

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium  
Lewis-Clark State College, Consortium Member  
Policies and Procedures Manual



LEWIS-CLARK STATE  
— COLLEGE —

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*Lewis-Clark State College is an Equal Opportunity institution. Auxiliary aids and services are available upon request to individuals with disabilities.*

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## **INTRODUCTION**

In 2014, the Idaho Center of Excellence (ICE) Healthcare Partnership embarked on a four-year Trade Adjustment Assistance Community College Career Training (TAACCCT) grant, awarded by the U.S. Department of Labor (U.S. DOL). The partnership is comprised of three postsecondary education institutions, workforce, industry and labor partners, including North Idaho College (lead organization), Lewis-Clark State College, Idaho State University College of Technology, Kootenai Health, Heritage Health, Idaho Hospital Association, The Hospital Cooperative, Bingham Memorial and Northwest Hospital Alliance.

**MISSION:** To ensure a reliable and stable healthcare workforce for the state of Idaho with emphasis on rural and underserved populations.

**VISION:** Implement a collaborative statewide approach to increase healthcare education and employment opportunities.

**TAGLINE:** Idaho Center of Excellence, expanding healthcare education throughout Idaho.

The project components of this \$6.4 M grant include the following:

- Initiating an Idaho Center of Excellence in Healthcare Partnership offering certificates, certifications, and degrees by consortia institutions that prepare students for employment in the health care industry.
- Career Pathways and Program areas developed and/or expanded in the following areas:
  - Surgical Technology
  - Medical Lab Technician
  - Pharmacy Technology
  - Military Medic to Paramedic
  - Veteran to Nurse
  - Military Medic to Medical Assistant
  - Dental Hygiene
  - Pre-Med (EMS)
  - Medical Assistant
  - Pre-Pharmacy
  - Mental Health Assistant
  - Certified Nursing Assistant
  - Emergency Medical Technician
  - Medical Coding
  - Occupational Therapist Assistant
- The proposal will target Idaho's TAA participants, low-skilled adults, dislocated workers, veterans, and unemployed and underemployed individuals, however, anyone can benefit from the programs and materials developed.
- The grant will fund equipment, personnel, common curriculum statewide, prior learning assessment, professional development, and evaluation.

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- The grant will serve approximately 506 unique participants, 237 participants will complete a funded program of study, and 224 participants will be employed after funded program study of completion.
- Sustainability will occur through strategic alignment with the Idaho State Board of Education as well as Division of PTE in order to reduce duplication of programs and share resources and industry partnerships.

The purpose of this document is to guide this effort to successful completion and to ensure compliance with U.S. DOL guidelines. This manual outlines the procedures surrounding the monitoring and execution of project-related activities.

Wherever applicable, these procedures reference the policies which they support. These policies are derived from Lewis-Clark State College, North Idaho College, the U.S. DOL, or other State or Federal agencies.

## **SECTION 1 – CIVIL RIGHTS AND PLURALISM COMPLIANCE PROCEDURES**

Lewis-Clark State College is an equal opportunity institution. Auxiliary aids and services are available upon request to individuals with disabilities.

As a Consortia Partner, Lewis-Clark State College is responsible for complying with all applicable college policies in regards to Civil Rights, Disability Compliance, Equal Opportunity and Pluralism.

As necessary North Idaho College will monitor Consortia Partners to ensure proper federal and college policy is posted in appropriate locations and that project staff are in compliance with applicable procedures and regulations.

### **EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION STATEMENT**

Lewis-Clark State College is an equal opportunity employer committed to providing equal opportunity and nondiscrimination to applicants and employees without regard to race or ethnicity; creed; color; national origin; sex; marital status; sexual orientation; age; religion; genetic information; the presence of any sensory, mental, or physical disability; or whether a disabled or Vietnam-era veteran. The college is equally committed to take affirmative action to increase the numbers of Asians, Blacks, Hispanics, Native Americans, women, persons between the ages of 40 and 70, persons of disability, and disabled and Vietnam-era veterans in positions where it is determined they are underutilized. The college will make every effort to eliminate barriers to equal employment opportunity encountered by these protected group members and improve employment opportunities available to underutilized groups.

For additional information please view [Statement of Nondiscrimination #3.105](#), [Recruiting/Hiring Policy #3.106](#) and [Discrimination Complaint Procedures #3.109](#).

### **EQUAL OPPORTUNITY IN EDUCATION AND EMPLOYMENT**

Lewis-Clark State College does not discriminate on the basis of race or ethnicity; creed; color; national origin; sex; marital status; sexual orientation; age; religion; genetic information; the presence of any sensory, mental, or physical disability; or veteran status in educational programs and activities which it operates. Lewis-Clark State College is

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prohibited from discriminating in such a manner by college policy and by state and federal law. All college personnel and persons, vendors, and organizations with whom the college does business are required to comply with applicable federal and state statutes and regulations designed to promote affirmative action and equal opportunity.

The following notice is posted in project staff offices, where applicable:

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Equal Employment Opportunity is  
**THE LAW**

**Private Employers, State and Local Governments, Educational Institutions, Employment Agencies and Labor Organizations**

Applicants to and employees of most private employers, state and local governments, educational institutions, employment agencies and labor organizations are protected under Federal law from discrimination on the following bases:

**RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN**

Title VII of the Civil Rights Act of 1964, as amended, protects applicants and employees from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment, on the basis of race, color, religion, sex (including pregnancy), or national origin. Religious discrimination includes failing to reasonably accommodate an employee's religious practices where the accommodation does not impose undue hardship.

**DISABILITY**

Title I and Title V of the Americans with Disabilities Act of 1990, as amended, protect qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship.

**AGE**

The Age Discrimination in Employment Act of 1967, as amended, protects applicants and employees 40 years of age or older from discrimination based on age in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment.

**SEX (WAGES)**

In addition to sex discrimination prohibited by Title VII of the Civil Rights Act, as amended, the Equal Pay Act of 1963, as amended, prohibits sex discrimination in the payment of wages to women and men performing substantially equal work, in jobs that require equal skill, effort, and responsibility, under similar working conditions, in the same establishment.

**GENETICS**

Title II of the Genetic Information Nondiscrimination Act of 2008 protects applicants and employees from discrimination based on genetic information in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. GINA also restricts employers' acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

**RETALIATION**

All of these Federal laws prohibit covered entities from retaliating against a person who files a charge of discrimination, participates in a discrimination proceeding, or otherwise opposes an unlawful employment practice.

**WHAT TO DO IF YOU BELIEVE DISCRIMINATION HAS OCCURRED**

There are strict time limits for filing charges of employment discrimination. To preserve the ability of EEOC to act on your behalf and to protect your right to file a private lawsuit, should you ultimately need to, you should contact EEOC promptly when discrimination is suspected:

The U.S. Equal Employment Opportunity Commission (EEOC), 1-800-669-4000 (toll-free) or 1-800-669-6820 (toll-free TTY number for individuals with hearing impairments). EEOC field office information is available at [www.eeoc.gov](http://www.eeoc.gov) or in most telephone directories in the U.S. Government or Federal Government section. Additional information about EEOC, including information about charge filing, is available at [www.eeoc.gov](http://www.eeoc.gov).

**Employers Holding Federal Contracts or Subcontracts**

Applicants to and employees of companies with a Federal government contract or subcontract are protected under Federal law from discrimination on the following bases:

**RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN**

Executive Order 11246, as amended, prohibits job discrimination on the basis of race, color, religion, sex or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

**INDIVIDUALS WITH DISABILITIES**

Section 503 of the Rehabilitation Act of 1973, as amended, protects qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

**DISABLED, RECENTLY SEPARATED, OTHER PROTECTED, AND ARMED FORCES SERVICE MEDAL VETERANS**

The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits job discrimination and requires affirmative action to employ and advance in employment disabled veterans, recently separated veterans (within

three years of discharge or release from active duty), other protected veterans (veterans who served during a war or in a campaign or expedition for which a campaign badge has been authorized), and Armed Forces service medal veterans (veterans who, while on active duty, participated in a U.S. military operation for which an Armed Forces service medal was awarded).

**RETALIATION**

Retaliation is prohibited against a person who files a complaint of discrimination, participates in an OFCCP proceeding, or otherwise opposes discrimination under these Federal laws.

Any person who believes a contractor has violated its nondiscrimination or affirmative action obligations under the authorities above should contact immediately:

The Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of Labor, 200 Constitution Avenue, N.W., Washington, D.C. 20210, 1-800-397-6251 (toll-free) or (202) 693-1337 (TTY). OFCCP may also be contacted by e-mail at [OFCCP-Public@dol.gov](mailto:OFCCP-Public@dol.gov), or by calling an OFCCP regional or district office, listed in most telephone directories under U.S. Government, Department of Labor.

**Programs or Activities Receiving Federal Financial Assistance**

**RACE, COLOR, NATIONAL ORIGIN, SEX**

In addition to the protections of Title VII of the Civil Rights Act of 1964, as amended, Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color or national origin in programs or activities receiving Federal financial assistance. Employment discrimination is covered by Title VI if the primary objective of the financial assistance is provision of employment, or where employment discrimination causes or may cause discrimination in providing services under such programs. Title IX of the Education Amendments of 1972 prohibits employment discrimination on the basis of sex in educational programs or activities which receive Federal financial assistance.

**INDIVIDUALS WITH DISABILITIES**

Section 504 of the Rehabilitation Act of 1973, as amended, prohibits employment discrimination on the basis of disability in any program or activity which receives Federal financial assistance. Discrimination is prohibited in all aspects of employment against persons with disabilities who, with or without reasonable accommodation, can perform the essential functions of the job.

If you believe you have been discriminated against in a program of any institution which receives Federal financial assistance, you should immediately contact the Federal agency providing such assistance.

*EEOC 9/02 and OFCCP 8/08 Versions Usable With 11/09 Supplement*

*EEOC-P/E-1 (Revised 11/09)*

## SECTION 2 – HUMAN RESOURCES

Lewis-Clark State College has policies and procedures regarding Human Resources which project staff will uphold, including hiring, performance, and termination. Policies and procedures are located at the following URL:  
<http://www.lcsc.edu/policies>

Additional administrative services operational guidelines are located at: <http://www.lcsc.edu/administrative-services/>

Project staff will also comply with Idaho State Statutes concerning human resources, located at <http://legislature.idaho.gov/idstat/TOC/IDStatutesTOC.htm>.

### SECTION 2.1 – COMPENSATION

Salary schedule, benefits, and employee classification are located at the LCSC Human Resource site:  
<http://www.lcsc.edu/hr/>.

#### LEWIS-CLARK STATE POLICY ON ESTABLISHMENT OF NEW POSITIONS [#3.104](#)

##### 1. Positions Classified on the Basis of Duration

- a. **Permanent Positions** - A permanent position is one that is established with the intention that it will continue indefinitely. Once established, it continues to exist, whether filled or vacant, until abolished.
  - i. A permanent position may be faculty, exempt, or classified.
  - ii. A permanent position may be part-time or full-time and it may be filled by an appointment that is temporary, probational, fixed-term, continuing, with or without tenure. It is the position, not the appointment, that is permanent.
  - iii. A permanent position is designated as "permanent" solely on the basis of intent as to its duration, irrespective of the duties, the appointment, the funding, or any other consideration.
  - iv. A permanent position will be automatically deleted by the state if it is vacant for a period of one year.
- b. **Temporary Positions** - A temporary position is one that is established for a definite period. Typically, the duration corresponds to the period of a grant or contract. Irregular help and student help, though not necessarily established for an explicit duration, are, for the purposes of this and related policies, not considered to be permanent positions.

##### 2. Authorization of Temporary Positions

Temporary and irregular help positions may be approved by the appropriate Vice President or President (in the case of DRU's). There can be no commitment to continue a temporary position beyond the length of time specified when it is established. In particular, there can be no commitment to continue on appropriated funds a position initially established with non-appropriated funding.



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**LEWIS-CLARK STATE POLICY ON ANNUAL INCREASES**

- For FY 2016 the legislature has appropriated a 3% on-going merit-based increase in CEC (Change in Employee Compensation) as well as an increase in the minimum rate of pay for each paygrade from 68% to 70% of policy.
- A Compensation Review Committee (CRC), tasked by the President, is comprised of representatives from the Classified Staff Organization (CSO), Professional Staff Organization (PSO), Faculty, Human Resources, the Budget Office, and an elected Chair. This committee reviews the annual compensation report from the State Division of Human Resources, the CEC tracking system in place, and previous years' CRC reports, and makes recommendations to upper administration.

**LEWIS-CLARK STATE POLICY ON PAYROLL [#3.124](#)**

**1. PREFACE**

Lewis-Clark State College is an agency of the State of Idaho and is a part of the state payroll system. This is on a bi-weekly pay cycle with a two-week lag time. That is, work performed during one pay period will be paid at the end of the following pay period.

**2. GENERAL PROVISIONS**

- a. Any individual who performs a service for the institution in virtually any capacity will be considered an employee and, by law, must be paid through the state payroll system. Online personnel action forms are used to initiate or change payroll for full time or regular employees; a personnel record card is generally used for irregular help or work study employees. These on line forms must be completed and approved before submitting to Human Resource Services to initiate any action regarding payroll, i.e. new hire, salary change, leave of absence or termination. A schedule of pay dates and due dates for documentation is available at <http://www.lcsc.edu/hr/payroll/>.

Forms submitted after the stated deadline will be processed the following pay period. Time sheets not submitted by the stated deadline will automatically be disapproved and must be resubmitted the following pay period.

- i. Personnel Action Forms (PA's)
  1. Regular PA form: Use this form for employees who have a permanent PCN or Irregular Help employees who are on the benefit package
  2. Adjunct Faculty teaching for Credit: Use this form for adjunct faculty who are teaching courses for credit
  3. Temporary & Adjunct / Non-Credit Instruction: Use this form for temporary employees and adjunct faculty who are teaching non-credit courses
  4. Personnel Record Cards (PRC's) are to be used for Temporary and Workstudy employees who will complete I-Time
- b. Full time salaried employees may be required by their supervisor to submit a time sheet biweekly. However, if a timesheet is not submitted, they will still receive their regular biweekly salary. Time not worked, (i.e. vacation, sick leave, etc.) must be reported via the I-Time payroll system.

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- c. Non-salaried or part time employees must complete a time sheet each pay period via the I-Time payroll system. Time sheets not submitted by the stated deadlines must be resubmitted the following pay period.
- d. Organizations and individuals who have a business and provide a service to the college through that business may be considered an independent contractor. Contractors will be paid via an independent contractor form after the submission of proper documentation (including a W-9) to the office of Human Resource Services. To determine independent contractor status, contact Human Resources Services.
- e. Current employees of Lewis-Clark State College may not contract with the college and MUST be paid through the payroll system, regardless of the work they perform, unless they are awarded the contract through a competitive bid.
- f. Each employee must submit a W-4 and an I-9 and a voided check for direct deposit to HRS prior to or on the first day of work in addition to the personnel action or personnel record card.
- g. The annual salary of full time individuals who work on an on-going basis, but work less than twelve months will be pro-rated and paid over a twelve-month period. These individuals will need to enter their time through the I-Time system. Individuals working on a temporary, interim, visiting or otherwise limited basis will be paid only over the duration of their employment.
- h. Salary increases are generally effective the last pay period in June for classified staff, the first pay period in July for professional staff and the first pay period in August for faculty.
- i. Regularly scheduled paydays are every other Friday. Employees hired after July 1, 2002 who receive a biweekly payment are required to use direct deposit. Pay stubs will be available on line with the use of your individual user ID and password. Contact the Payroll Office if you have questions concerning direct deposit.

**3. PAY IN ADDITION TO CERTIFIED SALARY**

- a. Payments made in addition to normal salary or payments made for short term service will be submitted via a PA form and will be made as follows, assuming all correct information has been provided to payroll;
  - i. An employee receiving an additional payment of \$1,000 or less will receive one payment for the total amount as soon as possible after completion of the service.
  - ii. Employees receiving an additional payment of more than \$1,000 may receive a lump sum or will receive no more than one payment per \$1,000 (rounded to the nearest thousand).

**4. ADDITIONAL COMPENSATION FOR ADMINISTRATIVE APPOINTMENTS OF FACULTY**

- a. When calculating the salary of a new administrator holding academic rank, the portion that is paid as an administrative stipend and the base salary of the faculty appointment are to be clearly identified.

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- b. When an administrative appointment ends and a faculty member returns to instructional duties, the change is to be accompanied by a salary adjustment that reflects the relinquishment of administrative duties and is commensurate with the revised position description.

**5. PAYMENT TO ADJUNCT/TEMPORARY EMPLOYEES**

Adjunct faculty or temporary employees may receive payment for their service only during the duration of that service by any of the following methods:

- a. Adjunct Faculty must be paid using either the Temporary & Adjunct Non-Credit PA form or the Adjunct Faculty teaching for credit PA form. The payment schedule (i.e. one lump sum, 2 equal payments, etc.) must be noted on the PA.
- b. Temporary employees must be paid using the Temporary and Adjunct Non-Credit PA form. The payment schedule (i.e. one lump sum, 2 equal payments, etc.) must be noted on the PA.

**6. PAY ADVANCES**

- a. It is not the practice of Lewis-Clark State College to allow employee pay advances. In extraordinary circumstances, advances may be granted to an employee with approval of the President of the college.

**LEWIS-CLARK STATE POLICY ON EMPLOYEE BENEFITS [#3.139](#)**

Eligible employees are employees of LCSC who are working twenty hours or more per week and whose terms of employment is expected to exceed five consecutive months. Eligible dependents include spouses and children up to their 26<sup>th</sup> birthdays. Adjunct faculty who teach the equivalent of at least 24 credits per year are also eligible for benefits upon approval of the applicable Academic Dean or Provost. Further information regarding Employee Benefits may be found on the LCSC Human Resources site: <http://www.lcsc.edu/hr/benefits/>.

**SECTION 2.2 – COMPLAINTS AND GRIEVANCES**

**LEWIS-CLARK STATE POLICY ON EMPLOYEE COMPLAINTS AND GRIEVANCES**

- Employees are encouraged to refer to the appropriate grievance policy referenced below. Employees are encouraged to attempt to resolve issues early and through direct conflict resolution approaches to initiating formal complaints.
  - Policy for Faculty wishing to resolve a conflict or dispute regarding a decision or action affecting the employee: <http://www.lcsc.edu/media/1438775/2115-faculty-grievance-policy.pdf>.
  - Policy for Professional Staff wishing to resolve a conflict or dispute regarding a decision or action affecting the employee: <http://www.lcsc.edu/media/1470634/3128-grievance-procedures-for-non-faculty-exempt-employees.pdf>.
  - Problem solving and due process procedures for Classified Staff: <http://www.lcsc.edu/media/1436547/3127.pdf>.
- Employees may anonymously use the Confidential Report Line to report unethical, illegal, or irresponsible activity.

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**LEWIS-CLARK STATE POLICY ON STUDENT GRIEVANCES**

- Grade appeals may be made no later than one semester after receiving the grade in question. Students should contact the appropriate instructor, and if both parties agree upon an acceptable resolution, no further proceedings are necessary. Procedures for instances of disagreement are covered in the LCSC Student Handbook: <http://www.lcsc.edu/media/3506765/Student-Handbook.pdf>.
- Tuition Refund Policy: <http://www.lcsc.edu/student-accounts/refund-policy/>.
- Financial Aid Appeal: <http://www.lcsc.edu/financialaid/satisfactory-academic-progress-policy/>
- Parking Citation Appeal: <http://www.lcsc.edu/security/appeal/>.

**SECTION 2.3 – CONFLICT OF INTEREST AND ETHICS**

**LEWIS-CLARK STATE POLICY ON FACULTY PROFESSIONAL ETHICS [#2.102](#)**

- This policy is based on the 1966 statement of the American Association of University Professors, and applies to both tenured and non-tenured faculty.

**LEWIS-CLARK STATE POLICY ON CONFLICT OF INTEREST AND PROFESSIONAL CONSULTING**

- Guidelines for employees' conduct in areas where there are actual or potential ethical concerns between their public duties and private interests can be found in the Conflict of Interest/Ethical Conduct Policy: <http://www.lcsc.edu/media/1529419/3101-code-of-ethical-conduct.pdf>.
- Faculty and staff performing consulting services outside of and/or beyond their regular full-time positions are required to fill out and submit the Faculty and Staff Professional Consulting/Conflict of Interest Statement (<http://www.lcsc.edu/media/2006142/Annual-Conflict-of-Interest-Statement.pdf>) to LCSC Human Resources, per LCSC policy. (See Professional Consulting and Additional Workload #3.132: <http://www.lcsc.edu/media/3298958/3132-professional-consulting-and-additional-workload.pdf>.)

**SECTION 2.4 – PENSION AND RETIREMENT**

**LEWIS-CLARK STATE POLICY ON RETIREMENT [#3.121](#)**

**1. Introduction**

To retire is to withdraw from one's position or occupation; to conclude one's professional or working career.

**2. Involuntary Retirement**

- a. LCSC employees are not required to retire on the basis of age.
- b. Although employment cannot be involuntarily terminated for the reason of age alone, indefinite continuation of one's position is not guaranteed. If an employee becomes unable to perform the duties

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required by his or her job description, he or she may be required to retire or may be reassigned to another position for which he or she is qualified, possibly at a lower rate of pay.

- c. Eligibility for retirement benefits in the case of involuntary retirement is determined as it is in the case of voluntary retirement.

### 3. Voluntary Retirement

- a. LCSC employees may voluntarily retire on the basis of age, length of service, or a combination of age and service, or on account of disability.
- b. Eligibility for Public Employee Retirement System (PERSI) Benefits.
  - i. Upon retirement, an employee qualifies fully for the benefits if he or she has completed five (5) years of participation in PERSI and if either of the following requirements is satisfied:
    - 1. Attainment of age 65.
    - 2. Completion of a period of service in the system such that the sum of the years of service and the years of age equals 90.
  - ii. An employee who has completed five years of participation in PERSI but has not satisfied either a or b above may, nevertheless, retire at any time after attaining age 55. Upon retirement under these conditions, he or she will be eligible to receive a fraction of the benefits determined by the length of time between the date when retirement payments commence and the date when eligibility for full benefits would have been attained.
- c. Eligibility for the Optional Retirement Plan (SBOE Policy): Faculty or non-classified employees hired on or after July 1, 1990, are required to participate in the Optional Retirement Plan. When these employees (as well as any who chose to switch from PERSI to the ORP) elect to retire, they will do so in accordance with the provisions of their selected carrier.

### 4. Disability Retirement

- a. An employee who has participated in PERSI for 5 years and becomes disabled may receive a disability income allowance.
- b. The Optional Retirement Plan does not contain a disability benefit provision. An employee who has participated in this plan may begin receiving an annuity income if he or she becomes disabled.

### 5. Retiree Insurance Benefits

- a. The State of Idaho offers a comprehensive and flexible retiree benefit package. Visit the Office of Group Insurance website for eligibility requirements.

### 6. Reference

- a. For information concerning PERSI eligibility and benefits, please contact Human Resource Services or visit PERSI's website: <http://www.persi.idaho.gov/>.

## SECTION 2.5 – TIME DISTRIBUTION

Lewis-Clark State College is required by federal regulations and accounting standards to ensure that the apportionment of employee compensation accurately reflects the work performed by the employee on grant-related work.

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Time and effort tracking will be utilized through documentation reviewed and approved by the appropriate supervisors and grant administrations of both NIC and LCSC.

### **SECTION 3 – BUDGET PROCEDURES**

Lewis-Clark State College engages in a comprehensive, annual budget process that is performed in conjunction with the State Board of Education for appropriated funds. A detailed “budget book” is prepared annually, outlining sources and expected uses of College funds. An ongoing assessment process is utilized to distribute or reallocate funds within the institution.

Sponsored Projects are overseen by the Office of Grants and Contracts both pre and post-award, in consultation with principal investigators and other administrative staff. All grant funds flow through the central accounting system of the College, and are subject to the internal controls and oversight of the Finance and Administrative Division. Budgets for sponsored projects are developed according to the requirements of the individual grant and granting agency, and are monitored on an ongoing basis by fiscal personnel.

#### **SECTION 3.1 – PURCHASING CARD RECONCILIATION PROCEDURES**

LEWIS-CLARK STATE POLICY ON PURCHASING PROCUREMENT CARD “P-CARD” [#4.121](#)

The Lewis-Clark State College Purchasing Card program is designed to streamline and simplify the requisitioning, purchasing and payment processes for relatively small dollar items (under \$2,000). The P-Card is a supplemental tool to purchase approved goods and services that may be more efficiently acquired via credit card. The P-Card process is designed to shorten the approval process and reduce the paperwork associated with procurement procedures including requisitions, purchase orders and petty cash. P-Card policy and procedures may be found on the Controller’s Office site: <http://www.lcsc.edu/controllers-office/p-card/policy-manual/>.

#### **SECTION 3.2 – REIMBURSEMENT PROCEDURES**

Request for Reimbursement/Invoice forms with proper back-up documentation including all receipts are due to North Idaho College by the 20<sup>th</sup> of every month.

- Send this report in Excel format and a PDF copy of Request for Reimbursement with signatures and scanned back-up to [dahatfield@nic.edu](mailto:dahatfield@nic.edu).
- Emailed files must include signatures with complete source documentation before reimbursement will be made.
- Complete the report with zeroes if no activity for the month.

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#### REIMBURSEMENT REQUEST/INVOICE

- Enter data in the current month and year of the grant by line item on the Year tab.
- Verify totals all tie back to your College's systems report and backup. The current monthly expenditures should tie back to your College's General Ledger Trial Balance. This workbook was designed so that data only needs to be entered once on the Year page. Formulas will populate the corresponding invoices.
- Completing the Year tab in your workbook will auto-populate an invoice for your Institution.
- Notify North Idaho College of requests for additions and/or changes to your current budgets for entry by North Idaho College.
- Line Item Budget will be entered for each category specified in contract. Column will be adjusted for any approved budget modifications.
- Obtain signatures and date.
- Attach copies of your General Ledger reports that show the activity to be reimbursed.
- Include all receipts and recruitment materials pertaining to the activity to be reimbursed (effective October 1, 2016).
- Each October North Idaho College will provide a new workbook for each Institution.

#### SECTION 3.3 – PURCHASING AND CONTRACTING PROCEDURES

Lewis-Clark State College's Purchasing Department is responsible for all purchases made campus-wide.

- LCSC Purchasing policy: <http://www.lcsc.edu/media/1451156/4111-purchasing.pdf>.
- Additional policies and procedures are provided on the LCSC Purchasing site: <http://www.lcsc.edu/purchasing/policies/>.
- The LCSC Purchasing Office is under the direction of the Vice President for Finance & Administration.
- All purchases must have the approval of the appropriate supervisors and key administrative staff.
  - IT related purchases must be approved by the IT Director.
  - Grant-funded purchases must be approved through the Office of Grants & Contracts.
- Purchases less than \$5,000 must be purchased from the vendor holding the contract. If there is not a current vendor holding the contract for the requested service or goods, departments may acquire in accordance with good business practices and in the best interest of the College and State. Information regarding State contracts may be found on the Purchasing site: <http://www.lcsc.edu/purchasing/statewide-contracts>.
- Purchases over \$5,000 must be purchased from the vendor holding the contract. If there is not a current vendor holding the contract for the request service or goods, an approved requisition must be submitted to Purchasing to initiate the solicitation process. Information regarding the solicitation process may be found on the Purchasing site: <http://www.lcsc.edu/purchasing/solicitations/>.
- Grant-funded programs are required to follow LCSC policies and procedures unless otherwise stipulated by the grant award. The stricter policy will take precedent.

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**SECTION 3.4 – TRAVEL AND MEAL PROCEDURES**

Detailed information and instructions on Lewis-Clark State College travel policies and procedures are located on the Controller's Office site: <http://www.lcsc.edu/controllers-office/travel/>.

**LEWIS-CLARK STATE POLICY ON TRAVEL [#4.101](#)**

The Typical Travel Cycle:

- Employee/supervisor determines travel is needed and pre-plan details of the trip
- Travel Authorization is completed, outlining arrangements and cost – supervisor(s) approve
- (If needed) Travel advance issued
- Travel takes place
- Upon return, employee completes and supervisor signs Travel Expense Claim form
- Employee is reimbursed for expenses
- Records are filed and retained

Travel Authorization and Expense Reimbursement:

It is College policy to pay for reasonable and necessary travel expenses incurred as a result of official College business. The travel policy applies to all travel conducted by College employees and students that involves College reimbursement or liability. Individuals should neither gain nor lose personal funds as a result of expenses associated with approved business travel.

- In order for travel expenses to be reimbursed by the College, the expenses must be incurred relative to official LCSC business and documentation standards set forth in the Lewis-Clark State College Travel Policy and Procedures Manual must be met. These standards apply to all College funds; including but not limited to budgeted state funds, discretionary local funds, grant and contract funds, and auxiliary enterprise funds
- Travel expenses incurred by part-time employees may be reimbursed at the discretion of the department director following the same guidelines that apply to full time employees
- For students to be reimbursed for travel expenses, the expenses must occur at the request of the College, under the control of the College, and for the benefit of the College

Other Sources of information and Assistance:

- The complete Travel Policy and Procedures Manual is provided on Controller's Office Website: <http://www.lcsc.edu/controllers-office/travel/policy-manual/>.
- Controller's Office: <http://www.lcsc.edu/controllers-office/travel/>.
- Risk Management Coordinator: <http://www.lcsc.edu/administrative-services/risk-management/>.
- International Programs: <http://www.lcsc.edu/international/>.



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- State Board of Education Travel Policy:  
<http://www.sco.idaho.gov/web/sbe/sbweb.nsf/pages/trvlpolicy.htm>

## SECTION 3.5 – LEAVES AND ABSENCES

### LEWIS-CLARK STATE POLICY ON LEAVE [#3.125](#)

Policy Statement: Lewis-Clark State College provides leave benefits to eligible employees in accordance with those leave benefits offered by the State of Idaho and in accordance with Idaho Code [67-5333](#), [59-1603](#), [59-1605](#), and [IDHR Rules 230 - 250](#).

1. Eligible Employees:
  - a. Employees who work 20 hours or more per week and their term of employment is expected to exceed 5 continuous months are eligible for leave benefits. Some employees are ineligible for leave, such as:
    - i. Employees who regularly work less than 20 hours per week; or
    - ii. Employees who are in non-pay status (i.e. on unpaid leave of absence); or
    - iii. Temporary employees who are hired to work less than five months, regardless of number of hours worked per week.
    - iv. Students who work more than 20 hours per week, but whose employment is predicated on student status.
  - b. Adjunct faculty who teach the equivalent of at least 24 credits per year are eligible for leave benefits upon approval of the applicable Academic Dean and Provost.
2. Vacation Leave
  - a. LCSC adheres to Statewide Policy, Section 2, [Vacation Leave](#) which states “eligible employees will earn vacation leave and be eligible to take vacation leave in accordance with Idaho Code §§ 67-5334, 59-1603, 59-1606 and IDHR Rule 230 ”
  - b. Vacation leave may be accrued and accumulated as follows, unless amounts in excess of the permitted accumulations have been expressly authorized in writing by the appointing authority during unusual or emergency situations. Faculty members on academic-year appointments of eleven (11), ten (10), or nine (9) months do not earn vacation leave.
  - c. Employees are required to obtain approval from their supervisor prior to the use of vacation leave. Supervisors should approve vacation leave with reasonable consideration for the employee’s needs and desires, on the basis of work requirements, and when it will least interfere with the efficient operation of the agency.
  - d. If an employee is unable to report to work because of severe weather, road, or other related emergency conditions, and the work facility has not been declared closed or inaccessible by the Governor, agency head or his/her designee, the employee shall be permitted to use accrued vacation leave to cover the period of absence from work.
  - e. If an employee on approved vacation leave becomes ill, sick leave cannot be substituted. Employee may substitute sick leave if they provide a doctor’s note.

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- f. Please see [State of Idaho Executive Branch Agency Policy Section 2](#) for specific policy information
- g. State employees may [donate](#) accrued vacation leave to an eligible State employee for use as paid sick leave. [Ref. Idaho Code § 67-5334(g)]

**3. Sick Leave Benefits**

- a. LCSC adheres to Statewide Policy Section 3, Sick Leave, Employees shall earn sick leave and be eligible to take sick leave in accordance with Idaho Code § 67-5333, 59-1603, 59-1605, and IDHR Rule 240.
- b. Sick leave may only be used in cases of the employee's actual illness or disability or other health reasons necessitating the employee's absence from work or Employee Assistance Program (EAP) appointments. In addition, an employee may also use sick leave when needed to attend to a family member's medical appointments, serious illness, disability, or death and funeral in the family. Eligibility to use sick leave includes self, spouse, child, foster child, parent, brother, sister, grandparent, grandchild, or the same relation by marriage or legal guardian. (Ref. IDHR Rule 240.03)
- c. Sick leave shall accrue at the rate of .04615 x hours worked per pay period and accrues without limit.
- d. Please see [State of Idaho Executive Branch Agency Policy Section 3](#) for specific policy information regarding sick leave.

Patterns or excessive absences can negatively impact individual performance and the Agency's services. Therefore, a supervisor who suspects an employee is abusing sick leave may: (Ref. IDHR Rule 240.07)

- i. Require the employee to provide a doctor's note justifying the absence; or
- ii. Investigate an employee's suspected sick leave abuse and address any misuse or abuse as necessary.
- iii. Any employee who is on approved sick leave and is found to be working at another job, or is otherwise misusing sick leave, shall be subject to disciplinary action up to and including dismissal.

**4. Family and Medical Leave Benefits**

- a. [The Family and Medical Leave Act \(FMLA\)](#) is a federal law which entitles eligible employees to unpaid, job protected leave, under qualifying circumstances, as follows:

Twelve workweeks of leave in a 12-month period for:

- i. the birth of a child and to care for the newborn child within one year of birth;
- ii. the placement with the employee of a child for adoption or foster care and to care for the newly placed child within one year of placement;
- iii. to care for the employee's spouse, child, or parent who has a serious health condition;
- iv. a serious health condition that makes the employee unable to perform the essential functions of his or her job;
- v. any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on "covered active duty" OR Twenty-six workweeks of leave during a single 12-month period to care for a covered service member with a serious injury or illness if the eligible employee is the service member's spouse, son, daughter, parent, or next of kin (military caregiver leave).

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Employees may, at their discretion, elect to use accrued vacation leave, sick leave, and/or compensatory balances concurrently while on FMLA leave (as appropriate).

- b. To qualify for FMLA leave, the employee must meet eligibility criteria, must submit a written request, and upon return to work must provide a medical release (as appropriate). In the event an employee does not request FMLA leave for time off work for a qualifying health condition, the Agency will designate the employee's absence as FMLA leave (as appropriate).
- c. LCSC adheres to [Statewide Policy, Section 4: Family and Medical Leave Act \(FMLA\) Leave](#).
- d. While on FMLA leave, the employee's health and dental benefits will remain unchanged. The employee will remain responsible for their share of the monthly health and dental premiums. If the employee is using sick, vacation or compensatory leave balances to receive a full or partial check while on FMLA leave, the employee's portion of health and dental insurance premiums will be deducted as usual. However, if the employee is not receiving a sufficient paycheck, he or she must arrange to pay the employee's portion of health and dental insurance premiums through the Payroll Office. If the employee does not return to work after FMLA leave for reasons beyond their medical condition, the employer can require the employee to reimburse the State's share of the premiums paid during the employee's FMLA absence.
- e. Upon return from FMLA leave, employees are entitled to be restored to the position they held prior to the FMLA leave, or to be restored in a substantially equivalent position with substantially equivalent benefits, pay, and other terms and conditions of employment.
- f. Additional information on the Family Medical Leave Act can be found on the [Department of Labor](#) website and on the [Family and Medical Leave Act Poster](#) which is posted at each work site location.

5. Other Leave Benefits

- a. LCSC follows the leave guidelines as set forth in [Statewide Policy, Section 5, Special Leaves](#).
- b. Sabbatical Leave – see [Sabbatical Leave Policy 2.114](#).

LEWIS-CLARK STATE HOLIDAY SCHEDULE

LCSC observes the following holidays:

- New Year's Day
- Martin Luther King, Jr.'s Day (Idaho Human Rights Day)
- Presidents' Day
- Memorial Day
- Independence Day
- Labor Day
- Columbus Day (floating holiday)
- Veterans' Day (floating holiday)
- Thanksgiving Day
- Christmas

Campus and administrative operations are closed the week between Christmas and New Year's Day.

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**LEWIS-CLARK STATE PROCEDURE ON INCLEMENT WEATHER ABSENCE**

When emergency warnings are issued by local and regional weather services, the Security department will contact the President to determine whether or not to close campus. LCSC students and staff are encouraged to visit the LCSC Emergency site (<http://www.lcsc.edu/emergency/>) during severe weather warnings to check for campus closure updates. In the event of an emergency, LCSC's Regroup system will send an alert message via email, text message, and text-to-speech to all students, faculty, and staff. More information may be found online: <http://www.lcsc.edu/emergency/notification/>.

**SECTION 3.6 – CLOSEOUT**

**CLOSEOUT PROCEDURES FOR CONSORTIA PARTNERS: ([from 29 CFR 95.70](#))**

- Consortia Partners shall submit final invoices within 30 calendar days after the date of completion of the award, all financial, performance, and other reports as required by the terms and conditions of the award.
- A Consortia Partner shall incur under the award not later than 30 calendar days after the funding period or the date of completion as specified in the terms and conditions of the award or in agency implementing instructions. Only expenditures accrued by the date of completion of the award can be liquidated within the 30 day period. All items must be received by final date to be considered an accrued expense.
- Consortia Partners shall promptly refund any cash balances paid in advance and not authorized to be retained by Consortia Partner during this period.
- Consortia Partners shall account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with §§95.31 through 95.37.
- In the event a final audit has not been performed prior to the closeout of an award, U.S. DOL retains the right to recover an appropriate amount after fully considering the recommendations on disallowed costs resulting from the final audit.

**CLOSEOUT PROCEDURES FOR NORTH IDAHO COLLEGE: ([from 29 CFR 95.70](#))**

- North Idaho College shall submit, within 90 calendar days after the date of completion of the award, all financial, performance, and other reports as required by the terms and conditions of the award. U.S. DOL may approve extensions when requested by the recipient.
- Unless U.S. DOL authorizes an extension, a recipient shall liquidate all obligations and/or accrued expenditures incurred under the award not later than 90 calendar days after the funding period or the date of completion as specified in the terms and conditions of the award or in agency implementing instructions.
- U.S. DOL shall make prompt payments to a recipient for allowable reimbursable costs under the award being closed out.
- North Idaho College shall promptly refund any balances of unobligated cash that U.S. DOL has advanced or paid and that is not authorized to be retained by the recipient for use in other projects. OMB Circular A-129 governs unreturned amounts that become delinquent debts.
- When authorized by the terms and conditions of the award, U.S. DOL shall make a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports are received.

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- North Idaho College shall account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with §§95.31 through 95.37.
- In the event a final audit has not been performed prior to the closeout of an award, U.S. DOL retains the right to recover an appropriate amount after fully considering the recommendations on disallowed costs resulting from the final audit.

**SUBSEQUENT ADJUSTMENTS AND CONTINUING RESPONSIBILITIES.**

- The closeout of an award does not affect any of the following:
  - The right of U.S. DOL to disallow costs and recover funds on the basis of a later audit or other review.
  - The obligation of the recipient to return any funds due as a result of later refunds, corrections, or other transactions.
  - Audit requirements in §95.26.
  - Property management requirements in §§95.31 through 95.37.
  - Records retention as required in §95.53.
- After closeout of an award, a relationship created under an award may be modified or ended in whole or in part with the consent of U.S. DOL and the recipient, provided the responsibilities of the recipient referred to in §95.73(a), including those for property management as applicable, are considered and provisions made for continuing responsibilities of the recipient, as appropriate.

**COLLECTION OF AMOUNTS DUE.**

- Any funds paid to a recipient in excess of the amount to which the recipient is finally determined to be entitled under the terms and conditions of the award constitute a debt to the Federal Government. If not paid within a reasonable period after the demand for payment, U.S. DOL may reduce the debt by paragraphs (a), (b), or (c) of this section.
  - Making an administrative offset against other requests for reimbursements.
  - Withholding advance payments otherwise due to the recipient.
  - Taking other action permitted by statute.
- Except as otherwise provided by law, U.S. DOL shall charge interest on an overdue debt in accordance with 4 CFR Chapter II, "Federal Claims Collection Standards."

**SECTION 3.7 – DEBT COLLECTION**

Lewis-Clark State College has a variety of account receivable types and loan funds that may require collection efforts at one time or another. The primary receivables that exist at the College are:

- Student tuition and fees, including financial aid that has been advanced
- Student Federal Financial Aid that is subject to Return to Title IV reimbursement
- Nursing and Federal Perkins loans
- 3<sup>rd</sup> party sponsorships of tuition and fees
- Sponsored Program receivables

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The Controller's Office is responsible for collection efforts on all College receivables. Efforts to collect and related procedures vary depending on type of receivable, as follows:

- Student tuition and fees, where financial aid is not involved, are typically collected by informing the student that they will be dis-enrolled if payment is not made. This is done via a "purge" process, usually 2 weeks into the school year.
- Where financial aid is involved, student receivables are often created because the student has received financial aid funding up and above the amount needed to pay tuition and other College-assessed charges, and as a result has received a disbursement of "residual" funds. Some students will then drop some of their classes, thus making them ineligible for some of the funds that they received. Other students withdraw completely, or do not attend class – either way making them ineligible for some or all of the funds that they have received. Frequently these situations result in a Return to Title IV or "R2T4" scenario – where the federal government requires the College to return unearned financial aid to the government and collect the same from the student.
- For student debt described above, the Student Accounts unit of the Controller's Office diligently attempts to collect the monies due, utilizing a series of steps that include:
  - Telephone calls to the student and family
  - E-mails and text messages to the student
  - Reminder and demand letters sent by US Mail
  - Placement of "holds" on student transcripts and on the student's ability to re-enroll or enroll in a subsequent term
- Where the above collection efforts are not successful, usually after approximately 4-6 months, the College will place the debt with one of two commercial collection agencies. At this time, and although commercial efforts do result in some collections, the student debt is "written off" by means of creating a bad debt allowance for the full remaining balance. Subsequent collections are then recognized as revenues when they are received.
- Nursing and Federal Perkins loans are collected in installments, and the College utilizes a third party agency to bill for and collect the payments. Also, the collection period does not begin until after the student has left school, thus the time frame is significantly different in the event that a loan becomes overdue. When a borrower does not begin or quits making payments, the College engages in collection efforts similar to that described for other student debt, after initial outreach is performed by the billing agency.
- 3<sup>rd</sup> party sponsorship receivables include amounts owed by government agencies, the military, and in some cases foreign government agencies. Collection procedures normally consist simply of processing and sending a bill to the entity for the sponsored student(s). At times follow-up efforts are needed, often consisting of sending copies of documents or providing additional paperwork to support the amount owed. While some agencies are slow to remit funds, write offs are a rarity.
- Sponsored Program receivables (grants) are created where an award requires performance by the College in advance of receiving funds. The College typically prepares and submits monthly billings, complete with the

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documentation specified by the granting entity. As with sponsorships, collection can be slow, but are a near certainty.

### SECTION 3.8 – FIXED ASSETS

Lewis-Clark State College has a significant investment in fixed assets, including land, building, and equipment utilized to support the primary mission of the College. The [Fixed Assets](#) site provides direction to properly safeguard, control and dispose of fixed assets in accordance with State and Federal regulations, audit requirements, and generally accepted accounting principles.

- Equipment purchased with a unit cost of \$2,000 or more and anticipated to have a useful life or service period exceeding three years, will be tagged with a LCSC numerical inventory tag. In addition, any donated item that has a fair market value of \$2,000 or more, at the time of donation, will be tagged with a LCSC numerical inventory tag.
- Once payment has been submitted for the purchase of a fixed asset, a numerical inventory tag will be assigned. A copy of the Purchase Order and the numerical inventory tag will be forwarded to the department. The inventory tag should be applied to a clean, visible location on the fixed asset. The department staff will write the serial number, building and room number on the Purchase Order and return the Purchase Order copy to the Controller's Office.
- Under certain circumstances, equipment can be sold to the general public. Contact the Purchasing Department for further details. Employees of Lewis-Clark State College, including their spouses, dependents or any other person acting on the employee's behalf, are prohibited from participating in the acquisition of surplus property.

### SECTION 3.9 – PETTY CASH

Departments can avoid processing requisitions for small reimbursement by utilizing the petty cash process within their departments, if applicable. Petty cash reimbursements are limited to \$50 per receipt. Original receipts are required and must have an authorized signature and the complete 15 digit expenditure account number.

Any travel related expenses, including gas, taxis, parking costs, etc., must be submitted on a Travel Expense Claim for reimbursement.

More information is available on the Controller's Office site: <http://www.lcsc.edu/controllers-office/general-accounting/cashier/petty-cash/>.

### SECTION 3.10 – CASH MANAGEMENT POLICY

The ICE Healthcare Partnership uses a reimbursement method to request grant funds from the primary award recipient. Budget status reports are used to calculate reimbursement amounts based on accrued expenses. Cash on hand is not allowed.

### SECTION 3.11 – PROGRAM INCOME

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Lewis-Clark State College adheres to the policy and definition of handling program income as directed by the Department of Labor, found below and at: <http://www.DOLeta.gov/grants/docs/GCFAQ.pdf>

*“Program income – gross income earned by the recipient that is directly generated by a grant supported activity or earned as a result of the award. Program income includes but is not limited to income from fees for services performed, the use or rental of real or personal property acquired under Federally-funded projects, the sale of commodities or items fabricated under an award, license fees and royalties on patents and copyrights and interest on loans made with award funds. However, interest earned on advances of Federal funds *and tuition costs are not considered program income*. Such income is added to the award and expended for the same purposes. Unspent program income is subject to a request for refund during the closeout phase.”*

### SECTION 3.12 – SEVERANCE PAY

Lewis-Clark State College does not have a severance pay policy.

### SECTION 3.13 – A-133 SINGLE AUDIT REPORTS

The Report of Independent Auditors and Financial Statements for Lewis-Clark State College may be found at the following URL: <http://www.lcsc.edu/administrative-services/lcsc-financial-statements/>.

### SECTION 3.14 – ADMINISTRATIVE AND INDIRECT COSTS

#### ADMINISTRATIVE COSTS

Pursuant to 20 CFR 667.210(b), grantees are advised that there is a 10% limitation on administrative costs on funds administered under this grant. In no event, may administrative costs exceed 10% of the total award amount. The cost of administration are further outlined under 20 CFR 667.220(b).

- Examples of administrative costs include accounting, budgeting, personnel management, administrative portion of indirect costs, fiscal staff charged to the grant, and payroll functions.
- Administrative costs and administrative labor need to be tracked through the college system and reported to the DoL on the quarterly financial report.

#### INDIRECT COSTS

Indirect costs are costs which are not readily identifiable to a particular cost objective. These costs are shared among different programs on campus. These costs can be either administrative or programmatic in nature. Examples of indirect costs are space utilization, clerical or managerial staff, or supplies. The portion of indirect costs that are identified as administrative must also follow the 10% administrative cost limitation identified above.

Lewis-Clark State College has a negotiated Indirect Cost Rate agreement that identifies how to apply indirect costs among different programs. The Office of Grants & Contracts is responsible for the allocation of indirect costs to



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different programs. At a minimum of quarterly, the Lewis-Clark State College will apply indirect costs in accordance with the DoL guidance and the approved Indirect Cost Rate agreement.

### SECTION 3.15 – ALLOWABLE COSTS

Fiscal Compliance Manager reviews costs against OMB Circular A-21 and Award Agreement PART IV Special Clauses and Conditions.

#### 1) Basic Considerations

- a) **Allowable** – An allowable cost is a cost that is *reasonable, allocable*, and given consistent treatment within an organization. The cost must also conform to limitations or exclusions set forth in these principles, the grant agreement and the Notice of Solicitation for Grant Applications (SGA).
- b) **Reasonable and necessary** – A cost is *reasonable* if the nature of the goods or services, and the amount involved, reflect the action that a prudent person would have taken under the circumstances.
- c) **Allocable** – A cost is *allocable* to a grant agreement if (1) it is incurred solely to advance the work under the agreement; (2) it benefits both the agreement and other work of the institution in proportions that can be approximated through use of reasonable methods, or (3) it is necessary to the overall operation of the institution and, in light of Federal cost principles, is deemed to be assignable in part to sponsored projects.
- d) Unallowable activities/costs include:
  - i) The use of grant funds to pay the costs of a participant’s tuition (including scholarships), books, fees, and other personal expenditures; incentive payments for participants such as performance-based cash bonuses; wages of participants (including the wages of students participating in co-operative education programs or participant support services, Registered Apprenticeship, or internships) and stipends for wage replacement of participants; the purchase of real property; and construction (not including altering or renovating facilities, as described above).
  - e) Grant funds to supplant other funding sources they are currently using to fund existing activities.
  - f) The purchase of any food or equipment.
  - g) Must receive prior approval for conference and meeting room costs. See Employment and Training Administration Conference/Meeting Clearance and Request Form.

Purchasing approvers must be familiar with the items mentioned above and will review costs against activities prior to authorization of payment. An additional review is done by the North Idaho College Business Office prior to fiscal reporting or drawdown of funds.

### SECTION 3.16 – BUDGET MODIFICATIONS

The Grants & Contracts Specialist will monitor financial activity monthly to ensure that spending is in alignment with the DOL approved budget.

- As directed by the DOL, budget line item flexibility will be allowed within the grant budget (except wages, salaries and fringe benefits, and indirect cost rates), provided no single line item is increased or decreased by more than 20%. Changes in excess of 20% and any changes in wages, salaries and fringe benefits, and indirect cost rates must receive prior written approval from the Grant Officer.

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- Any changes in mix and match within the wages and salaries line do not require a grant modification. However, the assigned DOL Federal Project Officer must review these changes prior to implementing these changes. Failure to obtain such prior written approval may result in cost disallowance.
- If it is determined that a formal budget modification is needed, the modification must be approved to the Business Office prior to submission to the DOL. Grant activity will not operate outside the approved DOL budget until written approval is received from the Grant Officer.
- All Consortia Member Institutions are required to have prior written approval for any budget modifications as outlined in that Institution's Memorandum of Understanding.

### SECTION 3.17 – LEVERAGED RESOURCES

Leveraged resources are additional non-grant resources expended to further the grant objectives. Lewis-Clark State College is not required to provide leveraged resources in this grant agreement. However, leveraged resources can be reported to the DOL on the quarterly financial reports. All expenditures and costs incurred which are counted as a leveraged resource will be subject to the same documentation requirements as those paid for with grant funds.

- Contributions must be spent on costs for grant activities which would be allowable if paid for with the federal grant dollars. They must be in accordance with cost principles and comply with any grant program restrictions.

Leveraged resources will be tracked and reported by the Project Director and the Grants & Contracts Specialist since leverage is included in both the program and financial quarterly report. Unrecovered indirect costs can be used as leverage but must be applied by the Lewis-Clark State College.

### SECTION 4 – DATA MANAGEMENT AND SECURITY PROCEDURES

Lewis-Clark State College staff must maintain student data and employee sensitive data in a method consistent with the LCSC policy and the Family Educational Rights and Privacy Act (FERPA).

- Lewis-Clark State College employees must take appropriate steps to secure any private data they create, possess, or have access to in connection with their college employment, education, or research. This obligation includes maintaining electronic private data only on college computer systems and electronic devices and securing those computers and devices as required by policy.
- College private data must be stored on college-owned computers unless a contract approved by an authorized college representative exists with the non-college business, person, or entity. Employees must not store college private data on personally owned computers or other personally owned electronic devices, mobile storage devices.
- College computers and devices must be installed and actively maintained on an ongoing basis so that they protect the data stored or accessed through them and meet college compliance requirements and pertinent external regulations. All college computers must meet a basic level of security to protect the integrity of the data and network. Some computers and devices require additional enhanced protection measures

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SECTION 4.1 – RECORDS RETENTION

Lewis-Clark State College follows the State of Idaho’s procedures for archiving records. Grant staff will follow this policy and procedure to appropriately archive all grant documents and records at close of grant project. The ICE Consortium has committed each college to storing records until October 1, 2021.

LEWIS-CLARK STATE POLICY ON RECORDS RETENTION [#4.103](#)

Policy: This policy summarizes LCSC records retention policy and procedure, and sets forth the schedules to be used within the institution.

1. General – As per the guidelines set forth by the Department of Administration at: <http://history.idaho.gov/records-center> and the SBOE, Lewis-Clark State College has developed, and periodically updates, a general college-wide retention schedule as well as department-level or “retaining department” schedules. This segregation recognizes the different retention requirements that a responsible department may have as opposed to other offices (ex: Payroll records maintained by HRS vs. the employing department).

College-wide Retention Schedule: <http://www.lcsc.edu/media/186216/LCSCretentionschedule9-13-12.pdf>.

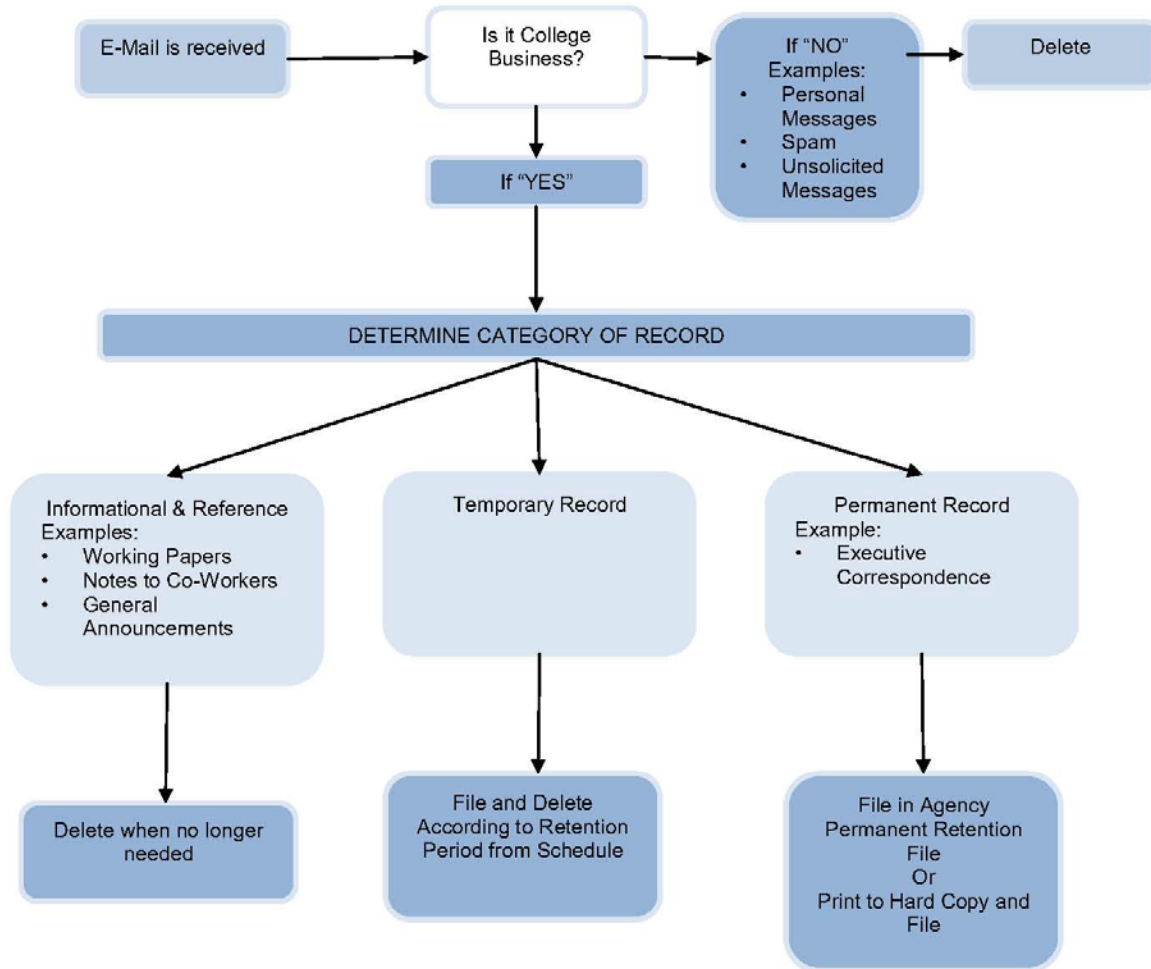
LCSC Departmental Retention schedules: <http://www.lcsc.edu/administrative-services/records-management/>.

The above link directs the user to retention schedules for ten separate areas on campus: Instructional Division, Administrative Services, Admissions, Continuing Education & Community Events, Distance Learning, Information Technology, New Student Recruitment, Workforce Training, the Provost’s Office, and Purchasing. Within each area schedule, retention requirements for all primary functions (Academic, Administrative, Fiscal, Personnel, etc.) are detailed, with the “Office of Origin” identified as the retaining department. If a particular document cannot be found among these schedules, or you have questions concerning conversion of files to electronic records, contact Administrative Services, in the office of the vice President for Finance and Administration for assistance. Retention of records involves, time, expense and effort, documents should be disposed of when no longer needed, subject to the retention schedules.

2. Electronic Correspondence (e-mail) – LCSC recognizes the guidelines of the Idaho Records Center (see Records Management Guide, above Appendix 7) with regard to the retention of e-mail correspondence. Find summary diagrams below.

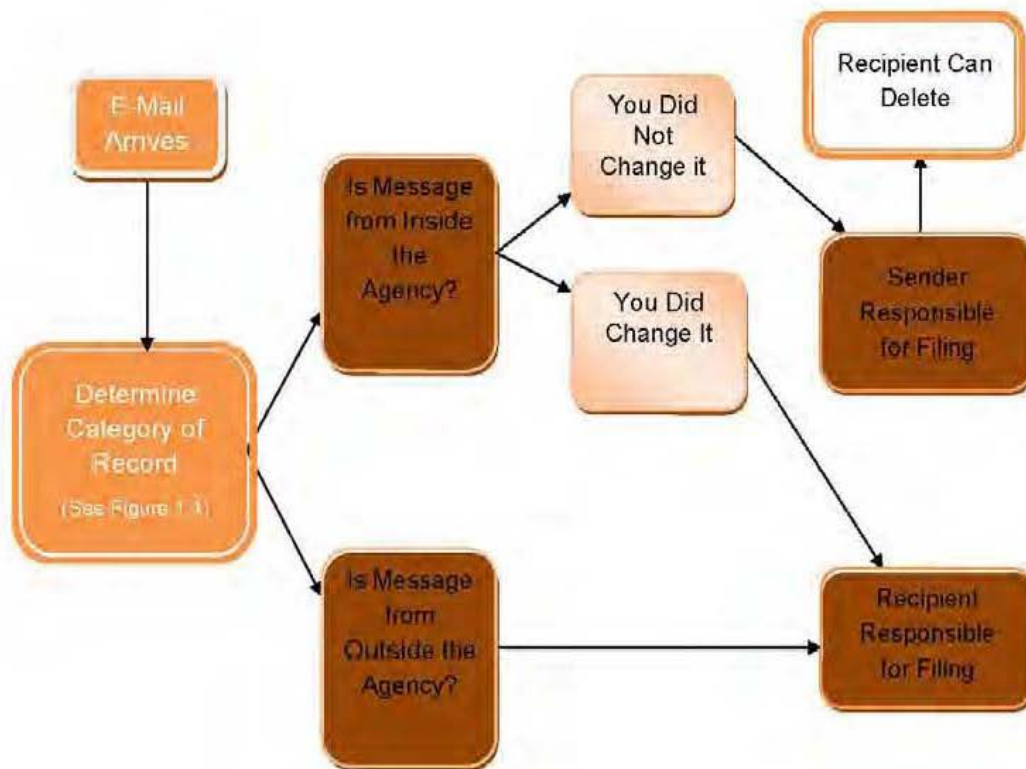
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3. FIGURE 1.1: DECISION SEQUENCE FOR DETERMINING E-MAIL RETENTION



## FIGURE 1.2: DETERMINING RESPONSIBILITY FOR RETAINING E-MAIL MESSAGES

Because e-mail messages can be forwarded and routed to multiple addresses, copies of the messages may exist in many areas of the agency. In most cases, the author, or originator, of the e-mail message is responsible for maintaining the "record" copy. However, in cases in which the recipient has altered the message (made changes, added attachments, etc.) or when the message is coming from outside the agency (and, therefore, not documented anywhere within the agency), the recipient is the one responsible for retaining the message.



### LEWIS-CLARK STATE POLICY ON THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT [#1.117](#)

The Family Educational Rights and Privacy Act of 1974 (FERPA) is a Federal law which states (a) that a written institutional policy must be established and (b) that a statement of adopted procedures covering the privacy rights of

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students be made available. The law provides that the institution will maintain the confidentiality of student education records.

**DEFINITIONS:**

1. Education records: Records, in any media, that are directly related to a student and maintained by Lewis-Clark State College (LCSC) or by a party acting for the institution.

Records NOT protected by FERPA include:

- records of instructional, administrative, and educational personnel which are the sole possession of the maker and are not accessible or revealed to any individual except a temporary substitute
- records maintained by College security/law enforcement unit
- records of employment which relate exclusively to individuals in their capacity as employees (records of students employed by the College as a result of their status as students are education records, e.g. work-study)
- records created, or maintained by a physician, psychiatrist or other recognized professional acting in his or her professional capacity (including counseling and health records)

2. Student: Any individual who is enrolled in a LCSC credit or non-credit course on the first day of the course.

**DIRECTORY INFORMATION:**

Lewis-Clark State College considers the following Directory Information and WILL release this information WITHOUT the written consent of the student.

* Full Name	* Academic Honors	* Withdrawal Date
* Major or Program	* Email Address	* Dates/Terms Enrolled
* Previous Colleges Attended	* Full or Part-Time Status	* Athletic Achievements
* Height & Weight of Athletes	* Degrees/Certificates Awarded and Date Conferred	* Photographs

**NON-DIRECTORY INFORMATION:**

Lewis-Clark College considers the following Non-Directory Information and therefore will NOT release this personally identifiable information without the student's written consent.

* Date of Birth	* Academic Standing	* Entrance Exam Results
* Class Schedule/Roster	* Social Security Number	* Grades
* Address/Phone Number	* Transcript	* Gender
* Student Identification Number	* Parent Address(es)	* Credits (semester/cumulative)
* Semester/Cumulative		

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If non-directory information is needed to resolve a crisis or emergency situation, the College may release that information to appropriate officials if the College determines that the information is necessary to protect the health or safety of a student or other individuals.

Upon request, LCSC discloses education records without consent to officials of another college in which a student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for the purposes related to the student's enrollment or transfer.

**DISCLOSURE:**

Those members of LCSC who act in the student's educational interest within the limitations of their "need to know" have access to student education records. These personnel are referred to as "school officials" and include members of Student Services, Controller's Office, Athletics Department, Security, Administration, Community Programs, Distance Learning, all Academic/Professional Technical Divisions, and the College's attorney.

No one outside the institution shall have access to, nor will the institution disclose any non-directory information from a student's education record, without the written consent of the student except to those with a legitimate educational interest as listed below:

- Appropriate transfer school officials;
- Authorized officials conducting audits or evaluations;
- Appropriate parties in connection with financial aid to a student;
- Organizations conducting certain studies for, or on behalf of, the school;
- Accrediting organizations;
- Individuals requesting information through a judicial order or lawfully issued subpoena;
- Appropriate officials in cases of health and safety emergencies;
- State and local authorities, within a juvenile justice system, pursuant to specific State law;
- Officials at other institutions in which the student has already enrolled;
- International sponsors

The release of information to those having legitimate educational interest does not constitute authorization to share that information with a third party without the student's written consent.

The Registrar shall decide the legitimacy of requests for student information. However, if the Registrar is served with a subpoena requesting student information, the Registrar must comply with the request. Before doing so, the Registrar shall attempt to notify the student of the subpoena in advance of compliance so the student may seek protective action, unless the disclosure is in compliance with a subpoena issued by an agency that has ordered the contents of the subpoena, or the information furnished in response to the subpoena, not be disclosed.

Information on deceased students will only be made available to survivors or third parties via a subpoena to the Registrar.

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The Solomon Amendment requires colleges and universities to release information regarding enrolled students to the military for recruitment purposes. Students may restrict disclosure to the military by restricting all disclosure of personal information.

Students may submit a “Directory Information Restriction Request” form to the Office of the Registrar to prevent directory or non-directory information from being released. This Restriction form is valid for one year and must be re-submitted if the student intends for the restriction to be in effect for a longer period of time.

**STUDENT RIGHTS:**

FERPA affords students certain rights with respect to their education records. These rights include:

- The right to inspect and review educational records; requests will be complied with no later than 45 days from the date of the student’s written request, which is to be directed to the Office of the Registrar. Students do not have the right to receive a copy of their record unless failure to do so would prevent them from inspecting and reviewing their record, such as when the student no longer lives within commuting distance. LCSC may arrange for these students to inspect the requested records at a school located closer to the student.
- The right to request the amendment of educational records, which the student believes are inaccurate, misleading or otherwise in violation of the students’ rights of privacy. If the Registrar does not agree with the student’s request to amend his/her educational records, the student may submit a written request to the Office of the Dean of Student Services asking for a formal hearing on his/her request. The Dean shall make the final decision regarding the student’s request. If the student disagrees with the decision of the Dean, he/she may submit a written statement which will be placed in his/her official record commenting on the disputed information.
- The right to consent to disclosure of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent;
- The right to file with the US Department of Education a complaint concerning alleged failures by LCSC to comply with the requirements of FERPA;
- Individuals who apply for admission but are not admitted, and therefore not enrolled, have no rights under FERPA.
- An individual student’s rights under FERPA are no longer valid upon death of that student.

**STUDENT SCHEDULES:**

The Office of the Registrar will not release class schedules or locations for any student. In the event that a student needs to be contacted, a message will be delivered to the student. However, this will only be done in emergency situations where the health and/or safety of an individual are of concern. It is the responsibility of all students to make available their whereabouts to parents, children, spouses or anyone else they deem appropriate.

The Office of the Registrar is the primary contact for all student information inquiries. Specific concerns regarding FERPA and data privacy can be addressed to Julia Barrett at 208-792-2222 or [jbarrett@lcsc.edu](mailto:jbarrett@lcsc.edu)



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**SECTION 4.2 – PARTICIPANT DATA TRACKING PROCEDURES**

Lewis-Clark State College ICE Healthcare Partnership participant tracking procedures will:

- Capture participant information to assess progress toward project goals.
- Obtain data required for Federal reporting.

For in depth data information, please see ICE Healthcare Partnership Participant Procedures document found on ICE Healthcare Partnership SharePoint.

**INDIVIDUAL TRACKING OF STUDENTS**

The ICE Intake Form is used for participant tracking and reporting (attached at the end of this section)

- This form is provided to all Student Success Navigators across the Consortium by the Data Analyst.
- Upon enrollment, appropriate staff will ask students to fill out this form detailing key areas of reporting required by the U.S. DOL. Current categories include, but are not limited to:
  - Name (x.2abc)
  - Date of Birth (x.3)
  - Student ID (x.1)
  - Street Address
  - Email
  - Phone
  - Gender (c.1ab)
  - Race/Ethnicity (c.2a-g)
  - Student Status (c.3ab)
  - Currently Working (c.4)
  - Veteran Status (c.5)
  - Disabilities (c.7)
  - Pell-Grant Eligible (c.8)
  - TAA Eligible (c.9)
  - Intake Date (x.5)
  - Major (x.6)
  - Education Goal (x.7)
  - US Citizen/Eligible to Work (x.11)

Student Success Navigators/Data Analyst will update the ICE Healthcare Partnership Data Collection Tool with the students' information. The Data Collection Tool will contain a worksheet for tracking the following student information:

- Demographics - Tracks all the same information from the ICE Intake Form
- Also includes the following categories:
  - EDUID (used to de-identify participant) (x.4)

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- Completed at Least One Cert. or Degree (b.6abc)
- Exited or Withdrew (in any fashion) (x.12)
- Moved on to Other Non-Grant Education Program (b.4)
- Credit Hours Completed (b.5)
- Non Incumbent Workers Employed in 1<sup>st</sup> Qtr. after Exit (b.8)
- Those Employed in BOTH 2<sup>nd</sup> and 3<sup>rd</sup> Qtr. after Exit (b.9)
- Incumbent Workers to Receive any Wage Increase Post Enrollment (b.10)
- Last Name (x.2a)
- First Name (x.2b)
- Student ID (x.1)
- Certificate Title (x.8)
- Degree Title (x.9)
- Earned or Completion Date (x.10)
- 1 Yr. or Less Certificate (b.6a)
- More than 1 Yr. Certificate (b.6b)
- Earned a Degree (b.6c)
- Enter Another Program (b.4)
- Student Success Navigators will use the secure file-sharing software provided by Data Analyst. All parties submitting or receiving participant data must maintain the privacy and security of unique and identifiable participant information and transmit to the Data Analyst on a semester basis.

#### **PARTICIPANT FILES**

The Student Success Navigators/Data Analyst will maintain secure files for each participant:

- Participant intake form or proof of efforts made to collect information.
- Participant self-evaluation or proof of efforts made to collect information.

Data Analyst, on a semester basis, will sort and sum student totals in the following CUMULATIVE PARTICIPANT OUTCOMES (requested by the U.S. DOL) and provide them to the Project Director:

- Total Unique Participants Served (B.1)
- Total Number of Participants Completing a TAACCCT-Funded Program of Study (B.2)
- Total Number of Still Retained in Their Program or Other TAACCCT-Funded Program (B.3)
- Total number of Participants Completing Credit Hours (5A)
- Total Number of Participants Earning Credentials (6A+6B+6C)
- Total Number of Participants Enrolled in Further Education After TAACCCT-Funded Program of Study Completion (B.7)
- Total Number of Participants Employed After TAACCCT-funded Program of Study Completion (B.8)
- Total Number of Participants Retained in Employment After TAACCCT-Funded Program of Study Completion (B.9)
- Total Number of Those Employed at Enrollment Who Receive a Wage Increase Post-Enrollment (B.10)

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Data Analyst, on a quarterly basis, will sort and sum student totals in the following CUMULATIVE PARTICIPANT SUMMARY INFORMATION and provide to Project Director:

- Gender (c.1ab)
- Race/Ethnicity (c.2a-g)
- Full-time Status (c.3a)
- Part-time Status (c.3b)
- Incumbent Workers (c.4)
- Eligible Veterans (c.5)
- Pell-Grant Eligible (c.8) –Supporting documents need to be provided
- TAA Eligible (c.9)
- Participant Per Program
- Certificate and Degrees Awarded

On a semester basis Student Success Navigators will send the following data to Data Analyst. After de-identifying the student information the Data Analyst will send to Third Party Evaluator.

- Participant Name
- Student ID/Proxy ID
- Date(s) of Contact
- Type of Support Provided during Each Contact in the Following Categories:
  - Academic
  - Career/Professional
  - Life Issues/Personal Challenges
- Additional Notes on Type of Assistance Provided

Employment Transition Coordinator/Data Analyst, on a semester basis, will compile a report of graduated and currently enrolled participant information, specifically name and Social Security Number/EDUID, based on the amount of students who consented to this reporting. The Data Analyst will then transmit this information securely to the Idaho Department of Labor in order to retrieve and report items based on U.S. DOL Outcome requirement tracking:

- Total Number Employed After Program of Study Completion (b.8)
- Total Number Retained in Employment After Program of Study Completion (b.9)
- Total Number of Those Employed at Enrollment Who Receive a Wage Increase Post-Enrollment (b.10)

#### **PARTICIPANT INTAKE FORM**

ICE Participant Intake Web Form is located on ICE SharePoint Site or at this link:

<https://www.nic.edu/forms/ICEHealthcareForm.aspx>

If Web Form is not available, below form is acceptable.

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# Idaho Center of Excellence Healthcare Partnership

◆◆◆  
Idaho State University • Lewis-Clark State College • North Idaho College

## PARTICIPANT INTAKE FORM

This form is utilized by Lewis-Clark State College, Idaho State University and North Idaho College to facilitate any Idaho Center of Excellence (ICE) Healthcare Partnership participant intake. This form is to be filled out by all participants enrolled in an ICE course. ICE is a \$6.4 million Trade Adjustment Assistance Community College and Career Training (TAACCT) grant awarded by the U.S. Department of Labor. The mission of ICE is to ensure a reliable and stable healthcare workforce for the state of Idaho with emphasis on rural and underserved populations. The consortium partners from across the state include; Lewis-Clark State College, Idaho State University and North Idaho College as the lead institution.

<b>TODAY'S DATE:</b>		<b>STUDENT ID:</b>		<b>SCHOOL:</b>	
<b>STUDENT INFORMATION</b>					
<b>LAST NAME:</b> <small>X.2A</small>		<b>FIRST:</b> <small>X.2B</small>		<b>MIDDLE:</b> <small>X.2C</small>	<b>GENDER:</b> <small>C.1AB</small>
<b>BIRTH DATE:</b> <small>X.3</small>		<b>AGE:</b> <small>C.6</small>		<b>EMAIL ADDRESS:</b>	
<b>STREET ADDRESS:</b>				<b>CITY:</b>	
<b>STATE:</b>		<b>ZIP:</b>		<b>CONTACT PHONE #:</b>	
<b>RACE: (SELECT ALL THAT APPLY) C.2B-G</b> <input type="checkbox"/> Black/African American <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian <input type="checkbox"/> White <input type="checkbox"/> Native Hawaiian or Pacific Islander		<b>DO YOU CONSIDER YOURSELF HISPANIC OR LATINO? C.2A</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>ARE YOU A US CITIZEN? X.11</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No, but work authorized	
<b>MILITARY/DISABILITY/EMPLOYMENT/SCHOOL INFORMATION</b>					
<b>DISABILITY INFORMATION (1)</b>			<b>TAA INFORMATION (2)</b>		
<b>ARE YOU DISABLED? C.7</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>HAVE YOU BEEN IN CONTACT WITH DISABILITY SUPPORT SERVICES:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>ARE YOU ELIGIBLE FOR TAA BENEFITS? C.8</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>EMPLOYMENT INFORMATION</b>					
<b>ARE YOU CURRENTLY EMPLOYED? C.4</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>IF YES, WHO IS YOUR EMPLOYER?</b>			
<b>IF NO, DO YOU RECEIVE UNEMPLOYMENT BENEFITS? C.9</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>WHAT IS YOUR OCCUPATION?</b>			
		<b>WHAT IS YOUR CURRENT MONTHLY GROSS EARNINGS? \$</b>			
<b>MILITARY INFORMATION (3)</b>					
<b>ARE YOU A US MILITARY VETERAN? C.5</b> <input type="checkbox"/> Yes <input type="checkbox"/> No					
<b>BRANCH OF MILITARY SERVICE:</b>			<b>FROM (DATES):</b>		<b>TO (DATES):</b>
<b>CHARACTER OF DISCHARGE? C.6</b> <input type="checkbox"/> HONORABLE <input type="checkbox"/> DISHONORABLE <input type="checkbox"/> OTHER THAN DISHONORABLE					
<b>HAVE YOU SERVED AT LEAST ONE-DAY OF ACTIVE DUTY? C.10</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>ARE YOU AN ELIGIBLE SPOUSE? C.11</b> <input type="checkbox"/> Yes <input type="checkbox"/> No			
<b>SCHOOL INFORMATION</b>					
<b>COLLEGE ATTENDING:</b> <input type="checkbox"/> NIC <input type="checkbox"/> ISU <input type="checkbox"/> LCSC					
<input type="checkbox"/> FULL TIME (12 Or More Credit Hours For Fall/Spring, 6 Or More Credit Hours For Summer)					
<input type="checkbox"/> PART TIME (Less Than 12 For Fall/Spring, Less Than 6 For Summer)					
<input type="checkbox"/> NON-CREDIT (Workforce Training Program)					

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<b>WHAT IS YOUR MAJOR?</b>	<b>IF UNDECIDED, WHAT MAJORS ARE YOU CONSIDERING?</b>
<b>WHAT IS YOUR EDUCATIONAL GOAL? <small>x7</small></b> <input type="checkbox"/> NON-CREDIT CERTIFICATE <input type="checkbox"/> CREDIT LESS THAN 1 YEAR CERTIFICATE <input type="checkbox"/> DEGREE	<b>DID YOU RECEIVE A PELL GRANT AWARD (4)?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>DID YOU RECEIVE A WORKFORCE INVESTMENT OPPORTUNITY ACT (WIOA) AWARD?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	

<b>IF THE TRAINING/EDUCATION PROGRAM DID NOT EXIST, WHAT IS YOUR BEST GUESS ABOUT WHAT YOU WOULD HAVE DONE?</b> <i>(Select ONE of the following)</i>
<input type="checkbox"/> I would have not pursued any training/education
<input type="checkbox"/> I would have enrolled in a similar program of study offered at this college. <b>Which program?</b>
<input type="checkbox"/> I would have enrolled in a similar program of study offered at another college. <b>Which college?</b>

This is an equal opportunity program and auxiliary aid and services are available upon request to individuals with disabilities.

**PRIVACY ACT**

In accordance with the Privacy Act of 1974 (Public Law No. 93-579, 5 U.S.C. 552a), you are hereby notified that the Department of Labor is authorized to collect information to implement the Trade Adjustment Assistance Community College and Career Training Program under 19 USC 2372 – 2372a. The principal purpose for collecting this information is to administer the program, including tracking and evaluating participant progress. Providing this information, including a social security number (SSN) is voluntary; failure to disclose a SSN will not result in the denial of any right, benefit or privilege to which the participant is entitled. The information that is collected on this form will be retained in the program files of the grantee and may be released to other Department officials in the performance of their official duties.

**CONSENT:** By submitting I understand ICE is a DOL funded grant and I give permission for the ICE staff to contact my employer to verify information for reporting purposes only. None of my personal identifying information will be shared outside the institution(s).

**ATTESTATION:** By submitting I certify the information provided is true to the best of my knowledge. I am aware that the information I have provided is subject to review and verification.

\_\_\_\_\_  
PARTICIPANT SIGNATURE

\_\_\_\_\_  
SIGNATURE DATE

*This project was funded \$6,438,050 (100% of its total cost), from a grant awarded under the Trade Adjustment Assistance Community College and Career Training Grants, as implemented by the U.S. Department of Labor's Employment and Training Administration. (#TC-26479-14-60-A-16)*

*For more information, contact [icehp.org](http://icehp.org)*

<b>DEFINITIONS</b>
<b>(1) PERSONS WITH A DISABILITY:</b> Participants, where known, or who self-identify that they have any "disability," as defined in Section 3(2)(a) of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102). Under that definition, a "disability" is a physical or mental impairment that substantially limits one or more of the person's major life activities. (For definitions and examples of "physical or mental impairment" and "major life activities," see paragraphs (1) and (2) of the definition of the term "disability" in 29 CFR 37.4, the definition section of the WIA non-discrimination regulations.) Auxiliary aids and services are available upon request to individuals with disabilities.
<b>(2) TRADE ADJUSTMENT ASSISTANCE (TAA) ELIGIBLE:</b> The Trade Adjustment Assistance (TAA) Program is a federal entitlement program that assists U.S. workers who have lost or may lose their jobs as a result of foreign trade. You are TAA eligible if your petition was approved by the US Department of Labor and your states Trade Coordinator certifying your eligibility for assistance. To learn more, please visit our website at <a href="http://www.doleta.gov/tradeact">www.doleta.gov/tradeact</a> .
<b>(3) ELIGIBLE VETERAN / SPOUSE OF ELIGIBLE VETERAN (DEPARTMENT OF LABOR):</b> Participants who meet one of the following conditions: 1. Is a person who served at least one day in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). 2. Is a person who is (a) the spouse of any person who died of a service-connected disability, (b) the spouse of any member of the Armed Forces serving on active duty who at the time of application for assistance under this part, is listed, pursuant to 38 U.S.C 101 and the regulations issued thereunder, by the Secretary concerned, in one or more of the following categories and has been so listed for more than 90 days: (i) missing in action; (ii) captured in the line of duty by a hostile force; or (iii) forcibly detained or interned in the line of duty by a foreign government or power; or (c) the spouse of any person who has a total disability, permanent in nature resulting from a service-connected disability or the spouse of a veteran who died while a disability so evaluated was in existence.
<b>(4) PELL GRANT ELIGIBLE:</b> Federal Pell Grants are direct grants awarded through participating institutions to students with financial need who have not received their first bachelor's degree or who are enrolled in certain post baccalaureate programs that lead to teacher certification or licensure. <a href="http://www2.ed.gov/programs/fpg/eligibility.html">http://www2.ed.gov/programs/fpg/eligibility.html</a>

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**SECTION 5 – COMPLIANCE**

The primary purpose of the ICE Healthcare Partnership compliance procedures are to ensure that all project staff, including Consortia Institutions, follow policies as set forth in the Department of Labor’s Solicitation for Grant Applications (SGA), the ICE Healthcare Partnership Statement of Work (SOW), and Grants Management Advisories.

The ICE Healthcare Partnership is committed to:

- 1) Consortium Communication consisting of:
  - a) Monthly Support phone calls from North Idaho College Lead to each Consortia Partner to address crucial discussion points and milestones for the grant in the areas of curriculum, fiscal/finance and data reporting.
  - b) Monthly Video Conferences with ICE Project Team.
  - c) Yearly on-site support visits by the Dean, Project Director, Data Analyst, and Fiscal Compliance Manager to each Consortia Partner.
  - d) North Idaho College will maintaining a collaborative SharePoint site to be used Consortium members to share:
    - i) News
    - ii) A Consortium wide calendar with report deadlines and project activities
    - iii) Documents and files, non-sensitive in nature
- 2) U.S. DoL Attribution: *(For all required attributions on recruitment materials, refer to the Required Statements and Outreach Regulations located on the ICE Healthcare Partnership SharePoint site.)*
  - a) To be attached on all printed materials with the text reading:
    - i) “This workforce solution was funded \$6,438,050 (100% of its total cost), from a grant awarded under the Trade Adjustment Assistance Community College and Career Training Grants, as implemented by the U.S. Department of Labor’s Employment and Training Administration. (#TC-26479-14-60-A-16). The solution was created by the grantee and does not necessarily reflect the official position of the U.S. Department of Labor. The Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information linked on sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability or ownership”
  - b) To be attached on email signatures, etc. with the text reading:
    - i) “This project was funded \$6,438,050 (100% of its total cost), from a grant awarded under the Trade Adjustment Assistance Community College and Career Training Grants, as implemented by the U.S. Department of Labor’s Employment and Training Administration (TC-26479-14-60-A-16).”
- 3) Equal Opportunity and Disabilities statements
  - a) To be attached on all printed materials with the text reading:
    - i) “Lewis-Clark State College is an Equal Opportunity institution”
    - ii) “Auxiliary aids and services are available upon request to individuals with disabilities”
- 4) Incident Reporting
  - a) Lewis-Clark State College will immediately document actual, potential or suspected fraud; gross mismanagement or misuse of program funds; conduct violations; violations of regulations; and (program) abuse via the Incident Report (IR) form found in TEGl 2-12.
  - b) Situations involving imminent health or safety concerns, or the imminent loss of funds exceeding an amount greater than \$50,000 are considered emergencies and will be immediately reported to the OIG and



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Department's Office of Financial and Administrative Management (OFAM) by telephone and followed up with a written IR form no later than one working day after the telephone report.

(a) OIG forms and contact information:

OIG Complaints Analysis Office  
200 Constitution Avenue, NW  
Room S-5506  
Washington, DC 20210  
202-693-6999 or 1-800-347-3756

- 5) Memorandum of Understanding
  - a) Each Consortia Institution has a signed Memorandum of Understanding (MOU) with North Idaho College. This document ensures each college will "fully comply with...regulations and cost principles".
- 6) On-site Support Visit Resolution
- 7) Resolution of On-site Support Visits from North Idaho College Lead to Consortia Institutions:
  - a) Schedule agreeable time to meet.
  - b) Participants of meeting to include, when available, Dean, Project Director, Data Analyst, and Fiscal Compliance Manager.
  - c) Lead and Consortia Partner agree to provide any documents in advance of meeting for review.
  - d) Lead agrees to provide feedback to Consortia Institution within 30 business days.
  - e) Follow up email with summary of findings/concerns from On-Site Support Visit is created with input from Dean, Project Director, Fiscal Compliance Manager, and Data Analyst.
  - f) Upon confirmation of findings, Project Team makes determination of the need for further attention from Consortia Institution on findings. The findings email to be shared with Consortia Deans and key college administration as identified. This email to also include suggested next steps for resolution.
  - g) Consortia Institutions will identify and evaluate findings, along with providing a strategic and realistic timeline for resolution.
  - h) Regular check-ins with remediation and action points, as well demonstration/documentation of progress towards resolution.
  - i) Communication of findings and remediation plan to FPO will be shared as appropriate.
  - j) Re-evaluation of timeline due to extenuating circumstances may be necessary.
  - k) Outcomes detailed in Quarterly Narrative reports to U.S. DOL.
- 8) Resolution of Monitoring Visits from U.S. DOL to North Idaho College Lead:
  - a) Upon receiving findings, if any, from the U.S. DOL, the Fiscal Compliance Manager, Dean and Project Director will lead in the development of a Monitoring Response Plan.
  - b) Staff effort is assigned to finding resolution and Monitoring Response Plan as necessary.
  - c) Resolution of outstanding findings will ascend to the highest priority for early completion.
  - d) Consortium agrees to respond to U.S. DOL findings appropriately within a 60 or 90 day timeframe, whichever the U.S. DOL advises.
  - e) FPO, North Idaho College Leadership, and Consortium will be kept current with Monitoring Response Plan progress.
- 9) Creative Commons Licensing, found at <http://creativecommons.org/licenses>, requiring all materials (including images) that are open source and/or which are able to share legally with appropriate citations.

**SECTION 6 – DEVELOPMENT AND DISSEMINATION OF CURRICULUM AND INSTRUCTIONAL MATERIALS**

Lewis-Clark State College’s lead representative to the ICE consortium will ensure that curriculum produced/enhanced with grand funds by the institution adhere to DOL TAACCCT regulations.

LEWIS-CLARK STATE POLICY ON CURRICULAR PROCEDURES 2.103

All curricular modifications, additions or deletions must be reviewed by the College Curriculum Committee, the Faculty Senate and be approved by the respective Division Chair, Provost, the President of the college and the State Board of Education. New or expanded program proposals must also be reviewed by the state level Academic Affairs and Program Committee.

**Policy:**

1.0 General Policy

- 1.1 The Curriculum Committee will meet twice monthly throughout the academic year. Meetings may be held more frequently at the discretion of the committee.
- 1.2 A proposal must be submitted and accepted for reading at a meeting prior to the meeting in which the committee votes on the proposal. Faculty sponsor(s) will be invited to introduce the proposal at the first meeting and to discuss the proposal with the committee at subsequent meetings. Every attempt will be made to make a decision at the second meeting in which a proposal is considered.
- 1.3 All proposals must be complete and follow the procedures as outlined in this policy.
- 1.4 Particular attention should be focused on providing the committee an adequate justification for proposed changes. In the case of new and revised courses, a complete syllabus must be included.
- 1.5 Each academic year the Curriculum Committee will establish deadlines for curriculum proposal submission and distribute these dates to the faculty and division chairs. The committee will in no case establish deadlines later than the first meeting in February for submission of program proposals and the first meeting in April for submission of curriculum modifications for inclusion in the college catalog for the next academic year.

2.0 Policy Regarding New or Expanded Instructional Programs

- 2.1 New or expanded programs are defined as any curricular offering leading to a certificate, minor, option or emphasis area within a major, major or degree not previously offered by the institution. The State Board of Education requires the preparation and submission of a detailed proposal for each new or expanded program.
- 2.2 The following areas of analysis must be included:
  - 2.2.1 Program description abstract with attention directed to need and justification.
  - 2.2.2 Relationship to the role and mission of the institution as established by the State Board of Education.
  - 2.2.3 Effect of the proposed program upon the institution's administrative structure and potential involvement of other divisions.
  - 2.2.4 A description of similar programs offered in Idaho, the Pacific Northwest and states bordering Idaho.
  - 2.2.5 Names of accrediting agencies or societies which would deal with particular issues.



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- 2.2.6 Outline of proposed curriculum courses and credit hours by semester.
  - 2.2.7 New courses needed to be added to the curriculum.
  - 2.2.8 Existing courses which will apply to the proposed program.
  - 2.2.9 Implementation schedule.
  - 2.2.10 Enrollment sources, expected enrollment and future trends.
  - 2.2.11 Budget detail information and anticipated revenues.
  - 2.2.12 Faculty and staff requirements.
  - 2.2.13 Facilities and equipment required to support the program at the time of initiation and in the future.
  - 2.2.14 Infrastructure needed to support the program at startup and on a continuing basis.
- 3.0 Procedures for Program Addition, Expansion or Deletion
- 3.1 The Office of the State Board of Education has developed a set of forms for use in the preparation of proposals. Proposal forms differ for academic and technical programs. Forms are available from the Office of the Provost.
  - 3.2 A “Notice of Intent” form and program abstract must be sent to the state level Academic Affairs Council for review and recommendation. Forms are available from the Office of the Provost. All Notices of Intent and program proposals will be forwarded by the Office of the Provost.
  - 3.3 The program proposal and 16 copies are submitted to the College Curriculum Committee for review.
  - 3.4 Upon approval, the proposal is then submitted to the Faculty Senate for review.
  - 3.5 Upon approval of the Faculty Senate, the Office of the Provost will then submit the proposal to the President and circulate copies to the Academic Affairs and Program Committee.  
It has been the custom of the State Board of Education to review proposals for new or expanded programs at their June meeting. For the Board to act, proposals must be presented at the April meeting. Final action by the faculty must be completed in early February in order to consider implementation the following semester. This may vary however, depending upon budget impact of new or expanded program proposals.
- 4.0 Policy Regarding Curricular Modifications, Minor Additions or Deletions
- 4.1 All curricular changes not described in section 2.1 are included in this section.
  - 4.2 The following must be included in each proposal:
    - 4.2.1 A description of the present program or course/s.
    - 4.2.2 A description of the proposed modification, addition or deletion.
    - 4.2.3 A rationale for the proposed change (need and justification) and the potential benefits to students.
    - 4.2.4 A list of additional infrastructure and its cost necessary to support the proposed change.
    - 4.2.5 A list of additional equipment and/or space along with estimated costs needed to support the proposed change.
    - 4.2.6 A completed summary cover form available from the Office of the Provost and submit to the Chairperson of the College Curriculum Committee.
    - 4.2.7 A list of personnel necessary to support the changes.
- 5.0 Procedure for Curricular Modification, Minor Addition or Deletion
- 5.1 The proposal and 16 copies are submitted to the College curriculum Committee for review
  - 5.2 The Committee will, after sufficient review, recommend action of acceptance or rejection.
    - 5.2.1 All proposals affecting the General Education Core will be reviewed by the General Education subcommittee of the Curriculum Committee prior to action by the whole committee.

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- 5.2.2 All proposals for Writing Intensive courses will be reviewed by the Writing Across the Curriculum subcommittee of the Curriculum Committee prior to action by the whole committee.
- 5.4 Upon acceptance, the proposal will be forwarded to the Faculty Senate.
- 5.5 The Chair of the Curriculum Committee or designee will present the curriculum proposal and recommend action to the Senate.
- 5.6 Upon acceptance by the Faculty Senate, the proposal will be submitted to the Provost and will be forwarded to the State Board of Education for final action.
- 5.7 Notification of Board action will be made to the Curriculum Committee and to the appropriate divisions by the Office of the Provost.
- 6.0 Subcommittees of the Curriculum Committee
  - 6.0.1 The General Education Committee will be a subcommittee of the Curriculum Committee and will be responsible for reviewing courses which affect the general education core. The General Education Committee will develop a process for reviewing such courses and will work with the assessment officer to monitor the effectiveness of the general education core.
  - 6.02 The Writing Across the Curriculum Committee will be a subcommittee of the Curriculum Committee and will be responsible for reviewing courses which propose a Writing Intensive course designation. The Writing Across the Curriculum Committee will develop a process for reviewing such courses and will work with the assessment officer to monitor the effectiveness of the Writing Across the Curriculum initiative.
  - 6.1 The Curriculum Committee Chair will appoint Curriculum Committee members to chair each subcommittee of the Curriculum Committee. Each instructional division may elect a representative to each subcommittee; subcommittees require a minimum of six elected members to operate.
  - 6.2 Subcommittees of the Curriculum Committee will set their own rules of operation and meeting schedules. These rules will include mechanisms for providing the Curriculum Committee with regular reports and timely review of items referred to them by the Curriculum Committee.
  - 6.3 Subcommittees of the Curriculum Committee act as autonomous bodies except in matters that are in the purview of the Curriculum Committee.
- 7.0 Course Comparability

Two courses are deemed comparable when they are cross-listed in the Lewis-Clark State College catalog.

  - 7.0.1 Two courses may be cross-listed in the catalog when the faculty who teach in both disciplines agree that the two courses may be cross-listed and a proposal to that effect from both divisions has been approved through the curriculum approval process as dictated in policy 2.103.
  - 7.0.2 A division may offer a course whose prefix and number resides in another division only if the division that administers the prefix approves the course and course instructor.
  - 7.0.3 Two cross-listed courses satisfy the same requirements stated in the Lewis-Clark State College catalog.

**ICE HEALTHCARE PARTNERSHIP DEVELOPMENT AND DISSEMINATION OF CURRICULUM AND INSTRUCTIONAL MATERIALS**

- Curriculum Review and Approval Process:
  - Appropriate Program Director reviews all curriculum forms submissions from Consortium colleges to ensure that all of the required information is included.
  - The Division Chair and Appropriate Dean reviews Curriculum Approval forms checking to ensure that:

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- Industry input was obtained
- Target audience and target jobs are clearly defined
- Objectives are appropriate
- Content makes sense for the target jobs and is logically organized
- Division Chair and Appropriate Dean makes recommendations, as needed
- Instructional Materials Review and Approval Process:
  - eLearning team reviews course materials to ensure that content is complete and in alignment with best practices noted in the Quality Matters Rubric.
  - eLearning team identifies elements that need revision and makes recommendations, where appropriate.
- Accessibility - eLearning team will ensure that all online and technology-enabled content and courses developed under this grant must incorporate the principles of universal design in order to ensure that they are readily accessible to qualified individuals with disabilities. The content and courses must be in full compliance with the Americans with Disabilities Act and Sections 504 and 508 of the Rehabilitation Act of 1973, as amended, and the Web Content Accessibility Guidelines 2.0, Level AA
- Training and Support:
  - eLearning team provides training in instructional design best practices to Consortium staff
  - eLearning team provides technical support for the development of games, activities, and multi-media instructional elements
- Monitoring and Tracking:
  - eLearning team works with colleges to establish due dates for submission of curriculum and instructional materials
  - eLearning team tracks progress against goals
- Enhancements - Instructional teams identify ways to enhance instructional materials before final dissemination
- Dissemination:
  - Instructional teams identify dissemination opportunities through conferences and professional association meetings
  - Instructional teams identify optimal organization of content for easy access by faculty and administrators
  - Instructional teams identify promotional strategies such as press releases to raise awareness of availability of curricula
  - Instructional teams make materials available through publicly accessible sites such as skillscommon.org
- Quality Improvement - Instructional teams review program accreditation annual reports completed by Consortium colleges following program pilots
- Challenge Exams for Prior Learning Assessment - Instructional teams review challenge exam submissions to ensure that all objectives are assessed.

## **SECTION 7 – RECRUITMENT AND OUTREACH PROCEDURES**

Under general supervision, the Student Success Navigator will provide support to assist ICE Healthcare Partnership participants at all consortium colleges in achieving their academic and professional goals. The Navigators will oversee all recruitment and outreach strategies for program participants, participant assessments, and work closely with existing PTE student support services personnel to provide advising, registration, admissions, resource navigation, and

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financial aid services to program participants to ensure grant outcomes are met. The Navigators will prepare, submit, and present all reports, updates, and information to the Project Director.

## **SECTION 8 – RETENTION, INTERNSHIPS AND STUDENT EMPLOYMENT PROCEDURES**

Under general supervision, the Student Success Navigator and/or Employment Transition Coordinator will assist in clinical or externship and job placement for students finishing Consortium programs using a combination of financial planning, support services, and mentorship. The Student Success Navigator and/or Employment Transition Coordinator will work closely with the Consortium faculty Program Directors, industry employers, regional Idaho Department of Labor offices, and other agencies to place students as well as offer students job retention and career advancement support and community resources on and off the campuses. The Student Success Navigator and/or Employment Transition Coordinator will prepare, submit, and present all reports, updates, and information to the Project Director.

## **SECTION 9 – CONTINUOUS IMPROVEMENT AND EVALUATION**

ICE Project Team:

- 1) Established by month 6, to include:
  - a) Project Director
  - b) Senior Administrative Assistant
  - c) Data Analyst
  - d) Fiscal Compliance Manager
  - e) Consortium Deans
  - f) External Evaluator
  - g) Division Chairs
- 2) Charge:
  - a) The ICE Project Team, composed of representative Consortia Partner and central Consortium staff, will be charged with quality control, and ensuring deliverables exceed expectations. Specifically, the Consortium Operational Team will accomplish the following:
    - i) Integrating program assessment, reflection and improvement
    - ii) Extracting timely information regarding:
      - (1) learner experience
      - (2) performance
      - (3) progress
      - (4) comprehension
      - (5) instructor feedback
    - iii) Mining learning platform metrics
  - b) Surveying students and faculty to provide context
  - c) These sources and other input from regular ICE Leadership Team meetings will be used for real time improvement of instruction and support services, throughout the pilot period.
- 3) Strategies:
  - a) Well-Defined Plan for Formal Data Reviews - The Consortium will utilize data captured during the course of quarterly and annual reporting as part of a cycle of continuous improvement, overseen by the ICE Project

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Team. Using proven, evidence-based design, the Data Analyst and Project Director will establish central data tools and procedures in alignment with DOL ETA reporting requirements and program continuous improvement expectations.

- i) To successfully apply the lessons learned through data, a series of access points and procedures will ensure full transparency to all stakeholders.
  - ii) The Project Director will lead the Consortium using a Data Review Plan that supports overarching goals of continuous improvement and innovation.
  - iii) Maintaining and disseminating a real-time dashboard representation of program, fiscal and outcome measures, the Project Director will work directly with all members to capture and analyze metrics not only for DOL’s annual outcome measures, but also towards progress against goals, and the capture of transformative feedback from learners, faculty, industry and others.
  - iv) The Dean, Project Director and the Data Analyst will also collaborate actively with the third party evaluator to ensure their expertise contributes to the cycle of continuous improvement.
- b) Credential attainment and student progress will be part of student profile information analyzed at the Consortium level in order to standardize data exchange between colleges and state agencies, and among institutions as they relate to stacked and latticed credentials.
  - c) Student interaction and success data will be captured and analyzed via learning management system and Student Success Navigators and faculty will add context to analysis and improvement to address shortcomings of online learning such as student isolation and archival of data without action.
  - d) Articulation and transfer data to track student persistence and academic path will be obtained in order to develop an information base to assess effectiveness of transfer and articulation agreements.
  - e) A Prior Learning Assessment Coordinator will work with Consortia Partners to facilitate credit for prior learning and provide standards of service and continuous improvement oversight.
  - f) Technology-based continuous improvement mechanisms: Student Success Navigators will monitor student performance in programs through technology-enabled tracking tools. They will check in with students if they see signs of impeded progress and determine appropriate timely interventions.
    - (1) At the end of each course, Student Success Navigators will review assessment data to identify course elements in need of revision.
    - (2) Next, Curriculum Development Specialists will revise learning activities to promote improved learning outcomes.

DATA REVIEW PLAN		
Monthly	Quarterly	Annually
-Individual meetings with each Consortium member  -Review of program and fiscal measures against forecasts  -Monthly review ensures early identification of barriers, and	-Consortium Operational Team review of all data measures against goals  -Planning for next steps and improvement	-All project participants, including third party evaluation teams, will review results of Annual Outcome Measures reporting  -Planning for next steps and improvement

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immediate opportunity for improvement	-Development and execution of mitigation strategies, if data indicates barriers to progress	
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- g) Third Party Evaluation - The independent third-party evaluator (Social Policy Research) responsibilities will include data collection, analysis and reporting. Social Policy Research, in conjunction with grant staff, will develop and carry out a plan to evaluate program processes and outcomes, and disseminate evaluation findings to stakeholders.