

**U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual**



North Idaho College

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U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
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Policies and Procedures Manual

CONTENTS

CONTENTS	2
INTRODUCTION	4
SECTION 1 – CIVIL RIGHTS and PLURALISM COMPLIANCE PROCEDURES	5
SECTION 2 – HUMAN RESOURCES.....	7
SECTION 2.1 – COMPENSATION	7
SECTION 2.2 – COMPLAINTS AND GRIEVANCES	9
SECTION 2.3 – CONFLICT OF INTEREST and ETHICS.....	9
SECTION 2.4 – PENSION and RETIREMENT	10
SECTION 2.5 – TIME DISTRIBUTION	10
SECTION 3 – BUDGET PROCEDURES.....	11
SECTION 3.1 – PURCHASING CARD RECONCILIATION PROCEDURES.....	11
SECTION 3.2 – REIMBURSEMENT PROCEDURES.....	11
SECTION 3.3 – PURCHASING and CONTRACTING PROCEDURES	11
SECTION 3.4 – TRAVEL and MEAL PROCEDURES	12
SECTION 3.5 – LEAVES and ABSENCES	13
SECTION 3.6 – CLOSEOUT	16
SECTION 3.7 – DEBT COLLECTION.....	17
SECTION 3.8 – FIXED ASSETS.....	19
SECTION 3.9 – PETTY CASH	20
SECTION 3.10 – CASH MANAGEMENT POLICY.....	20
SECTION 3.11 – PROGRAM INCOME.....	20
SECTION 3.12 – SEVERANCE PAY	20

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

SECTION 3.13 – A-133 SINGLE AUDIT REPORTS	21
SECTION 3.14 – ADMINISTRATIVE AND INDIRECT COSTS	21
SECTION 3.15 – ALLOWABLE COSTS.....	22
SECTION 3.16 – BUDGET MODIFICATIONS.....	212
SECTION 3.17 – LEVERAGED RESOURCES.....	213
SECTION 4 – DATA MANAGEMENT AND SECURITY PROCEDURES.....	244
SECTION 4.1 – RECORDS RETENTION	24
SECTION 4.2 – PARTICIPANT DATA TRACKING PROCEDURES	26
SECTION 5 – COMPLIANCE	32
SECTION 6 – DEVELOPMENT AND DISSEMINATION OF CURRICULUM and INSTRUCTIONAL MATERIALS	34
SECTION 7 – RECRUITMENT and OUTREACH PROCEDURES	35
SECTION 8 – RETENTION, INTERNSHIPS and STUDENT EMPLOYMENT PROCEDURES.....	35
SECTION 9 – CONTINUOUS IMPROVEMENT and EVALUATION	35

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

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.

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
- The proposal will target TAA eligible dislocated workers, veterans, and other adults.
- The grant will fund equipment, personnel, common curriculum statewide, prior learning assessment, professional development, and evaluation.
- 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 North Idaho College, the U.S. DOL, or other State or Federal agencies.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

SECTION 1 – CIVIL RIGHTS AND PLURALISM COMPLIANCE PROCEDURES

North Idaho College is an equal opportunity institution. Auxiliary aids and services are available upon request to individuals with disabilities.

As the lead institution and a Consortia Partner, North Idaho 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

North Idaho 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 North Idaho College Policy 3.02.01

<http://www.nic.edu/websites/default.aspx?dpt=121&pageId=>

EQUAL OPPORTUNITY IN EDUCATION AND EMPLOYMENT

North Idaho 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. North Idaho College is 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:

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

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 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.

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, 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)

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

SECTION 2 – HUMAN RESOURCES

North Idaho 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.nic.edu/websites/default.aspx?dpt=121&pagelD=>.

Additional administrative services operational guidelines are located at:

<http://www.nic.edu/websites/default.aspx?dpt=107&pagelD=2579>.

Project staff will also comply with Idaho State Statutes concerning human resources, located at

<http://legislature.idaho.gov/idstat/TOC/IDStatutesTOC.htm>.

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.

SECTION 2.1 – COMPENSATION

Salary schedules for all benefit-eligible employees are located on the NIC portal Human Resources site at:

<https://my nic.nic.edu/sites/hr/Salary%20Structures/Forms/AllItems.aspx>.

ESTABLISHING SALARIES FOR NEW EMPLOYEES

- Prior to posting of a position, the hiring manager/supervisor of a new employee will submit to the Assistant Director of Human Resources a job description outlining the responsibilities of the position.
- After reviewing the job description, the Assistant Director of Human Resources will then identify the FLSA status as well as where the position will be classified on the identified salary schedule.
- The position will then be posted by Human Resources to begin the hiring process.
- Prior to extending an offer to the selected candidate, the Assistant Director of Human Resources will review the candidate's education and experience to determine which salary step the candidate should be offered.

ANNUAL INCREASES

- Employees can advance on the step schedule for their pay grade for each year of full-time employment at North Idaho College.
- Step advancements are not guaranteed and must be approved by the North Idaho College Board of Trustees during the fiscal year budgeting process.
- The Board of Trustees may also make cost-of-living adjustments to the salary schedules during the fiscal year budgeting process.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

SALARY OVERPAYMENT RECOVERY

- When the Employer has determined that an employee has been overpaid wages, the Employer will provide written notice to the employee that will include the following items:
 - The amount of the overpayment;
 - The basis for the claim; and
 - The rights of the employee under the terms of this Agreement.

METHOD OF PAYBACK

- The employee must choose one (1) of the following options for paying back the overpayment:
 - Voluntary wage deduction;
 - Cash; or
 - Check.
- The employee may have the option to repay the overpayment over a period of time depending on the amount of the overpayment. The employee and the Employer will agree to the amount and timeline for the repayment arrangement.
- If the employee fails to choose one (1) of the three (3) options described above, the institution will deduct the overpayment owed from the employee's wages in the next pay period not to exceed the cost of mandatory deductions or the employee's cost for insurances.
- Any overpayment amount still outstanding at separation of employment will be deducted from the earnings of the final pay period.
- The Employer agrees not to add interest to the overpayment amount.

PRE-TAX RETIREMENT CONTRIBUTIONS

- Benefit-eligible employees are mandated by the State of Idaho to participate in the Public Employee Retirement System of Idaho (PERSI) or the Optional Retirement Plan (ORP) depending on the employee's classification.
- The Employer agrees to withhold retirement contributions on a pre-tax basis as permitted by federal tax law or regulation.

PRE-TAX HEALTH CARE PREMIUMS

- The Employer agrees to provide eligible employees with the option to pay for the employee portion of health premiums on a pre-tax basis as permitted by federal tax law or regulation.

FLEXIBLE SPENDING ACCOUNT (FSA) REDUCTION PLAN

- The Employer agrees to continue to allow eligible employees, covered by the Agreement, to participate in a medical expense reimbursement program to cover co-payments, deductibles and other medical expenses, if employees have such costs, or expenses for services not covered by insurance on a pre-tax basis as permitted by federal tax law or regulation.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

DEPENDENT CARE SALARY REDUCTION PLAN

- The Employer agrees to maintain the current dependent care salary reduction plan that allows eligible employees, covered by this Agreement, the option to participate in a dependent care reimbursement program for work-related dependent care expenses on a pre-tax basis as permitted by federal tax law or regulation.

SECTION 2.2 – COMPLAINTS AND GRIEVANCES

EMPLOYEE COMPLAINTS AND GRIEVANCES

- Employees are encouraged to refer to the grievance policy and procedure 3.02.23 located at <http://www.nic.edu/websites/default.aspx?dpt=121&pagelid=.%20> The college encourages employees to attempt to resolve issues early and through direct conflict resolution approaches prior to initiating formal complaints.

STUDENT GRIEVANCES

- Appeals are requests for an exception to a college policy or procedure when extenuating circumstances have occurred. Please follow the links below for information and forms related to the following types of appeals:
- Tuition/Fee Refunds at <http://www.nic.edu/websites/default.aspx?dpt=12&pagelid=180>
- Admission and Academic Standards appeals at <http://www.nic.edu/websites/default.aspx?dpt=121&pagelid=.%20>
- Financial aid appeal at <http://www.nic.edu/websites/default.aspx?dpt=29&pagelid=4298>
- Parking citation appeal at <http://www.nic.edu/websites/default.aspx?dpt=113&pagelid=5934>

GENERAL COMPLAINT RESOLUTION

- The college takes seriously its obligation to respond to disputes, conflicts or complaints and to facilitate equitable and timely resolution to the degree possible. Issues should be brought to the attention of the Executive Director of Human Resources to identify resolution options available to students, staff and visitors to campus who have a general concern regarding a college employee(s). Contract violations must be addressed through the appropriate grievance process. Concerns regarding student conduct must be addressed through the student code of conduct.
- Additional information about conflict resolution is located in the North Idaho College Policy Manual under policy 3.02.23.01 at <http://www.nic.edu/websites/default.aspx?dpt=121&pagelid=.%20>

SECTION 2.3 – CONFLICT OF INTEREST AND ETHICS

North Idaho College is a governmental entity operating in accordance with Idaho state law. College employees are obligated to treat their positions as a public trust, using their official powers and duties and the resources of the college only to advance the public interest.

SECTION 2.4 – PENSION AND RETIREMENT

Retirement options listed below are also found here:

<https://mynic.nic.edu/sites/hr/benefits/Shared%20Documents/Forms/BenDocs.aspx>

EMPLOYEE BENEFITS (from employee handbook)

<https://mynic.nic.edu/sites/hr/benefits/Shared%20Documents/Forms/BenDocs.aspx>

RETIREMENT OPTIONS

- Tax Deferred Retirement Plans
 - PERSI: defined benefit plan
 - TIAA-CREF Optional Retirement Plan: defined contribution
 - Valic Optional Retirement Plan: defined contribution plan

*Employee and Employer contributions to applicable retirement plans are mandatory for benefit eligible employees. Employment classification will determine whether employees must contribute to the PERSI or ORP plans.

- Supplemental Retirement and Deferred Compensation Plan
 - Supplemental Retirement Plan: In addition to regular mandatory retirement, employees can voluntarily participate in a 403(b) plan and set their income in pre-tax elective deferral, 457(b) plan and set their income in pre-tax elective deferral, or an after-tax (Roth) elective deferral. Agreements and amounts can be changed at any time.
 - Employees are able to participate in one or both supplemental 403(b) plans and a 457(b) deferred compensation plan. Contributions are subject to limits as outlined in federal tax law or regulation.
 - Contributions to a 403(b) or 457(b) plan are funded solely by the employee.

SECTION 2.5 – TIME DISTRIBUTION

North Idaho 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.

Time and effort tracking will be utilized through North Idaho College's time entry and approval system. Employees 100% grant funded will not be required to provide additional time and effort documentation. Employees dedicating less than 100% of their time on grant activities will provide additional time and effort documentation to the grant accountant to ensure that time is charged to the grant based on actual work performed for grant activities.

Grant funds will not be used to supplant time and effort for other non-grant activities.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

SECTION 3 – BUDGET PROCEDURES

The primary purpose of North Idaho College's ICE Healthcare Partnership grant budget procedures are to provide ease in tracking North Idaho College's expenditures of funds granted from the U.S. DOL as well as ensure funds are utilized for activities that are allowable, reasonable, and allocable.

SECTION 3.1 – PURCHASING CARD RECONCILIATION PROCEDURES

North Idaho College is currently in the process of establishing a Purchasing Card system. This section will be update when cards are available and procedures have been established.

SECTION 3.2 – REIMBURSEMENT PROCEDURES

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

- Send this report in Excel format and a PDF copy of Request for Reimbursement with signatures and scanned back-up to nancy.king@nic.edu and jessica.grantham@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.

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.
- Each October North Idaho College will provide a new workbook for each Institution.

SECTION 3.3 – PURCHASING AND CONTRACTING PROCEDURES

Purchasing supports North Idaho College's educational mission and administrative needs in accordance with the College's policies and procedures by assisting faculty and staff in obtaining timely, high quality products and services at

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium North Idaho College, Lead Policies and Procedures Manual

low prices, utilizing good business practices and professional ethics. Purchasing provides the College with effective and responsive life cycle procurement practices. North Idaho College Purchasing Guidelines are included in the Administrative Services Operational Guidelines available at <http://www.nic.edu/websites/default.aspx?dpt=107&pagelid=2579>.

- North Idaho College purchasing is under the direction of Vice President for Finance and Business Affairs. The Business Office is responsible for the preparation and enforcement of North Idaho College purchasing guidelines for goods and services.
- No contract for the purchase of goods or services shall be made without proper supervisory or administrative approval. The Vice President for Finance and Business Affairs may delegate authority to an NIC employee to purchase specific types and classes of goods with prior written request and authorization by the department supervisor. This authorization shall specify what may be purchased by the employee and the duration of the purchasing authorization.
- Grant funded programs are required to follow NIC policies and procedures unless otherwise stipulated by the grant award. Generally, NIC guidelines are more conservative and should be adhered to unless the grant has a more conservative method.

SECTION 3.4 – TRAVEL AND MEAL PROCEDURES

North Idaho College has policies and procedures regarding Travel which the project staff will uphold. The policy is located at the following URL: <http://www.nic.edu/websites/default.aspx?dpt=107&pagelid=2579>

The U.S. DOL TAACCCT ICE Healthcare Partnership agreement supports travel expenses for some staff. The purpose of this Travel Procedure is not only to ensure that all travel funded by the project is properly accounted for, but also to ensure compliance with U.S. DOL guidelines for these activities.

Travel Guidelines found at the above URL include information regarding:

- Travel Authorization Procedures
- Travel Reservation Procedures for Airfare, Hotel, Rental Car. Conference Registration and Personal Vehicle or College Vehicle use.
- Travel Advances, when applicable
- After Travel Recap Procedures
- Per diem rates
- Mileage rate
- Approved travel agency list
- International travel risk guidelines.

TRAVEL AUTHORIZATION

- The Travel Authorization Form is available on the NIC Portal.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- Fill out the information on the traveler and trip prior to any travel charges incurred or reimbursed.
- Trip Information
 - Provide departure date, date of return, destination and purpose of travel.
 - Estimate of Cost:
 - College Auto or Personal Auto
 - Refer to Vehicle Use Guidelines available at:
<http://www.nic.edu/websites/default.aspx?dpt=107&pagelid=2617>
 - Airplane
 - Hotel
 - Food
 - Parking/Shuttle
 - Registration Fee
 - Miscellaneous
- Traveler must sign and submit Travel Authorization to Supervisor or Division Chair for review and approval. The original Travel Authorization must be returned to the North Idaho College Business Office. The traveler and/or department should retain a copy of the authorization.

AFTER TRAVEL RECAP

- Within two weeks of the completion of travel, the After Travel Recap form is completed and submitted to the Business Office. The form is available on the NIC Portal.
- Original Receipts are required for anything other than per diem charges.
- An original, detailed receipt for the hotel is always required, even if it was prepaid or direct billed.
- Food charges must be itemized if per diem is not used.
- Exceeding Authorized Expenditures: If your total travel expenses exceeded your total cost authorized, or there were any unanticipated expenses, your After Travel Recap must be reviewed and signed by your supervisor to authorize the exception.
- Tipping for bellhops and bags are allowed up to a maximum of \$2.00 per tip.
- Personal Expenses: If travel expenses were affected by a personal side trip, the traveler should provide documentation showing how much airfare, hotel and other expenses would have been without the side trip. If you traveled with a non-employee (i.e. family member) be sure to claim only the single room rate for lodging. Note adjustment on your receipt.
- Timing of Reimbursement: Reimbursement of employee paid expenses will be processed within 7 business days of receipt of your After Travel Recap and original receipts by the Business Office. If any portion of your claim cannot be paid or requires additional information, you will be notified via email.

SECTION 3.5 – LEAVES AND ABSENCES

Lead staff will follow all college procedures when reporting and taking any absence or leave.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

LEAVES AND ABSENCES

- Absences - Employees must notify their supervisors when they will be absent from campus during their regular work day. Unanticipated absences must be reported in accordance with department policy. All exempt and nonexempt staff record their absences and leave through the online time entry system.
- Bereavement Leave - Employees are entitled to bereavement leave for the death of a family member or member of the employee's immediate household. See policy 3.04.01.01 for details.
- Civil Duty Leave - Leave of absence with pay is granted to an employee who has been called to jury duty, to witness at a trial, or to fulfill some other subpoenaed civil duty. See policy 3.04.04 for details.
- Domestic Violence Leave - In accordance with the Domestic Violence Leave Act (RCW 49.76), leave without pay, including intermittent leave will be granted to an employee who is a victim of domestic violence, sexual assault or stalking. Family members of a victim of domestic violence, sexual assault or stalking will be granted leave without pay to help the victim obtain treatment or seek help. Family member for the purpose of domestic violence leave includes child, spouse, parent, parent-in-law, grandparent or a person the employee is dating. Human Resources may require verification from the employee requesting leave.
- Family and Medical Leave - Employees are eligible for parental leave and medical leave in accordance with the terms of the Family and Medical Leave Act (FMLA). Employees may use sick leave or annual leave during a FMLA leave, in accordance with the terms of usage. Human Resources is responsible for determining eligibility for FMLA leave. Employees who have exhausted their FMLA leave may request additional parental and/or medical leave. Employees who are granted additional parental and/or medical leave will be allowed to use appropriate paid leave balances to maintain benefits for the duration of the approved leave. Contact Human Resources for eligibility requirements.

HOLIDAYS

North Idaho College's annual calendar observes the following holidays:

- New Year's Day
- Martin Luther King, Jr.
- Presidents' Day
- Memorial Day
- Independence Day
- Labor Day
- Day before Thanksgiving
- Thanksgiving Day
- Day after Thanksgiving
- Christmas Day
- Day after Christmas through New Year's Eve

INCLEMENT WEATHER ABSENCE

Because closing campus seriously disrupts programs and services for our students, North Idaho College makes every effort to remain open despite bad weather or other unforeseen circumstances such as earthquakes, fires or power

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

outages. Closure decisions are based primarily on current conditions on the campus and the roads leading to it. Campus closures may occur when:

- Current local weather conditions severely restrict travel to and from campus
- Campus roadways, parking lots, walkways and buildings cannot be maintained for public safety. The College President, the Vice President of Finance and Business Affairs, and the Facilities Operations management team are all involved in making a decision to close campus. Notification of a campus closure will be communicated to students, employees, and the public.
- Employees absent from work due to a campus closure can report the absence as college closure through the online time entry system. Exempt (salaried) employees do not need to report the college closure. To determine whether the college is closed due to inclement weather, employees can check the NIC website at <http://www.nic.edu/>, listen to the local radio stations, call the Snow Closure Line at 1-800-254-4526, or the main campus line at (208) 769-3300. In addition, employees may receive alerts from the e Cardinal Contact System updating personal contact information on the MyNIC portal.

LEAVE WITHOUT PAY

Requests for leave of absence without pay must be submitted in writing and approved in accordance with policy 3.04.06.

MILITARY LEAVE

Employees who are called to active duty or active training duty in any of the organized reserve or armed forces of the United States are eligible for paid leave in accordance with state law. For additional information or if you are called into long term active service see policy and procedure 3.04.05 or contact Human Resources.

MILITARY FAMILY LEAVE

In accordance with the Military Family Leave Act (RCW 49.77), leave without pay will be granted to an employee whose spouse is on leave from deployment or before and up to deployment, during a period of military conflict. Use of leave without pay, annual leave, sick leave and all or part of a personal holiday is limited to a combined maximum of fifteen (15) working days per deployment. Employees must provide Human Resources with five (5) working days' notice after receipt of official notice that the employee's spouse will be on leave or of an impending call to active duty. Contact Human Resources for more details.

SICK LEAVE

All full-time benefit eligible employees accrue sick leave at rates determined by their employee status.

VACATION

Exempt and nonexempt staff accrue annual leave at rates determined by their employee status. An employee may not take vacation that he/she has not yet accrued. A vacation balance up to 240 hours may be carried over each college fiscal

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

year. Use of vacation requires prior approval from the appropriate supervisor. Vacation leave balances are reported on payroll checks, advices, or online through the MyNIC employee portal. For further information, contact Human Resources.

WORKER'S COMPENSATION LEAVE

An employee who suffers a work-related injury or illness that is eligible under the state Worker's Compensation Law shall refer to policy 3.02.18. For further information, contact Human Resources.

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.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- 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

COLLECTING PAST DUE RECEIVABLES

NIC will follow up promptly on past due receivables in a manner that is cost-effective for the overall collection program. Collection procedures vary depending on the type of receivable. Debts may be assigned to a collection agency with the approval of the Controller.

- The accounts receivable staff will use the following processes for collection of past due receivables, based on the type of receivable.
 - For miscellaneous and third party student receivables:

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- Past due notices are issued throughout the school semester
- Student's accounts will be put on hold after the posting of mid-term exams.
- Unpaid balances at the end of the semester are issued a final notice. Include statement that "unpaid balances may be subject to collections including additional collection and legal fees, if not paid within 30 days".
- Notify originating department of account status, if applicable.
- For non-sufficient funds (NSF) tuition receivables, as soon as NSF check is received:
 - Issue invoice including:
 - Statement that student will be withdrawn from classes if tuition is not paid within 10 days.
 - Returned check fee.
 - Instructions for providing payment.
- For miscellaneous and continuing education receivables, notify originating department of account status, if applicable.
- Forward appropriate past due accounts to collection agency.
- Produce a report of non-student debtors that have been forwarded to collections, when this does not conflict with federal and state laws. This report is to be made available to appropriate NIC departments.
- Document all collection efforts and retain documentation for a period established under the NIC records retention schedule.

ESTIMATING AND WRITING OFF UNCOLLECTIBLE ACCOUNTS

NIC will use the allowance method of accounting for uncollectible receivables. At least annually, estimates of total uncollectible receivables will be made and recorded in the accounting records. After management review of uncollectible receivables, the receivables will be written off promptly against the appropriate allowance account.

- The accounts receivable staff will:
 - On at least an annual basis, estimate the total uncollectible receivables.
 - Prepare aging receivables report.
 - Review account balances according to the length of time they have been outstanding.
 - Estimate the relative uncollectibility of the aged accounts by category, based on experience.
 - Total the estimated uncollectible amounts in each category to determine the total allowance.
 - Submit the estimate to the controller for review and approval.
 - Upon approval by the controller, establish the allowance for doubtful accounts by means of journal voucher entry.
 - Review accounts on a regular basis to determine if further collection efforts are warranted or if accounts should be written off. Accounts subject to write-off must meet the following criteria:
 - Costs exceed benefits of further collection procedures
 - Bankruptcies
 - Corporations with no assets
 - Unable to locate debtor
 - Statute of limitations
 - Hardship
 - Negotiated compromises

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- Collection remedies exhausted
- Notify originating departments of accounts prepared for write-off. Notification should include a date by which the departments should respond to the accounts receivable staff with information or corrections.
- Forward accounts recommended for write-off to the controller for review.
- Upon approval by the controller and vice president of finance and business affairs, record approved write-offs through journal voucher entry.
- If write-off is for student debt, verify hold status on student's record.
- Provide a report of accounts written off to the originating departments.
- The controller will:
 - Review the estimated uncollectible receivables for accuracy and appropriateness.
 - Correct as needed and return to accounts receivable staff.
 - Review and approve accounts to be written off and return to the accounts receivable staff. Approval of accounts to be written off must be evidenced by the signature of the controller and the vice president of finance and business affairs.
 - If request is denied, return to the accounts receivable staff.

SECTION 3.8 – FIXED ASSETS

Asset Management Guidelines can be found at <http://www.nic.edu/websites/default.aspx?dpt=107&pageId=2579>

INVENTORY PROCEDURES

- The physical assets of North Idaho College are to be acquired, used and accounted for in a manner consistent with the laws of the State of Idaho. The College values the buildings and grounds at original cost plus adjustments for additions and improvements. An annual survey of asset inventory is completed prior to May 1st each year.
- Grant funded programs are required to follow NIC policies and procedures unless otherwise stipulated by the grant award. Generally, NIC guidelines are more conservative and should be adhered to unless the grant has a more conservative method.
- North Idaho College uses the Colleague computer module for keeping track of qualifying equipment or furniture purchases. The inventory is separated by departmental responsibility. Equipment or furniture is placed on the inventory listing if its value is greater than \$500.00, per unit, and the useful life is greater than one year.
- An annual listing of inventory is sent to each department, for verification on April 1st with a due date of April 30th. This due date is extremely important as it allows the Business Office to complete the inventory survey process for the annual audit in a timely manner. Failure to meet this deadline will result in immediate notification of the Controller, the Vice President for Finance and Business Affairs, the supervising Vice President and the College President.
- Additions to inventory should be submitted when the inventory arrives on campus. The Equipment Additions Form and the Furniture Additions Form can be found on the College Portal in the Documents tab under Budgets and Purchasing. Budget object code "7810" is for equipment purchase, and budget object code "7900" is for furniture purchases. These codes should not be used for any items not meeting the asset inventory threshold of \$500.00 or greater for a single unit item.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

- Inventory must also be tracked using the Fixed Asset Change Form also found on the College Portal in the documents tab under Budgets and Purchasing. This form should be utilized for transfers or disposals of inventory. Please supply the serial number, when available, for the asset being transferred.
- The above forms should be reviewed and signed by the department head. Any questions concerning the use of the forms should be directed to the Business Office. Some departments may wish to keep a more detailed record of inventory. This can be done internally by the department, but is not considered part of the official inventory of the college.

SECTION 3.9 – PETTY CASH

North Idaho College permits certain departments to maintain a petty cash fund, as described by North Idaho College Petty Cash Guidelines. All departments maintaining a petty cash fund are required to abide by the College's Cash Handling Administrative Guidelines.

North Idaho College Petty Cash Guidelines and Cash Handling Guidelines are included in the Administrative Services Operational Guidelines available at <http://www.nic.edu/websites/default.aspx?dpt=107&pageId=2579>.

SECTION 3.10 – CASH MANAGEMENT POLICY

The ICE Healthcare Partnership uses a reimbursement method for drawing down grant funds. Budget status reports are used to calculate drawdown amounts based on accrued expenses. Cash on hand is not allowed.

SECTION 3.11 – PROGRAM INCOME

North Idaho 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

North Idaho College does not have a severance pay policy however the College reserves the right to disburse severance pay as deemed necessary.

SECTION 3.13 – A-133 SINGLE AUDIT REPORTS

The Single Audit Report can be found at: <http://www.nic.edu/about/annualFinancialReport.pdf>

The Single Audit Report is an entity audit of North Idaho College that includes both the financial statements and the expenditures of federal awards by all state agencies, including institutions of higher education.

- What's in the Single Audit Report?

The report is presented in three sections:

- Introductory section – includes background information and the scope of the audit.
- Financial section – includes the independent auditor's report, management's discussion and analysis, basic financial statements, notes to the financial statements, and required supplementary information.
- Single audit section – includes independent auditor's reports on internal control and compliance as well as findings and questioned costs relating to financial statements and federal financial assistance programs. Also included is the schedule of expenditures of federal awards and notes to the schedule, supplemental information on pass-through funds and loan activity and balances, corrective actions plans, and summary schedule of prior audit findings.

- Who conducts the audit?

The audit is conducted by an independent audit firm pursuant to provisions of the federal Office of Management and Budget's [Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations](#).

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.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

North Idaho College has a negotiated Indirect Cost Rate agreement that identifies how to apply indirect costs among different programs. The Business Office is responsible for the allocation of indirect costs to different programs. At a minimum of quarterly, the North Idaho College Business Office 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.

- Basic Considerations
 - 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).
 - 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.
 - 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.
- Unallowable activities/costs include:
 - 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).
 - Grant funds to supplant other funding sources they are currently using to fund existing activities.
 - The purchase of any food or equipment.
 - 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 North Idaho College Business Office will monitor financial activity on a minimum of quarterly to ensure that spending is in alignment with the DOL approved budget.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- 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.
- 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. North Idaho 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 Business Office 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 Business Office. Any donations to the grant program must be run through the NIC Foundation as required by NIC policy 7.03.

SECTION 4 – DATA MANAGEMENT AND SECURITY PROCEDURES

North Idaho College staff must maintain student data and employee sensitive data in a method consistent with North Idaho College policy 3.11 and the Family Educational Rights and Privacy Act (FERPA).

- North Idaho College employees and Consortia Partner 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.

SECTION 4.1 – RECORDS RETENTION

North Idaho 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.

- Document Management
 - Use track changes when editing shared documents.
 - After revisions, save as next consecutive version and notify other stakeholders that it is ready for review.
- Data Storage
 - Documents will be stored on ICE SharePoint site under an appropriate file folder.
- The ICE Consortium has committed each college to storing records until October 1, 2021.
- The Idaho State Higher Education Records Retention Schedule can be found at http://history.idaho.gov/sites/default/files/uploads/Education_Higher_Ed_Records_Book_0.pdf.
 - For grants issued by the federal government, colleges are required to adhere to the following retention schedule(s)
 - Until termination of the grant
 - Resolution of litigation/audits; or
 - Satisfaction of retention period stated in grant, whichever is longest

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

RECORDS STORAGE AND DISPOSAL

These procedures establish standards for North Idaho College to manage records according to the provisions of the Public Records Act and all other state and federal statutes and regulations which govern records keeping practices. These include the systematic identification and disposal of obsolete records; removal of non-current records from active office storage; protection and security backup of records essential to the college's authority and operations; disaster preparedness; insurance of records systems integrity and accessibility; and effective compliance with public disclosure requirements.

PROCEDURES

All offices, departments and divisions of the college will ensure that:

- Only active records are stored in valuable office space.
- Non-current records are regularly shifted to the records storage center.
- Historically valuable records are preserved.
- Records are destroyed at the end of the retention period specified on the retention schedule.
- Records essential to college authority and operations are adequately protected from damage and loss.
- The college will be prepared to recover or replace records damaged by fire, flood or other disaster.
- All information systems, including hard copy, microfilm, and electronic, shall preserve the integrity and accessibility of the public records they hold for the duration of the established retention periods.
- Records will be made accessible for public inspection and their security will be maintained according to the provisions of the Public Disclosure Act.

STUDENT DATA POLICY

Family Education Rights and Privacy Act: Disclosure of Student Information

North Idaho College implements policy contained in this chapter in compliance with Public Law 93-380, the [Family Educational Rights and Privacy Act of 1974](#) ("FERPA"). This law establishes that the education records of students attending or having attended the college are confidential and can be released only with written permission of the student. The Family Educational Rights and Privacy Act also authorizes the college to release so-called "directory information" without that prior written permission.

The college has adopted procedures to implement the Family Educational Rights and Privacy Act. Questions pertaining to the procedures and their implementation should be directed to the vice president of student services.

DEFINITIONS

- **Directory Information:** Those data items that are generally not considered harmful or an invasion of privacy if publicly available. This information cannot be released if student has a "no release" on his or her record. Each institution establishes what is considered to be directory information. Common examples may include: name, address, email address, telephone number, academic program of study, dates of attendance, date of birth, most recent educational institution attended, and degrees and awards received

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

- Education Records: Any record (in handwriting, print, tapes, film, computer, e-mail, or other medium) maintained by North Idaho College or an agent of the college which is directly related to a student, except:
 - A personal record kept by a staff member if it is kept in the sole possession of the maker of the record and is not accessible or revealed to any other person except a temporary substitute for the maker of the record.
 - Records created and maintained by public safety for law enforcement purposes.
 - An employment record of an individual whose employment is not contingent on the fact that he or she is a student (work-study employment is NOT an exception), provided that the record is used only in relation to the individual's employment.
 - Records made or maintained by the counseling center, if the records are used only for treatment of a student and are made available only to those persons providing the treatment.
 - Alumni records which only contain information about a student after he or she is no longer in attendance at the college and which information does not relate to the person as a student.
- Student – any person who attends or has attended North Idaho College.

SECTION 4.2 – PARTICIPANT DATA TRACKING PROCEDURES

North Idaho College's 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 Data Collection Tool found on ICE-HP 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 Senior Administrative Assistant/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:
 - 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)

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- 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)
- Students are asked for their informed consent to release their Social Security Number to regional Idaho Department of Labor in order to retrieve aggregate employment and wage data, as well as consent to sharing their data with participating program partners. Further information is shared about follow-up surveys that students can voluntarily participate in or decline. A signature is required to validate the student's consent.

Student Success Navigators 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:
 - EUID (used to de-identify participant) (x.4)
 - 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 1st Qtr after Exit (b.8)
 - Those Employed in BOTH 2nd and 3rd 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 encrypt the data collection tool to maintain the privacy and security of unique and identifiable participant information and send to the Senior Administrative Assistant/Data Analyst on a quarterly basis.

PARTICIPANT FILES

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

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- ICE Intake Form
- TAA and Pell grant eligibility supporting documentation
- Individual Service Plan/Case Notes
- Program Application

Student Success Navigators will send physical copies of ICE Intake Forms to the Senior Administrative Assistant/Data Analyst at North Idaho College after Consortium College's drop deadline.

Senior Administrative Assistant/Data Analyst, on a quarterly 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:

- Unique Participants Served/Enrollees (b.1)
- Total Number of Participants Who Have completed a grant funded Program of Study (b.2)
- Total Number of Grant-Funded Program of Study Completers Who Are Incumbent Workers (b.2a)
- Total Number Still Retained in Their Programs of Study (or Other Grant-Funded Programs) (b.3)
- Total Number Retained in Other Education Program(s) (b.4)
- Total Number of Credit Hours Completed (aggregate across all enrollees) (b.5)
- Total Number of Students Completing Credit Hours (b.5a)
- Total Number of Earned Credentials (aggregate across all enrollees) (b.6)
- Total Number of Students Earning Certificates - Less Than One Year (aggregate across all enrollees) (b.6a)
- Total Number of Students Earning Certificates - More Than One Year (aggregate across all enrollees) (b.6b)
- Total Number of Students Earning Degrees (aggregate across all enrollees) (b.6c)
- Total Number Pursuing Further Education After Program of Study Completion (b.7)
- 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)

Senior Administrative Assistant/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)

Senior Administrative Assistant/Data Analyst, on a quarterly basis, will send the following data from the Individual Service Plans to the Project Director. After de-identifying the student information the Senior Administrative Assistant/Data Analyst will send to Third Party Evaluator.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- 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

Senior Administrative Assistant/Data Analyst, on an annual basis, will compile a report of graduated and currently enrolled participant information, specifically name and Social Security Number, based on the amount of students who consented to this reporting. The Senior Administrative Assistant/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)

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

Idaho Center of Excellence Healthcare Partnership

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

PARTICIPANT INTAKE FORM

SUBMIT FORM

TODAY'S DATE:		NAVIGATOR:	
STUDENT INFORMATION			
LAST NAME: <small>X.2A</small>		FIRST: <small>X.2B</small>	MIDDLE: <small>X.2C</small>
GENDER: <small>C.1A8</small>		BIRTH DATE: <small>X.3</small>	AGE: <small>C.6</small>
STUDENT ID:			
STREET ADDRESS:		CITY:	STATE:
CONTACT PHONE #:		ZIP:	
EMAIL ADDRESS:			
RACE: <small>C.2B-G</small> <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 <input type="checkbox"/> More Than One Race		DO YOU CONSIDER YOURSELF HISPANIC OR LATINO? <small>C.2A</small> <input type="checkbox"/> Yes <input type="checkbox"/> No	
		AUTHORIZED TO WORK IN U.S? <small>X.11</small> <input type="checkbox"/> Yes, U.S Citizen <input type="checkbox"/> Yes, Permanent Resident/Non-resident Work Visa <input type="checkbox"/> No	
MILITARY/DISABILITY/EMPLOYMENT/SCHOOL INFORMATION			
DISABILITY INFORMATION		TAA INFORMATION	
ARE YOU DISABLED? <small>C.7</small> <input type="checkbox"/> Yes <input type="checkbox"/> No	HAVE YOU BEEN IN CONTACT WITH DISABILITY SUPPORT SERVICES? <input type="checkbox"/> Yes <input type="checkbox"/> No	ARE YOU ELIGIBLE FOR TAA BENEFITS? <small>C.9</small> <input type="checkbox"/> Yes <input type="checkbox"/> No	
EMPLOYMENT INFORMATION			
ARE YOU CURRENTLY EMPLOYED? <small>C.4</small> <input type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, WHO IS YOUR EMPLOYER?		
IF NO, DO YOU RECEIVE UNEMPLOYMENT BENEFITS? <input type="checkbox"/> Yes <input type="checkbox"/> No	WHAT IS YOUR OCCUPATION?		
	WHAT IS YOUR CURRENT MONTHLY INCOME? \$		
MILITARY INFORMATION <small>C.5</small>			
ARE YOU A US MILITARY VETERAN? <input type="checkbox"/> Yes <input type="checkbox"/> No	BRANCH OF MILITARY SERVICE:	FROM (DATES):	TO (DATES):
CHARACTER OF DISCHARGE? <input type="checkbox"/> HONORABLE <input type="checkbox"/> DISHONORABLE <input type="checkbox"/> OTHER THAN DISHONORABLE			
HAVE YOU SERVED AT LEAST ONE-DAY OF ACTIVE DUTY? <input type="checkbox"/> Yes <input type="checkbox"/> No	ARE YOU AN ELIGIBLE SPOUSE? <input type="checkbox"/> Yes <input type="checkbox"/> No		
SCHOOL INFORMATION			
COLLEGE ATTENDING: <input type="checkbox"/> NIC <input type="checkbox"/> ISU <input type="checkbox"/> LCSC/WORKFORCE TRAINING			
<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)			
WHAT IS YOUR MAJOR?		IF UNDECIDED, WHAT MAJORS ARE YOU CONSIDERING?	
WHAT IS YOUR EDUCATIONAL GOAL? <small>X.7</small>		<input type="checkbox"/> NON-CREDIT CERTIFICATE <input type="checkbox"/> CREDIT LESS THAN 1 YEAR CERTIFICATE <input type="checkbox"/> DEGREE	

If the training/education program you are applying for did not exist, what is your best guess about what you would have done?

☐ I would have not pursued any training/education

☐ I would have enrolled in a similar program of study offered at this college. Which program?

☐ I would have enrolled in a similar program of study offered at another college. Which college?

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium

North Idaho College, Lead

Policies and Procedures Manual

TRADE ADJUSTMENT ASSISTANCE (TAA) ELIGIBLE:

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 www.doleta.gov/tradeact.

ELIGIBLE VETERAN / SPOUSE OF ELIGIBLE VETERAN (DEPARTMENT OF LABOR):

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.

PELL GRANT ELIGIBLE:

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. <http://www2.ed.gov/programs/fpgl/eligibility.html>

PERSONS WITH A DISABILITY:

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.)

FOR ELIGIBILITY PURPOSES: Authorization for Release of Information:

☐ I HEREBY authorize release of the following information unless the release or provision of such information is otherwise prohibited by law or regulation:

This authorization is valid for a period of forty eight (48) months from this date or until the close-out of TAACCCT grant #TC-26479-14-60-A-16 whichever is sooner. This authorization is valid for the purpose of obtaining information for program performance reporting and participant follow-up activities related to post-exit employment and earnings, to include wage record information, and for the purpose of obtaining educational information relating to vocational certification for a period not to exceed eighteen (18) months from the date of exit from programs and services.

Under the Federal Educational Rights and Privacy Act (FERPA), the College is required to maintain the confidentiality of personally identifiable information contained in educational records and cannot release this information to third parties without consent from the student. This program is funded by various governmental entities. In order to administer the program and to meet government grant requirements, the College will need to release confidential information contained in this application, together with information from college records and state records to the College's program partners, which include the Idaho Department of Labor, the Washington State Employment Security Department, the Department of Labor/Trade Adjustment Assistance Program, and Social Policy Research Associates (SPRA), the external evaluator contracted by NIC to conduct a federally-required evaluation of the grant program. Your participation in the survey will be completely voluntary and your responses will be confidential.

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.

ATTESTATION: I certify that the information provided is true to the best of my knowledge and there is no intent to commit fraud. I am aware that the information I have provided is subject to review and verification, and that I may be required to document its accuracy.

STUDENT SIGNATURE:

SIGNATURE DATE

OFFICE USE ONLY			
ICE INTAKE DATE: X.5	STUDENT ID #: X.1		DECLARED MAJOR: X.6
STUDENT STATUS: C.3AB	<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 STUDENT		EDUID #: X.4
PELL GRANT ELIGIBLE: C.8	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NO NON-CREDIT STUDENT		CREDIT ACCEPTED FOR PRIOR LEARNING: <input type="checkbox"/> YES <input type="checkbox"/> NO CREDITS

PROGRAM OF STUDY:

SUBMIT FORM

This project was funded \$5,438,050 (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-line and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability or ownership.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

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:

- Consortium Communication consisting of:
 - Emails sent to all Consortium to be sent to Dean and Project Director for review/comment before being sent. Subject line to include “ACTION REQUIRED” if needed.
 - 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.
 - Monthly Video Conferences with ICE Project Team.
 - Yearly on-site support visits by the Dean, Project Director, Senior Administrative Assistant/Data Analyst, and Fiscal Compliance Manager to each Consortia Partner.
 - North Idaho College will maintaining a collaborative SharePoint site to be used Consortium members to share:
 - News
 - A Consortium wide calendar with report deadlines and project activities
 - Documents and files, non-sensitive in nature
- U.S. DoL Attribution
 - To be attached on all printed materials with the text reading:
 - “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.”
 - To be attached on email signatures, etc. with the text reading:
 - “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).”
- Equal Opportunity and Disabilities statements
 - To be attached on all printed materials with the text reading:
 - “North Idaho College is an Equal Opportunity institution”
 - “Auxiliary aids and services are available upon request to individuals with disabilities”
- Incident Reporting

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- North Idaho 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.
- 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 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.

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

- Memorandum of Understanding
 - 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".
- On-site Support Visit Resolution
 - Resolution of On-site Support Visits from North Idaho College Lead to Consortia Institutions:
 - Schedule agreeable time to meet.
 - Participants of meeting to include, when available, Dean, Project Director, Senior Administrative Assistant/Data Analyst, and Fiscal Compliance Manager.
 - Lead and Consortia Partner agree to provide any documents in advance of meeting for review.
 - Lead agrees to provide feedback to Consortia Institution within 10 business days.
 - 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 Senior Administrative Assistant/Data Analyst.
 - 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.
 - Consortia Institutions will identify and evaluate findings, along with providing a strategic and realistic timeline for resolution.
 - Regular check-ins with remediation and action points, as well demonstration/documentation of progress towards resolution.
 - Communication of findings and remediation plan to FPO will be shared as appropriate.
 - Re-evaluation of timeline due to extenuating circumstances may be necessary.
 - Outcomes detailed in Quarterly Narrative reports to U.S. DOL.
 - Resolution of Monitoring Visits from U.S. DOL to North Idaho College Lead:
 - 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.
 - Staff effort is assigned to finding resolution and Monitoring Response Plan as necessary.
 - Resolution of outstanding findings will ascend to the highest priority for early completion.
 - Consortium agrees to respond to U.S. DOL findings appropriately within a 60 or 90 day timeframe, whichever the U.S. DOL advises.

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- FPO, North Idaho College Leadership, and Consortium will be kept current with Monitoring Response Plan progress.
- 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

- 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:
 - 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 makes materials available through publicly accessible sites such as skillscommon.org

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium North Idaho College, Lead Policies and Procedures Manual

- 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 Navigators 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 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 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 ET 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 ET Coordinator will prepare, submit, and present all reports, updates, and information to the Project Director.

SECTION 9 – CONTINUOUS IMPROVEMENT AND EVALUATION

ICE Project Team:

- Established by month 6, to include:
 - Project Director
 - Senior Administrative Assistant/Data Analyst
 - Fiscal Compliance Manager
 - Consortium Deans
 - External Evaluator
 - Division Chairs
- Charge:

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:

 - Integrating program assessment, reflection and improvement
 - Extracting timely information regarding:

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

- learner experience
- performance
- progress
- comprehension
- instructor feedback
- Mining learning platform metrics
- Surveying students and faculty to provide context
- 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.
- Strategies:
 - 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 Team. Using proven, evidence-based design, the Senior Administrative Assistant/Data Analyst and Project Director will establish central data tools and procedures in alignment with DOL ETA reporting requirements and program continuous improvement expectations.
 - To successfully apply the lessons learned through data, a series of access points and procedures will ensure full transparency to all stakeholders.
 - The Project Director will lead the Consortium using a Data Review Plan that supports overarching goals of continuous improvement and innovation.
 - 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.
 - The Dean, Project Director and the Senior Administrative Assistant/Data Analyst will also collaborate actively with the third party evaluator to ensure their expertise contributes to the cycle of continuous improvement.
 - 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.
 - 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.
 - 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.
 - 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.
 - 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.
 - At the end of each course, Student Success Navigators will review assessment data to identify course elements in need of revision.
 - Next, Curriculum Development Specialists will revise learning activities to promote improved learning outcomes.

**U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual**

U.S. DOL TAACCCT ICE Healthcare Partnership Consortium
North Idaho College, Lead
Policies and Procedures Manual

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 immediate opportunity for improvement	-Consortium Operational Team review of all data measures against goals -Planning for next steps and improvement -Development and execution of mitigation strategies, if data indicates barriers to progress	-All project participants, including third party evaluation teams, will review results of Annual Outcome Measures reporting -Planning for next steps and improvement

- 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.