT**

As an employee/intern of the Minnesota Democratic-Farmer-Labor Party, you may have access to certain confidential information, such as campaign strategy, computer programs, compilations of volunteer and donor information, internal party documents, strategic plans and procedures and other confidential information not generally known outside of the DFL Party Headquarters. By signing this agreement, you agree not to disclose or share this information either while serving on the staff, as an intern, or in the future.

By signing this agreement, you also consent not to download, save or distribute information or lists of any kind or share lists or information with any organization or campaign without the expressed consent or direction of your direct Supervisor.

I agree to the terms specified above.

Monali Bhakta 7/14/2020  
Employee Signature Date

Monali Bhakta  
Employee's Name (printed)

**Minnesota Democratic-Farmer-Labor Party**  
**Forms 3 of 4 - Attachment B**

**Discrimination, Bias and Harassment Acknowledgment**

By signing below, you acknowledge that you have read and understand the following:

We believe that a working environment that embraces everyone's difference is critical to employee's ability and ultimately the success of the Minnesota DFL. The Minnesota DFL is committed to providing a work environment that is free of discrimination, bias and harassment.

The Minnesota DFL prohibits discrimination, bias and harassment of any of our employees based on an individual's race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law.

The prohibited conduct may take the form of written, verbal, physical, or visual harassment and may include but is not limited to epithets, slurs, derogatory comments, or jokes, intimidation, bullying, negative stereotyping, threats, or assault or written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of the characteristics identified above.

Harassment can be physical and psychological in nature. An aggregation of incidents can constitute as harassment even if one of the incidents considered on its own would not be harassing. The DFL's policy may be violated even if the person did not intend to give offense or believed that their conduct was welcome.

Discrimination, bias and harassment in any form is against the DFL's policy and is not permitted on DFL property, in organization vehicles, via communication systems, during DFL-sponsored events, or in connection with DFL business, events or activities.

Any employee who engages in harassment; or permits employees under their supervision to engage in such harassment; or who retaliates or permits retaliation against an employee who reports such harassment is in violation of the Minnesota DFL's Discrimination, Bias and Harassment Policy and Non-Retaliation Policy and subject to corrective action up to and including termination.

I have read and understand the above-mentioned policies.

*Monali Bhakta*  
 Employee Signature

7/14/2020  
 Date

Monali Bhakta  
 Employee's Name (printed)

**Minnesota Democratic-Farmer-Labor Party**  
**Forms 4 of 4 - Attachment C**

**Sexual Harassment Policy Acknowledgment**

By signing below, you acknowledge that you have read and understand the following:

Employees at the Minnesota DFL have the right to be free from harassment. Employees are reminded to conduct themselves in a professional, mutually respectful manner, exercise good judgment in work-related relationships and to avoid behavior that is not acceptable or unwelcomed.

Sexual harassment is defined under the Minnesota state law as any unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact, or other verbal or physical conduct or communication of a sexual nature, when:

- Submission to the conduct or communication is made a term or condition of obtaining employment.
- Submission to or rejection of the conduct or communication is used as a factor in decisions affecting an individual's employment.
- The conduct or communication substantially interferes with an individual's employment or creates an intimidating, hostile, or offensive employment environment, and the employer knows or should know of the existence of the harassment and failed to take timely and appropriate action (*MN Stat. Sec. 363A.03*).

Sexual harassment also may be in the form of nonsexual, offensive conduct that is directed at an employee because of their gender and is not limited to conduct motivated by sexual attraction. It may occur between members of the opposite sex, members of the same sex and can be physical and psychological in nature. Sexual harassment can also come from a Supervisor, fellow employees, or guest.

The Minnesota DFL's policy goes further than federal, state, or local law to define sexual harassment to include conduct such as:

- **Written sexual harassment:** Suggestive or obscene written communication (letters, emails, texts, messages, social media posts)
- **Verbal sexual harassment:** Comments, propositions and derogatory comments, slurs, jokes and comments about an individual's body or appearance including comments made on a recording device.
- **Physical sexual harassment.** Assault, stalking behaviors, any unwanted or inappropriate touching, body contact or any physical touching that makes you feel uncomfortable, encroaching on another's personal space (e.g., standing or sitting too close).
- **Visual sexual harassment.** Gestures, staring; inappropriate display of sexually explicit objects, pictures, cartoons, or posters (hard copy or electronic format)

All employees are required to come forward with reports immediately to ensure appropriate action can be taken to correct the problem promptly. Report unwelcome conduct as soon as possible to your direct Supervisor, the DFL State Party Chair or Executive Director.

As an employee, it is your responsibility to be fully informed about the policies that affect you. Any employee who engages in sexual harassment is in violation of the Minnesota DFL's Sexual Harassment Policy and is subject to corrective action up to and including termination.

I have read and understand the Minnesota DFL's Sexual Harassment Policy.

Monali Bhakta  
 Employee Signature

7/14/2020  
 Date

Monali Bhakta  
 Employee's Name (printed)

## The Minnesota DFL: Policy Appendix

This section provides additional information for all Minnesota DFL policies referenced in the Employee Manual.

**Note: As an employee, it is your responsibility to be fully informed about the policies that affect you.**

### Minnesota DFL: Sexual Harassment Policy

#### Purpose

The Minnesota DFL is committed to ensuring our workplace is free from sexual harassment. Behavior drives culture and it is essential that all of us have a common understanding of right from wrong. This policy defines the common behavioral expectations and our responsibilities in keeping everyone safe. It also provides the framework to ensure our standards of conduct are demonstrated consistently across our organization.

#### Who Should Follow These Policies?

This policy must be followed by anyone who works for the Minnesota Democratic-Farmer-Labor Party.

#### Policy Statement

Making good decisions builds trust between each of us and the people we interact with. When we think of how we accomplish our mission for a healthy DFL culture, we do this by letting our *core values* guide our expectations and our behavior. All of us must cultivate a workplace that is free from sexual harassment. Employees are reminded to conduct themselves in a professional, mutually respectful manner, exercise good judgment in work-related relationships and to avoid behavior that is not acceptable or unwelcome.

#### Policy Definitions

Sexual harassment is defined under the Minnesota state law as any unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact, or other verbal or physical conduct or communication of a sexual nature, when:

- Submission to the conduct or communication is made a term or condition of obtaining employment.
- Submission to or rejection of the conduct or communication is used as a factor in decisions affecting an individual's employment.
- The conduct or communication substantially interferes with an individual's employment or creates an intimidating, hostile, or offensive employment environment, and the employer knows or should know of the existence of the harassment and failed to take timely and appropriate action (*MN Stat. Sec. 363A.03*).

Sexual harassment also may be in the form of nonsexual, offensive conduct that is directed at an employee because of their gender and is not limited to conduct motivated by sexual attraction. It may occur between members of the opposite sex, members of the same sex and can be physical or psychological in nature.

We serve the greater good and our actions should always reflect the highest possible standards when we work together. That's why the Minnesota DFL's policy goes further than federal, state, or local law to define sexual harassment to include conduct such as:

- **Written sexual harassment:** Suggestive or obscene written communication (letters, emails, texts, messages, social media posts)
- **Verbal sexual harassment:** Comments, propositions and derogatory comments, slurs, jokes and comments about an individual's body or appearance including comments made on a recording device.
- **Physical sexual harassment.** Assault, stalking behaviors, any unwanted or inappropriate touching, body contact or any physical touching that makes you feel uncomfortable, encroaching on another's personal space (e.g., standing or sitting too close).
- **Visual sexual harassment.** Gestures, staring; inappropriate display of sexually explicit objects, pictures, cartoons, or posters (hard copy or electronic format)

### Standard Requirements

#### Confidentiality and Anonymity

The Minnesota DFL is committed to maintaining the anonymity (when requested and as permitted by law) and the confidentiality of the reporting party, throughout the report lifecycle and for as long as records are maintained. Information related to reports are shared only with those who have a legitimate need to know, like law enforcement agencies when required by law, court order, or other legal mandate.

If another employee tells you that your actions are making them uncomfortable, you have the responsibility to listen, understand how your behavior is affecting others, and immediately stop the behavior.

## Reporting Sexual Harassment

We value your safety and there are a variety of ways to tell us when something's wrong. All employees are required to come forward with reports immediately to ensure appropriate action can be taken to correct the problem promptly. This includes incidents experienced by DFL employees that occur at non-sponsored DFL events or locations.

The Minnesota DFL offers multiple channels to raise a confidential concern. You can choose to speak to a direct Supervisor with whom you are comfortable with, the Executive Director about a potential issue or, put it in writing. We want you to choose the reporting option you are most comfortable using. Whichever option you choose, your confidentiality will be protected:

- A Supervisor, DFL State Party Chair or the Executive Director
- Email: [reporting@df.org](mailto:reporting@df.org)

If you are experiencing a life-threatening event or critical situation, or you or others are at serious risk of harm, please call 911 for assistance. If you have experienced violent behavior, please reach out to the law enforcement agency where the incident occurred or call 911 for assistance.

## Employees

We recognize that it takes courage to come forward and report an incident, you are doing the right thing. The DFL is committed to take action and there are people ready to support you. Unwelcome actions are inappropriate and contribute to a hostile work environment. When this violates the commitment we've made for a safe and inclusive work environment, we will address it.

Report unwelcome conduct as soon as possible – without exception to your direct Supervisor. They are likely in the best position to take the appropriate action immediately. If you are uncomfortable for any reason in reporting to your direct Supervisor or someone in a similarly situated role, or if you have already shared a concern and feel it's not being addressed appropriately, contact the DFL State Party Chair or Executive Director for assistance.

## Supervisors

Supervisors are the first line of defense against sexual harassment and have an even greater responsibility to ensure employees feel comfortable coming forward with questions and concerns about sexual harassment. If someone comes to their supervisor with a concern, they have a special responsibility to listen and act.

When informed of incidents of alleged sexual harassment, it is mandatory to immediately submit a report to initiate a prompt investigation in compliance with the DFL's Policy on Handling Reports.

- Report all incidents immediately and take the appropriate action as outlined in the DFL's Policy on Handling Reports.
- Respond respectfully. All reports of alleged sexual harassment must be taken seriously no matter how minor or who is involved.
- Emphasize the importance of reporting sexual harassment promptly and foster an environment of reporting harmful behavior.
- Ensure that employees feel comfortable raising concerns with no fear of retaliation.
- Effective measures should also be taken to ensure no further harassment occurs pending completion of an investigation.
- Take steps to protect the reporting party's confidentiality, avoid discussing the report with others who do not have a legitimate need to know.

Supervisors or those in a similarly situated role in the DFL, are prohibited from taking retaliatory actions against employees and must take steps to mitigate risks and guard against retaliatory conduct by proactively watching for signs of retaliation and reporting any observed conduct that may violate this policy.

Taking any action against anyone who in good faith reports or provides information about an incident of alleged prohibited behavior is unacceptable and a possible violation of this policy.

Supervisors who permit or tolerate sexual harassment or retaliation, including the failure to immediately report such misconduct, are in violation of this policy and the DFL's Policy on Handling Reports and the Non-Retaliation Policy.

**Non-Retaliation**

At the DFL, we are committed to maintaining a culture in which our employees feel comfortable reporting conduct that puts them at risk. The Minnesota DFL does not permit or tolerate any acts of retaliation against employees who in good faith reports sexual harassment.

If the employee believe that they have been retaliated against for reporting improper conduct or behavior, they must report it as soon as possible. If the employee is uncomfortable for any reason in reporting retaliation to their direct Supervisor, employees can also report improper conduct to the DFL State Party Chair or Executive Director. For additional information about retaliation protections, refer to the DFL's Non-Retaliation Policy.

**Further Assistance**

In addition to the internal reporting procedure, the federal Equal Employment Opportunity Commission (EEOC) and the Minnesota Department of Human Rights (MDHR) investigate and pursue complaints of unlawful harassment in employment. Employees who believe that they have been unlawfully harassed may file a complaint with either of these agencies. The EEOC and MDHR serve as neutral fact finders to help voluntarily resolve disputes.

Sexual harassment is illegal under the Minnesota Human Rights Act. If you have experienced sexual harassment, you also have the option to contact the MN Department of Human Rights at 651.539.1100 or Toll Free at 1.800.657.3704, or through our web site at [mn.gov/mdhr](http://mn.gov/mdhr).

If you're not satisfied with the way a concern has been resolved in the workplace, this policy does not prohibit employees from voluntarily communicating with relevant authorities regarding possible violations of applicable state laws.

**Sexual Harassment Training**

All employees will participate in training for a common understanding of respectful and professional behavior at the DFL, reporting and appropriately handling reports of sexual harassment.

# Minnesota DFL: Discrimination, Bias and Harassment Policy

## Purpose

We believe everyone is important, deserves respect and that we should treat one another with fairness and dignity. An environment that embraces everyone's differences is critical to our employees' ability to be their best and ultimately contributes to the success of the Minnesota DFL. This policy outlines the Minnesota DFL's guidance to ensure all employees have a common understanding of the definition, standards and the obligations related to discrimination, bias and harassment.

## Who Should Follow These Policies

This policy applies to all employees of the Minnesota Democratic-Farmer-Labor Party.

## Policy Statement

Consistent with our values, we strive to treat others with respect and do not tolerate discrimination, bias or harassment. We promote and cultivate an atmosphere of inclusion and collaboration that empowers everyone to do their best work. We are committed to a supportive environment that embraces everyone's differences and empowers every employee to reach their full potential.

## Policy Definitions

Discrimination, bias and harassment of any of our employees based on an individual's race, color, gender, national origin, religion, age, sexual orientation, gender identity, gender expression, genetic information, physical or mental disability, pregnancy, marital status, status as a protected veteran, or any other status protected by federal, state, or local law is strictly prohibited.

In the judgement of the DFL, the prohibited conduct defined in this policy may take the form of written, verbal, physical, or visual harassment and may include but is not limited to epithets, slurs, derogatory comments, or jokes, intimidation, bullying, negative stereotyping, threats, or assault or written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of the characteristics identified above.

Harassment can be physical and psychological in nature. An aggregation of incidents can constitute as harassment even if one of the incidents considered on its own would not be harassing. The DFL's policy may be violated even if the person did not intend to give offense or believed that their conduct was welcome.

Discrimination, bias and harassment may also occur when unwelcome conduct:

- Unreasonably interferes with an individual's work performance.
- Creates an intimidating, hostile, or offensive work environment.

Discrimination, bias and harassment in any form is against the DFL's policy and will not be tolerated on DFL property, in organization vehicles, via communication systems, during DFL-sponsored events, or in connection with DFL business, events or activities.

## Standard Requirements

### Reporting Discrimination, Bias and Harassment

If you believe you have been subjected to prohibited workplace conduct, know that you are shielded from retaliation for reporting or providing information in good faith about an incident when exercising your rights as protected by law.

When a situation occurs that prevents us from keeping our commitment to keep you safe in our work environment, it is important to us that we hear from you immediately to ensure appropriate action can be taken to correct the problem promptly. It is everyone's responsibility to report all forms of prohibited conduct, whether it's directed at you or it's something that you've seen or heard directed at someone else. Employees are encouraged to come forward with reports.

The Minnesota DFL offers multiple channels to raise a confidential concern. You can choose to speak to a direct Supervisor with whom you are comfortable, the Executive Director about a potential issue or, put it in writing. We want you to choose the reporting option you are most comfortable using. Whichever option you choose, your confidentiality will be protected:

- A Supervisor, DFL State Party Chair or the Executive Director
- Email: [reporting@dfi.org](mailto:reporting@dfi.org)

When you report discrimination, bias or harassment, the DFL will obtain all relevant information from you in a timely manner and will undertake or direct an effective, thorough, and objective review of the report, in alignment with our Policy on Handling Reports. When initiated by the DFL, all employees are required to cooperate in any fact-finding process to address the issue.

Once you report an incident by contacting one of the resources above, the Minnesota DFL will obtain all relevant information from you in a timely manner to review the harassment report. We will take corrective action that we determine is appropriate based on its findings. We will only share information regarding the review, including any corrective action taken, with those who have a legitimate business need to know.

#### **Employees:**

If you believe that you have been discriminated against or harassed or, if you are aware of the harassment of others ("bystander intervention") that potentially violates this policy, you must report it as soon as possible to your Supervisor or person you report to at the DFL. This includes incidents experienced by DFL employees that occur at non-sponsored DFL events or locations.

#### **Supervisors:**

Anyone who receives a complaint about this kind of behavior should immediately report the matter to the DFL State Party Chair, Executive Director or HR representative.

Any violation of this policy that affect a job applicant or an active employee's tangible job benefits, interfere unreasonably with an individual's work performance, or create an intimidating, hostile or offensive working environment are also prohibited.

For additional guidance on how to handle reports of harassment that occurred at a non-sponsored DFL event or location, refer to the Policy on Handling Reports to appropriately handle the report.

#### **Non-Retaliation**

At the DFL, we are committed to fostering a culture in which our employees feel comfortable reporting conduct that puts them at risk. The Minnesota DFL will not permit or tolerate any acts of retaliation against you when you report in good faith any prohibited conduct that violates this policy.

If the employee believe that they have been retaliated against for reporting improper conduct or behavior, they must report it as soon as possible. If the employee is uncomfortable for any reason in reporting retaliation to their direct Supervisor, employees can also report improper conduct to the DFL State Party Chair or Executive Director. For additional information about retaliation protections, refer to the DFL's Non-Retaliation Policy.

#### **Further Assistance**

If the employee not satisfied with the way a concern has been resolved in the workplace, this policy does not prohibit, alter or affect the right of any employee from voluntarily reporting discrimination with any State or federal agency with jurisdiction over such claims, filing a grievance under a collective bargaining agreement, or consulting with a private attorney.

In addition to this policy, employees should also know that the federal Equal Employment Opportunity Commission (EEOC) and the Minnesota Department of Human Rights (MDHR) investigate and pursue complaints of unlawful harassment in employment. Employees who believe that they have been unlawfully harassed may file a complaint with either of these agencies. The EEOC and MDHR serve as neutral fact finders to help voluntarily resolve disputes.

#### **Discrimination, Bias and Harassment Prevention Training**

The Minnesota DFL shall provide current and new employees annual training designed to educate and prevent discrimination, bias and harassment.

# Minnesota DFL: Non-Retaliation Policy

## Purpose

The Minnesota DFL does not permit retaliation against any employee who, in good faith, reports suspected unethical or illegal conduct. This policy establishes the expectations and requirements of employees to raise concerns without fear of retaliation and to not retaliate against any employee who engages in a protected activity.

## Who Should Follow These Policies

This policy applies to all employees of the Minnesota Democratic-Farmer-Labor Party.

## Policy Statement

We know it takes courage to come forward and share your concerns. Retaliation of any kind against an employee who makes a good faith report or participates in an investigation of a possible violation of our Code of Conduct, policies, or the law is inconsistent with our values and is not tolerated. This includes reporting sexual or other forms of harassment, discrimination, bias, workplace violence, health and safety issues or other inappropriate behavior.

## Policy Definitions

Reporting "in good faith" means you are coming forward honestly with information that you sincerely believe or have reasonable cause to believe is true without motive or malice for personal benefit.

## Protected Activity

Protected activity is an activity that is protected from retaliation, which includes:

- Reports made in good faith or otherwise in accordance with applicable laws of suspected unethical or illegal conduct or activities, violations of any Minnesota DFL policies (including the Code of Conduct).
- Opposing an employment practice that the employee, in good faith or otherwise in accordance with applicable laws, believes violates a law, rule, regulation, or Minnesota DFL policy.
- Filing a charge; truthfully testifying; or providing assistance or participating in an investigation or hearing related to an allegedly unlawful practice (internal and external).
- Exercising rights established by applicable Minnesota or U.S. laws.

Participation in an employment discrimination proceeding is also a protected activity even if the proceeding involved claims that ultimately were found to be unsubstantiated. Examples of participation include:

- Reporting behavior that may reasonably be employment discrimination.
- Cooperating with an internal investigation of alleged discriminatory practices.
- Acting as a witness at any legal proceedings involving alleged discriminatory practices.
- A protected activity can also include requesting a reasonable accommodation based on religion or disability.

## Retaliation

Retaliation means subjecting an employee to harmful conduct in response to an employee engaging in a protected activity, including but not limited to any conduct that has a material adverse effect on an employee's compensation, working conditions, or work environment. Examples of retaliation include taking the following actions (where such action is in response to an employee engaging in a protected activity):

- Termination without a valid rationale
- Demotion to a less desirable position or actions affecting prospects for promotion
- Denial of or withholding of information required to perform work functions
- Changing work assignments without a supported work-related reason
- Denial of promotion, overtime or benefits
- Unwarranted or excessive disciplinary/corrective action
- Failure to rehire
- Harassment or making threats against the employee
- Reduction of pay or hours
- Lower performance evaluation

**Note:** In signing the DFL's Employee Acknowledgement form, an employee has voluntarily acknowledged that there is no specified length of employment. Accordingly, either the employee or the Minnesota DFL can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or Minnesota state laws.

## Standard Requirements

Employees are required to come forward with complaints immediately to ensure appropriate action can be taken to correct the problem promptly. The DFL will not knowingly permit or allow retaliation against anyone who reports prohibited behavior, participates in an internal or external review, investigation or files an administrative charge or lawsuit alleging violations of any DFL policy.

### Supervisors (or those in a similarly situated role):

Supervisors have an even greater responsibility to create the kind of workplace where employees feel comfortable coming forward with questions and concerns. Supervisors or those in a similarly situated role in the DFL, are prohibited from taking retaliatory actions against employees and, must also guard against retaliatory conduct by proactively watching for signs of retaliation and reporting any observed conduct that may potentially violate this policy.

Taking any action against any person who in good faith reports or provides information about an incident of alleged prohibited behavior is unacceptable and a possible violation of this policy.

## Reporting Retaliation

Raising a concern should be as easy as possible. Regardless of who you contact, your concern will be handled appropriately.

We want all employees to feel comfortable raising concerns without fear of retaliation. If you believe that you have been retaliated against for reporting improper conduct or behavior, you must report it as soon as possible. If you are uncomfortable for any reason in reporting retaliation to your direct Supervisor or someone in a similarly situated role, you can report improper conduct to the State Party Chair, the DFL's Executive Director or HR representative.

### Where To Submit Reports of Retaliation

All employees are encouraged to come forward with reports immediately to ensure appropriate action can be taken to correct the problem promptly.

The Minnesota DFL offers multiple channels to raise a confidential concern. You can choose to speak to a direct Supervisor with whom you are comfortable, the Executive Director about a potential issue or, put it in writing. We want you to choose the reporting option you are most comfortable using. Whichever option you choose, your confidentiality will be protected:

- A Supervisor, State Party Chair or the Executive Director
- Email: [reporting@dfll.org](mailto:reporting@dfll.org)

Allegations of retaliation will be investigated promptly, as detailed in the DFL's Policy on Handling Reports. All reports will be handled as confidentially as possible however, sharing information with those with a need to know may be required in order to complete a full investigation. To ensure a review of a report is meaningful and complete, all parties with relevant knowledge must cooperate in the investigation. Failure to cooperate could result in corrective action.

After conducting an investigation, the State Party Chair, in consultation with the Executive Director, will make the final determination of the appropriate action to take. If an employee has been subjected to retaliatory behavior because they have spoken up or attempted to speak up, the person found to have retaliated may face corrective action, up to and including termination of employment.

## Research and Investigation

All reports of suspected unethical or illegal conduct and any related retaliation are taken seriously, we will investigate them objectively and thoroughly, maintain confidentiality, share information about such reports only with those who have a legitimate business need to know, and respond in a timely manner, with the goal of understanding and resolving any underlying problem that led to the report.

## Further Assistance

Employees should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and the Minnesota Department of Human Rights (MDHR) investigates and pursues complaints of unlawful harassment in employment. Employees who believe that they have been unlawfully harassed may file a complaint with either of these agencies. The EEOC and MDHR serve as neutral fact finders to help voluntarily resolve disputes.

If you're not satisfied with the way a concern has been resolved in the workplace, this policy does not prohibit employees from voluntarily communicating with relevant authorities regarding possible violations of applicable state laws.

# Minnesota DFL: Conflicts of Interest, Outside Employment and Activities Policy

## Purpose

This policy establishes the expectations and requirements regarding the identification and management of actual or potential conflicts of interest, outside employment and activities. It is also designed to help employees understand conflicts of interest; where they might occur, how they can be avoided and how to manage them when they are identified.

## Who Should Follow This Policy

This policy must be followed by anyone who works for the Minnesota Democratic-Farmer-Labor Party.

## Policy Statement

We act in the best interest of the Minnesota DFL. When presented with a situation involving an actual or potential conflicts of interest, DFL employees should consider whether this may raise a reasonable question about the appearance of impropriety or, lead an outside observer to believe a conflict of interest exists. The appearance or perception of a conflict of interest could cause reputational harm to the Minnesota DFL.

The Minnesota DFL recognizes it may not always be possible to keep personal connections and interests entirely separate from one's professional life, transparency and the avoidance of any conflict of interest is essential in ensuring the public's trust and confidence in the Minnesota DFL.

## Policy Definitions

The DFL defines a conflict of interest as an actual or potential action or inaction during the discharge of your duties that might affect your judgment or, appears to interfere with your responsibility for objective and unbiased decision-making on behalf of the organization.

A personal conflict of interest is a situation in which an employee's personal finances, relationships, or outside employment or activities may interfere with an employee's ability to perform their duties or obligations or to act in the best interest of the Minnesota DFL.

It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. The types of situations that may lead to conflicts of interest are:

- Working for unendorsed political campaigns or candidates using DFL resources.
- Performing outside work during DFL business hours, using DFL resources or intellectual property.
- Accepting employment or compensation or engaging in any business or professional activity that might require disclosure of confidential DFL information.
- Using confidential information for non-DFL related work, personal financial gain or benefit.
- Accepting or soliciting a gift, favor, or other benefits that is intended to, or might appear to, influence the employee's decision-making, independent judgment or professional conduct.
- Taking part in an evaluation or making a decision for someone with whom you have a romantic, intimate or close personal relationship.
- Exerting undue influence on or favoring someone because of a romantic, intimate or close personal relationship in order to influence an outcome or gain from it.
- Recruiting, hiring or supervising someone (or having a role with significant influence) while involved in a romantic, intimate or close personal relationship.

Just because a relative, spouse/significant other, or close friend is employed at the Minnesota DFL does not mean there is a conflict of interest. Some conflicts of interest may also be in violation of the law. A conflict of interest can exist even if there are no improper acts as a result of it. The right thing to do in that situation is to disclose the potential conflict of interest with your Supervisor or the Executive Director to determine the appropriate action to appropriately manage the conflict of interest.

When considering a course of action, ask whether the action you're considering could create a possible conflict. If you have any doubts about what you should do, ask the following questions:

1. Would I feel ok if others knew about it?
2. Am I willing to be held accountable for this decision?
3. Is this consistent with our Minnesota DFL values?

If "Yes" is the answer to all of these questions, it's probably safe to move forward. A "No" or "Not Sure" should cause you to stop and reconsider. Remember, always ask your direct Supervisor or the Executive Director if you're not sure.

## Standard Requirements

All employees must disclose actual or potential conflicts or any relationships that may create the appearance of a conflict of interest to their direct Supervisor or the Executive Director as soon as possible so that safeguards can be established to protect all parties. Failure to make required disclosures or resolve conflicts of interest satisfactorily can result in corrective action up to and including termination.

Supervisors must avoid any relationship or activity that may be perceived as affecting their ability to remain objective in managing or providing work direction to employees. If a personal relationship creates a potential conflict of interest, the appearance of a conflict of interest, or favoritism, this must be immediately escalated to the Executive Director or the DFL State Party Chair. This includes being the hiring manager for a position for which your relative or close friend is being considered.

### Disclosure of Conflicts of Interest

A conflict of interest is not necessarily a problem in itself but could become a problem if measures are not promptly reported or managed. In some instances, disclosure may be sufficient. In other cases, it may be appropriate to obtain prior approval. Discuss the matter with your direct Supervisor, DFL Executive Director or the State Party Chair to determine the appropriate action to remove or appropriately manage the conflict of interest.

### Confidential Information Handling

A record of the disclosure must be retained by Supervisors and be accessible only to those with a valid business need to know. All employees have an ongoing responsibility while employed with the DFL to notify their Supervisor when relevant interests change. Disclosed information must be treated sensitively and requests for confidentiality be kept in alignment with the DFL's Confidentiality Policy.

Failure to make required disclosures or resolve conflicts of interest satisfactorily can result in corrective action up to and including termination.

### Outside Employment

The Minnesota DFL recognizes that some employees may have other employment outside the DFL. Employees are asked to avoid employment when their objectivity could be or could appear to compromise your ability to make impartial DFL-business decisions.

Employees may not receive any income or material gain from individuals outside the Minnesota DFL for materials produced or services rendered while performing their Minnesota DFL work.

Outside employment should not detract from nor interfere with job performance at the Minnesota DFL. If the Minnesota DFL determines that an employee's outside work interferes with job performance, the employee may be asked to make changes to work arrangements or terminate the outside employment if they wish to remain with the Minnesota DFL.

### Outside Activities

All employees are encouraged to participate in outside activities however, personal interests or outside activities that conflict, or appear to conflict, with the interests of the Minnesota DFL must be avoided. Generally, this means not engaging in activities that compete with DFL time, when acting on behalf of the DFL, or allows the employee to personally gain financially.

Employees are expected to demonstrate professional and courteous behavior in the execution of their duties, in compliance with the Minnesota DFL Code of Conduct.

## Roles and Responsibilities

All employees are responsible for:

- Knowing and understanding the requirements of the DFL's Code of Conduct Policy and Confidentiality Agreement.
- Not allowing personal or outside business activities to compromise, interfere with, or otherwise call into question an employee's ability to act objectively in their responsibilities to the Minnesota DFL or cause reputational harm to the organization.
- Identifying and preventing actual or potential conflicts of interest; and escalating as the employee becomes aware of them.
- Seeking advice when appropriate from a Supervisor or the Executive Director.
- Disclosing and obtaining prior approval when required per this policy.
- Complying with the requirements of the Employee Confidentiality Agreement which prohibits sharing or disclosing confidential DFL information.

# Minnesota DFL: Policy on Handling Reports

## Purpose

This policy establishes the Minnesota Democratic-Farmer-Labor Party's expectations and requirements for consistently handling reports using common practices and processes.

## Who Should Follow These Policies

This policy must be followed by anyone who works for Minnesota DFL.

In addition, when external Legal Counsel is retained for certain reports, they will manage those reports according to their own standard case management protocols, not the requirements outlined in this policy.

## Policy Statement

DFL employees, volunteers, or parties outside of the Minnesota DFL may report about prohibited conduct or harmful behavior by employees working on behalf of the Minnesota DFL.

The Minnesota DFL is committed to receiving, researching, investigating, and dispositioning each report in an objective, consistent, and thorough manner, with the goal of understanding and resolving any underlying problem. The confidentiality of all parties related to the report will be respected. Reporters will be treated with the utmost respect throughout this process and any form of retaliation is prohibited per the DFL's Non-Retaliation Policy.

## Policy Definitions

The following definitions are fundamental to understanding this policy.

## Report

Any written or verbal report expressing concern about known or suspected unethical, illegal, harmful behavior or other violations by an employee, volunteer or individual acting on behalf of the DFL.

Reports may pertain to sexual and any other forms of harassment, bias, and discrimination, retaliation, theft, conflicts of interest, bribery or other forms of corruption, financial irregularities, deliberate or repetitive harmful behavior or policy violations or violations of law.

## Report Lifecycle

The report lifecycle begins with a report received into one of the DFL's intake channels; goes through intake, investigation, and disposition; and ends with close-out of the report.

## Report Handling Personnel

A DFL Human Resources representative or appointed individual with roles and responsibilities for handling reports, including intake, research, investigation, and disposition of reports.

Any other person or team acting as, or believing it is a report handling group, but not listed above, must contact the State Party Chair or the Executive Director to discuss the team's role and responsibilities to determine if it is a Minnesota DFL authorizes that group to handle reports.

## Intake Channel

The State Party Chair, Executive Director or HR representative may receive reports of, or identify through their work, suspected unethical or illegal conduct or harmful behavior and are responsible for submitting the report to an intake team. Intake channels include:

- DFL State Party Chair, Executive Director or HR representative
- DFL-related email communication mailboxes: [report@dfi.org](mailto:report@dfi.org)

## Reporting Party

A reporting Party is defined as a Minnesota DFL employee, Minnesota DFL volunteer or other party communicating reports to the Minnesota DFL.

## Standard Requirements

The following requirements are applicable at all times during the report lifecycle.

### Confidentiality and Anonymity

The Minnesota DFL is committed to maintaining the anonymity (when requested and as permitted by law) and the confidentiality of the reporting party, throughout the report lifecycle and for as long as records are maintained. Information related to reports is shared only with those who have a legitimate need to know or law enforcement agencies, when required by law, court order, or other legal mandate.

### Non-Retaliation

The Minnesota DFL does not permit or tolerate any acts of retaliation against employees who in good faith submits a report. For additional information about retaliation protections, refer to the DFL's Non-Retaliation Policy.

### Report Escalations

The escalation of a report is critical to ensure proper handling and processing occurs. If a report handling team identifies the need for escalation at any point in the report lifecycle, they must escalate the report promptly and document the escalation. Notification of an escalated case must be communicated to the DFL State Party Chair immediately by the report handling team.

The following types of reports require escalation:

- Reports involving potential violations of the law
- Financial irregularities
- Potential retaliation
- A report of significant impact to the Minnesota DFL's reputation

### Substantiated Report

Sufficient and credible information supports the original report reported or, some other type of misconduct or harmful behavior was discovered during research and investigation.

### Unsubstantiated Report

After completing research and investigation of a report, it is determined that there is insufficient credible information to support the claims made by the reporting party.

### Communicating with Reporting and Reported Parties

The report handling team, HR representative will communicate with the reporting party at the beginning of the case to acknowledge the receipt and assignment of the report and at the close of the case. Communicating with the reporting party may also occur during any phase of the report lifecycle if additional information or clarification of information is needed, or if the reporting party requests a status update of the report.

If the report was reported anonymously, communication with the reporting party will occur only if the necessary means to facilitate communication are available.

### Records Management

Report handling teams or individuals must keep case information complete and current to provide any other party with a business need to know with the necessary consolidated status view of reports.

### Monitoring

Periodic reviews of reports are performed to monitor resolution or remediation actions, determine if additional actions are needed to mitigate future risk of recurrence of the misconduct.

## Roles and Responsibilities

HR designated report handling teams are responsible for:

- Establishing standard procedures and practices in alignment with the requirements of this policy.
- Ensuring report case information is documented, maintained and validated according to this policy.
- Providing requested reports when requested using organization-approved channels and protocols.
- Researching and resolving reports as detailed in this policy and related procedures.
- Ensure role-specific report handling training is performed on an annual basis.
- Communicating policy changes that impact report handling group

## Minnesota DFL Policy Exceptions or Changes

Minnesota DFL policies cannot anticipate every situation or answer every question. To request additional guidance to address a situation not covered by these policies, to request a change to this policy or recommend an alternative practice, submit policy change requests to your Supervisor or the Executive Director. The request will then be routed to the DFL Personnel Committee for review.

After review, the outcome may result in an exception, change to existing policy, or directive to comply with existing policy. Initiate a request for a review before taking alternative action that will be out of compliance or immediately after a policy violation has been discovered.

The Minnesota DFL Personnel Committee will convene meetings when a policy exception or change requires the Committee's review. The State Party Chair, Executive Director or Human Resources representative must provide the Committee with notice a minimum of 10 business days notice to convene a review meeting.

If the decision is made to pursue an exception, or an alternate policy, that decision must be recorded in the employee's personnel file for traceability and future reference.

## Policy Violations

Failure to comply with the requirements of any DFL policy, without prior approval of an exception, is considered a policy violation. If a policy violation occurs, the situation must be escalated to the Executive Director and appropriate action will be taken up to and including termination of any employee found in violation of this policy.

These policies are very important to us. This means you must read, understand, and comply with the standards, policies and requirements that apply and, speak up when you see possible violations. If you have any questions about our policies, please contact the Executive Director or the State Party Chair.

## Policy Oversight

The following roles provide oversight of these policies and its content:

- Minnesota DFL State Party Chair
- Minnesota DFL Executive Director
- Minnesota DFL Personnel Committee

## Legal Requirements

When consulting external sources, Legal Counsel is the final authority for interpreting MN state laws and regulations on behalf of the Minnesota DFL.




This site is in beta, visit [FEC.gov](#)

An official website of the United States Government 

**Federal Election Commission**  
UNITED STATES – of – AMERICA

Home > Campaign finance data > Browse data > Disbursements

# Disbursements









Viewing **9** filtered results for: [Clear all filters](#) 

Data type: processed

MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY (C00025254) 

Bhakta 

2019-2020 

Spender	Recipient	State	Description	Disbursement date	Amount	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	11/20/2020	\$677.43	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	11/06/2020	\$1,277.91	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	10/23/2020	\$1,277.90	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	10/09/2020	\$1,277.90	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	09/25/2020	\$1,277.91	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	09/11/2020	\$1,277.91	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	08/28/2020	\$1,277.89	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	08/14/2020	\$1,277.91	
<a href="#">MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY</a>	BHAKTA, MONALI	MN	PAYROLL	07/31/2020	\$1,626.35	