NORTHWESTERN
COLLEGE

Employee Handbook

2026-27

PURPOSE

The purpose of this Employee Handbook is to inform all faculty and staff of personnel policies and practices currently in effect at Northwestern College and to serve as a guide to supervisors so that they will apply policies fairly and consistently. The college's Faculty Handbook states all relevant policies governing the employment of teaching faculty. It is the responsibility of all employees of Northwestern College to become familiar with the contents of the appropriate personnel policies manual. Should you have questions concerning any of the policies, practices, or procedures, please bring those to the attention of your immediate supervisor.

Revisions will be issued when new policy practices and procedures have been adopted.

AT-WILL EMPLOYMENT

Nothing contained in this Handbook is intended to create a contract or guarantee of employment of staff for any specific duration. This at-will employment relationship means staff employees or Northwestern College can terminate employment at any time, with or without cause, and with or without notice.

This at-will employment relationship exists regardless of any other written statements or policies contained in this Handbook or any other Northwestern College documents or any verbal statement to the contrary.

POLICY CHANGES

Every employee is encouraged to make suggestions for improving the working climate of Northwestern College, keeping in mind the college's educational and spiritual mission. Suggestions for changes or revisions of policies and practices should be referred to the President’s Cabinet. The President’s Cabinet may deem it appropriate to appoint a study committee for the purpose of formulating a recommendation. In general, proposed policies need approval by the Board of Trustees prior to implementation.

COMPLIANCE STATEMENT

Northwestern College adheres to all federal and state civil rights laws and regulations prohibiting discrimination in private institutions of higher education on the basis of race, color, national origin, sex (including pregnancy), age, or disability, or other characteristic protected by law, in admission, access to, or employment in its programs and activities except as modified by the protections of Northwestern’s religious identity, beliefs, and practices found in the First Amendment, the Religious Freedom Restoration Act, Title IX Religious Colleges Exemption, the Title VII Religious Employers Exemption, and other federal and state legal protections for religious freedom. Any person having inquiries concerning Northwestern College's compliance with the regulations implementing Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, the Age Discrimination in Employment Act of 1975, the Americans with Disabilities Act of 1990 (ADA), as amended, or Section 504 of the Rehabilitation Act of 1973 is directed to contact the Director of Human Resources (707-7223) or the Vice President for Academic Affairs (707-7103), Northwestern College, Orange City, Iowa, 51041. These individuals have been designated by Northwestern College to coordinate the institution's efforts to comply with the regulations implementing Title VI, Title IX, Age Discrimination in Employment, Americans with Disabilities, or Section 504. Any person may also contact the Assistant Secretary for Civil Rights, U.S. Department of Education, regarding this institution's compliance.

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SECTION I.
INTRODUCTION

1. MISSION

A. Mission

Northwestern College is a Christian academic community engaging students in courageous and faithful learning and living that empowers them to follow Christ and pursue God's redeeming work in the world.

Adopted by the Board of Trustees, October 2009

2. CHRISTIAN IDENTITY

As a Christian college, Northwestern identifies itself as Reformed, evangelical, and ecumenical. We view these Christian theological perspectives as complementary and draw from the strengths of each perspective in fulfilling our mission.

Reformed Commitment

Northwestern College was founded by the Reformed Church in America. We accept the ultimate authority of God's written Word and are guided by the wisdom of the ecumenical creeds* and our historic Reformed confessions**. We proclaim the sovereignty and grace of God in every area of creation and human life, our sinfulness and natural inability to have faith in God, God's sovereign and gracious choosing of God's people in Christ based solely on God's good pleasure and will, the Holy Spirit's initiation of the new birth resulting in faith and repentance, the life-giving spiritual union between Christ and believers, and God's compassionate embrace that keeps believers from ever truly falling away from faith. We affirm God's broad redemptive purposes, and we embrace the Christian call to reform the church, reflect critically on worldviews that influence culture, and transform the world.

*The Apostles' Creed, the Nicene Creed, and the Athanasian Creed
**The Heidelberg Catechism, the Belgic Confession, the Canons of Dort, and the Belhar Confession

Evangelical Engagement

As a Reformed institution, Northwestern stands within the broad tradition of evangelical Christianity. We affirm the divine inspiration, infallibility, authority, and sufficiency of Scripture in matters of faith and practice. We seek a warm, personal faith that is the product of conversion through an individual's trust in Christ as Savior and Lord and belief in Christ's redeeming and substitutionary work on the cross. We acknowledge that salvation comes solely through the unmerited, direct, and transforming gift of God's grace. We believe that Christians are called to live holy lives, to make disciples throughout the world by embodying in word and deed the good news of salvation, and to love all people through acts of justice and mercy in Christ's name.

Ecumenical Spirit

As a Reformed institution, Northwestern College identifies with the ecumenical spirit that unites all Christians in every time and place. This spirit is embodied in the unified confession of the historic Church as expressed in the Apostles' Creed. We desire greater unity among the universal Christian family. We celebrate the unique traditions and gifts of other Christian communities. We seek new cooperative relationships with other Christians in our common witness to the gospel and our pursuit of justice for all creation. Our ecumenical spirit calls us to appreciate alternative perspectives in an ethos of peaceful dialogue.

Adopted by the Board of Trustees, April 2012

3. A VISION FOR LEARNING

Northwestern College is a community rooted in Scripture and the confessions of Reformed theology and thus shaped by a robust integrative and transformative vision of the Triune God who creates, redeems, and sustains. This theological background supports a framework within which students, staff, and faculty of various Christian traditions take up the task of loving, understanding, and serving the world whose Savior and Lord is Jesus Christ. We see the pursuit of liberal arts education as worship experienced in community and offered to the glory of God. Embracing this calling with a freedom that arises from confidence in God's saving grace and sovereignty, we are committed to cultivating virtues of heart and mind that will enable us to live out our shared vocation as participants in God's redemptive work. We respond to God's call to proclaim the message of the gospel, be stewards of creation, serve Christ in all persons, and bring all things under his lordship.

In keeping with this commitment, we intend Northwestern graduates to be persons who

Trust, Love, and Worship God

- Understanding that God is the center of life, learning about God through careful and rigorous study, and aspiring to trust, love, and worship God as the sovereign Lord of the universe.
- Recognizing that to love God is also to live joyfully as participants in a variety of communities, valuing the diversity of the human family and seeking opportunities for learning, growth, and transformation through intercultural relationships.

Engage Ideas

- Demonstrating competence in navigating and contributing to the world of ideas and information, having learned to listen, read, question, evaluate, speak, write, create, and perform with a disciplined imagination.
- Gaining a comprehensive understanding of the theoretical foundations, methods, and products of the humanities, the social and natural sciences, and the fine arts
- Pursuing truth faithfully in all aspects of life; developing, articulating, and supporting their own beliefs; and seeking meaningful dialog with those holding different convictions.
- Desiring to continue a life of learning and contemplation.

Connect Knowledge and Experience

- Completing academic majors that enable acquisition of the narrower but deeper knowledge and skills that serve as the basis for mastery of a particular discipline and as preparation for meaningful life and work.
- Exhibiting a broad understanding of the current and historical interplay of different realms of knowledge and experience.
- Seeking opportunities for growth and reflection that integrate faith, learning, and living in community.
- Seeing beauty and finding joy in all pursuits.

Respond to God's Call

- Discerning and developing their unique gifts in service to Christ, the church, and the world Christ loves and redeems.
- Regarding all persons as made in the image of God and thus deserving of understanding, love, and justice.
- Living a balanced and whole life in obedience to God.

Adopted by the Board of Trustees, October 2006

4. VISION FOR DIVERSITY

Guided by the biblical narrative of creation, fall, redemption and restoration, Northwestern College strives to pursue God's redeeming work in the world by courageously and faithfully engaging the fullness of our similarities and differences in our learning and living together.

We embrace diversity in God's creation

- valuing each person as created in the image of the triune God and thus intended for community
- respecting the complexity of human identities
- recognizing human difference as central to an education that fosters critical thinking, empathy and dialogue

We lament human brokenness,

- grieving our thoughts, words and actions that diminish, caricature or isolate one another
- confessing our failure to hear and respond to marginalized voices on campus and in the world
- recognizing our past and current participation in unjust social systems
- repenting from any form of dehumanization that distorts God's creation

We reconcile with one another,

- bridging divisions that separate people from one another and from God
- partaking in courageous conversations where varied perspectives are welcome
- challenging unjust systems of power, privilege and oppression
- building and sustaining social structures that foster the common good

We embody shalom,

- anticipating restored creation, where people from every nation, tribe and language worship God and live in harmony
- pursuing human flourishing in our relationships, curriculum, staffing, resource allocation and corporate actions
- affirming that all things hold together in Christ, to the glory of God

Adopted by the Board of Trustees, October 2015

5. INSTITUTIONAL COMMITMENTS

As a college shaped by a commitment to the liberal arts and to the Christian faith, Northwestern teaches and practices the unity and university of God's truth, fulfilling our shared visions through a campus-wide commitment to claiming and maintaining the Christian and liberal arts traditions.

We develop habits of thought and belief that become part of a comprehensive world view; refine basic and liberating skills in communication and critical thinking; promote excellence in teaching, research, scholarship, performance, and production; and make decisions in a participatory system of shared governance.

We nurture a Christian community marked by faith in Jesus Christ, caring interpersonal relationships, and respect for others' unique gifts and perspectives; we create and maintain cultural, ethnic, and racial diversity among our students and staff and in our curricular and co-curricular programs; and we provide educational, cultural, and recreational opportunities for students, faculty, staff, and the surrounding communities.

We provide an attractive and efficient campus that is aesthetically pleasing, promotes active stewardship of the environment, and is conducive to serious learning and Christian living; generate the financial resources necessary to provide educational excellence; and maintain fiscal responsibility in all programs and operations.

SECTION II.
COLLEGE GOVERNANCE

Northwestern College as a non-profit institution of Christian higher education is governed by an elected Board of Trustees as the controlling body. On-campus governance procedures and responsibilities are vested in the administrative officers.

1. PRESIDENT'S CABINET

The administrative officers of Northwestern College serve in an advisory capacity to the President as members of the President's Cabinet (PC).

President – Gregory E. Christy

The president is the head of all departments and agencies of the College and is a member ex-officio of each faculty and administrative committee. The president is responsible to the Board of Trustees.

Vice President for Academic Affairs – Dr. D. Nathan Phinney

The vice president for academic affairs is responsible for all undergraduate academic program as well as the graduate school and adult learning. The VPAA also oversees faculty development, evaluation and curriculum. The library, computing services, learning resource center, academic support program, online learning, institutional research and the registrar also report to the VPAA.

Vice President for Student Life – Julie Elliott

The vice president for student life is responsible for student housing, co-curricular activities, student discipline, career development, campus safety and security, and wellness services.

Vice President for Finance and Operations – Kent Wiersema

The vice president for finance and operations oversees the business and financial transactions of the College, accounting, human resources, buildings and grounds.

Vice President for Advancement – Jackie Davis

The vice president for advancement coordinates fund raising, alumni relations, and church relations.

Vice President of Christian Formation – Mark DeYounge

The vice president of Christian formation gives leadership in areas of spiritual formation – discipleship, missions and service learning. The dean of Christian formation is also responsible for chapel and worship.

Vice President for Enrollment & Marketing - Tamara Fynaardt

The vice president for enrollment and marketing is responsible for public relations and marketing and for all matters pertaining to the recruitment, admission and financial support of students.

Vice President for Athletics – Tony Hoops

The vice president for athletics is responsible for all athletic programs.

2. FACULTY/STAFF COMMITTEES

Many of the policies of the College are developed through a rather extensive committee system. Several staff members serve on these committees by virtue of their assignments at Northwestern. More detailed information on the campus committee structure can be found in the Faculty Handbook.

3. STAFF ADVOCACY COMMITTEE

The staff advocacy committee represents NWC staff in regards to interests, issues and concerns that affect them. The group serves in an advisory capacity and is responsible to the president.

The committee is made up of full-time and regular part-time (75% or above) representatives (1 from each area) from the following areas:

- Academic Support – Computing Services, Library, Graduate & Online Learning, Academic Support, Global Education, Franken Leadership, Registrar, Institutional Research
- Advancement
- Enrollment Management – Admissions, Financial Aid, Public Relations
- Finance and Operations – Business Office, Printing Office, Bookstore, Mailroom, HR
- Maintenance
- Athletics
- Student Development – Campus Ministry, Career Development Center, Wellness Center, Intercultural Affairs, Student Programs, Residence Life
- Director of Human Resources – serves as a resource to the group

The committee will have representation from both exempt and non-exempt staff. The director of human resources and chair of the staff advocacy committee will solicit nominations and conduct elections from representative areas and assure that there is a mix of exempt and non-exempt staff. Each member of the committee will serve for 2 years and will elect a chair, vice chair and secretary. These positions will be elected annually. Each member of the group will have voting privileges except for the director of human resources who serves as a resource to the group.

Meetings will be held monthly throughout the academic year and the committee will decide on when and if to conduct summer meetings.

The chair will preside over all meetings. In the absence of the chair, the vice chair will assume this responsibility. The secretary will maintain records of meeting minutes and copies of communications to the president or recommendations to the President's Cabinet.

The committee can focus its efforts on any of the following areas:

- Staff outreach and events
- Professional development
- Recognition and appreciation
- Health and wellness
- Policies and benefits
- Budget and finance, staff salaries
- Fostering positive working relationships with faculty

The staff advocacy committee may be consulted or make recommendations on policies, benefits, budget and salary issues, but a final decision on those items resides with the President's Cabinet. They may also consult and involve relevant faculty committees on programs or events that would also be of benefit to faculty members.

Staff who have concerns, questions or recommendations regarding any of the above listed areas can contact the member of the staff advocacy committee from their area (or any other area) who will then bring that item to a meeting for discussion.

SECTION III.
SUPERVISOR/EMPLOYEE RELATIONSHIP

1. GENERAL GUIDELINES

A. Recognize that employees are an organization's greatest resource. Their growth and development are of primary importance.

B. Acquaint yourself with all aspects of your job and the job others do in your office.

C. You must familiarize yourself thoroughly with this manual of Northwestern College so that your decisions and/or actions are based on actual policies.

D. Whenever a supervisor needs additional information or interpretation it is that person's responsibility to seek assistance.

E. Make every effort to respond to employee complaints or settle grievances at the earliest possible moment. In the case of a grievance follow the procedures outlined in Section XI.

2. COST CONTROL

A. Continually analyze ways and means of improving work performed in your office or department and look for ways in which your area can become more efficient.

B. Make every effort to study and use any available cost data pertaining to your area.

C. Exercise controls over your office or department budget to make sure that you stay within your allocation and have accurate information when submitting your area budget request.

D. Be an example to your people in the use of supplies and time.

3. PERSONNEL RECORDS

As supervisor, you have responsibility to maintain certain personnel records in your department. Such records are to serve as:

A. Documentation necessary to show that the legal, regulatory, and procedural requirements have been met in all matters.

B. A basis for making personnel decisions.

C. A basis for reports on personnel activities (performance evaluations, work load, vacation and sick days, personal leave, etc.).

D. A basis for defining and revising job descriptions for each position in your office or department.

SECTION IV.

EMPLOYEE GROUPS

1. FULL-TIME EMPLOYEES

Those employees who work the customary minimum of forty hours per week and maintain continuous regular employment status.

2. PART-TIME EMPLOYEES

Those employees who work less than the customary minimum forty hours per week and maintain regular employment status. Part-time employees are not eligible for Northwestern College benefits, except for those specifically outlined in Section VIII of the Employee Handbook.

3. EXEMPT (SALARIED) EMPLOYEES

Employees who are exempt from the minimum wage, time card and overtime provision of the Fair Labor Standards Act (Wage-Hour law). Exempt positions must meet the Department of Labor's regulations for job responsibility in one of the categories for executive, administrative, professional, computer or outside sales, and be paid a minimum salary of $684 per week for each week worked to be considered exempt. Employees who are classified as exempt under the FLSA are not paid overtime in either cash or compensatory time.

All exempt administrative and staff appointments are renewed at the beginning of each academic year, August 1 or September 1, provided continued employment is in the interest of the College. Because of the nature of Northwestern College as an educational institution, some exempt positions (i.e. academic, admissions, athletic, and student development staff) may be for less than twelve months, usually nine or ten months, unless stated otherwise in their letters of appointment.

4. NON-EXEMPT (HOURLY) EMPLOYEES

Employees who are not exempt from minimum wage, overtime, and time card provisions of the Fair Labor Standards Act (Wage-Hour law). These employees receive overtime at the rate of one and a half times their regular rate for hours worked over the customary minimum of forty hours per week.

SECTION V.

TERMS OF EMPLOYMENT

1. GENERAL PHILOSOPHY

While Northwestern College will not discriminate in hiring on the basis of gender, race, national or ethnic origin, age, or disability, and while the College hopes to assemble a diverse faculty and staff, including representation of minorities and women, the College's mission as a Reformed/evangelical institution of higher learning demands that all who accept a position at Northwestern profess faith in Jesus Christ as Savior and Lord, are committed to behavior that is in keeping with biblical principles, and desire the growth of Christian convictions and maturity in the College's students.

2. HIRING PROCEDURES FOR STAFF PERSONNEL

A. A request for hiring a staff or faculty member will be made to the President by a President's Cabinet member by completing the "Request for Position Approval" form.
B. Each approved staff position may be advertised in-house, locally, or nationally, depending on position requirements. The advertisement shall identify expected responsibilities, required qualifications, and the need for commitment to the Christian faith.
C. A person is considered a candidate for the position after submitting a completed application to Human Resources.
D. Evaluation and screening of candidates will be managed by the hiring supervisor, search committee or President's Cabinet member.
E. Candidates invited for campus interviews will be scheduled to meet with relevant personnel.
F. After all the initial interviews and review of the feedback from interviewers, the hiring supervisor and/or the President's Cabinet member shall recommend the candidate to be offered the position.
G. If the President approves the offering of a position, the President's Cabinet member, in consultation with Human Resources and the President, shall determine the employee status and salary for the offer. If the job offer is accepted, the hiring supervisor and/or President's Cabinet member shall then complete a "Hiring Authorization" and a letter of appointment shall be issued.
H. Only the President or designee has the authority to offer a written appointment on behalf of the College, and only the promises made in that appointment agreement bind the College.

3. HIRING OF RELATIVES

The college does not prohibit the hiring of family members of a staff or faculty employee. However, an employee is not allowed to supervise a family member directly. Indirect supervision should be discussed with Human Resources before any offer of employment would be made.

4. EMPLOYMENT OF MINORS

As a general policy, employees of Northwestern College must be 18 years of age or older and no one under the age of 16 may be employed. A "minor" is defined as any individual under the age of 18.

Supervisors should be aware that certain employment restrictions apply to minors. These include:

A. Minors age 17 and under are restricted in the number of hours they may work in a day and week. Restrictions on hours worked vary depending upon the minor's age and whether work is performed on a school day or non-school day.
B. Minors of any age are not permitted to work under the direct or indirect supervision of a relative.
C. Employees under 18 years of age are prohibited by law from performing certain types of work deemed hazardous, such as:

    1. Roofing or excavation operations.

2. Occupations involving the operation of hoisting apparatus or power-driven tools or machinery (including lawn mowers).
3. The operation of motor vehicles or service as helpers on such vehicles.
4. Construction (including building trades).
5. Spray painting.
6. Operation of weed eater or floor machines and window cleaning above the second floor.
7. Jobs involving exposure to hazardous materials.

If a supervisor is seeking to offer employment to a minor, prior to the offer he/she must contact the Director of Human Resources.

5. BACKGROUND CHECKS

As part of the employment process, Northwestern College will conduct criminal background checks on applicants hired for all full-time and part-time staff and faculty appointments. Volunteer positions may also warrant background checking when involvement with or interaction among students is significant

The college reserves the right to determine which positions will be subject to background checks at any time prior to the beginning of recruitment efforts. Additionally, applicants who indicate on their application they have previously been convicted of or pled guilty to a felony or indictable misdemeanor will also be subject to background checks.

Procedure

At the point of hire, the candidate will be informed that the offer is contingent on a satisfactory background check that will be conducted by an outside vendor for review by the College. The background check will consist of a criminal background search and, depending upon the job description requirements of the position to be filled, may also involve an educational background search and/or motor vehicle driving record search. Credit checks will be conducted for positions with key financial responsibilities (i.e. VP for Finance and Operations, Controller, etc.) or positions that handle large sums of cash on a regular basis.

All candidates will be required to have a criminal background check conducted prior to the first day of employment. Under most circumstances, background checks will be completed prior to the first day of employment. However, if employment is begun prior to receipt of the results of the background check, continued employment is conditioned upon an acceptable background check.

The Office of Human Resources will be responsible for conducting the background check and will obtain the appropriate signed consent or waiver form(s) for the background investigation from the candidate. This form(s) will be kept in strict confidence by the College and will be used only for obtaining the necessary background check from the vendor.

Most checks will be returned in 1-2 days, but are dependent on the counties in which the vendor must search and the record itself.

Criminal history record information will not be made part of the applicant's or employee's file or communicated to any unauthorized person.

Candidates will be informed of any findings of concern and be given the opportunity to verify or dispute the accuracy or completeness of the information. The President, in consultation with the division Vice President or Dean and the Director of Human Resources, will consider whether an offer is to be rescinded as a result of any findings based on the background check.

Summary

Criminal history information will be used only for the purpose of evaluating candidates for employment and shall in no way be used to discriminate on the basis of race, color, national origin, gender, disability or age. This policy does not automatically exclude from consideration for employment all individuals with criminal convictions.

6. TERMS OF APPOINTMENT

Staff is issued letters of appointment by the President with the following understanding:

A. The appointee shall be in fundamental agreement with the purpose of the college as set forth in the Employee Handbook.
B. The appointee shall express an active Christian commitment, which in the Reformed tradition includes identification with a local body of Christian believers.
C. The appointee shall actively support those measures taken by the college to further the Christian understanding and commitment of the members of the campus community.
D. The appointee shall agree to resign from the Northwestern College staff as a person of integrity if ever in good conscience there is an inability to agree with the Christian stance to which the college is committed or an inability to actively support its program, including the chapel program.

7. CONFLICT OF INTEREST

In an effort to preserve institutional integrity, accountability and fairness, it is appropriate that institutions have conflict of interest policies and accompanying procedures. A conflict of interest exists when the institution's employees or members of its governing board have an outside interest that has the potential of being at variance with the best interest of the institution.

This could include conflicting financial interests, use of confidential information for personal gain, unauthorized disclosure of confidential information, use of institutional time or facilities for personal purposes or other activities. It is also recognized that the appearance of a conflict of interest (when in fact it may not exist) can be damaging to the institution.

It is unlikely that all conflicts of interest can be avoided. Such conflicts should not inevitably disqualify one from service or employment. Rather, certain safeguarding procedures should be followed.

Members of the governing board, senior administrative officers and certain other employees will be required to sign a conflict of interest statement indicating their willingness to disclose such conflicts of interest, to resolve them where appropriate, and to excuse themselves from the discussions and decisions which would/could be self-serving.

8. TERMINATION

When an employee voluntarily terminates employment, the College requires notification in writing, at least two weeks prior to the last working day (both non-exempt and exempt employees). The written notice should be given to the supervisor. The supervisor should forward said notice to the President and notify the Human Resources Office.

If the College must terminate employment for any reason other than unsatisfactory performance, the employee will receive notice at least two weeks prior to termination date. If termination is necessary because of unsatisfactory work or for cause, the College will reserve the right to offer as much notice as the employer deems appropriate.

9. RETIREMENT

A. Sixty-five is the "normal" retirement age for all Northwestern College employees. There is, however, no mandatory retirement age for employees.

B. Those eligible for the retirement benefit retain it until they retire from the College.

C. Early Retirement

The policy of the College to contribute to the College's Retirement Program on behalf of an employee was adopted to ensure that employees will, through the Retirement Program and Social Security, have a reasonable retirement income when they retire. For employees, normal retirement age has been defined in the College's Retirement Program as age 65 and one's normal retirement date is the last day of the academic year during which he/she attained the normal retirement age. The academic year of the College is the 12-month period beginning on August 15 and ending on August 14. (For purposes of determining the age eligibility of this benefit, the academic year is utilized.)

It is recognized, however, that for personal reasons an employee may wish to retire before age 65. In an effort to be responsive to individual aspirations and needs, as well as to the on-going needs of the College, this Early Retirement Program (the "Program") has been developed.

1. **Eligibility**: The early retirement plan at Northwestern College provides two eligibility options. Employees must be in a benefit-eligible category (75% or above) at the time of early retirement to qualify. All years of part-time service will be used to calculate a full-time equivalency.

    a. Option A: Employees who have reached the age of 57 and have completed 20 years of full-time service to the College. An employee who has attained age 57 and served the College on a full-time basis for at least 10 years, but has not completed 20 years of service to the College, is eligible for these benefits on a pro-rata basis based on the ratio of years of full-time service to 20 (i.e., an individual with 10 years of service shall receive 50% of the monetary benefit).

    b. Option B: Employees whose age plus the number of academic years of service at Northwestern College as a full-time employee equals or exceeds seventy-seven (77). The employee must meet the 77-point requirement by the requested retirement date. Unless renewed by the College's Board of Trustees, this Option B is in effect only until August 14, 2029, at which time it shall terminate.

2. **Monetary Benefits:**

    a. Early retirement benefits are payable for a maximum of five years or for each year of early retirement preceding age 65, whichever occurs first, with such amount to be paid in twelve monthly installments.

    b. Under Option A, the College will pay to an early retiree an amount equal to 16.25% (plus .25% for each year of service to the College beyond 20) a year of the retiree's last academic year's salary.

    c. Under Option B, the College will pay to an early retiree an amount equal to 16.25% a year of the retiree's last academic year's salary for a combined age and service equal to 77. The College will pay an additional .25% for each 2 points above 77 (i.e. plus .25 at 79, 81, 83, 85, etc.).

3. **Additional Benefits:** For a maximum of five years or until they reach normal retirement age, whichever occurs first, the College will provide employees who retire pursuant to the program with the following benefits:

    a. Retirement Benefit
    The College will make a contribution to the retiree's retirement plan as it does for regular benefit-eligible employees. This contribution will be based on the early retirement compensation.

    b. Medical, Vision, and Dental Insurance
    Early retirees who participate in the College's group medical insurance plan, vision and dental plan, on the date of early retirement have the option of continuing coverage for the early retiree and his or her eligible dependents for a maximum of five years or until they reach normal retirement age (65), whichever first occurs. The College shall pay the same share of the cost of the early retiree's coverage under the Plan that it pays for the coverage of its active employees. COBRA continuation coverage will be available to a retiree upon the expiration of the retiree medical coverage.

    The College may amend or terminate this coverage for retirees in whole or in part, including amending the contributions required for such coverage, at any time and for any reason, without prior

notice to any person and without regard to the effect that such amendment or termination may have on the benefits payable to any retiree; provided, that nothing shall deprive a retiree of the right to receive any payment due and owing under the plan as of the effective date of the change. The College may at any time amend, modify, or terminate medical, vision, or dental coverage for retirees without any requirement that the coverage for active employees or other dependents be similarly amended, modified, or terminated.

c. Life Insurance
Life insurance for early retirees is limited to basic life insurance coverage, with no additional benefits for accidental death or dismemberment insurance or voluntary life. The life insurance benefit will terminate on the first of the month following the attainment of age 65 or after five years of early retirement benefits, whichever occurs first. Employees who elect early retirement cannot return to full-time employment by his/her own election.

4. An employee who elects early retirement may accept an invitation, when extended by the College, to work on a part-time basis.

5. An employee who wishes to retire early pursuant to this program must notify the College in writing of this intention no later than October 1 of the academic year at the close of which the early retirement is to commence. Staff members should make this notification to the Vice President for Finance and Operations and faculty members should notify the Vice President for Academic Affairs.

6. A faculty member in early retirement is eligible for emeritus status and all the privileges and benefits accorded emeritus faculty members on the same basis as normal retirees.

7. Early retirement benefits shall not apply to persons who qualify for disability status.

8. Staff employees will be paid any earned but unused vacation or personal time prior to retirement benefits.

9. If an eligible employee dies after electing to participate in the early retirement, the employee's spouse will be eligible for the retirement payments. If there is no surviving spouse, the College is relieved of the responsibility to make payments under this plan. Continuance of payments after death to the employee's spouse will cease in the event of the spouse's death prior to the completion of the payment period.

10. Unless renewed by the College's Board of Trustees, this program is in effect until August 14, 2029, at which time it shall terminate. The benefits of the program are not available to anyone unless a written request for these benefits has been received before October 1, 2028.

10. PHASED RETIREMENT

A. **Eligibility**
Participation in the Phased Retirement Program is open to all regular, full-time employees in good standing who have completed 10 years of service and whose age plus the number of years of service at Northwestern College as a full-time employee equals or exceeds seventy-seven (77). All requests for participation in the program must be approved at the discretion of the division President's Cabinet member and the president. The College reserves the right to limit participation in the program based on the needs of the college or a particular department. The College reserves the right to deny a request for participation if phased retirement would create a hardship for a department.

In the case of a dean or vice president who requests participation in the program, the request shall be submitted to the president.

B. **Terms**
Participation in the Phased Retirement Program is limited to no more than three years. After three years, a participating employee must enter full retirement.

Participating employees will be allowed to elect a reduced workload for a corresponding fraction of their salary as indicated below, but no less than a 50% reduction:

- ¾ staff service = ¾ of full-time salary + 10% of last salary
- ½ staff service = ½ of full-time salary + 10% of last salary

During this period, a staff member will continue prorated duties in addition to committee assignments. Overtime will not be allowed. During this period, a faculty member will continue prorated duties in addition to teaching, including advising, scholarly activities and committee assignments. Overload teaching will not be allowed.

Tenured faculty employed under this plan will retain the right and responsibilities of tenure as described in the Faculty Handbook.

A participating employee and the division dean or vice president will establish an agreement specifying the terms of the reduced workload. The dean or vice president and the employee will review and renew the workload agreement annually up to a maximum of three years.

C. **Benefits**

1. Participating employees will continue to receive full **health, dental or vision benefits** at the regular full-time employee rates, provided the employee pays the required employee premium contribution for any coverage.
2. College-provided **life insurance** will continue for the employee and any family members as long as the staff member is at ¾ service. Voluntary life benefits are available starting at 3/4x service.
3. College-provided **403(b) contributions** are based on an employee's actual salary during participation in the Phased Retirement Program.
4. College-provided disability insurance is based on a staff member's actual salary provided the staff member is at ¾ service during participation in the Phased Retirement Program. Disability benefits are not available at less than ¾ service.
5. Participating employees are also entitled to **tuition remission**.
6. Participating staff members that earn and accrue paid leave benefits (vacation, personal, sick leave) will accrue pro-rated benefits according to their reduced work schedule as long as they are at a ¾ schedule or greater. Paid leave benefits will not accrue if the work schedule is less than ¾ time.

Northwestern College may modify or terminate the terms of this program at any time in its discretion or if benefits are changed for all College employees generally.

D. **Procedures**

A written request for participation must be submitted to the division dean or vice president no later than six (6) months before the beginning of the academic year that the employee wishes to enter into the Phased Retirement Program.

After the request is submitted, the dean or vice president and the employee will meet to discuss the request. The dean or vice president will indicate tentative approval or reasons for denying the request. Denial of a request does not preclude approval of a subsequent request. If the dean or vice president provides tentative approval, the matter will be forwarded to the president for final approval. Upon approval of the president, the dean or vice president and the employee will develop an agreement establishing the terms of the employee's participation in the Phased Retirement Program. The Phased Retirement Program agreement will include the reduced workload agreement. The reduced workload agreement is subject to annual review and renewal for up to three years.

Once a Phased Retirement Program agreement has been developed, it will be reviewed by Human Resources before the dean or vice president provides final approval. After review by Human Resources, the dean or vice president will make any required changes to the agreement. When it is finalized, the dean or vice president and the employee will review and sign the agreement.

SECTION VI.

HOURS

1. GENERAL POLICY STATEMENT

Northwestern College will maintain hours of work which are compatible with Federal and State legislation and maintain an effective and efficient schedule of work. The Federal Wage-Hour laws (Fair Labor Standards Act) require that Northwestern College maintain accurate accounting of hours worked.

2. NORMAL WORK WEEK

A. For record keeping purposes the work week starts at 12:01 a.m. Sunday and ends on midnight Saturday and consists of five working days of eight hours each (40 hours per week).

B. The normal work day consists of eight hours.

1. Normal work hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday – an elapsed time of nine hours, while the normal lunch period is one hour. The one-hour lunch period is to be deducted from total elapsed time, providing for a net total of eight hours daily. There are a variety of other work schedules used in various departments.

2. Beginning the first full week after commencement and continuing through the first full week before August 1, normal work hours will be from 8:00 a.m. to 4:30 p.m.

3. Staff employees will be given the opportunity to use summer flex time (37½ hours per week) beginning the first full week after commencement and continuing through July. Normal working hours will resume in August or the first full week where August 1 falls and this date will be communicated to staff in advance. The following option is available for summer flex time:

Monday	8:00 to 4:30	½ hour lunch break
Tuesday	8:00 to 4:30	½ hour lunch break
Wednesday	8:00 to 4:30	½ hour lunch break
Thursday	8:00 to 4:30	½ hour lunch break
Friday	7:30 to 1:00	no lunch break

Employees must work 37½ hours or cover the time with any paid benefit time available to receive the 40-hour pay benefit. From time to time, some offices may need to remain open on Fridays to meet constituent needs. That will be determined by the department director or area vice president.

4. Individual work schedules and the number of hours worked per day and/or week may be adjusted to meet particular overload conditions, work requirements, or the desires of certain employees to work less (e.g., during the summer).

3. REPORTING OF HOURS WORKED

In accordance with federal and state laws, accurate records must be kept of hours worked in each work day and each work week. All Northwestern College non-exempt employees are expected to record their actual hours of work through the payroll time and attendance system.

Hours worked should be recorded to the nearest quarter (1/4) hour. Each supervisor will be responsible for approving time cards in his/her department. The supervisor must review the timecard of each employee and indicate approval of hours worked and/or absences reported.

4. INCLEMENT WEATHER PROCEDURES

In cases of inclement weather, we prioritize 1) the safety of employees and students, and 2) delivering the educational experience we promise students. Employees are expected to make every reasonable effort to be present when the campus is open.

Campus closures for inclement weather will be rare as some onsite student services are necessary for residential students' wellbeing. If the college decides to cancel classes, close offices or otherwise alter its schedule, that information will be communicated via email to employees and students, posted on our website and social media, and communicated via our text messaging emergency alert system.

Daytime closure announcements will be made by 6 a.m.; evening closure announcements will be made by 3:30 p.m. Late openings or early closures will be considered if doing so best serves the safety of the campus community (e.g., allowing time for maintenance to clear sidewalks and parking lots). If campus closes, has a late start or an early closure, closed hours will be treated as paid time off for staff.

It is up to the employee to decide if weather conditions make it unwise for them to travel to campus or remain on campus. In that situation, these options are available for faculty and staff:

Faculty members who are unable to be on campus must:

1. Notify students by NWC email at least two hours prior to the beginning of class and provide an alternative assignment
2. Notify your department chair or dean

Staff members who are unable to be on campus may pursue any of the options listed below, which must be approved by the employee's direct supervisor. We recognize there is no "one size fits all" solution because of the highly diverse nature of our work, but our goal is nonetheless to be as equitable as possible. Staff members may:

1. Use personal or vacation time or take the day off without pay
2. Work remotely if their work can reasonably be done at home (see *Remote Work Guidelines* in *Section V*)
3. Make arrangements to make-up missed time

If staff absences result in an entire office being closed, the supervisor must ensure an office closure notice is posted on the door or window.

5. REMOTE WORK GUIDELINES

Community in the form of personal relationships—between faculty/staff and students and among faculty and staff—are central to the mission of Northwestern College. To ensure the success of our mission, we expect employees to primarily do their work onsite. However, there are exceptions that may allow for remote work.

Temporary remote work may be allowed for employees who can reasonably do their work offsite in circumstances that include inclement weather (see *Inclement Weather Procedures* in *Section VI*), special projects, family or personal illness, or business travel.

Such arrangements are exceptions and will be made on a case-by-case basis with no expectation of ongoing continuance. Temporary remote work must be approved by an employee's direct supervisor.

Permanent (or long-term) remote work may be allowed and supported when such an arrangement: 1) is mutually beneficial to both the college and the employee, 2) does not unduly burden the college financially or operationally, 3) can be appropriately supervised, and 4) suits the nature of the role and work being performed.

Permanent or long-term remote work arrangements are an exception and must be documented in a remote work agreement (available from HR) and approved by an employee's direct supervisor, human resources, and the President's Cabinet member who oversees the employee's division.

Any employee working remotely (either temporarily or long-term) must live in one of the 13 states where the college is registered and must also meet these requirements:

- Maintain a safe and secure work environment to reduce any potential physical strain
- Maintain security of all college data, working with Computing Services to ensure sharing and storing of data is done properly
- Be generally available for video, phone and email contacts during normal working hours (8 a.m. to 5 p.m., M-F)
- Ensure customers and colleagues are able to reach you by phone (forwarding your campus extension to a cell or home phone) or email and respond to voicemails and emails with a timeliness consistent with the response rates of onsite colleagues

Questions regarding any aspect of this policy should be directed to the Human Resources Office or the President's Cabinet member who oversees your division.

6. OVERTIME

Because of the nature of some work, it may be necessary occasionally for employees to work some overtime. When that is necessary, overtime work must be approved in advance by the division or department head. Overtime is all time worked by non-exempt (hourly) employees in excess of forty (40) hours per week and is paid at one and one-half times their regular hourly rate. Paid vacation, personal and sick leave days do not count as hours worked in computing weekly overtime. Holiday hours, however, do count as time actually worked when calculating overtime.

7. CALL-IN PAY – MAINTENANCE STAFF

When a non-exempt, hourly maintenance employee has completed their scheduled work for the day, has left the campus, and is subsequently called-in for an emergency repair call during unscheduled time, they will be guaranteed a minimum of one (1) hour at 1½ times their regular rate of pay. If the repair call exceeds one hour, they will receive one hour of pay at time and one-half for each partial hour worked. Scheduled event coverage is not part of this policy.

8. TRAVEL TIME

Travel time to attend training or a workshop out of town, and the time spent in the training or workshop will be considered hours worked. For more information about pay when attending training, workshops or working at off-site locations, contact the Human Resources Office.

9. ABSENTEEISM

Any employee who is absent from work shall be responsible for notifying his/her supervisor when he/she is off and when he/she will report back to work and complete the appropriate absence form on the time and attendance system.

10. REST PERIODS OR COFFEE BREAKS

Employees are entitled to two 15-minute rest periods during the day, one in the morning and the other in the afternoon. The purpose of the rest periods is to allow employees a break from the strain of his/her workload away from the work place area. The precise times for these rest periods are to be set in consultation with the supervisor, who will insure that the office has proper phone coverage and that the normal work flow is not encumbered. Employees are strongly urged to attend chapel in lieu of the morning coffee break. Each supervisor will be pleased to arrange as much chapel participation as is fair and practical while at the same time maintaining adequate office staffing.

11. PREGNANCY ACCOMODATIONS / BREAK TIME FOR NURSING MOTHERS

Northwestern College will consider and approve reasonable accommodations for pregnant employees, consistent with applicable law and other college handbook policies.

In accordance with section 4207 of the Patient Protection and Affordable Care Act (also known as Health Care Reform), the college will provide reasonable break time* and a private, non-bathroom place for nursing mothers to express breast milk during the workday, for one year after the child's birth.

Supervisors may consider flexible working arrangements. Women may use their break and lunch time to express milk. Additional time used beyond authorized break time will be uncompensated and should be recorded as such unless the employee makes up the additional time needed or uses any paid leave time.

The college will also make a reasonable effort to provide the employee with a private location within close proximity to her work area to express milk. Milk should be placed in cooler-type containers and may be stored in college refrigerators.

An employee wishing to be provided a break and/or location for expressing breast milk should notify the Director of Human Resources.

*The frequency of breaks needed to express milk as well as the duration of each break will likely vary.

SECTION VII.
WAGE AND SALARY POLICIES

1. GENERAL POLICIES AND PROCEDURES

Northwestern College makes a sincere effort to pay employees fairly and to be sure that their pay is in line with the degree of responsibility, skill, and knowledge required in their jobs. It is our goal to have established job descriptions for all staff positions, permitting individual consideration of job performance and deserved promotion.

Each staff job has a pay range that is determined through market pricing and external job comparisons, internal job comparisons, the distinctive character and intrinsic value of a job to the institution, and the financial resources of the college. The President's Cabinet in consultation with the Human Resources Office determines the appropriate pay range for each position. Pay ranges will be reviewed annually to keep pace with the labor market and preserve pay equity within the college.

Faculty members who assume full-time administrative positions (librarians, Vice President for Academic Affairs, etc.) are considered administrators on 12-month appointments with their salaries not being determined by the faculty step system, rather by policies that determine administrative/staff salaries.

2. COMPENSATION REVIEWS

All staff employees will have their salary or wage reviewed once every twelve months, usually in late spring. If a raise is granted it will go into effect on August 1 or September 1 of a given year. Individual compensation is based on a number of factors including: performance, recommendation by direct supervisor, current compensation as compared to similar positions across campus, length of service, level of compensation as compared to similar positions in the marketplace, and the availability of college resources. Since each position has an established pay range, individuals are also evaluated and paid based on the relation to their position in the range as well as the factors listed above.

3. PAYROLL PAYMENT SCHEDULE

Paychecks are issued the 25th of each month. Checks will be directly deposited into your bank account and direct deposit is required as a condition of hire. If the 25th day of a month falls on a Saturday, Sunday or a holiday falls on a weekend or Monday, the payment will be made the Friday before.

4. BENEFIT ENROLLMENT FORMS & PAYROLL DEDUCTIONS

All employees of Northwestern College must meet with Human Resources no later than the first day of employment to complete various required employment, payroll and benefit forms.

When an employee marries or when the number of dependents changes, a revised W-4 statement should be filed and submitted to Human Resources. The College is required by law to withhold from all employees specified amounts for federal and state income taxes and social security tax. Optional deductions are allowable if authorized in writing by the employee. Some examples would include medical insurance coverage, participation in the tax-sheltered retirement program, and payroll deductions which are contributions to Northwestern College. Each employee will receive a W-2 statement of the annual salary and deductions for income tax purposes.

5. POLICY ON EXEMPT PAY

In accordance with the Fair Labor Standards Act regulations, exempt employees who are required to be paid on a salary basis may not have their pay reduced for variations in the quantity or quality of work performed. Employees who believe their pay has been improperly reduced should contact the Director of Human Resources. If it is determined that an improper deduction has occurred, the college will reimburse the employee as promptly as possible.

It is also the college's policy to pay exempt employees on 9- or 10-month appointments over 12 months. Exempt employees will not have the option of choosing a payment schedule less than 12 months.

SECTION VIII.

EMPLOYEE BENEFITS

1. ADMISSION TO COLLEGE EVENTS

Employees, spouses and dependent children (under the age of 24), or employees and one guest, are admitted free to college-sponsored events. Employee identification cards will admit you, your spouse, and dependent children to college-sponsored theatre events. Employee digital passes for athletic events can be claimed at nwcraiders.com/tickets using the unique employee passcode sent via an email from the athletics department. There may be a few campus activities at which everyone will be expected to pay an admission fee.

2. ADOPTION BENEFITS POLICY

Policy Overview

To offer assistance to all employees who are building families, a policy has been developed to provide eligible employees with adoption benefits—including financial reimbursement and adoption leave of absence.

Eligibility

Effective July 1, 2007, all employees working at least 1560 hours per year are eligible for adoption benefits after one year of employment. Effective May 1, 2023 adoption benefits include adoption of any person, child or adult. If an employee and his/her spouse both work at Northwestern College, only one employee can utilize the financial benefit, but leave may be shared between the two parents per the Family Medical Leave of Absence (FMLA). The employee must be actively employed at the time any financial reimbursement is made.

Financial Reimbursement

Eligible adoption-related expenses will be reimbursed to a maximum of $2,000 per adoption. Adoption of a special needs adoptee with a permanent mental or physical disability will qualify for an extra $1,000 reimbursement per adoptee. (Documentation from the placement organization of special needs will be required.) Most expenses directly related to the adoption are reimbursable. These include:

- Home studies
- Agency and placement fees
- Legal fees and court costs
- Temporary foster care costs
- Medical expenses of the child, not covered by insurance
- Immigration, immunization and translation fees
- Transportation and lodging

Timing and Procedure for Reimbursement

Upon legal placement of the adoptee, obtain an Adoption Financial Reimbursement Form from the Human Resources department. Itemized receipts for expenses are required for documentation.

Financial assistance for adoption expenses are exempt from federal and state income tax withholding, but are subject to social security and Medicare taxation. All qualifying adoption expenses reimbursed will be reported on an employee's W-2. Employees should refer to Internal Revenue Service instructions entitled *Qualified Adoption Expenses* regarding taxation of financial benefits, tax credits and tax exclusions.

Adoption Leave of Absence

- Paid and unpaid leave:
  An employee who adopts a child, whether male or female, is eligible for up to 7 days of paid leave (in addition to parental leave – see the parental leave policy on page 35). This time may be utilized both pre or post adoption, and will be applied to leave allowed under the Family Medical Leave Act. Additionally, the employee is eligible for up to 11 additional weeks of unpaid leave per FMLA. If both parents are employees by the college and each wish to take FMLA leave, they may only take a

combined total of 12 weeks of leave. Employees may use accumulated sick leave, vacation, personal leave, or other paid time as designated under the college's FMLA benefit during their leave. During Family Medical Leave, employees will continue to receive regular benefits which are related to date of hire. (Please refer to the Family Medical Leave of Absence, Section VIII. #8 for more detailed information.)

- Procedures for leave of absence:
  Employees are requested to provide their supervisor with as much preliminary information on need for time off as early as possible. Though many adoptions are unpredictable as to when they occur, in many cases this will prevent unplanned interruptions in departmental workflow while allowing employees to take necessary leave time. Once an employee knows the dates needed for the leave, they must complete a FMLA leave of absence request form.

3. RETIREMENT PLAN

Employer provided retirement benefits are provided for all employees whose work schedule exceeds 1,000 hours annually and eligibility is the first of the month coinciding with or following the date of hire. The college shall contribute a sum equal to 4% of the base salary of employees to TIAA. In addition, the college will match employee elective contributions of up to 2% of eligible compensation. Part-time employees working less than 1,000 hours annually are eligible to make elective deferrals to the plan, but are not eligible for employer contributions. Please refer to the Summary Plan Description for the 403(b) Defined Contribution Plan for additional information regarding this benefit and definitions of terms.

4. BEREAVEMENT LEAVE

Bereavement leave is provided for employees working at least 1560 hours annually and will be pro-rated for part-time employees.

Up to four working days of personal leave with pay may be granted in the event of the death of an immediate family member. "Immediate family" includes parents, stepparents, husband, wife, children, stepchildren, grandchildren, siblings, step-siblings and in-laws. Two days off with pay may be granted for the death of grandparents. This paid leave is not automatic and actual length of time will depend on your involvement in the arrangements, possible travel time, and your attendance at the funeral. Request for bereavement leave must be submitted to your supervisor.

5. BOOKSTORE DISCOUNT

The College Bookstore offers employees a 25% discount on merchandise other than textbooks or items already discounted. Departmental charges for merchandise do not receive the 25% discount. Books special ordered are without shipping charges and receive a minimum 25% discount. Price quotes are available on special order books before placing an order.

6. EMPLOYEE ASSISTANCE PROGRAM (EAP)

Northwestern College offers an Employee Assistance Program (EAP) to all employees who work 1000 or more hours during the year. The EAP provides access to confidential prepaid professional services which help employees and their family members deal with a wide range of problems including: family or relationship, emotional or mental health, substance abuse or addiction, financial or legal, gambling, or other problems that interfere with daily living.

Benefits
Employees or their family members can call a 24-hour hotline, speak directly to an EAP representative, and give a brief description of their problem. The representative will talk with them and if needed, set up a face-to-face appointment with a counselor at an area agency that deals with a particular problem area.

Individuals can have from one (1) to six (6) counseling sessions per incident at no cost to them. Any additional counseling needed is either at their own expense, or if for a medical condition covered under the college's health plan, can be submitted for reimbursement under the health plan.

Confidentiality
Services are completely confidential. The college receives a report on usage in order to pay for EAP services, but no personal identifying information on any employee or family member. Employees can use a variety of providers, including participating EAP providers outside the immediate area in order to further maintain confidentiality.

IMPORTANT: Consult your EAP information for additional information regarding this benefit, or contact Human Resources for questions on accessing EAP services.

7. FACILITY RENTALS

Current employees of Northwestern College receive a 50% discount on the rental rate for campus facilities (excluding housing facilities) when rented for their own personal use. Employees can contact the Maintenance Office Assistant (ext. 7170) for information and pricing on facilities available for rent.

8. FAMILY AND MEDICAL LEAVE OF ABSENCE (FMLA)

Northwestern College understands the importance of family issues as its faculty and staff members often face conflicting demands of family obligations and work. Because employees may find it necessary to take leave from their jobs for a temporary period to address certain family responsibilities or their own serious health condition, and in order to comply with the Family and Medical Leave Act (FMLA) as revised January 2009, Northwestern College has established the following family and medical leave policy and procedures.

Northwestern College provides to eligible employees unpaid time away from work for up to a total of 12 weeks or 26 weeks as applicable during a 12-month period for the following reasons:

- The birth and care of an employee's newborn child (12 weeks);
- The placement of a child with an employee for adoption or foster care (12 weeks);
- The care of a spouse, child (under 18 years of age or older child if disabled) or parent with a serious health condition (12 weeks);
- The inability of the employee to work because of a serious health condition (12 weeks);
- A qualifying exigency caused by a family member's active duty or call to active duty in the National Guard or Reserves in support of a contingency plan (12 weeks); or
- The care of a family member seriously injured or made ill in the line of active military duty (26 weeks)

Eligibility
To be eligible for FMLA leave, an employee must have been employed by the college for at least 12 months, and have worked at least 1250 hours during the 12-month period immediately preceding the leave.

GENERAL GUIDELINES

Leave Year (12-Month Period)
The "leave year" will be the 12-month period measured forward from the day an eligible employee's first FMLA begins. The employee may use the leave that is allowed during the year and, if he/she uses the total amount, will not be eligible for another such leave for a period of one (1) year from the FMLA begin date.

Serious Health Condition
A serious health condition is defined as a condition that requires inpatient care at a hospital, hospice or residential medical care facility, including any period of incapacity or any subsequent treatments in connection with such inpatient care or a condition that requires continuing care by a licensed health care provider.

Birth, Adoption or Foster Care Placement
Leave must be completed within 12 months of birth, adoption or foster care placement. Additional FMLA leave is not available due to multiple births, such as twins.

Spousal Exception
If spouses both work for Northwestern College and each wish to take leave for the birth of a child, placement of a child for adoption or foster care, or to care for a child with a serious health condition, the spouses may only take a combined total of 12 weeks of leave.

Qualifying Exigency
An employee whose spouse, son, daughter or parent either has been notified of an impending call or order to active military duty or who is already on active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following:

- Short-notice deployment (limited to seven days from notification),
- Military events and related activities,
- Child care arrangements and school activities (but not ongoing childcare),
- Financial and legal arrangements (limited to 90 calendar days if after the termination of active duty),
- Counseling by a non-medical counselor (such as a member of the clergy),
- Rest and recuperation (leave permitted up to five days for each instance),
- Post-deployment activities (limited to 90 calendar days after termination of duty), and
- Additional activities that arise out of active duty provided that the college and employee agree, including agreement on timing and duration of the leave.

Leave to handle qualified exigencies is not available to family members of the Regular Armed Services. Active duty or call to active duty status for purposes of qualifying exigencies applies to retired members of the Regular Armed Forces, the retired Reserves, the Reserves, and the National Guard. The leave may commence as soon as the individual receives the call-up notice. (Son or daughter for this type of FMLA leave is defined the same as for child for other types of FMLA leave except that the person does not have to be a minor.)

Military Caregiver Leave (also known as covered servicemember leave)
This leave may extend up to 26 weeks in a single 12-month period for an employee to care for a spouse, son, daughter, parent or next of kin covered servicemember with a serious illness or injury incurred while on active military duty and who is unable to perform the duties of the servicemember's office, grade, rank or rating. Next of kin is defined as the closest blood relative of the injured or recovering servicemember.

Leave to care for an injured or ill servicemember, when combined with other FMLA-qualifying leave, may not exceed 26 weeks in a single 12-month period.

Intermittent Leave or a Reduced Work Schedule
An employee taking leave for their own serious health condition or to care for a sick family member need not take such leave continuously and may take it on an intermittent basis (a few days at a time), or by reducing the employee's scheduled work hours. The employee must provide certification from the health care provider caring for the employee and/or family member that it is medically necessary for leave to be taken in this manner. If leave is not taken continuously, it will be deducted from the employee's entitlement to leave (i.e., 12 or 26 weeks equivalent during a 12-month period).

Requests for intermittent or reduced schedule (part-time) leave after the birth, adoption, or foster care placement of a child will be considered on a case-by-case basis.

Workers' Compensation Medical Leave
An employee who is injured on the job will receive workers' compensation following 3 days off from work as provided under state law. The workers compensation leave and FMLA will run concurrently.

PROCEDURES FOR REQUESTING LEAVE

Employees must provide 30 days advance notice to the College for foreseeable family or medical leaves. For unforeseen circumstances, notice must be given as soon as possible and practicable. Except in cases of extreme medical emergencies, the employee is expected to advise Human Resources as soon as they know of the need for and expected duration of the leave by completing the FMLA Request Form. Within 5 business days after the employee has provided this notice, the HR Director will complete and provide the employee with the DOL Notice of Eligibility and Rights.
Employees requesting leave must provide the appropriate certification to support a requested leave within fifteen (15) calendar days of the request. Failure to provide certification may result in a denial of continuation of leave. The following DOL Certification forms can be obtained by contacting Human Resources.

- Certification of Health Care Provider for Employee's Serious Health Condition
- Certification of Health Care Provider for Family Member's Serious Health Condition
- Certification of Qualifying Exigency for Military Family Leave
- Certification for Serious Injury or Illness of Covered Service member

Within five business days after the employee has submitted the appropriate certification form, the HR Director will complete and provide the employee with a written response to the employee's request for FMLA leave using the DOL Designation Notice.

IMPACT OF A LEAVE ON PAY AND BENEFITS

An employee who takes an FMLA qualifying leave is entitled to return to the position held before the leave was taken, or to be placed in an equivalent position with the same benefits, pay, and other terms and conditions of employment. Any leave granted will be unpaid unless employees are eligible for paid time as defined below.

Staff employees on 12-month appointments can use accumulated sick leave or other paid time-off benefits during an FMLA qualifying leave. Health-related leaves of absence for eligible full-time and ¾ time faculty, and for full-time and 3/4x athletics, student development and academic affairs staff on a 9 or 10-month appointment will provide for regular salary payments according to the following schedule during the academic year. Additional periods of medically required absence beyond 12 weeks will be worked out in consultation with the employee's President's Cabinet representative and Human Resources.

Years of Service	Weeks Paid (maximum)
1-4	4
5	8
6	9
7	10
8	11
9	11
10+	12

Where necessary, the college will be responsible for arranging and paying substitutes to cover the classes that are missed. The full-time faculty member retains responsibility for course content, class procedures and student grades.

There will be no change in faculty status for faculty members who receive a medically required leave of absence.

Group Medical Insurance
During any period of FMLA, the employee's group medical insurance will remain in effect provided the employee continues to pay their regular premium for medical insurance. Employee contributions will be required either through payroll deduction while on paid leave or direct payment to the college by the 1st of the month if the employee is on unpaid leave. If required premium payments are not paid within 30 days of the date such payments are due, medical coverage will be discontinued for the duration of the leave. The college will provide 15 days' notification prior to the employee's loss of coverage.

If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member or a circumstance beyond the employee's control, the college will require the employee to reimburse the amount paid by the college for the employee's health insurance premium during the leave period.

If the employee notifies the college that he/she is not returning from leave or does not return after 12 weeks, health benefits will terminate and the employee will be entitled to continuation of health insurance benefits in accordance with COBRA and the provisions of the group medical plan.

Retirement Plan
During a paid leave of absence, contributions to the college's retirement plan will continue to be made based on an employee's compensation paid during their leave of absence. No contribution will be made during an unpaid leave of absence.

Other Benefits
Other benefits normally provided to an employee shall be available only if permitted by the plan document governing the provision of benefits, and if the employee complies with the schedule for any required premiums.

RETURN TO WORK

Employees returning from leave will be reinstated to the same or an equivalent position, benefits, and pay to that which was held prior to leave, unless the employee would have lost their job in the absence of any leave (i.e. layoff, elimination of position, etc.) or any benefit or condition of employment has been discontinued for the college's employees.

The college may require a fitness-for-duty certification prior to reinstatement if an employee wishes to return to work early or where there is any question regarding the employee's ability to perform the essential functions of their job.

Employees who fail to return to work after a leave covered under this policy shall be treated as having voluntarily terminated their employment.

CONFIDENTIALITY

Northwestern College will keep confidential all information relating to requests for family or medical leave. This information will be used only to make decisions in regard to the provisions of this policy. The supervisor must submit all records to Human Resources and should not retain any copies in their files.

SUMMARY

The function of this policy is to provide employees with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law.

If you have any questions, concerns, or disputes with this policy, you must contact Human Resources in writing.

9. GPS ONLINE TUITION BENEFIT

Full-time and part-time **employees** working at least 1560 hours per year may enroll in credit-bearing online GPS courses at 75% off the current tuition rate.

The **spouse** of an eligible employee may enroll in credit-bearing online GPS courses at 25% off the current tuition rate. This benefit is not available to the employee's dependents.

The following polices apply to this program:

A. The maximum number of credits subject to this discount is limited to 18 credits per 12-month period for employees. There is no limit for spouses.
B. Credits may not be banked from one year to the next.
C. Benefit-eligible (75% time and above) faculty, staff and their spouses are eligible for the GPS online tuition waiver after the employee has worked for the college for at least 12 months.
D. The tuition benefit is available for the college's own curricular offerings, whether offered during the academic year or during the summer. It does not apply to course-by-arrangements, independent study courses, or directed study. The tuition benefit cannot be applied to any non-Northwestern College tuition costs.
E. The tuition benefit is limited to actual tuition costs less all grants and scholarships (Federal, State, Institutional, etc.) to which the student would be entitled. The tuition benefit will be applied after all grants and scholarships have been applied. All students must pay applicable program and miscellaneous fees (i.e. technology fees, application fees, textbook fees, etc.).
F. The employee shall be employed each semester the benefit is applied to the student account except for an employee who dies, is totally disabled, is called to military service, or retires (early retirement included) while in the employ of the college. In such exceptional cases, a tuition reduction on the balance remaining after all other grants have been applied shall be granted at the rate of 50%. (For purposes of this benefit, a person "retires" when leaving the full-time employ of the college after age 59 1/2.)
G. The tuition benefit program applies to only GPS online classes offered at the college. The tuition benefit does apply to graduate level endorsements and certificates. It does not apply to the Physician Assistant Program offered at the college.
H. Students who enroll in GPS classes may receive this benefit provided class enrollment minimums are obtained without counting waivered students. If minimum enrollments are not achieved, students may either withdraw or shall be billed at the established tuition rates. A student shall have 7 days from the date of a tuition bill issued pursuant to this provision to drop the class with no financial obligation.
I. Any employee needs to work for the college 12 months after the semester of their most recent receipt of this benefit, otherwise will be required to pay back 50% of the portion of the benefit value obtained during the preceding 12 months.
    a. Monthly payments will commence 30 days following the employee's termination date. During the repayment period prime rate is charged on the unpaid balance of the loan principal. Prime rate will be determined at the employee's termination date and will be adjusted annually. Principal and interest not paid when due shall draw interest at the rate of 12% per annum. The employee will have up to 2 years to repay the loan amount due.
J. Employees must complete the "GPS Online Tuition Benefit Application" form and submit it to the Financial Aid office for each year they or their spouse apply for the tuition waiver benefit. This form is available from the Financial Aid and Human Resources intranet site http://intranet.nwciowa.edu/hr/default.asp.

10. GRADUATE EDUCATION TUITION ASSISTANCE

To develop a competent work force, the attainment of graduate degrees or graduate level studies may often be of mutual benefit for both individuals and the college. Where mutual benefit is evident, the college will encourage and support the graduate studies by making available forgivable graduate tuition loans.

Eligibility

1. Employees who hold a regular appointment of 3/4x or more are eligible to apply for a graduate tuition assistance.
2. Graduate studies should be related to the enhancement of the employee's skills for fulfilling her/his current position at NWC.

Amount of Assistance

1. For full-time employees, 50% of graduate tuition and course fees will be covered up to $5,250 per year with a lifetime maximum of $21,000.
2. Employees at ¾ time or above will receive a prorated benefit.
    a. For example, a ¾ time employee would receive 75% of the 50% tuition benefit.

3. Travel, housing, books and supplies will not be covered
4. Funds will be granted on a forgivable loan basis: 25% forgiven for each year of full-time employment following the receipt of tuition funds.
    a. Employees who resign within four years from the year of participation in the program are required to reimburse the college on the following schedule

Time Limit	**Return of Tuition Refund**
Termination at end of year in which loan received	100%
Termination after 1 year	75%
Termination after 2 years	50%
Termination after 3 years	25%
Termination after 4 years	No payback required

    b. The employee will sign a promissory note for the loan agreement upon receiving tuition assistance, stipulating all conditions.
    c. If the employee should resign at the end of the year in which they have received a tuition loan, they shall have a loan repayment term of 4 years, paying back 25% per year, at prime rate interest. If they have worked one year at NWC, gaining 25% forgiveness of the loan amount, the repayment term shall be 3 years, at 25% per year, and likewise for each additional year.
    d. Monthly payments will commence 30 days following the employee's termination date. During the repayment period prime rate is charged on the unpaid balance of the loan principal. Prime rate will be determined at the employee's termination date and will be adjusted annually. Principal and interest not paid when due shall draw interest at the rate of 12% per annum. The employee will have up to 3 years to repay the loan amount due.

Process for Applications

1. Complete an application. The application form can be obtained from Human Resources or the Human Resources web page.
2. Review your application with your supervisor and President's Cabinet member. They must approve the application before it can be submitted to Human Resources. A plan, including rationale, estimated costs, and time line, should accompany the application.
3. Submit your application to Human Resources.
4. Application will be reviewed and approved by the President's Cabinet member in consultation with the Director of Human Resources.
5. Applicants are encouraged to submit application for the following academic year by October 1. Applications received after this date will be less likely to be funded.
6. Applications for graduate studies during the current fiscal year may be submitted. If funding for the current fiscal year is still available, requests will be funded on a first-come, first-served basis.
7. Preference will be given to those with longer service to the institution.

Other Stipulations

1. An application and approval from your supervisor and President's Cabinet member does not guarantee funds will be available and distributed.
2. Applicants must reapply every year.
3. An initial acceptance year does not guarantee funds will be available or granted for subsequent years. Preference will be given, however, to those who have received funds in the previous year.
4. Yearly and lifetime amounts may change if the IRS changes the allowed amount of tax-free educational assistance.
5. Any major variance from funds the employee originally requested in their application form will be discussed with his/her President's Cabinet member. The employee will be notified if the college can only fund up to the amount requested in the original application regardless of the individual program yearly limit.
6. Requests for payment of tuition must be submitted to Human Resources once approved by the President's Cabinet member.
7. Refer to Professional Development (Section VIII. #19) for guidelines regarding time off for graduate studies.

11. HOLIDAYS

Employees working at least 1560 hours per year will receive holiday pay. Full and part-time employees will be paid in accordance with their usual workday for holidays observed during their employment period. Employees are not eligible to receive pay for holidays not falling within the period of their job assignment (i.e., those employed during the academic year only would, therefore, not be entitled to holiday pay for Memorial Day or the Fourth of July).

The following holidays will be observed and compensation will be granted for hours not worked during these days. It is recognized that some offices may have certain work demands on a holiday or during a holiday period. If an employee needs to work on one of the following designated holidays or on Sunday within a holiday period it is understood that the employee may take equal time off on another day of the week.

A. **Good Friday**

B. **Tulip Festival**
Thursday and Friday afternoons of Orange City's Tulip Festival (provided such a festival actually takes place) will be considered as holiday hours. Any staff member (exempt and non-exempt) required to participate in the Tulip Festival beyond those two afternoons must arrange a leave with his/her immediate supervisor.

C. **Memorial Day**

D. **Independence Day**
If Independence Day falls on a Saturday it will be observed on Friday; if it falls on Sunday it will be observed on Monday.

E. **Labor Day**

F. **Veteran's Day (November 11)**
Employees who are veterans will be provided holiday time off on Veterans Day if the employee would normally be required to work that day. Employees wishing to take the day off must provide their supervisor with at least one month's prior notice of his or her intent to take time off for Veteran's Day and must also provide, if requested, a federal certificate of release or discharge from active duty, or similar federal document, for purposes of determining the employee's eligibility for the benefit.

G. **Thanksgiving**
All offices will be closed on Thanksgiving and on the Friday following.

H. **Christmas and New Year's Holidays**
Offices will be closed during the period from Christmas Eve through New Year's Day. A minimum of six (6) days will be designated as holiday time with exact dates to be determined annually by the President's Cabinet based on where the holidays fall and when classes resume. If Christmas Eve falls on a Saturday, offices will be closed the Friday prior to that date.

12. INSURANCE/HEALTH & WELFARE BENEFITS

All employees working at least 1560 hours annually are eligible for the various health and welfare benefits available on the first of the month coincident with or following the date of employment. Those benefits include:

A. **Medical & Health Savings Account (HSA)**
The college will pay a portion of the cost of medical coverage for eligible full-time and part-time employees. Employees can contribute to an HSA on a pre-tax basis and can make changes to contribution amounts throughout the year. The college will determine annually any employer contribution to an employee's HSA account. HSA accounts rollover from year to year and employees take funds with them upon termination of employment.

If eligible, employees age 65 and over have both the college medical plan and Medicare, the college's medical plan will be primary and Medicare secondary payer. Medicare participants are not eligible to contribute to an HSA.

Coverage ends on the last day of the month in which termination of employment occurs.
IMPORTANT: This information is subject to change. Consult your Medical Benefit Plan booklet for additional information regarding this benefit.

B. **Flexible Benefit Plan**

The flexible benefit plan allows employees to

- Pay employee benefit plan contributions on a pre-tax basis.
- Set aside money on a pre-tax basis in a medical spending account for unreimbursed medical expenses such as: deductibles, cost-sharing amounts, dental services and vision care.
- Set aside money on a pre-tax basis in a dependent care spending account. Day care expenses are babysitting while employees and their spouses are at work.

Due to the tax advantages of flexible benefit plans, the Internal Revenue Service imposes certain rules. Employees must make a commitment to participate for the entire plan year. Elections cannot be changed except in the event of a qualifying family status change (i.e., marriage, birth, adoption, death, or change in employment). Also, if employees do not use the funds during the plan year, they will be forfeited.

If employees participate in a Health Savings Account, they can only participate in a Limited Purpose Medical Flexible Plan for dental and vision expenses.

C. **Dental & Vision**

The college offers voluntary dental and vision benefits. Employees pay the full cost for these benefits.

Coverage ends on the last day of the month in which termination of employment occurs.

D. **COBRA Continuation**

The Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue coverage for health and welfare benefits (A. – C.) under the college plan when a "qualifying event" would normally result in the loss of eligibility. Examples of qualifying events include:

- Employment for the employee or spouse ends for any reason other than gross misconduct,
- Death of an employee,
- Reduction in an employee or their souse's hours,
- An employee's divorce or legal separation,
- A dependent child no longer meeting the eligibility requirements.

Under COBRA, the employee or beneficiary pays the full cost of coverage under the college plan plus an administration fee.

E. **Income Replacement Benefits**

The college provides several benefits to replace income in the event of disability or death at no cost to eligible employees. Those benefits include:

1. Short Term Disability Policy
   Benefits are payable beginning on the 90th calendar day following the onset of the disability.
   Benefits shall end on the earlier of:
   a. The 180th day of disability;
   b. The end of the employee's disability;

c. Benefits become payable under a long-term disability plan maintained by the college;
d. Death of the employee; or
e. Employee's termination from employment

IMPORTANT: Consult your Short-Term Disability Policy Summary for additional information regarding this benefit.

2. Long-Term Disability
Benefits are payable after 180 days of disability, as defined, until Social Security Normal Retirement Age. The monthly benefit is 60% of earnings with a maximum of $5,000; it is reduced by the other types of income listed in the policy.

IMPORTANT: Consult your Group Long-Term Disability Certificate for additional information regarding this benefit.

3. Life
The death benefit is $50,000. The benefit is reduced for employees over age 65. Benefits are also available for accidental death and dismemberment. Coverage ends on the last day of the month in which termination of employment occurs.

IMPORTANT: Consult your Life Insurance Certificate for additional information regarding this benefit.

4. Social Security
The College shall pay the employer's share of social security as prescribed by law.

5. Workers' Compensation
All employees of the college are covered by the Workers' Compensation provisions of the laws of Iowa.

13. JURY DUTY

The college recognizes the civic responsibility of all citizens to serve on jury duty. Upon **receiving** notice of jury duty, it should be reported to your immediate supervisor. In addition, an absence report must be filed. In case of jury duty, your regular salary will be maintained, minus any amount paid to you by the Court for your services. Many times a call to jury duty entails only a weekly reporting in at the courts and you are not actually assigned to jury duty. Therefore, you will be expected for regular work schedule on days when you are not actually serving or reporting.

14. LIBRARY SERVICES

The resources of the library are available at no cost to all employees.

15. MILITARY LEAVE

It is the policy of Northwestern College to comply with the Uniformed Services Employment and Reemployment Act of 1994 (USERRA) and applicable state laws which protect job rights and benefits for workers who serve in the military. The law covers all persons serving in the Army, Navy, Marine Corps, Air Force, Coast Guard, Public Health Service commissioned corps, and the reserve components of these services and the National Guard.

USERRA gives protection to those individuals who are absent from work for active duty, active duty for training, and initial active duty training (such as drills). USERRA also includes inactive duty training, full-time National Guard duty, and a period for which a person is absent from a position of employment for the purpose of an examination to determine the fitness of the person to perform any such duty.

A. **Procedure**

An employee in a regular full- or part-time position, excluding an employee in a brief or nonrecurrent appointment, who is drafted or called to active duty by the U.S. military services will be granted military leave as specified below. In the granting of such leave, Northwestern College may require verification of an employee's military orders.

Notification

Unless precluded by military necessity or circumstances under which the giving of notice is otherwise impracticable or unreasonable, the employee (or appropriate officer of the uniformed services in which the employee serves) must give as much advance written or verbal notice as possible of the need for military leave. Whenever possible, written notification is preferred along with a copy of the official military orders or other evidence that the employee is performing service in the uniformed services.

Types and Length of Military Leave

Military leave consists of:

Reserve training leave for inactive duty, such as weekly or monthly meeting or weekend drills. Faculty or staff members whose positions required their presence during the academic year when students are on campus should, if possible, arrange such training leave at times when it won't interfere with their job duties.

Temporary military leave when ordered to full-time active military duty for training or a period not to exceed 180 calendar days, including the time spent traveling to and from such duty.

Extended military leave when an employee enlists or is ordered to active-duty service of any length or active-duty training in excess of 180 days or when an employee is ordered to active Federal military duty as a member of the National Guard, Air Force, or Marine Corps. Such leave will be granted for a period not to exceed 5 years.

Emergency National Guard leave when an employee is called to active duty by proclamation of the Governor during a state emergency. An employee who as a member of the National Guard is called to active federal military duty at the request of the President of the United States will be granted extended military leave.

Physical examination leave when an employee is required to take a pre-induction or pre-enlistment physical examination to fulfill a commitment under a Selective Service or comparable law, or during a period of war or comparable national emergency.

B. **Benefits and Compensation**

Military leaves of absence are unpaid. However, employees may request to use any paid leave benefits (i.e. vacation, personal leave) if they wish to be paid during any portion of this unpaid leave.

An employee granted military leave will receive the following benefits:

1. Healthcare: Continuation of health insurance benefits is available as required by USERRA based upon the length of leave. For an employee on active duty for fewer than 31 days, the College will continue healthcare coverage as if he or she is actively at work. Those on active duty for 31 or more days may elect to continue group health coverage for up to 24 months by paying 102% of the full premium cost. The Medical Benefits Plan booklet has more information on USERRA and the continuation of health care coverage. Health insurance benefits will be reinstated, with no waiting period or exclusions, when the employee returns to active employment.
2. Retirement Plan: Upon the employee's return to work, the College will make up contributions to the Plan that would have been made on behalf of the employee had the employee not been absent. Employees who also make voluntary contributions through salary reduction will have up to three times their period of service in the military to make missed employee deferral contributions (not to exceed five years).

3. Other length-of-service credits related to employment that would have been granted had the employee not been absent, provided that the employee returns to Northwestern College's service at the conclusion of the leave in accordance with the applicable Federal and State laws.
4. Time-off Benefits: Sick leave, vacation leave, personal leave and holiday credit will not be earned or accrued during a period of military training when leave without pay has been granted.
5. Other Benefits: Group life insurance, short-term disability, and long-term disability insurance will be reinstated, with no waiting period, when the employee returns to active employment with the college.
6. Tuition Waiver: Dependents of employees who are eligible or become eligible for tuition benefits will retain this eligibility during the time the employee is on military leave.

If, prior to leaving for military service, an employee knowingly provides clear written notice of intent not to return to work after military service, the employee waives entitlement to leave-of-absence rights and benefits not based on seniority. This does not surrender other rights and benefits, particularly reemployment rights.

C. **Reinstatement**

Upon the completion of service an employee must return to work based upon the following schedule unless the delayed return is due to factors beyond the employee's control (hospitalization, disability, etc.) and the employee has provided prior notice.

Period of Service	Return to Work Following Release From Duty
Fitness Examination	First full, regularly scheduled day after release.
1-30 days	Return to work on the next scheduled work day following completion of service plus an 8 hour period of rest
31-180 days	Submit a request for reemployment within 14 days of release
181+ days	Submit a request for reemployment within 90 days of release

When returning to work an employee will be provided with a position equal or comparable to the job that would be occupied if the employee had remained continuously employed. The position provided will be comparable if not equal in both seniority and pay. If an employee is disabled while in military service, an extended return date may be granted and reasonable efforts will be made to accommodate the employees' disability so the employee can perform the position they would have held had they remained continuously employed.

An employee who fails to notify the college of his/her intent to return within the specified time periods will be considered to have voluntarily terminated their employment.

NOTE: This policy may not address all items concerning an employee's right during military leave. If issues arise that are not addressed in this policy, the college will abide by USERRA and any controlling state law.

16. MOVING EXPENSES

The College will provide reimbursement of moving expenses for new **full-time, continuing, faculty/staff members living further than 50 miles from Northwestern**. Moving expenses are limited to the costs of transporting the faculty member/staff member and their family to the new residence and of moving ordinary and customary household goods and personal effects. This reimbursement is considered a taxable fringe benefit by the IRS. Fringe benefits are subject to Federal and State tax withholding as well as Social Security and Medicare taxes and will be included on an employee's W-2 form. The Human Resources office, along with the President's office, will coordinate the reimbursement of moving expenses and can be contacted for the moving assistance policy.

17. NWC I.D. CARDS / ATHLETIC PASSES

At the time of hire, each employee will be issued a Faculty-Staff Identification Card. This I.D. card is issued to all full-time and part-time employees, including adjunct faculty. The following privileges not extended to the general public are available to all holders of a NWC I.D. card:

A. Free admission for employees, their spouses and dependent children under 24 years of age or the employee and one accompanying guest to regularly scheduled athletic contests, drama and music events sponsored by the college. GPAC conference or NAIA tournaments are not eligible for free admission. Occasionally, programs of a more professional nature are presented on campus for which the I.D. card is not valid (i.e. concerts coordinated through the Student Activities office, Madrigal Dinner, etc.).
    a. Athletic event passes are offered through the online platform, HomeTown Ticketing. Northwestern Employees may redeem their all-sports pass by following instructions sent to them via email by the athletics department.
B. Use of the Rowenhorst Student Center (RSC) athletic facilities during regular hours for the employee, spouse and dependent children under the age of 24 or the employee and one accompanying guest. I.D. card holders are expected to follow all RSC policies.
C. Food discounts at the dining hall (cafeteria), The Hub and Learning Commons coffee shop offered by the college's food service vendor. Benefit eligible employees also receive 4 free meals at the beginning of the fall and spring semesters to use at the cafeteria or The Hub.
D. A discount of 25% at the college bookstore (textbooks excluded).
E. Use of library resources at the college library.

Retirees and Emeriti Faculty

Faculty and staff who officially retire from the college after at least 10 years of full-time or equivalent service, and to emeriti faculty can continue to use their I.D. card for the following benefits / privileges that current employees have, such as: admission to athletic, drama and music events, use of the RSC athletic facilities, bookstore discount, discount food service and library privileges.

This benefit is intended for Northwestern College retirees and early retirees, not those who leave the college for other employment.

Procedure

At the time of hire the employee will be asked to complete a "Northwestern College Employee Profile Form." They will then be issued a photo Faculty-Staff Identification Card and their family, if requested, will be issued printed I.D. cards without a photo. The I.D. cards for family members will allow them access to the RSC athletic facilities in the absence of the employee.

Employees and other I.D. card holders should not lend their I.D. card to friends to enjoy the benefits reserved for employees, retirees, and emeriti faculty, nor should the family guest passes be lent to those who are not immediate family members.

The I.D. card is required when using the RSC facility and should be presented at the RSC Control Desk for admittance. Students who staff the RSC desk are not expected to know each I.D. card holder personally.

If an employee or other cardholder loses his/her I.D. card or wants to have a new card issued, there will be a charge for that service. The replacement fee for an I.D. card is $10.00. Cards can be ordered from the Student Development office.

18. PARENTAL LEAVE

Northwestern College provides to full-time and 3/4x (75%) employees paid parental leave time away from work for the purpose of recovery from childbirth and/or to care for and bond with a newborn or newly adopted child. Six (6) weeks of paid parental leave is available after twelve months employment or after twelve months employment since the end of a prior paid parental leave.

1. Paid parental leave is available to be used in a single six-week block of time commencing upon the birth of a child or placement of an adopted child. Additional parental leave is not available due to multiple births, such as twins.
2. This paid leave may be used by the birth mother, father, adoptive parents or an employee acting "in loco parentis" (in place of a parent).
3. If spouses both work for Northwestern College and each wish to take parental leave for the birth of a child or placement of a child for adoption, the spouses may only take a combined total of 6 weeks of leave. The two parents need not take leave time concurrently.
4. Parental leave will run concurrently with FMLA and is limited to a total of six-weeks per birth or adoption per family.
5. Parental leave will not be extended by, but rather will run concurrently with, any paid holiday falling within the leave period.
6. An additional six (6) weeks may be used under provisions of the FMLA policy.
7. Parental leave has no adverse effect on employment with the college. The break in employment does not affect continuous employment, nor will it affect seniority, status, tenure or promotion decisions, or benefit eligibility.
8. All benefits in which an employee is enrolled will remain in effect provided the employee continues to pay their regular premiums for those benefits.
9. Contributions to the retirement plan will continue to be made based on an employee's compensation paid during their leave of absence.
10. It is not the intent of the Parental Leave provision to provide remuneration beyond that for which a faculty member is contracted. Thus, faculty members will not receive compensation for any part of Parental Leave utilized during a scheduled academic break.

Written request for this leave should be submitted to Human Resources and an employee's President's Cabinet member or supervisor thirty (30) days prior to the expected leave date, or as soon as practicable. The FMLA Request should also accompany this leave request.

Employees who fail to return to work after a leave covered under this policy shall be treated as having voluntarily terminated their employment.

19. PERSONAL LEAVE

Personal leave is provided for full-time and part-time staff employees working at least 1560 hours per year, and faculty on a 12-month appointment. It is intended for family and individual needs (personal, voluntary church or civic responsibilities, etc.). Employees on a 12-month appointment will receive a maximum of two personal days per year. Personal leave is accrued at 1 1/3 hours per month (pro-rated for part-time employment). Personal leave is capped at 32 hours. Full-time faculty, academic year appointments, athletic staff, residence life, and student development staff on less than 12-month appointments, and academic year athletic staff do not accrue personal leave. Some less than 12-month appointments may accrue a varied amount of personal leave.

A maximum of two personal leave days may be accumulated and carried forward. Thus, it is possible that four personal leave days might be granted in a year, two unused yet accumulated and carried over from the past year and two earned during the current year. Personal leave requests should be made in hour increments.

20. PROFESSIONAL DEVELOPMENT

Northwestern College encourages the professional development of employees through attendance and participation in approved meetings, seminars, professional certification programs, educational opportunities, etc., which are directly related to Northwestern's operations, activities and mission, and which will place employees in a position to improve their job performance. Employees who are not planning to return the following academic year are generally not eligible to receive professional development support.

Procedure:

A. An employee shall prepare a written request stating:
   1. Name and location of seminar or educational opportunity
   2. Area pertaining to job performed
   3. Expected outcome
   4. Dates to be absent and attending seminar
   5. Projected cost (include travel, lodging, meals, tuition, and fees)

B. This written request will be forwarded to the appropriate Vice President or Dean (President's Cabinet member), who will designate proper expenditures and notify the employee concerned of the approval or denial of request.

C. All expenses incurred for professional development will be charged to the proper account, although the college reserves the right to reimburse employees at less than 100% for professional development. In any event, funds available for professional development and previous professional development activities of the employee making the request determine whether or not a particular request can be granted.

D. Hourly paid employees will receive payment for travel time and time spent at seminars.

E. When mutual benefit is evident for further education, employees may petition their vice-president or dean for a short-term, paid leave of absence to pursue a recognized degree or professional certification. Up to 10 days in a calendar year may be given for such leave if the time period of attendance for class(es) is required during an employee's scheduled work hours. The decision for granting such leave will be made by the vice-president or dean in consultation with the President. Financial assistance requested for the attainment of a graduate degree will follow the guidelines for graduate education tuition loan assistance (see #9. Graduate Education Tuition Assistance).

21. ROWENHORST STUDENT CENTER

The Rowenhorst Student Center (RSC) is an integral part of the college's total educational program and as such offers to all employees and their immediate families an excellent facility in which you may profitably spend some of your leisure time, including physical fitness activities.
All faculty and staff are automatically considered members of the RSC and are entitled to the privileges that come with such membership. Information explaining the philosophy and policies of the RSC, membership privileges, and the facilities are available from the RSC staff.

22. SICK LEAVE

Staff working at least 1560 hours per year and faculty on a 12-month appointment are eligible for sick leave. Benefits for part-time employees will be pro-rated and their sick leave will be earned on a pro-rated schedule over the full 12-month period, but will be paid based on the work schedule at the time of illness. Sick leave is capped at 960 hours. Benefits for athletics, student development and academic affairs support staff on 10-month appointments will be paid according to the schedule for medically-related leaves (see 8. Family Medical Leave of Absence in this section).

Policy
Sick leave is intended primarily for sickness of an employee in order to minimize the economic hardships that may result from a short-term illness or injury. Sick leave is provided for the protection and security of the employee during an extended illness. In addition, sick leave may be used for illness, injury, or medical appointments of the employee, dependent child(ren), spouse or parent.

Employees will be eligible to receive one day of paid sick leave for each completed month of active service up to a maximum of 120 days. There is no payment of accumulated but unused sick leave upon termination.

As required by law, employee pregnancy and childbirth will be treated the same as other health conditions for purposes of utilizing sick leave benefits. Accumulated sick leave days may be taken as additional paid time off for maternity or the care of a newborn child.

Procedure for Sick Leave

When an employee is unable to work because of illness, he/she should notify the supervisor not later than the time the employee is expected to be at work. Sick leave requests should be made in hour increments. The employee may be required to produce a physician's statement whenever sick leave is requested. Since sick leave is not intended for slight indispositions, an employee who is frequently absent from work due to illness may be considered physically unable to continue employment at the college.

If a person becomes seriously ill during a scheduled vacation and can verify this with a medical report, this type of illness would be considered sick leave. If serious illness happens during a vacation period, the supervisor should be contacted as soon as possible.

If an employee has used up all accumulated sick leave and personal leave days, any additional sick days or personal absences will be charged against vacation time earned.

23. SPRING SERVICE PARTNERSHIP LEAVE

Many students participate in spring service partnerships. The maximum time away from campus is ten days. Employees are encouraged to serve as advisors for the student groups. We consider this to be an opportunity for personnel to build meaningful relationships with students and to show support for their projects. This time away from campus, which is allowed at the supervisor's discretion, will not be considered vacation time but rather institutional service. Full-time and part-time staff will be paid in accordance with their usual on-campus assignments.

24. TUITION WAIVER

Full-time and part-time employees working at least 1560 hours per year are eligible for the tuition waiver. The tuition waiver will be pro-rated for eligible part-time employees in direct proportion to their work schedule.

For the purpose of attracting qualified employees for Northwestern College, the following tuition waiver policy has been adopted:

A. A tuition waiver shall be available for Northwestern College's own curricular offerings, both during the academic year and courses offered during the summer, and also for study abroad opportunities that are sponsored solely by Northwestern College and taught by our faculty members (i.e. Sports in Societies, Topics in …. Cultural Studies). It does not apply to private lessons, summer course-by-arrangements, or summer directed study. The tuition waiver cannot be applied to any off-campus tuition costs. However, all other financial aid may be applied against the off-campus tuition cost.
B. The tuition waiver is limited to actual tuition costs less all grants and scholarships (Federal, State, Institutional, etc.) to which the student would be entitled. All tuition waiver students must pay applicable program and miscellaneous fees. The student is required to file the free Application for Student Aid (FAFSA) by June 30 if he/she has been admitted as a regular degree-seeking student. Failure to file the FAFSA by the deadline when outside grants would be received will reduce the amount the college will waive accordingly.
C. The employee shall be employed each semester the tuition waiver is applied to the student account except for an employee who dies, is totally disabled, is called to military service, or retires (early retirement included) while in the employ of the college. In such exceptional cases a tuition reduction on the balance remaining after all other grants have been applied shall be granted at the rate of 10% for each full year of full-time employment at Northwestern College or prior institutions maintaining a tuition waiver policy.

(For purposes of this benefit, a person "retires" when leaving the full-time employ of the college after age 59 1/2.)

D. The tuition waiver program applies to undergraduate classes only. This includes the interpreting certificate, the BAEC, and BALI programs.
E. All eligible employees, their dependent spouses, and unmarried dependent children or step-children under 24 years of age who have made application for state and federal tuition grants and scholarships shall be eligible for a tuition waiver following one year of employment. Dependent children or step-children are eligible for the waiver through the end of the semester in which they turn age 24. A married child might be eligible if reported as a dependent on their parent's income tax return for the year in which they are applying for the tuition waiver benefit. If the child files a joint return with their spouse for the tax year, they cannot be considered a dependent for purposes of this benefit.
F. Employees must complete the "Tuition Waiver Benefit Verification" form and submit it to the Financial Aid office for each year they or a qualifying dependent apply for the tuition waiver benefit. This form is available from the Financial Aid and Human Resources office, or the Human Resources intranet site http://intranet.nwciowa.edu/hr/default.asp.

25. TUITION EXCHANGE

Northwestern participates in a tuition exchange program with the Council for Christian Colleges & Universities (CCCU). The CCCU tuition exchange program uses the same eligibility criteria as found in the "Tuition Waiver" Section A-E. All tuition exchange students must pay applicable program and miscellaneous fees. Students will be required to process the same financial aid application as other student applicants at the receiving college. After completion of the aid application process, the financial aid director at the receiving college will determine the "actual" amount granted by the college to make a full tuition award. Each college in the CCCU reserves the right to choose not to participate in the exchange program or to exempt certain programs. The Financial Aid office has information regarding individual college's participation details.

Northwestern also participates in the Council of Independent Colleges (CIC) tuition exchange and Tuition Exchange, Inc. For more information about these programs and participating institutions, please contact the Financial Aid Office.

26. NWC / WESTERN THEOLOGICAL SEMINARY TUITION WAIVER PROGRAM

In recognition of the historic connection as servants of the Church of Jesus Christ and in particular the Reformed Church in America, Northwestern College and Western Theological Seminary agree to a tuition waiver program as stated in the following:

Who is eligible?

- Northwestern College faculty, staff, spouses and their children would be eligible for a tuition waiver as degree-seeking candidates (having met the normal admissions requirements) or as a participant in individual courses in the in-residence and/or distant-learning Master of Divinity program. This waiver would be consistent with that offered by Western Theological Seminary to spouses and children of their own faculty and staff.
- Western Theological Seminary's faculty and staff members' children would be eligible for a tuition waiver consistent with Northwestern's current policy for her faculty/staff dependents (children 24 years of age or younger) and with the tuition waiver available through the Council of Christian Colleges and Universities (CCCU).
    1. Applicants must meet the requirements for admissions acceptance to Northwestern College.
    2. Students and his/her parents need to file annually a FAFSA as the application for all federal and state aid.
    3. This waiver applies to tuition only.

How will parity issues be addressed?

- Every three years an audit of actual credits will be made by each institution.
- The maximum imbalance shall be the equivalence of two years' credits.
- Should Western Theological Seminary exceed the program limit, Northwestern College shall be empowered to grant a Northwestern College/Western Theological Seminary Partnership Grant to the graduate of their choice to attend tuition free Western Theological Seminary in order to complete the normal course of studies for the Master of Divinity.
- Should Northwestern College exceed the program limit, new students to the program would pay tuition to Western Theological Seminary at the following discounted rates until the program returned to within the two-year equivalency.
    1. Full-time Master of Divinity candidates would pay 10%.
    2. Part-time or individual courses for credit would pay 50% of the normal tuition rate.

Either institution, Northwestern College or Western Theological Seminary may discontinue this program at the conclusion of any academic year. However, it is the hope of both institutions that a long and successful relationship will continue.

27. SIOUX FALLS SEMINARY TUITION REDUCTION AGREEMENT

Sioux Falls Seminary offers a tuition reduction of 25% for all Northwestern College employees. Dependents are not eligible for this reduction. To receive the tuition reduction, a letter of request should be signed by either the Director of Human Resources or the President. This tuition reduction will be in effect until further notice from Sioux Falls Seminary.

28. VACATION

Full-time employees accrue vacation with pay in accordance with the following rules:

A. Fulltime exempt and hourly staff employees and faculty on a 12-month appointment earn 20 working days of vacation over a 12-month period. A person in this category accrues 1.67 vacation days for every month of employment. There are some employees who are by nature of their appointment entitled to vacation days which vary from the above. Such arrangements are made only if in the judgment of the college a particular position is more closely tied to the academic year and justifies a different arrangement.
B. Vacation time for part-time staff employees working at least 1560 hours will be earned on a pro-rated basis comparable to full-time staff. Part-time staff on other than or less than 12-month appointments will receive pro-rated benefits comparable to other full-time staff on less than 12-month appointments.
C. Temporary employees and part-time employees working less than 1560 hours per year are not eligible for paid vacation.
D. Employees eligible for vacation days must work an entire month to get the full accrual of vacation and be actively employed. No vacation will be earned on partial months either on beginning or termination of employment.
E. Vacation requests can be made in increments of 1 hour. Accounting of vacation time will be based on the college's fiscal year (July 1 – June 30). This is necessary because accounting of vacation time is required for auditing purposes and the auditor's report is based on the fiscal year. Therefore, vacation earned by June 30 of the first year of employment will be pro-rated on the basis of the number of months worked.
F. Full-time faculty, academic year appointments, athletic staff, residence life, and student development staff on less than 12-month appointments, and academic year athletic staff do not accrue vacation as their vacation is governed by the academic year calendar.
G. Vacation time earned in one fiscal year (i.e., between July 1 and June 30) may be carried over into another fiscal year (i.e., vacation earned by June 30 may be used after July 1 of the new fiscal year), with the exception that vacation time earned by June 30 must be used by March 31 of the following year or it will be forfeited.
H. Vacation days earned cannot be paid in lieu of using the time earned for vacation. However, accrued but unused vacation days will be paid upon an employee's termination. These accrued days cannot be used to extend an employee's actual date of termination.

29. EMPLOYEE BENEVOLENCE FUND

The Northwestern College Employee Benevolence Fund was formed as an expression of our Christ-centered community and call to care for one another as colleagues and brothers and sisters in Christ. The fund exists to facilitate the loving concern and generous spirit of our community, assisting employees with essential needs in the event of a crisis, hardship, or emergency.

Governance

An Employee Benevolence Fund Committee will oversee the distributions of the fund. Meetings of the Committee are held as needed to review requests for distribution of the funds. Members of the committee include: Director of Human Resources, Dean of Christian Formation and faculty member (TBD).

Application Process

All requests for assistance from the Benevolence Fund can be made by submitting a "Benevolence Fund Application Form." The application form is submitted to Human Resources, and then brought before the Employee Benevolence Fund Committee for review and appropriate action. Supporting documentation and sufficient explanation should be provided as part of the application. However, Benevolence Fund Committee members may also become aware of a need, initiate the process to determine the scope of need, and reach out to the affected employee to see if they would like assistance. Participation as a donor or beneficiary is voluntary.

Eligibility

The Employee Benevolence Fund Committee shall evaluate all requests using the following criteria:

- Beneficiary must be an employee of NWC and in a regular full-time or part-time position. Temporary employees and student workers are not eligible.
- Beneficiary's financial assistance must be in response to or in the context of "undue hardship." An undue hardship is hereby defined as an emergency or unforeseen circumstances beyond the employee's control, either of which are of a magnitude or severity that it is unlikely that the employee has sufficient resources to reasonably expect a favorable outcome.
- Undue hardship may include, but is not limited to, unforeseen expenses caused by medical emergencies, family emergencies, and acts of nature.
- Common life occurrences that would not in and of themselves be undue hardship include: expenses related to car repairs, home repair/maintenance, car accidents, legal fees, child care, credit card payments, general dentistry, and living beyond one's means.

Award Limits

The amount of a distribution depends on the need and the availability of funds. No single distribution will exceed $500, and cash distributions will be considered taxable income.

Under no circumstance is assistance from the Employee Benevolence Fund to be considered a loan. No gift may be repaid, either in part of in full. Funds from the Employee Benevolence Fund are disbursed at the sole discretion of the Committee, in accordance with the Policy, and are dependent upon money being available in the Fund.

The names of those receiving distributions and the amounts are kept in strict confidence among the members of the Employee Benevolence Fund Committee.

Donations to Employee Benevolence Fund

Employees who would like to donate to NWC's Employee Benevolence Fund are welcome to donate via payroll deduction as a post-tax charitable donation to the College. The Advancement Office can facilitate the donation and will maintain the recordkeeping and disbursements of the fund. Employee donations are tax deductible and employees will receive a gift acknowledgement from the College. Per IRS regulations, employees may designate their donation to the Employee Benevolence Fund but may not restrict the gift to a specific person or family, as this constitutes a person-to-person gift, for which there is no tax deduction. Gifts restricted to a specific person or family must be refused by the College or the donor must remove the restriction.

30. VOLUNTARY SHARED LEAVE PROGRAM

The college recognizes that employees may experience serious personal or family medical hardships or catastrophic illnesses that cause a severe impact to them, resulting in a need for time off in excess of their available paid leave hours. This program allows employees with paid leave benefits to donate vacation or personal leave from their unused balance to a shared leave bank to be distributed to eligible employees in need, in accordance with the shared leave guidelines as outlined below.

Eligibility

Eligibility applies to those employees who have exhausted all available paid leave, such as sick, vacation or personal leave hours or FMLA pay, and do not meet the requirements for short-term disability (STD), long-term disability (LTD), or workers' compensation benefits; and who also meet the definition of having a "serious medical hardship or catastrophic illness or injury."

Criteria to receive donated leave include:

- An incapacitating, critical, or catastrophic illness or injury of the staff member or an immediate family member that poses a threat to life and/or requires hospital or hospice health care and that has been certified by the treating licensed healthcare practitioner.
- The employee qualifies for FMLA leave due to the employee's or immediate family member's qualifying illness or injury.
- Family members include: employee's spouse, dependent child or parent.

Serious medical hardship or catastrophic illness or injury may include:

- Cancer – In a treatment program requiring radiation or chemotherapy;
- Major surgery for a life-threatening condition;
- A serious accident;
- Heart attack;
- In a treatment program requiring kidney dialysis;
- Other serious or life-threatening illnesses; or
- Diagnosed as terminally ill; and
- For which a physician has certified the condition is likely to result in the cessation of active work for 30 or more calendar days.

Maternity leave and short-term, common conditions or illnesses will not be eligible for donated leave hours unless there are extenuating medical complications that meet the guidelines for catastrophic illness.

Operation of Program

The Human Resources office will administer the voluntary shared leave program. Requests for shared leave donations will be solicited by Human Resources periodically or when the bank of hours is low.

The shared leave program is strictly voluntary; no staff member shall be compelled to participate in the shared leave program. Staff members are eligible to donate leave according to the criteria below:

- Vacation – Minimum donation is four (4) hours. Vacation hours donated should not reduce the donor's vacation leave below an annual accumulation of 80 hours (2 weeks); prorated for part-time employees.
- Donation of carryover vacation (previous vacation) will not be allowed January through March when the carryover period is close to expiring.
- Personal leave – Minimum donation is one (1) hour. Personal leave hours donated should not reduce the donor's personal leave below an annual accumulation of 8 hours (1 day); prorated for part-time employees.
- Sick leave is excluded from donation. Employees must retain sick leave in the event they have short- or long-term illness or injury or family medical needs.
- Donors should complete the "Voluntary Shared Leave Donation Form" found on the Human Resources website.

Leave donated to a recipient's leave account is exempt from any carryover restrictions. Donors may not personally donate to or restrict their donation to a specific employee. All donated hours will be deposited in the leave bank to be distributed indiscriminately.

Donated leave will be paid at the receiving employee's current rate of pay. All monies received will be taxable and subject to scheduled deductions.

Donated hours to the leave bank will not remain in the bank indefinitely. All hours donated in a fiscal year (July 1 – June 30) will expire on the following year end, June 30.

Confidentiality

Medical information is confidential. No information on an approved recipient will be disclosed.

Individual leave records are confidential and only individual employees may reveal their donation or receipt of leave.

SECTION IX.

STAFF EMPLOYEE STANDARDS AND EVALUATION

1. PURPOSE AND PROCEDURE

It is the policy of Northwestern College to review and evaluate the performance of each staff employee regularly. Performance evaluations are written by the supervisor and discussed with the employee at established intervals. Performance evaluations will be conducted at least once a year. The purpose of the performance evaluation is the following: (1) to maintain and improve each employee's job satisfaction and morale; (2) to improve performance; (3) to serve as a basis for promotion and salary wage increases; and (4) to provide an opportunity for each employee to discuss job problems and interests with his/her supervisor.

A. Performance evaluations are to be conducted annually. In March or April, a reminder will be sent to all supervisors of the upcoming performance evaluation, including a review of all procedures for conducting evaluations.

B. Each supervisor will complete an evaluation form for each of his/her employees and each employee will complete a self-evaluation.

C. The evaluation for each employee will be reviewed and discussed by the appropriate President's Cabinet member and the President (if / when necessary). The supervisor and employee will then meet to discuss the evaluation. When these reviews have been completed, the evaluation will be returned to the employee for signature. The employee will receive a copy of the evaluation and the original should be retained in the supervisor's file.

D. Letters of appointment will be issued typically by the first week in June of each year.

SECTION X.

STANDARDS AND EXPECTATIONS

1. DRUG FREE WORKPLACE

The Northwestern College community faces many challenges as it attempts to facilitate the continued development among the individuals it encounters. One such challenge concerns the use or abuse of alcohol and drugs by employees. In an effort to encourage accountability among employees as well as to establish an additional support system we have prepared information in accordance with the federal guidelines for the Drugfree Workplace Act and the Employee's Assistance Programs. This information is found on the Northwestern College website at http://www.nwciowa.edu/safety/safecommunity.aspx. Our hope is that you will utilize its information to continue to assist each other in Christ.

2. SMOKE FREE WORKPLACE

In accordance with Iowa's Smoke-free Air Act, Northwestern's campus, including buildings and outdoor spaces, is required to be smoke free. Smoking is prohibited on our athletic fields, inside or outside of our buildings, on parking lots, or in a vehicle on one of our parking lots.

In addition, Northwestern College has chosen to be a tobacco-free campus and employees are prohibited from using any tobacco products while on college property. Employees are also prohibited from using products that simulate tobacco use, such as e-cigarettes and herbal chew.

3. SUBSTANCE ABUSE POLICY

A. Alcoholic Beverages

The abuse of alcoholic beverages is contrary to Biblical principles in which life, health, and one's rational powers are sacred trusts, which must not willfully be destroyed or impaired. While recognizing Christian liberty, Northwestern has adopted a policy for all members of the campus community which calls for the discipline of complete abstinence on campus, at all on-campus and off-campus college events or while officially representing the college. Furthermore, it is against school policy to unlawfully possess, use or distribute any alcohol on school property or at any of its activities. Appropriate sanctions for violators shall be imposed by the administration. The sanctions will, at a minimum, be consistent with local, state and federal laws including, but not limited to referral for prosecution, required rehabilitation, suspension and termination of employment.

B. Drug Abuse

The use of illegal drugs and the misuse of prescribed and over-the-counter drugs are destructive of the welfare of our employees. The unlawful manufacture, distribution, dispensing, possession or use of a controlled substance, except as directed on over-the-counter drugs or as prescribed by a medical doctor, is a violation of government regulations and college policy. Appropriate sanctions for violators will be imposed by the administration. The sanction will, at a minimum, be consistent with local, state and federal laws including, but not limited to referral for prosecution, required rehabilitation, suspension and termination of employment.

C. Reporting Procedure

Employees are required to report substance abuse in the workplace to the administration. By government regulation an employee will notify the employer of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction. The college is then required to notify the appropriate agency within 10 days of receiving such notice and taking appropriate disciplinary action against an employee within 30 days of receiving such notice.

D. Voluntary Rehabilitation

If an employee who has been taking drugs or abusing alcohol seeks help from the college, the college reserves the right, within the law, to suspend normal sanctions. The difficulties of freeing oneself from the drug habit are well known, and it is the desire of the college to surround the person with the best possible support during the crucial period of withdrawal. Therefore, the employee will be expected to accept such help as is determined necessary after consultation with the Dean of Christian Formation.

4. HAZING POLICY

Northwestern College prohibits any form of "hazing" in its programs, activities, and by student organizations. This policy sets forth the College's procedures for handling reports of hazing, the potential consequences for engaging in hazing, information on Northwestern's hazing prevention and awareness programs, and the College's reporting and publication requirements.

Policy Definitions

For purposes of this policy:

"Student organization" means any organization at Northwestern in which two or more of the members are enrolled students, whether or not the student organization is established or recognized by Northwestern. This includes clubs, societies, associations, athletics teams, fraternities, sororities, bands, or student government.

"Hazing"[1] means any intentional, knowing, or reckless act by a person, or in concert with others, against another *regardless of their willingness to participate* that:

(1) Is committed in the course of initiation into, affiliation with, or the maintenance of membership in, a student organization; and

(2) Causes or creates an unreasonable risk of physical or psychological injury, including any activity which places another person in reasonable fear of bodily harm through the use of threatening words or conduct and any activity that includes or requires another person to perform a criminal violation of state or federal law.

This includes whipping, beating, striking, electronic shocking, or placing a harmful substance on someone's body. It includes causing, coercing, or otherwise inducing: sleep deprivation; exposure to the elements; confinement in a small space; extreme exercise; consuming food, liquid (including alcohol), drugs, or other substances; or the performance of sexual acts.

Reporting Hazing and Investigations

All forms of hazing must be reported to the Vice President of Student Life, Title IX Coordinator or Deputy Title IX Coordinator, or other College administrator. If any campus official or employee such as a coach, sponsor, advisor, or residence life staff member receives a report or becomes aware of an alleged hazing incident, they should report it to one of the afore-mentioned College administrators.

All allegations of hazing will be taken seriously and investigated. Allegations against students and/or student organizations will be handled under policies and procedures outlined in the Northwestern College student handbook. Any allegations against faculty or staff will be investigated and handled under appliable employee policies, procedures, and law.

Consequences for founded incidents of hazing can include discipline up to and including suspension or expulsion for students, serious sanctions for student organizations, and termination of employees.

[1] Iowa also has a criminal law on "hazing," Iowa Code 708.10. This law defines hazing as an intentional or reckless act or acts involving forced activity which endangers the physical health or safety of a student for the purpose of initiation or admission into, or affiliation with, any organization operating in connection with the College, regardless of the student's willingness to participate.

Allegations of hazing may also be reported to law enforcement for criminal investigation.

Clery Act Statistical Reporting and Transparency Report

In accordance with the Clery Act, statistical information on hazing incidents within the College's Clery geography are included in the Annual Security Report which is distributed to the campus community each year on or before October 1st.

Consistent with applicable law, Northwestern will also collect information on hazing incidents involving student organizations and publish a Campus Hazing Transparency Report on its website, if there are violations to report. If there are violations, the College will update the Transparency Report at least twice a year with the following information:

A. A statement notifying the public of the annual availability of the College's hazing statistics in the Annual Security Report;
B. Information about this policy and Iowa's hazing law; and
C. For each period of time since the last update, the following information about each finding of responsibility for a hazing violation against a student organization:
    - The name of the student organization;
    - A general description of the hazing violation that resulted in a finding of responsibility, including whether the violation involved the abuse or illegal use of alcohol or drugs;
    - The findings of the institution, and any sanctions placed on the student organization by the institution, as applicable;
    - The dates on which the hazing was alleged to have occurred, when the investigation was initiated and ended, and when the student organization was noticed of the violation.

Neither the statistical information in the Annual Security Report nor the Campus Hazing Transparency Report will include any student's personally identifiable information, as defined by the Family Educational Rights and Privacy Act ("FERPA"). Past Transparency Reports will be maintained by Northwestern for at least five ("5") calendar years from the date of publication.

Prevention and Awareness Programs

It is the policy of Northwestern to develop and offer prevention and awareness programs related to hazing. These programs will be research-informed and campus-wide, and designed to reach students, faculty, and staff with information about:

A. This policy, including how to report incidents of hazing and Northwestern's processes used to investigate incidents of hazing;
B. Iowa's hazing law; and
C. Primary prevention strategies intended to stop hazing before hazing occurs, which may include skill building for bystander intervention, information about ethical leadership, and the promotion of strategies for building group cohesion without hazing.

5. APPEARANCE

The personal appearance of employees is important and essential in establishing a business-like atmosphere. Every employee should be dressed in good taste and appropriate to the type of work and position assigned.

6. CHAPEL ATTENDANCE

Joint daily worship offers a vital expression of our mission as a Christian college. It points our academic community to the ultimate goal of honoring God and reflects the discipline we as Christians are expected to practice as we model faith and love to each other. Therefore, the college's Board of Trustees has continued

to adhere to a policy of required chapel attendance for all full-time students, and has repeatedly urged that all full-time faculty and staff participate in chapel with a certain regularity.

While it is understandable that not all full-time employees can leave their offices or workplaces regularly to attend chapel it is expected that all full-time employees will join the college community in worship on a semi-regular basis to underscore our common commitment to the Lordship of Jesus Christ.

7. CONSENSUAL RELATIONSHIPS

Consensual dating and romantic relationships between a member of the faculty and a student or between a supervisor and an employee or student worker carry risks of conflict of interest and abuse of power. In the collegiate setting such relationships may have the effect of undermining the atmosphere of trust on which educational or institutional activities depend, diminishing a student's freedom of choice, or interfering with a subordinate's ability to choose freely in the relationship. Examples may include:

- A student or employee may feel forced into an unwanted relationship because he or she fears that refusal to enter or continue in a relationship will adversely affect his or her education or employment;
- Conflicts of interest may arise when a supervisor, faculty member, or other college member is required to evaluate the work of or make personnel or academic decisions with respect to the person with whom he or she is involved;
- A charge of sex discrimination could be brought by a peer of the student or employee if it is perceived that the subordinate person in the relationship has been given unwarranted benefits, such as higher grades or better evaluations;
- A charge of sexual harassment against the person who has the "power" in the relationship could follow the termination of the relationship on "unfriendly" terms.

Faculty and staff should consider seriously the exploitative possibilities that may be inherent in dating and romantic relationships. Because consent cannot be given freely in a situation where one person has power over another, dating and romantic relationships between the following are prohibited: faculty with currently enrolled students and students being recruited, supervisors with any person she/he supervises, or any other college employee with someone over whom she/he has a position of power or control. Faculty members in particular are under a special obligation to preserve the integrity of their relationships with students, and therefore are expected to maintain at all times the highest level of professionalism with students, whether or not any real or perceived authority over the student exists.

Consensual dating or romantic relationships between an employee and a current student, or between supervisors and those they supervise may be construed as, or may in fact be, harassment. Because a position of power or control exists in such relationships, "consent" is ambiguous. Therefore, if a charge of sexual harassment is subsequently lodged, it will be difficult to prove immunity on grounds of mutual consent, and may make one liable for a charge of sexual harassment or discrimination on the basis of sex.

In internal proceedings, the College will in general not be sympathetic to a defense based on consent when the situation is such that the accused had the power to affect the complainant's academic or employment status.

Beyond these concerns about power imbalances in relationships, the college is also concerned that its employees' relationships are consistent with the design for sexual activity outlined in the Bible and affirmed by Christians throughout history. Northwestern College calls its faculty, staff, and students to practice Christian chastity, which involves abstinence outside of marriage and fidelity within marriage. The college lifts up the Christian ideal of marriage between a man and a woman and contends that all sexual intimacy shall be within the bounds of such marriage. Employees are expected to refrain from sexual activity contrary to Biblical standards. This includes, but is not limited to, extramarital, premarital, or same-sex sexual activity. Cohabitation between unmarried heterosexual or same-sex partners is also prohibited. Any faculty or staff member engaging in such conduct, regardless of issues of consent, will face appropriate disciplinary action up to and including termination.

8. GENDER IDENTITY STATEMENT

Northwestern College's position on gender identity is rooted in deeply-held convictions about God's design for human personhood, revealed to us through Scripture, the Christian tradition, and general revelation. We come to this position out of a longing to promote human flourishing and to honor God with our bodies, not out of malice toward persons who identify as transgender or non-binary. While our Christian convictions challenge the emerging gender paradigm present in American culture, they also call us to treat all persons as image-bearers of God. When someone has entrusted their story of distress related to gender identity to a member of the campus community, we must work to hold together our care for the person with our commitment to Biblical convictions, in a posture of humility, recognizing that we have more to learn and to understand.

The following statement does not attempt to answer every question related to transgender students and employees on our campus, but rather:

- to set out some basic definitions and
- to provide a Biblical, theological and philosophical foundation for specific policies on housing, athletics, academic records, and human resources

Definitions

"**Transgender** is an umbrella term for many ways in which people experience, express, or live out a gender identity different from the gender identity corresponding to their birth sex."[i] In contrast, "**Non-binary** refers to a wide range of gender identities that are not exclusively male or female or masculine or feminine."[ii] Sometimes identifying as transgender or non-binary is a personal preference unrelated to psychological distress. As a college, we are concerned that these preferences fail to acknowledge the created goodness of our male and female bodies, and as such, we do not affirm such self-expressions.

At other times, identifying as transgender is rooted in significant psychological distress caused by the incongruence between one's birth sex and one's gender identity. The standard psychological diagnostic manual, the DSM-5, defines gender dysphoria as clinically significant distress or impairment related to gender incongruence, which may include desire to change primary and/or secondary sex characteristics. As a college, we strive to be a community in which those suffering from gender dysphoria find empathy, belonging, and compassion. Having gender dysphoria should not be treated as either a willful choice or a sinful act. Any person experiencing gender dysphoria should be free to speak with members of the campus community without fear of judgment or retaliation.

A small percentage of individuals are born with Differences in Sex Development (DSD)/Intersex conditions. This phenomenon should not be conflated with transgender or non-binary gender identities. Students and employees with DSD will generally be treated at Northwestern in continuity with the sexual/gender identity they have lived into prior to coming to the college.

Christian commitments related to sex and gender

As a Christian college that is Reformed, evangelical, and ecumenical, we affirm that

- *Sexual difference is part of God's good creation*. God created his image bearers, male and female, as two distinct sexes. The differentiation between the sexes is reiterated throughout the Old and New Testaments (Gen 1:27, Deut. 22:5, Matthew 19:4, Mark 10:6, 1 Cor. 11: 1-16). Our sex is not arbitrary. It is meaningful because it is part of the way we reflect God's image in the world.
- *We are our bodies*. Although there is more to us than our bodies, our bodies are not simply containers of our true selves. Our bodies are central to the Biblical drama of creation, fall, redemption, and restoration, and are a means by which God reveals himself to us. We lament gender paradigms that define the self in disembodied or dualistic ways and that deny the reality and significance of the body. We call upon our community to embrace a biblical anthropology that understands human beings as embodied creatures, fearfully and wonderfully made. (Gen. 1:7, Mk. 12:30; Lk. 10:27).
- *The fall affects all parts of creation, including our bodily existence.* In this world, we groan inwardly while we await the redemption of our bodies (Rom 8:23). Gender dysphoria is one example among many others that creation is not always how God intended it to be. This recognition

of the human condition should instill compassion for those who experience gender dysphoria. Students and employees in distress are urged to seek out professional counseling, pastoral support, and/or mentoring.

- *Our bodies belong to God*. As Christians in the Reformed tradition, we hold to the words of the Heidelberg Catechism that "I am not my own, but belong, body and soul, in life and in death, to my faithful savior, Jesus Christ." (Heidelberg Catechism, Q&A #1). As such, we submit our lives to the will of our loving Creator who desires our flourishing.
- *We have freedom to express ourselves within the goodness of God's creational design*. As Christians, we are granted freedom to express our uniqueness as persons and are not bound to overly-narrow cultural definitions of what constitutes masculinity and femininity. We lament that these narrow definitions can contribute to gender dysphoria.
- *We are called to Christ-like love*. All members of the community are called to care for and respect one another as persons made in the image of God. If a Northwestern student or employee experiences harassment, intimidation, or abuse due to their gender expression, they should report those offenses to the proper campus authorities so that the offending party or parties can be held accountable. Such behavior will not be tolerated on our campus.
- *Jesus's sacrifice on the cross is for all persons who confess him as Lord*. Having gender dysphoria does not prevent one from being part of this Christian community. It is our prayer that all persons will grow in their knowledge and love of Jesus while at Northwestern and will experience the love of the Christian community while here.

Implications of our Christian commitments

Based on these Christian convictions, we call students and employees to live in congruence with their sex at birth. In decisions about housing, employment, academic records, athletic participation, and more, Northwestern College will prioritize sex over gender identity as a more meaningful marker of one's personhood. In all situations, we will do our best to care for the individual and the community as a whole. We recognize that, just as every person is unique, so must our response to individual cases be discerned in light of the posture, role, and expectations of the person in question and our understanding of how our Christian convictions apply in particular situations.

There may be instances when a person's gender identity/expression and their gender-related requests are incompatible with the Christian convictions outlined in this statement or with the kind of Christian community we strive to cultivate on campus. In such cases, it may not be possible for that person to remain a member of the college community. When such a judgment is made, the college will work closely with that person to ensure a graceful and respectful exit. In all situations, the college is committed to treating people with dignity and care, recognizing one another as God's beloved children.

[1] Mark Yarhouse and Julia Sadusky, *Emerging Gender Identities*, Brazos Press, 2020, p. 8.
[1] Preston Sprinkle, *Embodied*, David C. Cook, 2021, p. 30.

9. TITLE IX EQUAL OPPORTUNITY, HARASSMENT & NONDISCRIMINATION POLICY

Northwestern College is committed to providing a working, learning, and living environment that promotes personal integrity, civility, and mutual respect in an environment free of discrimination free from discrimination, harassment, and retaliation. Discrimination, harassment and retaliations is contrary to the standards of the college community, as it violates an individual's fundamental rights and dignity as a person made in the image of God. Northwestern College considers discrimination, harassment and retaliation in all its forms to be a serious offense and it will not be tolerated. The college is dedicated to preventing and educating all students, faculty, and staff regarding all forms of harassment, discrimination and retaliation. This policy refers to all forms of discrimination and harassment, including but not limited to: unfair treatment based on sex, sexual harassment, hostile environment harassment, sexual assault, sexual exploitation, domestic violence, dating violence, stalking, hazing and bullying by other students, employees, or third parties.

The Title IX policy describes how and who to report incidents of harassment, discrimination or retaliation. All employees are expected to be familiar with their responsibilities in reporting such incidents. Detailed

information about the policy, the Title IX Coordinator and other responsible employees is found at: https://my.nwciowa.edu/ICS/Employees/ or https://www.nwciowa.edu/campus-life/TitleIX .

10. MANDATORY CHILD ABUSE REPORTING

Northwestern College ("NWC" or the "College") strives to protect the welfare of minors on its campus. This includes minors who are on NWC's campus or participating in off-campus College-sponsored programs. This policy outlines the responsibilities of employees at the College as mandatory reports of child abuse and other forms of misconduct. Consistent with Iowa Code 261.9, the purpose of this policy is to explain who is required to report child abuse, when child abuse reporting is required, and the process for reporting. The scope of this policy is intended to be broad, and any uncertainty about whether reporting is required should be resolved in favor of making a report.

Who Must Report

Any employee who in the scope of their responsibilities, examines, attends, counsels, or treats a child must report suspected physical or sexual abuse of a child. This includes all College employees, including, but not limited to, faculty, coaches, student employees, and staff ("College Reporters"). If you are not sure whether you are required to report, this policy encourages you to err on the side of caution and report. Proof that abuse has occurred is not required in order to be obligated to report.

Raising such concerns is a service to the College. The College depends on each individual to report potential or suspected violations of applicable laws and regulations. Failure to report known or suspected violations and crimes is itself a breach of the College's ethical standards and can lead to discipline of employees and students, up to and including separation from the College. Reports made in good faith will not jeopardize the reporter's position or employment, and retaliatory action against an employee for participation in making a good faith report of child abuse or aiding and assisting in an assessment of a child abuse report is prohibited.

When to Report

College Reporters must report child abuse when they see, know about, or reasonably suspect the abuse of a child. A report must be made as soon as practical, but no later than twenty-four hours after becoming aware of the suspected abuse. The types of abuse that are required to be reported under this policy include any physical or sexual abuse of a child.

"Child" means any person under the age of eighteen years.

"Physical abuse" means any non-accidental physical injury, or injury which is at variance with the history given of it, suffered by a child as the result of the acts or omissions of a person responsible for the care of the child. This could also include denial of critical care, mental injury, or presence of illegal drugs in a child's body. Common indicators could include unusual or unexplained burns, bruises, or fractures.

"Sexual abuse" means the commission of a sexual offense according to Iowa law, including rape, sexual assault, molestation, incest, indecent exposure, or exploitation of a child in a manner in which the child is used for gratification or sexual enjoyment by another person.

Reporting Procedures

In the event of an emergency, first call 911.

College reports who, in the scope of their work, suspect minor abuse must:

Immediately report the suspected abuse to the Iowa Department of Health & Human Services (HHS) at 1-800-362-2178 or csiu@hhs.iowa.gov.

Then suspected abuse must be reported to any of the following Northwestern College individuals:

- Director of Campus Safety & Security:
  Office (712) 707-7475 or Cell (712) 395-1077
  Email andy.vanommeren@nwciowa.edu

- Vice President for Student Life:
  Office (712) 707-7204 or Cell (484) 318-9063
  Email julie.elliott@nwciowa.edu
- Director of Human Resources:
  Office (712) 707-7223 or Cell (515) 783-4176
  Email mindy.stichka@nwciowa.edu

When making a report of child abuse under this policy the College Reporter shall provide the following information to the best of their knowledge:

- Name of the alleged victim(s);
- Name of the alleged perpetrator(s);
- Time and date of the incident(s) being reported;
- Location where the incident(s) occurred; and
- Any additional information supporting the allegation that misconduct has occurred.

Mandatory Reporters Under Iowa Code 232.69

It is possible that some College Reporters, as well as others who interact with minors who are on NWC's campus or participating in off-campus College-sponsored programs may be Mandatory Reporters of child abuse under Iowa Code §232.69. These individuals have additional responsibilities to report all forms of child abuse as described in Iowa Code §232.68(2). Under §232.69, Mandatory Reporters must report suspected abuse to the Department of Human Services. Child Abuse can be reported to the Department of Human Services by calling the toll-free child abuse reporting hotline 24 hours a day: 1-800-362-2178.

The College encourages everybody, including those who are not Mandatory Reporters under Iowa Code §232.69, to report all forms of child abuse to the Department of Human Services in addition to reporting to the NWC individuals indicated above and the Department of Public Safety under this policy.

11. WHISTLEBLOWER POLICY

Northwestern College (College) as a Christian institution is dedicated to the highest standards of ethical conduct, professionalism, and high quality in our education and administration. These concepts are consistent with the mission and expected in the behavior of each individual associated with the College.

The College encourages all employees (faculty, staff, student employees, and volunteers) to come forward with credible information on illegal practices or violations of College policies. Any individual is encouraged, in good faith, to report (1) a violation of law or government regulation, (2) a violation of College policy, (3) mismanagement, (4) misuse of College funds, (5) an abuse of authority, or (6) fraudulent or dishonest conduct. Examples of such include, but are not limited to:

- Violation of Law or government regulation;
- False or misleading financial reporting;
- Unauthorized destruction, alteration or manipulation of College records (including computer files);
- Improper financial transaction, including kickbacks or financial conflicts of interest;
- Submitting fraudulent or improper expense reports, for example, manipulation of expense report for business transportation, meals and lodging resulting in an unauthorized benefit;
- Authorizing or receiving compensation for goods not received or services not performed, for example, falsification of time sheets;
- Employee theft of College property or assets;
- The use of College property, resources, or authority for personal gain or other non-College purposes except as provided under College policy.

Reporting

In order for the College to take necessary internal corrective action, an employee is encouraged to report, in writing, a disclosure of any activity described above to the College's legal counsel (see Contact Information section below). The disclosure should be factual and contain as much specific information as possible. If an employee is unwilling or unable to put a disclosure in writing, he/she should report the activity orally to the

College's legal counsel (see Contact Information section below), who will prepare a written summary of the individual's disclosure, and provide a copy to the individual for accuracy and completeness.

All allegations will be investigated by the appropriate College official. All College employees are expected to fully cooperate in the investigation of the allegations. The appropriate corrective action, up to and including termination, will be administered if the investigation finds that an employee engaged in activity as described above.

Confidentiality
Individuals who report, in good faith, possible activity as described above will be accorded confidentiality and/or anonymity to the extent possible under state and federal law throughout the investigation.

Protection from Retaliation
The College will protect any employee from retaliation who, in good faith, reports any of the above described activity. Retaliation may include but is not limited to adverse employment action, discrimination, harassment, poor work assignments, and/or threats of physical harm.

Any employee who believes that he or she has been the victim of retaliation for reporting an activity as described above or participating in a proceeding related to such an activity should file a complaint with the College's legal counsel (see Contact Information section below). All complaints will be investigated promptly and with discretion, and all information obtained will be handled on a "need to know" basis. At the conclusion of the investigation, if it is determined that retaliation has occurred, appropriate corrective action will be taken with respect to the employee to whom retaliation has occurred and appropriate disciplinary action, up to and including termination, will be taken against the employee(s) found to have retaliated.

False Allegations
Any employee who knowingly makes false allegations of alleged activity as described above will be subject to corrective action, up to and including termination of employment, in accordance with College policies.

Contact Information
Klay, Veldhuizen, Bindner, De Jong, De Jong, & Halverson, P.L.C.
Brad De Jong
121 Albany Avenue NE
PO Box 405
Orange City, IA 51041

Phone #: 712-737-4851
Email: bkdejong@klaylaw.com

12. ADA POLICY (AMERICANS WITH DISABILITIES ACT)

Northwestern College complies with the Americans with Disabilities Act (ADA), the ADA Amendments Act (ADAA), and the Iowa Civil Rights Act (ICRC). These acts provide qualified individuals with disabilities an equal opportunity to benefit from the full range of employment-related opportunities available to others and prohibits discrimination in recruitment, hiring, promotion, training, pay, benefits, and other privileges of employment. It requires that employers make reasonable accommodation to the known physical or mental limitations of otherwise qualified individuals with disabilities so they can perform their essential job functions safely and effectively, unless it results in undue hardship to the employer. An accommodation is any change in the work environment or in the way things are customarily done that enables an individual with a disability to have equal employment opportunities and to perform the essential functions of the job as other similarly situated employees without disabilities.

Process
An employee may make a request for a reasonable accommodation to Human Resources. Supervisors are responsible for notifying Human Resources of any employee accommodation request brought to their attention.

A request made to Human Resources will be reviewed with the employee's supervisor to the degree necessary to properly evaluate the accommodation request and to implement any accommodation deemed necessary. In order to make a request for a reasonable accommodation, an employee must do the following:

- Complete the Reasonable Accommodation Request Form
- Have your physician complete the ADA Information from Medical Provider Form
- Submit both completed forms to the Human Resources Office

The determination of whether to provide an accommodation is made on a case-by-case basis. The employee accommodation process will be an interactive process between the employee, the employee's supervisor and Human Resources. This is an individual process through which Human Resources, the department and the individual with a disability discuss and arrange for necessary and reasonable changes, provided they do not create undue hardship to the employer or other workers in the requesting employee's department.

Assistance Animals on Campus

The Student Handbook contains Northwestern College's full policy on general guidelines and permitted used of assistance animals in providing disability accommodations in college buildings and on college property. This policy will be used if an accommodation request includes the request for an assistance animal and can be found at https://my.nwciowa.edu/ICS/Student_Life/. These accommodation requests will be reviewed by Human Resources and follow the same interactive process as other accommodation requests.

Confidentiality and Record

Because of the personal nature of some disability issues, all college officials and supervisors have a responsibility not to share information regarding employee's disability-related information or accommodation requests with others unnecessarily. Documentation related to an employee's disability will be filed with other confidential medical records and not be placed in the employee's personnel file.

SECTION XI.

GRIEVANCE POLICY

1. PURPOSE AND PROCEDURE

It is the intent of Northwestern College to be fair and reasonable with all members of the administration, faculty and staff. However, situations may arise where some member may feel that a problem or problems have arisen or injustices have occurred that are not solvable through ordinary interpersonal discussion with either co-workers or supervisors.

If any person hired by Northwestern College has a question about interpretation or application of college policy, or is in disagreement with a co-worker or a supervisor he/she may use the following procedure.

Step 1: The Immediate Supervisor

The grievant should arrange a conference to bring the concern or question to the attention of their immediate supervisor. If the initial conference does not provide satisfaction for the grievant or if the grievance is with the supervisor and is known to the supervisor, the grievant may submit his/her grievance in writing to his/her supervisor.

The supervisor will provide a solution or an explanation in writing to the grievant within seven working days after receiving the written grievance.

In the event that the solution or explanation is not acceptable to the grievant, then the grievant may proceed to Step 2.

Step 2: The Vice President, Dean or Director

The grievant may submit the grievance in written form to the appropriate Vice President, Dean or Director within seven working days after receiving the supervisor's written response.

The Vice President, Dean or Director will investigate and provide a written solution or explanation to the grievant within seven working days.

In the event that the solution or explanation is not acceptable to the grievant, then the grievant may proceed to Step 3.

Step 3: The President

The grievant may appeal the decision of the Vice President, Dean or Director to the President in writing within seven working days after receiving their decision.

The President will investigate and provide a solution or explanation to the grievant within seven working days.

In the event that the solution or explanation from the President is not acceptable to the grievant the grievant may proceed to Step 4.

Step 4: Executive Committee of the Board of Trustees

The grievant may appeal to the Executive Committee of the Board of Trustees. The grievant has seven working days after receiving the President's response to submit a written request to the chairperson of the Executive Committee.

The Executive Committee of the Board of Trustees will investigate and provide a solution or explanation to the grievant.

The decision of the Executive Committee of the Board of Trustees is final.

SECTION XII.

GENERAL PROCEDURES AND GUIDELINES

1. ACCESS TO ACADEMIC AND ADMINISTRATIVE BUILDINGS

No student shall be allowed in any campus building after hours unless accompanied by faculty or staff. Hours that facilities are accessible can be found on My Northwestern.

2. AUDIO-VISUAL EQUIPMENT AND RENTAL

Audio-visual equipment is available for on-campus use or for official college use. However, there are times when it is helpful to loan pieces of audio-visual equipment to churches, businesses, community groups, or even individuals. Such loans shall be made on the basis of the following policy:

Northwestern will charge a fee on the use of equipment by businesses and individuals and reserves the right to limit the type of equipment available for rent. Any requests can be submitted to the audio-visual department through MYNWC.

3. COLLEGE VEHICLE USAGE

College vehicles must be reserved for college business electronically at least 72 hours prior to summer trips and a week before trips during the school year. To make a reservation, log into MYNWC, select employees tab and then select request campus vehicle. The budget account number must be provided when the reservation is made. Keys, mileage cards and credit cards should be picked up at and returned to the Maintenance Department office. If the hour of your return is late, the keys and cards should be placed in the drop box located at the north door in the maintenance parking lot.

The Travel Expense Report (available in the Business Office) should be submitted for reimbursement as soon as possible.

Mileage rates charged to departments are as follows:

Car	$.42/mile
Mini-Van	$.45/mile
Van	$.58/mile
Trailers	$.10/mile

A. Any person needing to drive a college vehicle must complete the Northwestern College Driver Authorization and will be subject to driving records screening prior to driving college vehicles. Any person with more than two moving violations on their driving record during the past three years will be disqualified from operating a college vehicle until remedial training has been completed. Anyone with a suspended or revoked license, convicted of criminal misconduct while driving or convicted of driving under the influence of alcohol or drugs will be disqualified from operating a college vehicle until approval is received from the college insurance carrier. The driver authorization form must be updated when information changes, such as expiration date of driver's license.
B. All students needing to drive a college vehicle must complete the Northwestern College Driver Authorization Form prior to driving college vehicle. The disqualifications listed above apply to students as well.
C. All students needing to drive a college vehicle designed to transport more than 9 passengers must be turning 21 years of age and must successfully complete a Driver Safety Course. This course is offered at certain times during the school year and will be scheduled through the maintenance office. Faculty and staff are encouraged to complete this course as well.
D. Students cannot use college vehicles without being accompanied by a college faculty or staff person unless approval has been received from the Vice President for Finance and Operations.
E. The proper use of seat belts is required for the driver and all passengers while the vehicle is in motion.

F. Drivers shall not operate cell phones, laptop or tablet computers, navigational aids and any other device that may cause driver distraction while operating a college vehicle or while operating a privately owned vehicle in the course of conducting college business. Drivers shall properly park their vehicle prior to using such devices. Hands- free devices are recommended for mobile phone use while driving.
G. If the front passenger seat is occupied, that person is expected to remain awake, help the driver stay alert, and assist with driving directions.
H. Drivers on extended trips should take frequent breaks and be replaced periodically by another driver.
I. Maximum speed limit for all college vehicles is the legal speed limit.
J. College vehicles are to be used only for college-related business. Personal use that occurs incidental to the business use will be allowed if it occurs on the same route and incurs no additional miles. All other personal use is strictly prohibited.
K. Northwestern College is not responsible for the property of others. This includes loss or damage to your property located on our premises or in our vehicles. Please review your homeowner's and auto insurance policies to determine if your property is adequately covered in the event of loss or damage. The only exception to this policy is when the college has care, custody, or control of the property of others. In those circumstances, you may have a claim under the college's policy for loss or damage to your property.
L. The college will not reimburse employees or students for parking tickets and fines for moving violations.

See Professional Travel (See Item 15 of Section XII for reimbursement for use of personal cars.)

4. CONFIDENTIALITY

In the course of your work, you may have access to confidential information regarding the institution, its students, faculty, and even fellow employees. It is one of your most serious responsibilities that you in no way reveal or divulge any such information and that you use it only in the performance of your duty.

Specifically, with regard to student directory information and employee personal contact information, Northwestern employees are not allowed to share that information without the verbal or written consent of the student or colleague.

Your salary is considered confidential. Salaries are based on both the nature of the work and how well that work is done. Since no two cases are alike, comparison of salaries may give incorrect impressions.

5. CONSULTING AND OTHER SERVICES PROVIDED BY NORTHWESTERN COLLEGE PERSONNEL

While Northwestern College encourages its full-time staff members to use their talents and skills in representing the college and in providing services (consulting, preaching, lecturing, conducting, etc.) to outside groups and organizations, and while staff members are entitled to any honoraria received for providing such services, the following guidelines are in effect to protect the interests of the college:

A. The staff member is entitled to any and all honoraria received, provided all expenses incurred (travel, use of college car, accommodations, materials, etc.) are borne by the individual staff member or by the outside organization, and that the college will be adequately reimbursed for any expenses charged to or incurred by the college.
B. The staff member is expected to utilize a minimum of college time in performing such services, using instead as much personal or private time as possible or appropriate.
C. The staff member should refrain from engaging in on-going consulting services on a regular basis to a particular organization or enter into a contractual relationship that requires the staff member to provide consulting services to another institution or organization.
D. The staff member should refrain from becoming involved in providing services, consulting or otherwise, that could be interpreted as, or lead to conflict of interest situations.

Nothing in the above guidelines is to be interpreted as preventing or limiting a staff member from using one's special expertise and/or skills in providing services that add to the prestige of Northwestern College and that are important forms of professional development and growth of an individual staff member.

6. DINING HALL AND FOOD SERVICE

Food service at Northwestern is contracted to an independent company – Creative Dining Services (CDS). The company will provide a wide variety of services from coffee at meetings to special dinners. Arrangements for services and facilities should be made with the catering manager of the food service and the dining hall. Like other departmental expenses, these arrangements are for authorized and budgeted business purposes.

Employees may use the cafeteria (in Smith Hall), the HUB (snack bar in RSC) or Common Grounds (coffee shop in the Learning Commons). Flex Dollars (Raider Cash) may be purchased from the food service company online for discounts on food items (if an employee purchases $50 of flex dollars, an additional $10 will be added to their account). Benefit-eligible employees (75% +) will receive four free meals on their accounts to be used in the fall and spring semesters. These free meals do not carry over, they must be used in the semester they are received. Meals are uploaded to an employee's account at the beginning of each semester (fall and spring). Otherwise, cash payment will be required.

7. FLOWERS FOR CONDOLENCES OR ILLNESS

When members of the campus community are seriously ill or have experienced the death of an immediate family member, flowers are sent from the president's office on behalf of the whole college. If you are aware of a situation when flowers should be sent, please notify Jill Haarsma/President's Office or, in her absence, Mary Beltman/Advancement.

If you would like to send additional flowers on behalf of your department or other campus group, rather than using your departmental supplies budget or any other college budget, please "pass the hat" to fund those bouquets or plants with personal contributions.

8. FUND RAISING POLICY

Northwestern College depends upon the ongoing and generous financial support it receives each year from alumni, parents, friends, churches, businesses, foundations, and other donors. Donations typically are made to the college's operating fund (called the Northwestern Fund) or non-operating, which may include donations to capital campaigns or funds for other specific purposes.

The Office of Advancement coordinates all fundraising activities and accounting of donor gifts. Part of our role is ensuring that all fundraising efforts connected with the college complement—rather than compete with—one another. Thus, individual departments or efforts, such as SSP, for example, should communicate their fundraising activities to the Office of Advancement. Fundraising request forms are available from Advancement. Call the assistant to the VP for Advancement to request a form or if you need further information.

9. INTERNET USAGE

Northwestern College's campus network is a powerful resource for accessing, analyzing and presenting information. Improper use of the network can have unintended consequences such as but not limited to absorbing productive time and accessing offensive materials. The college's expectation is that our network will be used for its intended purposes and in accordance with the mission of Northwestern College. In keeping with its mission as a Christian college, Northwestern uses a filter to block both intentional and unintentional access to pornographic, hateful, gambling and other offending materials and subjects on the Internet.

While the college has the capability of monitoring employee and student time commitments including specific sites visited on the Internet, it is not our desire to do so. Rather we desire a commitment to self-regulation where employees and students will responsibly use technology for the purposes directly related to teaching, administrative or learning activities. This focus allows the campus community ready access the campus network to be used in a productive means and maintains the integrity of Northwestern's mission.

Any situation that becomes known that compromises the expectations of the college on this matter will be addressed on an individual basis and in accordance with applicable statutes and case law.

10. KEY POLICY

Keys for your office and the building in which it is located may be obtained from the Maintenance office. The college-wide policy with respect to the issuance and use of keys is as follows:

A. General responsibility for issuance of keys for all college buildings will rest with the Director of Facilities Management. Records concerning all keys will be kept in that office.
B. Request forms for approval and issuance of keys, available in the maintenance department office, must be completed and presented to the Director's office before any keys will be issued.
C. Each request form needs to be signed by the immediate department chair or supervisor and by the appropriate vice president or dean. Student keys must be requested by their supervisor. The key will then be issued to the supervisor who will be responsible for the student returning the key at the end of the academic year. Keys for residence halls will be handled between the Dean of Residence Life and the Director of Facilities Management.
D. Each person receiving a key must sign the Issuance form to obtain the key(s).
E. Each person having a key to any college facility agrees not to duplicate or let anyone else duplicate that key, nor loan the key to others.
F. Keys are to be returned to the maintenance department office when the person no longer needs a particular key or keys, or when employment with the college terminates, or when a faculty/staff person will be away from campus for longer than six months. **If keys are not returned, employees will be charged up to $50 per lock that's affected by the missing key on their last paycheck.**
G. Students who have obtained keys must return them to their supervisors at the end of the academic year.
H. A $20.00 charge will be collected before any replacement can be issued for a lost key. Key Replacement Request forms are also available in the maintenance department office.
I. Buildings in which keys are issued in large numbers to staff persons, loss of a key will mean replacement of lock and issuance of new keys to all persons involved. The person losing the key is responsible for the cost of replacing the lock and keys.
J. Any lost or stolen keys should be reported at once to the Director of Facilities Management.

11. NEWS RELEASES

College personnel are asked to notify the Marketing and Communications Office of any news that should be considered for publication. If an item is deemed newsworthy, the Marketing and Communications Office will gather the pertinent details and disseminate the release.

Despite our very best intentions, negative situations sometimes arise on campuses which prompt reporters to call colleges to gather information and opinions. Rather than be caught unprepared in such situations, we would like to adhere to the following procedures:

Anyone who becomes aware of a potentially inflammatory situation they believe likely to be "news," should immediately contact the Director of Marketing and Communications. If in doubt as to the newsworthiness of the incident, please call day or night (Office 707-7116; Cell 441-2179). In consultation with the President, the Director of Marketing and Communications will prepare a statement for the media. The President or the Director of Marketing and Communications, as his designate, reserves the right to be the official spokesperson for the college on such matters. Should the media

contact individual faculty/staff members directly for information on such issues, please refer them to the Director of Marketing and Communications.

The above policy is not intended to restrict your right to speak freely. However, it should be understood that all of us are regarded as representatives of the college and the media will invariably quote individuals, using a phrase such as, "a college official said. . . ."

Our collective hope is that incidents like these will occur only very infrequently, if ever. The above guidelines will allow us to speak with a prepared, united voice.

12. WORK-RELATED INJURIES

If an employee is injured at work, he/she should report this immediately to the supervisor. The college has an incident checklist to follow for handling a work-related injury. Please see mynwciowa.edu\employees for information. Documentation will be maintained in the Human Resources Office. In the event a claim is necessary injury claim forms are available in the Business Office and/or Human Resources Office.

13. PERSONNEL RECORDS

A confidential file containing employee records and employment compliance documents is maintained in the Human Resources office. Annual staff evaluations are also included in this file.

14. PRINTING SERVICES AND DUPLICATION

The Printing Office offers printing services.

Work is to be submitted 24 hours before the finished product is needed, with the name and department or the person requesting the work indicated, the number of copies desired, and the time stated when work should be completed. There may be busy times when the Printing Office will not be able to meet the normal 24-hour deadline. Please refer to the brochure received in August for further information.

Federal Copyright Laws

Because modern copying equipment has made it easy to make multiple copies of almost anything in print it has become necessary for the federal government to issue appropriate laws. Northwestern College is committed to adhering to these laws strictly and expects every employee to abide by those laws. A summary of the Federal Copyright Laws includes:

A. Single Copying – A single copy may be made of any of the following for use in scholarly research, class work, teaching or preparation thereof, or for any similar non-commercial use:
   1. A chapter from a book
   2. An article from a periodical or newspaper
   3. A short story, short essay or short poem, whether or not from a collective work
   4. A chart, graph, diagram, drawing, cartoon or picture from a book, periodical or newspaper

B. Multiple Copies for Classroom Use – Multiple copies, not to exceed in any event more than one copy per student, may be made by or for a teacher giving the course, for classroom use or discussion, provided that:
   1. The copying meets the tests of brevity and spontaneity as defined below
   2. The copying meets the cumulative effect test as defined below
   3. Each copy includes a notice of copyright

C. According to the Fair Use Doctrine of the Copyright Act of 1976, faculty may use portions of legally acquired copyrighted materials without permission. The fair use provision covers faculty members and students, who are permitted to use portions of copyrighted materials in multimedia projects for a specific course. These guidelines apply to educational projects (e.g. PowerPoint presentations) that involve

multimedia in ways that incorporate original materials such as lecture notes with copyrighted media, including graphic and photographic illustrations, music, motion pictures, and text materials. Faculty may use such projects in a variety of educational contexts, including: remote instruction via a secure network that does not permit unlawful copying; student self-study; workshops, presentations, and conferences, and; professional portfolios used in an academic setting. Any resulting document or file that includes copyrighted work must be used only for educational activities. Selling the work or using it in a for-profit setting requires permission. The fair use exception lasts for two years from the incorporation of the copyrighted content. Permission must be obtained after two years if the project will be used again. The following restrictions apply:

1. Motion media: up to 10% of the total or three minutes, whichever is less.
2. Text material: up to 10% of the total or 1,000 words, whichever is less.
3. Music, lyrics, or music video: up to 10% of the work but no more than 30 seconds of music or lyrics from an individual piece of music.
4. Graphic and photographic illustrations: no more than five images from one photographer or artist and no more than 10% or 15 images, whichever is less, from a collection.
5. Numerical data sets: up to 10 percent or 2,500 cell entries from a copyrighted tabulation, whichever is less.
6. Copying of a multimedia project: no more than two copies may be made of a project.

D. The Technology, Education, and Copyright Harmonization Act (TEACH Act) of 2002 extends many of the Fair Use exemptions provided in the Copyright Act of 1976 to the online classroom. To receive the protections the new law offers, NWC must maintain policies regarding copyright, provide informational materials explaining copyright, notify students of copyright policy, and ensure that transmission of copyrighted content is made solely for students enrolled in the course for which the transmission is made. The law offers the following benefits:

1. The display of complete non-dramatic musical or literary works, including poems, short stories, or music other than musicals and operas.
2. The transmission of content to classrooms is no longer limited to physical locations but includes the virtual classroom, which students may reach from any location.
3. In order to facilitate the transmission of digital material, the law now permits the digitization of some analog works. Digitization is permitted only if the work is not readily available in digital format.
4. Like former copyright laws, the TEACH Act allows educational institutions to retain copies of distance-education transmissions, even if they included copyrighted material belonging to others.

<u>Definitions</u>

A. Brevity

1. Poetry – A complete poem of less than 250 words and printed on not more than two pages, or from a longer poem an excerpt of not more than 250 words
2. Prose – Either a complete article, story or essay of less than 2,500 words, or an excerpt from any prose work of not less than 1,000 words or 10 percent of the work, whichever is less, but in any event a minimum of 500 words
3. Each of the numerical limits stated above may be expanded to permit the completion of an unfinished line of a poem or of an unfinished prose paragraph.
4. Illustration – One chart, graph, diagram, drawing, cartoon or picture per book or per periodical issue.
5. Special works – Certain works in poetry, prose or in "poetic prose" which often combine language with illustrations and which are intended sometimes for children and at other times for a more general audience fall short of 2,500 words in their entirety. Such "special works" may not be reproduced in their entirety. However, an excerpt comprising not more than two of the published pages of such a special work and containing not more than 10 percent of the words found in the text thereof may be reproduced.

B. Spontaneity

1. The copying is at the instance and inspiration of the individual teacher.
2. The inspiration and decision to use the work and the moment of its use for maximum teaching effectiveness are so close in time that it would be unreasonable to expect a timely reply to a request for permission.

C. Cumulative Effect
1. The copying of the material is for only one course in the school in which the copies are made.
2. Not more than one short poem, article, story, essay or two excerpts may be copied from the same author, not more than three from the same collective work or periodical volume during one class term.
3. There shall not be more than nine instances of such multiple copying for one course during one class term.

Federal Exemptions
The limitations stated above shall not apply to current news periodicals, newspapers, and current news sections of other periodicals.

Federal Prohibitions
Notwithstanding any of the preceding, the following shall be prohibited:

A. Copying shall not be used to create or to replace or substitute for anthologies, compilations or collective works. Such replacement or substitution may not occur whether copies of various works or excerpts therefrom are accumulated or reproduced and used separately.
B. There shall not be copying of or from works intended to be "consumable" in the course of study or of teaching. These include workbooks, exercises, standardized tests, test booklets, answer sheets and like consumable material.
C. Copying shall not substitute for the purchase of books, publishers' reprints or periodicals.
D. Copying shall not be directed by higher authority.
E. Copying shall not be repeated with respect to the same item by the same teacher from term to term.

Videotaping Policies

Federal Guidelines October 15, 1979, Congressional Record, pp. E4750-E4752

A. The guidelines were developed to apply only to off-air recording by non-profit educational institutions.
B. The broadcast program may be recorded off-air simultaneously with broadcast transmission (including simultaneous cable re-transmission) and retained by a non-profit educational institution for a period not to exceed the first 45 consecutive calendar days after date of recording. Upon conclusion of such retention period, all off-air recordings must be erased or destroyed immediately. “Broadcasting programs” are television programs transmitted by television stations for reception by the general public without charge.
C. Off-air recordings may be made only at the request and used by individual teachers in the course of relevant teaching activities, and repeated once only when instructional reinforcement is necessary, in classrooms and similar places devoted to instruction, during the first ten consecutive school days in the 45-day calendar day retention period. “School days” are school session days – not counting weekends, holidays, vacations, examination periods, or other scheduled interruptions – within the 45-calendar day retention period.
D. Off-air recordings may be made only at the request and used by individual teachers, and may not be regularly recorded in anticipation of requests. No broadcast program may be recorded off-air more than once at the request of the same teacher, regardless of the number of times the program may be broadcast.
E. A limited number of copies may be reproduced from each off-air recording to meet the legitimate needs of teachers under these guidelines. Each additional copy shall be subject to all provisions governing the original recording.
F. After the first ten consecutive school days, off-air recordings may be used up to the end of the 45-calendar day retention period only for teacher evaluation purposes, i.e., to determine whether or not to include the broadcast program in the teaching curriculum, and may not be used in the recoding institution for student exhibition or any other non-evaluation purpose without authorization.
G. Off-air recordings need not be used in their entirety, but the recorded programs may not be altered from their original content. Off-air recordings may not be physically or electronically combined or merged to constitute teaching anthologies or complications.
H. All copies of off-air recordings must include the copyright notice on the broadcast program as recorded.

Northwestern College Policies on Videotaping

A. The college follows the federal guidelines. All off-air recording of television programs shall be done in the context of what is morally and legally proper.
B. If a faculty member intends to make the videotape a part of the department's permanent audio-visual holding, the faculty member shall have evidence of clearance of copyright.
C. There are limited number of programs where copyright clearance is not necessary. The faculty member shall present evidence of such non-applicability when videotape becomes part of the permanent department collection.
D. Faculty members shall be as cautious not to violate copyright laws on videotaping, as students are to keep the rules about plagiarism in writing.
E. "Home Use Only" labeling on videodiscs and cassettes is interpreted by the Association for Educational Communications and Technology to mean, "The use must be part of the instructional program and [they] cannot be shown for recreation or entertainment."

Northwestern College Film Policy

Films shown at Northwestern College must possess some of the following characteristics:

- Laudable artistic merit;
- The capacity to provide intellectual and spiritual nurture, refreshment, and challenge;
- The capacity to enable the viewer to engage critically with social and political issues.

Because of our calling as a Christian community, not every film that has value in one or more of these ways will automatically be shown on campus, and films portraying excessive or unwarranted violence, profanity, nudity, or sex will not be shown. However, some films recommended for mature audiences may be shown if the subject matter is considered significantly educational. Such films will be identified in the published schedule, and a discussion will normally follow their showing. The screening of a film on campus does not imply the college's blanket endorsement of its content.

15. PROFESSIONAL TRAVEL

Mileage

Mileage costs incurred through the use of employees' personal vehicles to attend approved meetings, seminars, and other functions directly related to Northwestern's operations, activities, and mission will be reimbursed at the rate per mile established annually by the Finance and Operations Office.

Driving Versus Flying

In some instances, for long distance travel you may choose to drive instead of fly. In these cases, reimbursement for mileage will be at the current rate per mile up to the amount of the cost of an airline ticket (21 day advance out of Omaha) to that destination plus mileage to the airport and a rental vehicle at the destination, if necessary.

Restaurant Gratuity Practices

It is the policy of the college an adequate gratuity for service at a restaurant should be in the range of 15 to 18%. In the event a restaurant has a mandatory gratuity requirement for large groups, please do not exceed 20%.

Other Gratuity Guidelines

The college will reimburse employees for any gratuity of up to 10% of the total fare for service provided by a taxi cab driver. The services provided by a bellhop, airport attendant or similar service personnel are considered by the college to be personal services and will not be reimbursed as travel expenses.

16. PROPERTY LOSS

If in performing his/her job, an employee should accidentally damage college or personal property, it should be reported to the supervisor. The college does not have insurance covering employee personal property

which is located on campus. The cost would be prohibitive and in most cases the employee's personal insurance policy will cover the personal property regardless of where it is located.

17. PURCHASE AND DISBURSEMENT PROCEDURE/COMMITMENT AUTHORITY POLICY

A. Purchases

1. Invoices will be approved for payment as follows:
   a. Invoices under $500 require approval of a department head. Invoices over $500 require approval of a President's Cabinet member.
   b. Bookstore merchandise requires approval by Bookstore manager.
2. Invoices for services shall be approved as follows: Where invoices cannot be obtained (e.g., travel advances, athletic officials, chapel speakers) a check requisition should be completed by the person submitting the request and approved by their President's Cabinet member (and president if in excess of $5,000). After returning from travel, expense reports must be filled out (supporting documents attached) and approved by a President's Cabinet member (or president) for each travel advance requested.

B. Disbursements

Checks are issued weekly. Requests should be submitted to Business Office by 9:00 a.m. on Tuesday and checks will be available at 4:00 p.m. on Wednesday.

C. Commitment Authority Policy

1. **Purpose**

   The purpose of this policy is to define and fix authority to commit the College.

2. **General**

   Subject to the limitations imposed under the bylaws of the College and the more specific limitations contained herein, the President shall have the power to commit the College with respect to all matters in the ordinary course of business of the College. President's Cabinet members shall have authority to commit the College in respect to that portion of the ordinary course of business of the College for which they are directly responsible.

3. **Budget Approvals**

   The College operating budget requires the concurrence of the President's Cabinet member responsible for each budget category, the Vice President for Finance and Operations, the President, and the approval of the Board of Trustees. Any budgeted expenditure must be approved according to the following schedule:

Approvals Required	**Up to $500**	**$500 to $5000**	**Over $5000**
Department Head	X	X	X
President's Cabinet Member		X	X
President			X

4. **Capital Expenditures**

   Commitment for capital expenditures will be made only by:

   a. prior approval of a capital budget by the Board of Trustees, or
   b. specific approval by the Board of Trustees of special items.

   Either type of capital expenditure commitment must be approved according to the following schedule:

Approvals Required	**Up to $2000.**	**$2000 to $100,000**	**Over $100,000**
Department Head	X	X	X
President's Cabinet Member	X	X	X
President		X	X
Board of Trustees			X

Emergency capital expenditures for the preservation of buildings or other assets up to $100,000 may be approved by the President with a report and ratification required at the next scheduled meeting of the Executive Committee of the Board of Trustees.

For this purpose "capital expenditures" should be defined as the purchase of furniture, fixtures, vehicles or equipment with an estimated life of three or more years and costing more than $2,500 per unit.

5. **Property**
   Approval of the Executive Committee of the Board of Trustees shall be obtained prior to the purchase or sale of any real property.

6. **Banking**
   Authority shall be defined in the banking resolutions of the Board of Directors.

7. **Investments**
   a. Short-term Investments
      Authority to make short-term investments is vested in the President or Vice President for Finance and Operations.
   b. Endowment or Annuity Fund Long-term Investments Excluding Endowment Trust Fund
      Authority to make endowment and annuity fund investments is vested in the Vice President for Finance and Operations as directed by the Finance Committee of the Executive Committee.
   c. Endowment Trust Fund Investments
      Authority to make Endowment Trust Fund investments is vested in the Vice President for Finance and Operations as directed by the Executive Committee of the Board of Trustees.

8. **Borrowing**
   Short-term borrowing commitment authority shall be defined in resolutions of the Board of Trustees.

   Long-term borrowing shall require specific approval by the Board of Trustees.

D. General Procurement Standards for Federal Contracts

Northwestern College will take all necessary steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps will include:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation list;
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
5. Using the services and assistance, as appropriate, or such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5).
7. When/Where applicable, and in addition to the steps above obtained from the Code of Federal Regulation (CFR) Grants and Agreements, Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (specifically, CFR 200.321), the College will follow CFR Part 200 Subpart D Subsections 200.318 through 200.326, and Appendix II Part 200-Contract Provisions for Non-Federal Entity Contacts under Federal Awards. In addition, the College will follow CFR 180 Debarment and suspension steps.
   a. See https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

18. REPAIRS ON BUILDINGS AND EQUIPMENT

The following procedures are to be used in reporting any breakdown, any need of custodial/housekeeping assistance, or repairs anywhere on campus. Someone will be checking this several times each day Monday through Friday.

Please submit your work order request at maint@nwciowa.edu and be sure to include building name in the subject line, along with the room number or location where service is needed. A detailed description of the problem may go in the space below. Please remember that details matter and are very helpful. All requests will be accomplished in order of importance.

Emergency requests such as broken glass/unsafe situations, overflowing plumbing fixtures, leaking plumbing, or roofs may be telephoned to the Maintenance office during normal work hours or after hours to the person on call. To find the on-call schedule, log onto MyNWC and select the Employees tab. Listed below the Maintenance and Vehicle heading is a pdf named "Maintenance On Call Schedule".

19. SAFETY AND FIRE RULES

General

A. Acquaint yourself with the following locations in your building:
   1. exit escapes
   2. fire extinguishers
   3. first aid containers
   4. tornado shelters

B. In case of fire
   1. call (911) with exact location
   2. check to see if anyone needs help and warn nearby rooms and people
   3. Faculty and staff are the last people to leave a classroom. Close door and evacuate to the designated assembly area.
   4. notify Campus Security (7475)
   5. All who are able, are expected to assist those with disabilities.

C. Accidents
   All employees should think of the common safety by trying to prevent accidents. Besides removing hazards from their own work areas, employees are urged to remove or report such hazards as liquids spilled, equipment left in traffic areas, or any other conditions which may lead to an accident.

20. TELEPHONE POLICY

No personal long distance telephone calls should be charged to the college phone system.

The calls you make from your home that are toll calls should be charged to your home number. The Business Office will reimburse you when submitted with the proper evidence of such calls (i.e., copy of your personal phone bill indicating calls to be paid by the college).

21. THREATENING TELEPHONE CALLS

The college has an official policy on the receipt, notification, and evacuation procedures to follow in the event of threatening telephone calls. These procedures are posted at the switchboard and the appropriate administrative offices. Though unlikely, it is possible that such a call could come to any person at the college. In that event, the call responder should do the following:

1. Keep the caller on the line as long as possible.
2. Get as much specific information as possible.

3. Attempt to transfer the call to the President, Vice President for Finance and Operations, or the Director of Public Relations.
4. Contact the Director of Public Relations immediately. This call will activate the threatening telephone call policy procedure.

22. RECORD RETENTION AND DESTRUCTION POLICY

The records of Northwestern College (College) are important assets. The College must retain records for not only their immediate or current use, but for historical reference with contractual or legal requirements. Records and documents covered by this policy includes paper, electronic files (including e-mail) and voicemail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities.

The law requires the College to maintain certain types of business records for specified periods of time. Failure to retain those records for those minimum periods could subject the employee and the College to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the College in contempt of court, or seriously disadvantage the College in litigation. If the employee has any questions as to whether or not to destroy a record, please call the VP for Finance and Operations for clarification.

The College expects all employees to fully comply with the retention schedule listed below. If records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then those records must be preserved until the VP for Finance and Operations and/or General Counsel determines the records are no longer needed. That exception supersedes the retention schedule for those records.

Failure to comply with this Record Retention and Destruction Policy may result in disciplinary action against the employee, including suspension or termination. Questions about this policy should be referred to the VP for Finance and Operations who is in charge of administering and enforcing this policy.

In order to eliminate accidental or innocent destruction, the College has the following document retention schedule:

Type of Document	**Retention Period**
Accounts receivable and payable ledgers and schedules	7 years
Annual audited financial statements, audit reports, general ledgers, internal audit reports, trial balance journals	Permanently
Articles of Incorporation, Charter, Bylaws, minutes and other incorporation records	Permanently
Bank reconciliation	5 years
Bank statements, deposit records, electronic fund transfer documents, and cancelled checks	5 years
Budgets	7 years
Chart of accounts	Permanently
Contracts (still in effect)	Permanently
Contracts, mortgages, notes and leases (expired)	10 years
Correspondence (general)	3 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	5 years
Deeds, mortgages, and bills of sales	Permanently
Depreciation schedules	Permanently
Documents relating to exempt status	Permanently
Donations and funded grants	7 years
Duplicate deposit slips	2 years
Employee/employer records	5 years

• Background checks	
Employee/employer records • Benefit reports and rosters (health, flex, life, etc.)	10 years
Employee/employer records • Employment applications	1 year from creating the record or making the hire/no hire decision, whichever is later
Employee/employer records • I-9	3 years after hire or 1 year after termination, whichever is later
FMLA Records	3 years
Immunization records for students	7 years following graduation or transfer out
Insurance policies, records, current accident reports, claims (still in effect)	Permanently
Insurance policies, records, accident reports, claims (expired)	7 years
Interdepartmental charges	3 years
Inventory records	7 years
Invoices (to customers, from vendors) and purchase orders	7 years
Journal entries	7 years
OSHA logs	5 years
Payroll records (employer) • Timesheets, compensation, compensation decisions, garnishments, withholding tax statements	10 years
Personnel files/terminated employees not participating in the College's retirement plan	10 years after termination
Personnel files/terminated employees participating in the College's retirement plan	Until either death of participant or the participant no longer participates in the College's retirement plan
Press releases	Permanently
Retirement and pension records (fiduciary documents), & Summary Plan Descriptions (ERISA)	Permanently
Student billing sheets	5 years
Student loan rosters	7 years
Student loan promissory note and related documents	10 years from date loan is assigned, canceled or repaid
Tax returns and worksheets	Permanently
Title IV federal funds student documents	See FSA Handbook, Volume 2, Chapter 7 for details at https://fsapartners.ed.gov/knowledge-center/fsa-handbook/pdf/2022-2023
Trademark registrations and copyrights, patents and related papers	Permanently
Workers compensation file (including OSHA medical records)	30 years after employee's termination date

Record Destruction

After observance of the appropriate retention period shown above, the aged paper or electronic documents will be destroyed in accordance with systematic and secure methods of destruction established by the President's Office for paper records and Computer Services for electronic records. Paper records must be shredded and in such a way as to maintain confidentiality of the items being destroyed. If the number of paper records to be destroyed is a large amount, a third party can be contacted to conduct the shredding process. In that case, the process should be done on-site and supervised by a college employee. The destruction of electronic records must be coordinated with the Director of Computing Services.

Document destruction (paper or electronic) will be suspended immediately upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

If (after consultation with the Director of the DeWitt Library or the College's Archivist) it is determined that you are in possession or archival records and the applicable retention period has expired, please forward those records to the College's archives instead of destroying them.