

# STAFF HANDBOOK

*Revised September 2019*

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**NOTE: If you are unable to access the web links listed in this handbook, please contact the Human Resources Office for paper copies of the material.**

# FOREWORD

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The purpose of this handbook is to provide information to you as a staff member at St. Olaf College. The handbook outlines the basic guidelines, procedures, and benefits that are now in effect at the College. You are urged to read this handbook carefully. If you have any questions or need further clarification of any material in the handbook, please consult your supervisor or the Human Resources Office.

Nothing in the handbook changes, or is intended to change, the basic premise that, absent a formal letter of appointment from the President or the President's designate specifying a definite term of appointment, an individual's employment with St. Olaf College is "At Will" and can be terminated at any time with or without cause at the option of either the College or the employee.

This handbook, which replaces all previous handbooks and other oral or written statements of employment policy, does not constitute, nor is it intended to serve as, an employment contract. The guidelines contained in the handbook may be withdrawn or changed at any time without prior notice. This handbook will be revised from time to time as changes occur in guidelines, procedures, and benefits.

## Online Access

The Human Resources Office has published the Staff Handbook on the College's website. Electronic distribution of the handbook allows you to more readily access current information/policies. It also provides an opportunity to save precious resources, in keeping with the College's mission of sustainability.

Employees can access and view the Staff Handbook through the Human Resources homepage and if necessary, print pages from the Staff Handbook online. Future revisions and changes will generally first be reflected online. A "hard copy" of the Staff Handbook will be maintained and available for reference in the Human Resources Office.

## HISTORY AND HERITAGE

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A group of pioneer pastors, farmers and businessmen in Rice, Dakota and Goodhue counties, under the leadership of the Rev. Bernt Julius Muus, the Rev. N.A. Quammen and Harald Thorson, laid the groundwork for the College's founding in 1874. The purpose of the school, then as now, was to offer a program of liberal studies to students preparing for careers in business, politics, the clergy and other professions.

In choosing a name for the institution, the founders responded to strong Norwegian national as well as religious symbolism; it grew out of a celebration in the Norwegian immigrant community of the splendor of the Nordic middle ages as a means of defining ethnic merits and identity. They named the school for Olav II Haraldsson (spelled Olaf in the 19th century), King of Norway from 1016 until 1030. His martyrdom on July 29, 1030, at the Battle of Stiklestad, close to Pastor Muus's own place of birth, made him Norway's patron saint and eternal king and secured a national monarchy and the position of the Christian church in that country.

St. Olaf's School was operated as an academy until 1886, when a college department was added. The name was changed to St. Olaf College in 1889. The first College class graduated in 1890. The academy was discontinued in 1917.

Affiliated with the Lutheran Church throughout its history, St. Olaf is a college of the Evangelical Lutheran Church in America. In 1900 the College department of the United Church Seminary was consolidated with St. Olaf, and in 1917 the College department of Red Wing Seminary was merged with St. Olaf.

Many influences have combined to make St. Olaf what it is today. Dedicated faculty members have contributed to its academic reputation. Originating in the Norwegian immigrant desire for higher learning, the College has made a significant contribution to American liberal arts education while maintaining an academic center with a strong program for the study of Scandinavian culture. The rich St. Olaf tradition in music has gained worldwide renown for the College through its choirs and instrumental organizations.

Since 1874 the College has had eleven presidents: the Rev. Thorbjorn N. Mohn, who was first the principal of St. Olaf's School and then the president of St. Olaf College until 1899; John N. Kildahl, 1899-1914; Lauritz A. Vigness, 1914-1918; Lars W. Boe, 1918-1942; Clemens M. Granskou, 1943-1963; Sidney A. Rand, 1963-1980; Harlan F. Foss, 1980-1985; Melvin D. George, 1985-1994; Mark U. Edwards, Jr., 1994-2000; and Christopher M. Thomforde, 2001-2006, David R. Anderson, 2006-present.

# MEMBERSHIPS AND AFFILIATIONS

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## Memberships

American Association of Colleges of Nursing Accrediting Commission  
American Council on Education  
Associated Colleges of the Midwest  
Association of American Colleges  
Lutheran Educational Council of North America  
Minnesota Association of Colleges of Nursing  
Minnesota Intercollegiate Athletic Conference  
Minnesota Private College Council  
National Association of Independent Colleges and Universities  
National Collegiate Athletic Association (NCAA), Division III  
Phi Beta Kappa

## National Accreditations

American Chemical Society  
Commission on Collegiate Nursing Education  
Council of Social Work Education  
National Association of Schools of Dance  
National Association of Schools of Music  
National Association of Schools of Theatre  
National Council for Accreditation of Teacher Education  
National League for Nursing Accrediting Commission  
North Central Association of Colleges and Secondary Schools

## National Honorary and Service Organizations

Alpha Kappa Delta (Sociology)  
Alpha Phi Omega  
Beta Beta Beta (Biology)  
Blue Key (Leadership)  
Epsilon Alpha Sigma (Asian Studies)  
Eta Sigma Phi (Classics)  
Omicron Delta Epsilon (Economics)  
Phi Alpha Theta (History)  
Phi Beta Kappa (Scholarship)  
Pi Delta Phi (French)  
Pi Kappa Delta (Forensics)  
Pi Kappa Lambda (Music)  
Pi Sigma Alpha (Political Science)  
Psi Chi (Psychology)  
Senior Women's Honor (Leadership)  
Sigma Kappa Tau  
Sigma Pi Sigma (Physics)  
Sigma Theta Tau (Nursing)  
Theta Alpha Kappa (Religion)  
Theta Alpha Phi (Theater)



# EMPLOYMENT INFORMATION

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## Fair Labor Standards Act (FLSA)

All employees are subject to the provisions of the Fair Labor Standards Act. This Act is primarily concerned with the payment of minimum wages and premium pay for overtime. The Fair Labor Standards Act establishes two categories of employees for pay and overtime purposes: those that are exempt from provisions of the FLSA and those that are non-exempt.

## Exempt Employees

The Fair Labor Standards Act classifies executive, professional, and certain administrative employees as exempt. Employers are not required to keep hourly records of exempt employees, and exempt employees do not receive overtime compensation. Exempt employees are salaried and paid on a monthly basis. *(In this handbook, exempt employees will be referred to as salaried employees and exempt employees.)*

## Non-Exempt Employees

Employers must keep hourly work records of non-exempt employees and compensate them for overtime (hours worked over 40 hours per week). Non-exempt College employees who are required to work overtime are compensated with pay at time-and-a-half for overtime hours worked. *(In this handbook, non-exempt employees will be referred to as hourly employees and non-exempt employees.)*

## Full-Time Equivalency (FTE)

Exempt (salaried) employees are paid to perform a set of responsibilities rather than by the hour. For benefit purposes, however, each exempt (salaried) employee is assigned an FTE. This designation determines eligibility for benefits and to a lesser degree, the level of benefits.

A non-exempt (hourly) employee's FTE is calculated by dividing the number of hours worked by 2,080, the standard hours of a full-time employee. A full-time employee is considered a 1.0 FTE. An employee who works 1,560 standard hours a year is considered a .75 FTE ( $1,560/2,080$ ).

## Job Postings

All regular job openings will be posted for a minimum of three business days; excluding the situation of a promotion within a department/division. Hiring managers have the prerogative to: accept only internal applicants through a specific date; accept internal and external applications simultaneously; or list on the posting that a preferred applicant has been identified.

The College strives to follow this guideline to the extent it is possible and practical to do so. There may be exceptions, however, due to the sometimes limited ability to anticipate unusual or difficult recruitment situations.

## **Background Checks**

St. Olaf College is committed to providing a safe and secure campus for its students, staff and faculty, and to protecting the material resources of the College. As part of our strategy to achieve this goal, the College conducts background checks on all new St. Olaf staff and faculty, on those employees who move to a substantially different position on campus, and students and volunteers in certain positions. Background checks are conducted to confirm the accuracy of the information received and to ensure that the College has taken reasonable care in selecting its new staff and faculty and in placing students and volunteers.

### **Policy and Procedures:**

As a condition of employment, background checks are conducted prior to new employees beginning their employment or before current employees begin a new position. Background information collected by St. Olaf may include a criminal background check, verification of educational credentials, employment history, social security number, credit report, and professional references. Employees who operate a College-owned vehicle and/or transport either people or materials for the College will also be subject to a motor vehicle and driving record check. The College reserves the right to make the sole determination concerning the significance of information received from these checks and any employment decisions arising from them.

### **Procedures:**

1. All employment postings will include the following statement: "To provide a safe and secure educational environment, St. Olaf College verifies the accuracy of all credentials presented by applicants and conducts a criminal background check on every new employee."
2. Before an offer is made, Human Resources or the Hiring Manager will confirm the candidate's previous employment and will contact professional references regarding the candidate's qualifications for the prospective position with St. Olaf.
3. The College will determine when, during the search process, to conduct a criminal background check. At this point applicants will be given a form providing information regarding the background check to be performed and will be asked to authorize the College to procure such a report. The applicant may request a copy of the background report that St. Olaf will receive.
4. The Office of Human Resources will coordinate the consent form process, assure that a timely request for information is made to a third party vendor or to law enforcement agencies, receive the initial results of the background check and, if applicable, coordinate a review of those results with the hiring manager or other advisors of the College.

5. The existence of a criminal conviction does not automatically disqualify an individual from employment. The nature and number of the convictions, the amount of time that has passed since the last date of offense, the last date of incarceration (if applicable), the relationship the conviction has to the duties and responsibilities of the position. The candidate's conduct and rehabilitation efforts since conviction may also be taken into account in the hiring decision.
6. If the background check reveals findings relevant to the position which might factor in a decision not to hire, Human Resources will send the candidate a Pre-Adverse Action Notice along with a copy of the report and a notice of the individual's rights under the FCRA (Fair Credit Reporting Act).
7. If the candidate believes the report provided to the College is inaccurate, the College will give the candidate a reasonable period of time to refute the disputed information with the vendor. If the candidate does not dispute the accuracy of the report or if the matter is not adequately resolved with the vendor in a timely manner, the candidate will be given a Final Adverse Action Notice and the hiring manager may proceed with the hiring process with a different candidate.
8. If the decision is made not to hire a candidate and the information obtained in the background information factored in any way in this decision, a Final Adverse Action Notice will be mailed, notifying the candidate of the decision and providing the candidate with an additional copy of the background report and notice of the individual's rights under FCRA.
9. All information received through a background check will be maintained by Human Resources in a confidential, secure file, separate from the applicant's file or, if hired, the personnel file, which may be accessed only by those who have a bona fide need to know.

## **Pre-Employment Physicals**

Prospective employees receiving conditional offers of employment for positions that require significant physical activity and lifting activities as part of the essential job functions will be required to undergo a workplace physical to determine if the employee is capable of performing the essential functions of the position with or without reasonable accommodations.

## **I-9 Employment Eligibility Verification**

Section 1 of the I-9 form must be completed by the employee on or before their first day of work. Employees must present acceptable documents for the completion of Section 2 of the I-9 form to the employer on or before the third day of work. This I-9 form is used to verify an employee's identification and right to work in the United States.

## Temporary Employees

Temporary employees are those who are hired to work on special projects, for a short period of time, or on a fill-in or on-call basis. Temporary employees who work less than six consecutive months will not be eligible for benefits other than the voluntary salary reduction contributions made to the Salary Reduction Annuity Plan.

## Employee Information Changes

Employees covered under College-sponsored insurance need to communicate changes in marital status, legal name, number of dependents, address and phone numbers to Human Resources within 30 days of the event. Notice should also be given when an employee's spouse reaches age 65 or when a dependent reaches age 26. Such changes will have implications for some of the insurance benefits.

## Employment Verification

The employee's written permission is required to release information about his or her job performance and salary history. Credit companies or banks investigating an employee's credit worthiness will only be told the employee's job title and employment dates unless the employee signs a written release allowing the College to reveal his or her salary for each instance that it is requested.

## Hours of Operation

The official college hours of operation are 8:00 a.m. – 5:00 p.m. Monday through Friday. Each department would be expected to ensure adequate service coverage during hours of operation. St. Olaf acknowledges that various positions may have a schedule which warrants a start and end time that differs from the standard hours of operation (i.e. Public Safety, Facilities, etc.).

## Break/Rest Periods

A paid rest break of no more than 15 minutes is allowed each four-hour work period (excluding meal breaks) for non-exempt (hourly) employees at a time approved by the supervisor. Typically there is one rest break in the morning and one in the afternoon. Attending a daily chapel service is not considered part of a break period. Unused rest breaks cannot be used to shorten the scheduled workday. Supervisors have the discretion to determine the length and time of break/rest periods within the above parameters based on departmental needs.

## Meal Periods

Meal breaks are unpaid time during which the employee has to be completely relieved of duties for at least 30 minutes. Employees can choose to schedule a lunch break of ½, 1, or 1½ hours and then adjust their work hours accordingly, within departmental coverage constraints. Meal periods must not be less than ½ hour for all non-exempt

(hourly) employees that work for eight or more consecutive hours and cannot be taken at the beginning or end of a shift to shorten the scheduled work day. Meal periods are also recommended for exempt (salaried) employees, although are not required. Supervisors have the discretion to determine the length and time of meal periods within these parameters based on departmental needs.

## **Flexible Work Arrangements**

St. Olaf College is a residential college that values the presence on campus of its staff. The College understands that from time to time some flexibility in staff work arrangements may need to occur. In these circumstances, the needs of the college must always take precedence. Flexible work arrangements may only be in place when they serve the needs of the department. Supervisors must approve all such arrangements. The supervisor is responsible for ensuring that the needs of the College are being met and that the department is sufficiently staffed during the College's hours of operation.

Flexible work arrangements may include a temporary agreement to work away from campus on a short-term project, or a temporary agreement to work away from campus for a longer defined period of time on a specific project that can best be done remotely. Under either of these limited arrangements, employees are expected to be available via email, chat, or other means of communication during their working hours. Employees are expected to work the same amount of time as their normal schedule and in a distraction-free environment. When considering flexible work arrangements, employees are expected to start and end their work, within an hour of the College hours of operation, unless business needs require a different schedule.

In rare cases, the College may agree for employees to work full-time remotely who live full-time at a distance from campus that makes daily presence impossible and whose work can be accomplished remotely. Such an arrangement will begin on a trial basis and will be reviewed routinely to assess work productivity and to determine if it is allowed to continue. Normally such arrangements will be limited to work within the state of Minnesota because of the burden associated with out-of-state workers.

In all flexible work arrangements the College will not incur any additional costs associated with telecommuting arrangements such as phone/internet costs, ergonomic furnishings, or extra technologies.

This policy does not contemplate a permanent arrangement where an employee works on campus some days of the week and off-campus others.

## **Summer Hours**

The College follows an alternative schedule of hours for the summer. Summer hours are in effect beginning the week after reunion weekend and end the week prior to the arrival of first year students. Generally, office hours are Monday through Thursday, 7:30

a.m. – 4:30 p.m. with a ½ hour lunch period and Friday, 7:30 a.m. – 12:00 p.m. Summer hours/days may vary by department.

All non-exempt (hourly) employees, with an FTE qualify for summer hours. Those non-exempt (hourly) employees who work a minimum of 38.5 hours in a work week (hours worked include: actual hours, paid time off, College holidays, jury duty, and funeral leave) will receive an additional 1.5 summer hours/week. The 1.5 hours paid as summer hours are not treated as hours worked when computing overtime.

All exempt (salaried) employees with an FTE do not qualify for summer hours when taking a full week off (40 hours). These employees must use a full week (5 days) of vacation time.

There are offices within the College that may need to remain open five days a week. Vice Presidents will determine which offices will remain open and work with each supervisor to implement an equitable distribution of the responsibility.

The President's Leadership Team along with the President may designate changes in the duration of summer hours.

# **PAYROLL INFORMATION (General)**

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## **Payroll Documents**

Before an earnings statement can be issued, employees must complete the following forms:

- W-4 Employee's Withholding Allowance Certificate: This is used for federal and state tax withholding.
- An Election of Benefits form: This is used by the employee to designate his/her election of benefits for which he/she is eligible (see Employee Benefits).

Employees are encouraged to complete the following form to arrange for direct deposit of their paycheck into a personal bank account.

- An Employee Authorization for Direct Deposit Form

## **Payroll Deductions/Reductions**

The following payroll deductions are made by the College:

- Federal and Minnesota State Withholding Tax: The amount deducted is determined by government tables in accordance with the amount of earnings and the number of exemptions claimed by the employee.
- Social Security & Medicare: Under present law, the employee and the employer contribute equally toward this fund.

Eligible employees may elect the following optional benefits before Social Security, Medicare, federal and state tax deductions:

- Health Insurance
- Medical Reimbursement Account
- Dependent Care Reimbursement Account

Eligible employees may elect the following optional benefits before federal and state tax deductions:

- Matched Savings Retirement Account
- Salary Reduction Supplemental Retirement Account

Eligible employees may elect the following optional benefits after Social Security, Medicare, federal and state tax deductions:

- Supplemental life insurance
- Dependent life insurance
- 24-Hour Voluntary Accidental Death & Dismemberment insurance

Further details regarding these options can be found in the Employee Benefits section of this handbook.

## **PAYROLL INFORMATION (Exempt/Salaried)**

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### **Payment of Wages**

All exempt (salaried) employees are paid monthly. Payment is made on the last business day of the month.

Each employee can view their earnings statement via Employee Self-Service indicating gross earnings, deductions, reductions, and net pay. This statement also shows accumulated taxable earnings, withholding tax and social security deductions from January 1 to the present.

### **Workweek / Pay Periods**

Exempt (salaried) employees are paid on the accomplishments of duties performed without regard to specific hours worked. They are normally expected to observe general business hours and to work additional hours to meet work requirements when necessary. Exempt (salaried) employees are expected to keep their supervisor informed in advance of any time off.

### **Salary Calculation for Partial Months**

A daily rate for exempt (salaried) employees will be applied when partial months are worked. Partial months worked may be the month as a new hire, the month in which an approved unpaid absence begins, or the month in which separation of employment occurs.

The daily rate is calculated by taking the employees monthly salary divided by the number of workdays in that month.



## **PAYROLL INFORMATION (Non-Exempt/Hourly)**

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### **Payment of Wages**

All non-exempt (hourly) employees are paid bi-weekly. Payment is made on the Friday following the end of a pay period.

Each employee can view their earnings statement via Employee Self-Service indicating gross earnings, deductions, reductions, and net pay. This statement also shows accumulated taxable earnings, withholding tax and social security deductions from January 1 to the present. In addition, non-exempt (hourly) employees' earnings statement show paid time off and sick leave reserve balances.

### **Workweek / Pay Periods**

A pay period for non-exempt (hourly) employees consists of two workweeks. Workweeks begin at 12:00 a.m. on Saturday and end at midnight on the following Friday.

### **Timesheets**

All non-exempt (hourly) employees must record and submit timesheets to their supervisor on a bi-weekly basis. To ensure the accuracy of the hours, employees should record their hours on a daily basis. Sick leave reserve, paid time off, and holiday hours should be recorded on the days on which they occur. Deliberate falsification of an employee timesheet is considered misconduct and will be subject to appropriate disciplinary action. Both the employee and the supervisor must sign the timesheet.

The deadline for submitting timesheets to the Payroll Department is the Monday morning following the end of a two-week pay period. This deadline may occasionally be moved up when holidays shorten the payroll processing week.

### **Overtime Pay**

Non-exempt (hourly) employees are eligible for overtime pay for hours worked in excess of 40 hours in a workweek, as mandated by the Fair Labor Standards Act. For the purpose of this policy, holidays, paid time off, sick leave reserve, funeral leave and jury duty will be treated as hours worked when computing overtime.

The employee's supervisor must approve overtime hours in advance.

Part-time, non-exempt (hourly) employees who work over the number of their designated hours do not receive overtime pay unless they work over 40 hours in a week. When summer hours are in effect, the usual workweek is 38.5 hours, and employees will only be paid overtime for any hours worked over 40.

Non-exempt (hourly) employees with an assigned FTE who are required to work on official College designated holidays will be compensated at time-and-a-half for hours worked in addition to their holiday pay.

# CLASSIFICATION/COMPENSATION

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## Compensation

St. Olaf College provides compensation programs to support the College's mission, values and vision.

St. Olaf College complies with all applicable state and federal laws governing compensation, including The Equal Pay Act (amended to the Fair Labor Standards Act), The Fair Labor Standards Act (FLSA), as amended, and all other applicable laws and regulations.

## Salary Ranges

Salary ranges are established using labor market data. Salary ranges give the College a way to classify and group jobs to ensure that employees are paid for work they do in a consistent manner. A salary range denotes the pay limits of the job; each salary range has a minimum and a maximum rate of pay.

## Annual Increases

St. Olaf College provides a formal pay review which is conducted once a year. Annual wage increases, if awarded, are at the discretion of the President's Leadership Team and our effective September 1 for salaried employees and the first pay date on or after September 1 for hourly employees. All regular staff employees are eligible for increase to their base pay except employees hired after June 1 of the current year.

Employees who are at or exceed the maximum of their pay grade will receive the annual increase in the form of a one time, lump sum payment.

## Classification

St. Olaf College uses a job evaluation system to determine the job value and placement (classification) in a salary range. The Human Resources Office independently evaluates and provides for placement in the salary range.

## Job Reclassification

Job reclassification requests are initiated, in writing, by the immediate supervisor and divisional Vice President. Job reclassification reviews are limited to jobs that have significantly changed in responsibilities due to position vacancies, organizational or technological changes, and/or the establishment of a new position. The Human Resources Office independently evaluates the requests and provides a recommendation.

## **Promotional Adjustment**

An employee who is promoted to a position with a higher salary grade may receive a salary adjustment. The amount of the promotional increase will be based on the following:

- The promoted employee's current rate in relation to the new salary range.
- The individual's qualifications to perform the new job, and
- The rate of pay of other employees with similar responsibilities.

The promoted employee's new salary should be at least at the minimum of the new salary range and normally no greater than the top of the first quartile.

## **Temporary Adjustment**

Additional compensation may be paid to an exempt employee for a defined temporary period in addition to their base salary for additional duties that are clearly beyond the scope of the employee's current position. All temporary compensation must have prior appropriate Divisional Vice President, Treasurer and Human Resources approval.

## **EMPLOYEE BENEFITS**

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The benefits offered by St. Olaf College may change at any time, with or without notice. The descriptions of health and other employee benefits contained in this handbook are not summary plan descriptions. Any variations between the information contained herein and official plan documents will be governed by the plan documents. Current information on benefits is available in the Human Resources Office or on our [website](#).

### **Social Security**

The College contributes the mandated rate of an employee's FICA taxable salary to the Social Security Administration. In addition to providing retirement income, social security will also provide disability, survivor, and Medicare/Medicaid benefits under certain circumstances.

### **Worker's Compensation Insurance**

The Minnesota Worker's Compensation Act provides for certain benefits for employees who are injured on the job or who sustain an occupational illness. Worker's compensation benefits include the medical care, payment for lost wages, vocational rehabilitation and other benefits. If the claim is accepted, partial wage loss benefits are paid after an employee misses three or more days of work due to a work-related injury or occupational illness.

### **Recording of Lost Time**

A non-exempt (hourly) employee injured on the job and unable to complete their remaining regularly scheduled hours will receive their normal pay rate for hours not worked through the remainder of that shift. The supervisor should write "Work Comp" on the employee's timesheet for lost time while the worker's compensation provider determines the eligibility of the claim.

### **Long-Term Disability Insurance**

Employees with an FTE of .50 or more will be provided with long-term disability insurance effective on the first of the month concurrent with or following the date of hire. To receive coverage, employees must complete the Life/Disability Enrollment Form.

Disability pay through this insurance will begin after a six-month waiting period (assuming the medical criteria are satisfied). Disability benefits include 60% of pay up to the maximum allowed under the summary plan description and reduced contributions to retirement. No benefits will be paid for the first 12 months for a disability due to a pre-existing condition. See summary plan description for details.

## **Short-Term Disability Insurance**

Non-Exempt/Hourly employees will be provided with short-term disability insurance effective on the first of the month concurrent with or following the date of hire. The short-term disability plan will pay 60% of pay beginning on the 8th consecutive calendar day of disability. Non-Exempt/Hourly employees are required to supply a doctor's verification of the need for their leave. The benefit may continue up to 180 days, which is the waiting period for long-term disability coverage.

## **Group Term Life Insurance**

Employees with an FTE of .50 or greater are eligible to participate in group term life insurance without proof of insurability on the first of the month concurrent with or following their date of hire. Elections made subsequent to this initial enrollment will require medical evidence of insurability. To receive coverage, employees must complete a Life/Disability Enrollment Form. The maximum amount of coverage for all life insurance options cannot exceed \$500,000.

### **Basic Group Term Life Insurance**

Employees will be provided basic group term life insurance equal to two (2) times their annual base salary. The College will pay the premiums for this coverage. Employees have the option to limit this coverage to \$50,000. The IRS assigns an imputed value to life insurance in excess of \$50,000. This value is added to an employee's taxable income.

### **Supplemental Term Life Insurance**

Employees have the option of purchasing additional supplemental term life insurance equal to one (1) or two (2) times their annual base salary. The premiums for this coverage will be based on age and will be paid for by the employees with after-tax deductions. The value of supplemental life insurance is added to the imputed value of the basic life insurance and is added to the employees' taxable income.

## **Dependent Term Life Insurance**

**Spouse:** Employees who purchase voluntary life insurance for themselves may also purchase voluntary life insurance for their spouse. The amount of coverage that may be purchased up to one-half of the amount purchased on the employee, in increments of \$10,000. Spousal elections up to \$50,000 are guaranteed. Amounts elected over that amount are subject to a satisfactory health assessment.

The cost of the spouse's coverage is based on the employee's age. Coverage must be elected at the time when the spouse first becomes eligible for coverage; thereafter the insurance carrier requires participants to provide proof of insurability. The carrier reserves the right to accept or deny additional coverage based on the proof of insurability.

**Children:** Employees who purchase voluntary life insurance for themselves may also purchase voluntary life insurance for their child(ren). The amount of coverage for children is \$2,500 from birth to age 6 months, and \$10,000 thereafter. The cost of coverage for children is \$2.50 per month regardless of the number of children covered.

If the College employs husband and wife each employee may only be covered under one supplemental term life insurance plan and only one can elect coverage for the dependent child(ren).

## **24-Hour Voluntary Accidental Death and Dismemberment Insurance**

Employees with an FTE of .50 or greater can purchase 24-Hour Accidental Death & Dismemberment (AD&D) insurance. 24-Hour AD&D can be elected in \$10,000 increments up to \$500,000 (limited to 10x salary) for single or family coverage. The amount can be changed each year without proof of insurability. This plan covers both occupational and non-occupational accidents and protects the insured 24 hours a day. Employees pay for these premiums with after-tax deductions.

NOTE: If the College employs husband and wife, only one may purchase family coverage.

## **Matched Savings Plan (Retirement Annuity)**

The Matched Savings Plan is a "Defined Contribution Plan." As the name suggests, there are set or defined levels at which both the employee and the College can contribute to this plan.

All employees who work 1,000 hours per year, who have reached the age of 21, and who have completed one year of service are eligible to participate in the Matched Savings Plan. The one-year of service is waived for employees who have been previously employed by an educational or religious institution for at least one year with a minimum .50 FTE.

Employee pre-tax contributions starting at 1% are matched by an equal percentage contribution plus an additional 6% from the College. Employees can choose contributions by full percentage points. Although employees may contribute more than 3%, the College contribution will not exceed 9%.

Employee Contribution	College Contribution
1%	7%
2%	8%
3%	9%

The employee's election of a contribution level may be made at the initial time of eligibility, and following that, once per plan quarter.

The employee's and the College's contributions to the Matched Savings Plan will be invested with TIAA-CREF. Employees will determine how their contributions will be

invested and can change the allocations once they are on the plan. Employees who wish to participate in the Matched Savings Plan must complete a TIAA-CREF online application and a College salary reduction agreement.

## **Salary Reduction Savings Plan (Group Supplemental Retirement Annuity)**

Upon hire, all employees may contribute pre-tax dollars to a Salary Reduction Savings Plan up to the maximum amount set by law.\* If you are age 50 or older, you may be able to contribute more (contact Human Resources for assistance).

Salary Reduction Savings Plans are funded entirely by employee contributions and will be invested in TIAA-CREF. Participating employees must complete a TIAA-CREF online application and a College salary reduction agreement.

The employee election of a contribution level may be made at the initial time of eligibility, and following that, once per plan quarter. The minimum monthly contribution to a Salary Reduction Savings Plan is \$25.00 per pay period for exempt employees and \$12.50 per pay period for non-exempt employees.

Participants may stop their contributions to the Retirement Annuity or Group Supplemental Retirement Annuity at any time during the plan year.

\*Limit cannot exceed 100% of pay.

## **Flexible Benefits Plan**

All employees are eligible to participate in a program that allows employees to establish reimbursement accounts for either dependent care or out of pocket health care expenses with pre-tax dollars. Money set aside in these programs is exempt from social security, Medicare, federal income tax, and state income tax. Contributions to these plans cannot exceed 100% of pay. If the full value of the account is not used during the plan year (September 1 – October 31), the employee will forfeit the remaining amount.

The IRS regulations governing these programs limit the types of changes that participants may make during the plan year. Participants who set aside money are bound to those amounts for the entire plan year. Participants are not allowed to discontinue or change the amount of the contribution, except in very limited circumstances. Changes must be made within 30 days of a qualifying event.

Please refer to the Flexible Benefits Summary Plan Description or contact Human Resources for questions regarding status changes, eligible expenses, reimbursement procedures and plan limitations.

## **Medical Reimbursement Account**

Employees may participate in this program, up to a maximum as defined by the Flexible Benefit Plan (refer to the Human Resources website, Benefits Section). This account is



designed to reimburse employees for medical expenses that are not paid for through other plans (i.e., dental care, glasses and contacts, prescriptions, deductibles, co-payments, etc.). Certain over-the-counter medicines are also eligible.

### **Dependent Care Reimbursement Account**

Employees may participate in this program up to a maximum as defined by the Flexible Benefit Plan (refer to the Human Resources website, [Benefits Section](#)). If you are married, the services must be provided to enable you and your spouse to be employed, unless one spouse is a full-time student and the other is employed. (For the purposes of this plan, dependents are generally under age 13 and who are listed as dependents on your federal income tax return.) However, there may be other individuals who qualify, such as older children, spouses or parents who are physically or mentally incapable of self-care.

### **Health Insurance**

Employees with an FTE of 0.50 or more are eligible to participate in the College health plan. Plan coverage is effective on the first of the month concurrent with or following the date of hire. The plan provides coverage for illness and injury as well as for diagnostic and preventive medical care.

New employees will have 30 days from the date of hire to elect health insurance without being subject to pre-existing condition limitations. Employees who experience a loss of coverage during the plan year will be allowed to enroll in the St. Olaf Plan within 30 days of this coverage change without pre-existing condition limitations.

Once employees elect coverage, they are required to keep the coverage for the entire plan year (September 1 – August 31) unless they experience a status change\*. Change in benefit must be made within 30 days of the qualifying status change\*. New dependents must be added within 90 days for the birth or adoption of a child.

Changes made during the plan year, but outside of the dates stipulated, will be subject to pre-existing condition limitations.

### **Dental Insurance**

Employees with an FTE of 0.50 or more are eligible to participate in the College's dental plan.

### **\*Status Changes**

A change in circumstances that qualifies as a status change under applicable regulations. These include:

- An event that changes your marital status, including marriage, death, divorce, legal separation.

- An event that changes your number of dependents, including birth, adoption, placement for adoption, or death of a dependent.
- Termination or commencement of employment by you, your spouse, or your dependent, which results in a gain or loss of eligibility.
- Change in employment status, such as reduction or increase in your hours of employment or those of your spouse or dependent, including a switch between part-time and full-time, a change in worksite, strike or lockout, which results in a gain or loss of eligibility.
- Commencement or return from an unpaid leave of absence or an FMLA leave on the part of you or your spouse.
- An event that causes your dependent to satisfy or cease to satisfy the requirements for coverage under the health plan, due to attainment of age, student status or any similar circumstance.
- Change in the place of your residence or that of your spouse or dependent, which affects eligibility for an underlying benefit, such as moving outside of an HMO service area.
- Change in coverage due to the spouse or dependent's open enrollment.

For health and accident plans, Status Change also includes:

- The exercise of a right under the special enrollment rights of the Health Insurance Portability and Accountability Act (HIPAA).
- Certain court orders related to health coverage of a dependent or former spouse.
- The entitlement (or loss of entitlement) to Medicare or Medicaid of you, your spouse, or your dependent.

## **Retirement Health Account**

The Retirement Health Account is a "Defined Contribution" plan that will be available tax free in retirement for payment of health insurance premiums and reimbursement of other qualified medical expenses.

Contributions to the Plan by the College will begin when an employee with an FTE of .50 or greater reaches age 39. The College will determine the amount of the contribution. Employees (age 21 and older with an FTE of .50 or greater) can also make after-tax contributions. Please contact Human Resources for the current plan description or visit our [website](#).

## **Retiree Health Plan**

St. Olaf College offers a Retiree Health Plan to employees who retire and are age 55 or older with 5 years of service. Please contact Human Resources for the current plan description or visit our [website](#).

## **Employee Assistance Program (EAP)**

The College offers an Employee Assistance Program (EAP) to all employees and members of their immediate families. The EAP provides free, confidential, short-term

counseling and other services/guidance on topics including: Elder Care, Emotional Health, Family Life, Financial, Job/Career, Legal, Physical Health, Relationship, Substance Abuse - Alcohol, Smoking/Tobacco, etc.

## **Campus Conduct Hotline®**

The College offers this service designed to enable employees to express on an anonymous basis concerns about possible violations of college educational and employment policies as articulated in student, faculty and staff publications. The Campus Conduct Hotline® system is available for your use around the clock, seven days a week. Because the Hotline is operated by an independent organization, any calls made through this Hotline are completely confidential. The number to call is (866) 943-5787.

## **Additional Benefits**

### **Health Insurance**

- Doctor on Demand
- Dedicated Nurse Support
- Stop Smoking Support
- 24-Hour Nurse Line
- Health Coaching

### **Amplifon (Partner of Delta Dental)**

- Hearing Screening
- Hearing Aid Discount

### **Life, Disability and 24-Hour AD&D Insurance**

- Financial Services
- Will Preparation
- Health Advocacy Services
- Healthy Rewards Program
- Identity Theft Program
- Secure Domestic or International Travel Assistance

### **Long-Term Care Insurance**

All of this information and much more can be found on our benefits website:  
<http://wp.stolaf.edu/hr/benefits/>

## HOLIDAYS, VACATION, SICK PAY (Exempt/Salaried)

All benefit levels in this section reflect a full-time 1.0 FTE. The amount of holiday and vacation is pro-rated for all employees working less than full-time based on the employee's assigned FTE. The President of the College may designate changes in days observed as paid holidays as they may differ depending upon when they fall in any given year.

### Paid Holidays

The College observes the following holidays each year. Offices are closed and only essential personnel are on duty.

New Year's Day	Labor Day	Christmas Day
Memorial Day	Thanksgiving (2 days)	New Year's Eve
Independence Day	Christmas Eve	1 Personal Choice Day (see description below)

### Personal Choice Day

Good Friday is not an official college holiday and is offered as a Personal Choice Day allowing flexibility and respect for the needs of all members of the St. Olaf community. Employees hired on or before the Good Friday holiday are eligible to use the Personal Choice Day with prior approval from their supervisor. If employees wish to continue to observe Good Friday by using their Personal Choice Day, then they should obtain approval from their supervisor as they would any other day off.

The Personal Choice Day must be used by the end of the calendar year or it will be forfeited. The 8 hours must be used in full-day increments and cannot be divided among multiple days.

### Vacation Eligibility and Accrual

All employees with an FTE are entitled to paid vacation. Vacation days accrue from the date of hire. Vacation time off requires prior approval of the supervisor.

Years of Service	Accrual Rate/Pay Period (1.0 FTE)	Annual Vacation Benefit
0-1 year	.8333 days/month	10 days/year
2+ years	1.8333 days/month	22 days/year

Accrued vacation must be taken in the year in which it is earned. Unused vacation days will not be carried over into the next year and will be forfeited.

## **Vacation and Holidays**

If a holiday falls within an employee's vacation, it is counted as a paid holiday and not a vacation day.

## **Sick / Medical Pay**

It is the policy of the College that exempt (salaried) employees will be paid for a reasonable number of personal absences due to their own injury or illness, and for absences due to the injury or illness of the employee's dependent child. In addition, and up to 4 days may be taken to attend to the sick/medical issues of family members, other than dependent children, for whom the employee serves as the primary caregiver. Employees may be asked to present verification of the medical reasons for their absence(s). Sick/Medical pay may also be used for medical or human services appointments when it is not possible to schedule during non-duty hours.

If an injury or illness of an exempt (salaried) employee or his or her dependent child requires a prolonged absence, the employee should consult the Medical Leave policy. The College will determine, at its discretion, how and whether to compensate an employee for part or all of a prolonged absence under the Medical Leave policy.

## HOLIDAYS, PAID TIME OFF, SICK LEAVE RESERVE (Non-Exempt/Hourly)

The amount of holiday and paid time off is pro-rated for all employees working less than full-time based on the employee's assigned FTE. All benefit levels in this section reflect a full-time 1.0 FTE. The President of the College may designate changes in days observed as paid holidays as they may differ depending upon when they fall in any given year.

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The Personal Choice Day must be used by the end of the calendar year or it will be forfeited. The 8 hours must be used in full-day increments and cannot be divided among multiple days.

Tracking the Personal Choice Day is done within the Time Entry System. Non-exempt employees must enter the amount of hours they utilized based on their FTE in the Personal Choice Day box in the Time Entry System. Contact the Payroll Office at extension 3824 or 3299 for further assistance. Paid holiday hours shall be considered hours worked for the purpose of computing overtime pay.

### Paid Time Off (PTO) and Holidays

Employees required to work on College holidays will be paid time-and-a half for actual hours worked in addition to the straight holiday pay. If the actual holiday falls on a weekend, and the College holiday observance is designated to be another day, employees required to work on both such days will receive overtime pay for the day of the College observance. If the employee is required to work only on the actual holiday, hours worked will be paid at time-and-a-half. In addition, these employees will receive their

regular FTE based holiday pay at straight time rates. This exception applies only to certain New Year's, July 4th and Christmas holidays as applicable from year to year. If a holiday falls within an employee's PTO, it is counted as a paid holiday and not a PTO day.

## **Paid Time Off (PTO) Eligibility and Accrual**

All employees with an FTE are entitled to paid time off (PTO). PTO days accrue from the date of hire and employees may only use hours that are accrued. PTO requires prior approval of the supervisor. In the event of illness or emergency preventing an employee from requesting PTO in advance, the employee must notify their supervisor by the start of their scheduled shift. The rate of PTO accrual and the maximum accrual are set forth in the chart below.

Years of Completed Service*	Accrual Rate/Pay Period (1.0 FTE)	Maximum Accrual** (1.0 FTE)
0 – 5 years	5.538 hours	144 hours
6 – 13 years	7.076 hours	184 hours
14+ years	8.615 hours	224 hours

\* Edited 5/30/18, to reflect current system calculation, which has not changed since PTO implementation in 2008.

\*\* PTO accrual stops once the maximum balance is reached and resumes again when an employee's accrued balance falls below the maximum.

## **Sick Leave Reserve (SLR)**

Hourly employees with accrued sick balances on January 5, 2008 retain these balances in a separate sick leave account, called Sick Leave Reserve (SLR). SLR hours are available to the employee to:

- Supplement short-term disability up to 100% of pay during a disability leave
- To cover an absence from work during the short-term disability waiting period if PTO is exhausted
- During the first three working days of absence due to work-related injury if PTO is exhausted
- Pay for employee and dependent child illness if PTO is exhausted
- Up to four days per year may be used for extended family medical if PTO is exhausted

SLR is not paid out upon termination of employment.

## **CAMPUS SERVICES OFFERED DURING BREAKS**

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All college services must be offered on weekdays during regular hours, unless it is a college holiday. College services offered on weekends during the academic year must typically be offered on weekends during student breaks. Occasional closures may be necessary for software/hardware upgrades, facilities work, or inventories, although closure time should be minimized when possible.

Food Service, Tostrud, and the Bookstore are completely closed on college holidays (and on weekends when the Christmas/New Year's college holiday is adjacent to a weekend), with the following exceptions:

- Food Service and the Bookstore should be open limited hours on Labor Day.
- Food Service should be open limited hours on the day after Thanksgiving.
- Food Service should be open on Easter Sunday if it does not fall over Spring Break.

During student breaks, limited hours are permitted for the following areas:

- Food Services:
  - There is always a food service option for students at either the Cage or Stav Hall, except on the holidays listed above.
  - Academic year M-F workdays of breaks: Cage open minimum of 8:00-3:00
  - Academic year weekends/non-workdays of breaks: Cage open minimum of 11:00-5:30 or Cage may close if Stav Hall is open
- Tostrud: must be open from at least 11:00-2:00 (including weekends), excluding pool, climbing walls, and lower weight room.
- Library: 8:00-5:00 weekdays, closed weekends, open last day of Fall break, Thanksgiving break, and Spring break.
- Bookstore: C-store must be open from at least 8:00-5:00 on College workdays and noon-4:00 on non-workdays and weekends over breaks.
- Health Services: closed during breaks and summer
- All administrative offices have the option to close at noon on the day before Thanksgiving, the day before Christmas Eve, and the days between Christmas and New Year's. Vacation time must be used if closing early. Each supervisor, with the approval of the appropriate President's Leadership Team member, will attempt to facilitate the hours most convenient for his/her office staff while maintaining service from at least 8am to noon on these dates around the holidays to provide daily service, bearing in mind the needs of the College. Offices should provide a sign with who to reach or directing them to an open office whenever possible. Food Service, Tostrud, Library, and Bookstore must remain open, per the above.

If any departments require students to be on campus over breaks for music, athletics, etc. on days when meal plans are not available, departments should budget for and pay for meals.



# LEAVES OF ABSENCE

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## Policy

The leaves described below are provided by the College as well as any other leave the College is required by law to provide.

Requests for leaves of absence must be submitted in writing through the supervisor as far in advance as possible. All leaves require the written approval of Human Resources.

Generally, employees will be required to use any sick leave reserve, paid time off/vacation, holiday, or other paid leave benefits that is appropriate during a leave of absence before unpaid time is taken.

In many cases, particularly where the leave is 6 months or less, employees may be eligible to receive the College contributions to the College provided benefits in which an employee is enrolled. Employees will generally be responsible for paying the employee-share of College-provided benefits while on leave the College will comply with all applicable laws such as FMLA, COBRA, Minnesota Continuation and any state or federal regulations.

Upon returning from leave, an employee may be returned to the same position that the employee held when the leave began. There may be situations, however, where the College will need to fill the position. In these instances, the College will attempt to place the employee in a comparable position in hours, duties, and pay. The College requests at least one week notice prior to returning to work from a leave of absence and additional documentation may be needed.

Employees not returning to work upon the conclusion of their requested leave of absence will be deemed to have resigned from their employment, unless an extension of the leave has been requested and granted in advance by Human Resources.

## Family & Medical Leave Act (FMLA)

### Eligibility

Eligible employees under the FMLA policy have worked at least twelve months for the College with at least 1,250 hours worked during the twelve months immediately preceding the request for a leave.

### Basic Leave Entitlement

Under the Family and Medical Leave Act policy, an eligible employee is entitled to a total of 12 weeks of leave during a 12-month period\*, for:

- Incapacity due to pregnancy, prenatal medical care or child birth
- The birth of an employee's child, or the placement of a child with employee for adoption or foster care.

- A serious health condition that makes an employee unable to work or unable to perform the essential functions of their job.
- A serious health condition affecting an employee's spouse, child, or parent for whom the employee is needed to provide care.

\*At St. Olaf, the 12 month period is a rolling time frame, measured backward over the 12 months prior to the request.

More information about FMLA can be found here:  
<http://wp.stolaf.edu/hr/files/2013/02/FMLAFeb2013.pdf>

### **Military Family Leave Entitlements**

In addition to the above reasons for leave, eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard, Reserves, and service members of any branch of the Armed Forces deployed to a foreign country in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member would be a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred while in the line of duty while on active duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list. Family leave to care for a covered service member is available up to five years after the veteran leaves the service if the veteran develops an injury or illness that was incurred or aggravated while on active duty.

View the FMLA Military Leave poster here:  
<http://wp.stolaf.edu/hr/files/2013/02/NDAAAmndmnts.pdf>

### **Employee Responsibilities**

When the leave is foreseeable, employees are expected to give 30 days' notice before seeking a FMLA leave. When 30 days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with an employer's normal call-in procedures.

In order to be eligible for either the basic leave or the military leave entitlement, the employee must provide sufficient information for the employer to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Employees may be required to provide periodic recertification supporting the need for leave.

Employees who anticipate requesting a FMLA Leave should contact the Human Resources Office for specific information regarding application.

**Employer Responsibilities**

Upon an employee's request for leave, the College will inform the employee whether or not they are eligible for leave. If an employee is not eligible for FMLA leave the College will give a reason for the ineligibility.

**Use of Leave**

Leaves taken under the Act can be taken "intermittently or on a reduced leave schedule" in certain cases. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations.

**Benefits and Employment Protections**

Health benefits are maintained during the period of FMLA leave under the same conditions as if the employee continues to work. Employees who do not return from the leave will be required to reimburse the College for premiums paid on their behalf during the FMLA leave, except in certain limited circumstances specified by the Act.

Upon returning from leave, an employee is entitled to be returned to the same position or a comparable position (in hours, duties, and pay) that the employee held when the leave began. There may be certain circumstances when an employee will be denied restoration, depending upon layoffs, ability to perform essential job functions, or qualifications.

**Substitution of Paid Leave**

Employees are required to use their accrued paid leave time, as appropriate, as a part of the leave.

**Return to Work**

When returning from a leave of absence due to an employee's serious health condition, the employee must provide a doctor's written release to return to work prior to their first day back at work.

**Medical Leave**

Employees eligible under the Family and Medical Leave Act policy are governed by that policy, but may seek to request an extension of their medical leave under this section when necessary and appropriate. Employees not eligible for the Family and Medical Leave Act policy may request medical leave under this section.

When an employee anticipates missing work for three or more consecutive days due to a medical condition, they may apply for a medical leave of absence. Such requests should be accompanied by a doctor's written documentation of the anticipated length of leave. When returning from a medical leave, employees must provide a doctor's written release to return to work prior to actually returning to work. The appropriate sick leave benefit will be paid according to the College policy and amount of time indicated by the

employee's physician. Time off in addition to physician's request will require the use of the employee's paid leave time.

### **Bone Marrow Donation Leave**

A leave of absence up to forty hours will be granted to employees who seek to undergo a medical procedure to donate bone marrow. Employees will be required to use any appropriate paid time leave time available, before unpaid leave is taken.

### **Military Service Leave**

As required by law, employees will be granted a leave of absence for military duty, including but not limited to, induction, enlistment or Reserve/National Guard duty, or to service members of any branch of the Armed Forces deployed to a foreign country. The College will comply with all applicable laws regarding the employment of such individuals. The supervisor must be notified as far in advance as possible to permit redistribution of work assignments. Upon completion of the tour of duty, employees will make arrangements with the College for re-employment. Please refer to Supporting Document; "The Uniformed Services Employment And Reemployment Rights Act".

### **Parental Leave**

When employees, regardless of gender, become new parents, whether natural or adoptive, a parental leave may be available under the FMLA, the Minnesota Pregnancy and Parenting Leave Law, or both. Whenever possible, FMLA and the Minnesota Pregnancy and Parenting Leave will run concurrently. Parental leave governed by the FMLA is described above in the Family and Medical Leave Act policy.

Under the Minnesota Pregnancy and Parenting Leave Law, employees of the College who have worked one year or more, and at least half time (but fewer than 1250 hours, which is the threshold for leave under the Family and Medical Leave Act policy) during the 12 consecutive months preceding a leave are entitled to a maximum of 12 weeks of unpaid leave for prenatal medical care, pregnancy, birth or adoption of a child.

For employees giving birth, the leave will begin on or before birth occurs. Paid leave for employees who give birth will be six weeks for a vaginal birth, with an additional two weeks in the event of Cesarean birth. Employees who give birth must provide a Fitness for Duty form from their physician prior to returning to work. Once the paid parental leave is complete, PTO or vacation must be exhausted before any unpaid leave can be approved.

Parents who adopt or do not give birth are eligible for six weeks of paid parental leave. The parental leave may begin at a time selected by the employee, however, the leave must commence not more than the seventh week after the birth or adoption. In situations where the child remains hospitalized longer than the birth parent, the leave must begin no later than the seventh week after the child leaves the hospital. Once the paid parental leave is complete, PTO or vacation must be exhausted before any unpaid leave can be approved.

Benefits elected prior to the leave will continue during the leave, but the employee must pay the employee share of College provided benefits during the leave.

Parental leave requested under this policy may run concurrently with any medical leave provided under the Family and Medical Leave Act policy or any other leave rights for employees who are eligible.

## **Personal Leave**

A personal leave of absence is a leave that is requested for reasons other than leaves as defined in this section. Such leaves will be at the discretion of the employee's supervisor based on the needs of the particular department. In some cases, such leaves may cause an employee to lose eligibility for benefits, in which case the employee would be offered the opportunity to continue some of their benefits under COBRA. Employees will be required to use any appropriate paid leave time available before unpaid leave is taken.

## **School Conference and Activities Leave**

Employees will be granted leaves of absence to attend school conferences, other school activities, childcare services, and pre-kindergarten programs of the employees' children when such activities cannot be scheduled during non-working hours. The maximum amount of school leave that employees may take is 16 hours during any calendar year. The employees must provide their supervisor with reasonable prior notice and make reasonable effort to schedule the leave so as not to unduly disrupt the department's operation. Employees will be required to use any appropriate paid leave time available.

## **Care of Relatives**

An employee may use personal sick leave benefits provided by the College for absences due to an illness of or injury to the employee's child, as defined in section as adult child, spouse, sibling, parent, grandparent, or stepparent, for reasonable periods of time as the employee's attendance may be necessary, on the same terms upon which the employee is able to use sick leave benefits for the employee's own illness or injury. This section applies only to personal sick leave benefits payable to the employee from the College's general assets.

The College limits the use of personal sick leave benefits provided by the employer for absences due to an illness of or injury to the employee's adult child, spouse, sibling, parent, grandparent, or stepparent to a maximum of 160 hours in any 12-month period. This paragraph does not apply to absences due to the illness or injury of a child. Child includes a stepchild and a biological, adopted, and foster child.

For purposes of this section, "personal sick leave benefits" means time accrued and available to an employee to be used as a result of absence from work due to personal illness or injury, but does not include short-term or long-term disability or other salary continuation benefits.

## LEAVES OF ABSENCE – COLLEGE PAID

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### Bereavement Leave

Leave with pay will be granted to an employee for making funeral arrangements or for attending a funeral as follows:

- Up to 5 days of paid funeral leave for a member of the immediate family; defined as spouse, child, stepchild, mother, father, sister, brother, step-parent, step-sibling.
- Up to 2 days of paid funeral leave for a member of the extended family; defined as grandparent, grandparent-in-law, grandchild, step-grandchild, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law, and sister-in-law, aunt, uncle, niece, and nephew.

Additional time off may be arranged with the supervisor as vacation/PTO time or time off without pay if other paid benefits are exhausted.

### Jury Duty

The College will supplement jury duty pay for employees called to jury duty. Employees will continue to receive their regular pay while on duty and are required to turn in the check they receive for jury duty to the Payroll Office. Employees may keep the portion of the check received for mileage, day care, and parking.

If jury duty does not require the full workday, employees are expected to report for work for the remainder of the day.

### Voting

During federal and statewide elections or a special election to fill a vacancy for a state representative or senator, employees are allowed the necessary paid time off from work to go to the polling place, cast a ballot and return to work. Employees should advise their supervisor in advance of taking a voting leave.

# TUITION BENEFIT

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## Tuition Allowances for Employees' Dependent Children

St. Olaf College offers a partial tuition waiver for dependent children of faculty and staff to attend and receive a bachelor's degree from St. Olaf College or other eligible Evangelical Lutheran Church in America (ELCA) or Associated Colleges of the Midwest (ACM) post-secondary institutions around the country.

### Eligibility

All children, having at least one parent who is employed at .50 FTE or more by St. Olaf College, are eligible for participation in the plan provided all of the following criteria are met prior to the start of the applicable term:

1. The wages of the parent are paid by the College.
2. The parent has been employed by the College for a minimum of three consecutive years of full-time (0.75 - 1.0 FTE) service or a minimum of six consecutive years of part-time (0.50 - 0.749 FTE) service prior to the student's enrollment. **Note:** If an employee's FTE has varied, St. Olaf will use the average FTE over the appropriate 3 or 6 year time frame.
3. The student has one of the following relationships to the eligible employee:
  - Natural born child
  - Legally-adopted child
  - Step-child
4. Children are under the age of 25.
5. Children are dependent upon eligible employee's household for at least one-half of the household's financial support and/or are claimed as a dependent for tax purposes.
6. The student has not yet earned a bachelor's degree.

### Tuition Benefit Amount at St. Olaf

1. For dependent children of full-time (0.75 - 1.0 FTE) employees, the amount of the waiver will be 80% of the cost for tuition.
2. For dependent children of part-time (0.50 – 0.749 FTE) employees, the amount of the waiver will be 40% of the cost for tuition.
3. This benefit will continue for eligible students while they are participating in the St. Olaf Study Abroad programs.
4. While St. Olaf participates in both the ELCA and ACM tuition remission programs, children of St. Olaf employees will follow the ELCA annual process.

### Limitations of the Tuition Benefit

1. Each host institution has their own parameters and when a dependent attends a host institution, they will determine program limitations regarding enrollment, study abroad usage, maximum time frame, etc.
2. At St. Olaf, this tuition benefit is limited to a maximum of eight semesters. It will terminate earlier if degree is achieved in less than four years:



- Enrollment in three or more course credits in any semester constitute full-time enrollment (Interim credit counts toward fall enrollment) and will apply to the 8 semester maximum.
  - If enrolled below 3 credits during a term, a student can choose to use tuition benefit, which will count toward the eight semesters benefit maximum, or choose to not use the tuition benefit and thus will not deduct from the 8 semesters of benefit.
3. All rights to the tuition benefit for children shall end upon an employee's resignation or termination from employment at St. Olaf College, unless:
    - A. In the event of an eligible employee's **death**, the following provisions shall apply:
      - If length of service is 3 – 10 years, currently enrolled children shall remain eligible for the tuition allowance.
      - If length of service is 10+ years, children will be eligible for the tuition allowance regardless of whether or not they are enrolled in college at the time of the employee's passing.
    - B. In the event of an eligible employee's **retirement**, the following provisions shall apply:
      - An eligible retiree is a minimum of 55 years of age with at least five consecutive years of service at the College.
      - If length of service is 5 – 10 years, currently enrolled children shall remain eligible for the tuition allowance.
      - If length of service is 10+ years, children will be eligible for the tuition allowance regardless of whether or not they are enrolled in college at the time of the employee's retirement.
  4. Parents who are on an approved leave of absence with pay and benefits, will continue to be eligible for the tuition benefit, as long as they were eligible prior to the leave.

### **Tuition Benefit at Other ELCA Institutions**

St. Olaf is a participant in a tuition exchange program with other ELCA institutions. This program allows children of employees to receive a tuition benefit at other ELCA schools. The amount of the benefit varies by institution, and the "host" institution has the authority to establish policies regarding the student's eligibility, amount of the discount, and how many recipients will be awarded the tuition benefit.

#### **ELCA Process:**

1. Employee completes St. Olaf Tuition Benefit Application at <https://wp.stolaf.edu/hr/tuition-benefit/>. Employee submits the form **by May 1st each year**.
2. St. Olaf HR will validate eligibility for this benefit and will notify the St. Olaf Financial Aid Office.
3. The St. Olaf Financial Aid Office will notify other participating ELCA institutions of student's eligibility based upon Tuition Benefit Application. The host institution will communicate with the St. Olaf employee's dependent regarding benefit amount.

4. Following the decision of the St. Olaf employee's dependent, the employee must complete the online Enrollment Confirmation Form **by May 1st each year.**

### **Tuition Benefit at ACM Institutions**

St. Olaf is a participant in a tuition remission exchange program with other ACM institutions. This program allows children of employees to receive a tuition benefit at other ACM schools. The amount of the benefit varies by institution, and the "host" institution has the authority to establish policies regarding the student's eligibility and how many recipients will be awarded the tuition benefit.

#### **ACM Process:**

1. Employee completes St. Olaf Tuition Benefit Application at <https://wp.stolaf.edu/hr/tuition-benefit/>. Employee submits the form **by May 1st each year.**
2. The employee submits the required application fee to St. Olaf Human Resources via a \$25 check made payable to ACM.
3. St. Olaf HR will validate eligibility for this benefit and will notify the St. Olaf Financial Aid Office and forward the application check and Tuition Benefit Application information to ACM.
4. The host institution will communicate with the St. Olaf employee's dependent regarding benefit amount.
5. Following the St. Olaf employee's dependent decision, the employee must complete the online Enrollment Confirmation Form **by May 1st each year.**

### **Participating Institutions**

For a current list, go to <https://wp.stolaf.edu/hr/tuition-benefit/>. Note: ELCA and ACM institutions choose whether or not to participate in the exchange/remission programs and may withdraw their participation at any time.

## **Tuition Allowance for Employee, Emeriti, or Spouse**

Employees (with a minimum .50 FTE), their spouse, and Emeriti are allowed to take one course credit per term at St. Olaf College, up to a maximum of two course credits per year, at no charge. Courses may be audited free of charge if permission is obtained from the instructor of the course.

### **Limitations**

1. Additional courses above the maximum per year will be at a cost of 50% off the full, per-course tuition charge.
2. For courses involving special costs beyond basic local classroom work, calculated cost fees will be charged.
3. This benefit is not available for independent study/independent research, music lessons, summer school courses, off-campus courses, or courses through the St. Olaf College Study Travel Office.

### **Process**

1. Employees, spouses, Emeriti complete the form in HR that authorizes eligibility available in the Human Resources office, Tomson Hall, suite 180.
2. Registration must take place through the Registrar's Office, for audit or credit, in-person on the first day of class for each term.
3. The Student Accounts office will then adjust the tuition to reflect the benefit for the registered individual.

# PROFESSIONAL DEVELOPMENT

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St. Olaf College is committed to professional development and growth in order to facilitate the achievement of the institution's objectives and to help staff members realize their potential.

The yearly review is completed to identify an employee's accomplishments, areas for growth, training needs, and professional development goals as they relate to the needs of the College. The College provides for and supports employee's attendance at on-campus training and development opportunities including:

- On-the-job-training
- Computing seminars sponsored by Information Technology (IT)
- Courses in the College curriculum as part of the Tuition Allowance program.

## **Department Sponsorship:**

Activities and programs that are necessary for employees to perform their jobs or will enhance job performance may be supported through departmental funds. This includes, but is not limited to, professional membership fees necessary for the performance of the position duties, attendance at appropriate professional workshops and seminars, webinars and conferences as deemed appropriate by the supervisor.

Employees are encouraged to work with their supervisor in advance of the budgeting cycle to determine the needs and associated costs. Participation is subject to supervisory approval and available funds.

# SEPARATION FROM EMPLOYMENT

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## Resignation

Employees are requested to give reasonable notice before resigning. Resigning employees are eligible for payment time worked as well as for any accrued-unused vacation/paid time off balance. The accrued-unused vacation/paid time off balance is based on the last actual work day as determined by the supervisor in consultation with Human Resources. Certain benefits are also eligible for continuation after separation (see COBRA section below).

## Involuntary Separation

Employees who are involuntarily separated from employment will be paid for all time worked as well as for any accrued-unused vacation/paid time off. Certain benefits may also be eligible for continuation after separation (see COBRA section below).

## Retirement

Employees nearing retirement should consult with the Human Resources Office in advance for information on retirement procedures. Contributions to the retirement plan by the College shall cease when the employee is no longer on the payroll.

## Death

Upon the death of an employee, remaining payments for time worked will be made to the beneficiary of the group life insurance policy or to the estate of the deceased employee.

## Exit Interview

The Human Resources Office will schedule an exit interview, when feasible, with each separating employee. The purpose of the exit interview is to gather information pertinent to the employee's position and employment with the College in general that will assist Human Resources as they search for a replacement. He/she will also receive information on eligibility to continue certain benefits (see COBRA section below).

## Continuation of Benefits After Termination (COBRA)

This notice has important information about your right to COBRA continuation coverage, which is a temporary extension of coverage under the group health plan (the Plan). **This notice explains COBRA continuation coverage, when it may become available to you and your family, and what you need to do to protect your right to get it.** When you become eligible for COBRA, you may also become eligible for other coverage options that may cost less than COBRA continuation coverage.

The right to COBRA continuation coverage was created by a federal law, the Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA). COBRA continuation coverage can become available to you and other members of your family when group health coverage would otherwise end. For more information about your rights and obligations under the Plan and under federal law, you should review the Plan's Summary Plan Description or contact the Plan Administrator.

**You may have other options available to you when you lose group health coverage.** For example, you may be eligible to buy an individual plan through the Health Insurance Marketplace. By enrolling in coverage through the Marketplace, you may qualify for lower costs on your monthly premiums and lower out-of-pocket costs. Additionally, you may qualify for a 30-day special enrollment period for another group health plan for which you are eligible (such as a spouse's plan), even if that plan generally doesn't accept late enrollees.

### **What is COBRA continuation coverage?**

COBRA continuation coverage is a continuation of Plan coverage when it would otherwise end because of a life event. This is also called a "qualifying event." Specific qualifying events are listed later in this notice. After a qualifying event, COBRA continuation coverage must be offered to each person who is a "qualified beneficiary." You, your spouse, and your dependent children could become qualified beneficiaries if coverage under the Plan is lost because of the qualifying event. Under the Plan, qualified beneficiaries who elect COBRA continuation coverage must pay for COBRA continuation coverage.

If you're an employee, you'll become a qualified beneficiary if you lose your coverage under the Plan because of the following qualifying events:

- Your hours of employment are reduced, or
- Your employment ends for any reason other than your gross misconduct.

If you're the spouse of an employee, you'll become a qualified beneficiary if you lose your coverage under the Plan because of the following qualifying events:

- Your spouse dies;
- Your spouse's hours of employment are reduced;
- Your spouse's employment ends for any reason other than his or her gross misconduct;
- Your spouse becomes entitled to Medicare benefits (under Part A, Part B, or both); or
- You become divorced or legally separated from your spouse.

Your dependent children will become qualified beneficiaries if they lose coverage under the Plan because of the following qualifying events:

- The parent-employee dies;
- The parent-employee's hours of employment are reduced;
- The parent-employee's employment ends for any reason other than his or her gross misconduct;
- The parent-employee becomes entitled to Medicare benefits (Part A, Part B, or both);
- The parents become divorced or legally separated; or
- The child stops being eligible for coverage under the Plan as a "dependent child."

### **When is COBRA continuation coverage available?**

The Plan will offer COBRA continuation coverage to qualified beneficiaries only after the Plan Administrator has been notified that a qualifying event has occurred. The employer must notify the Plan Administrator of the following qualifying events:

- The end of employment or reduction of hours of employment;
- Death of the employee; or
- The employee's becoming entitled to Medicare benefits (under Part A, Part B, or both).

**For all other qualifying events (divorce or legal separation of the employee and spouse or a dependent child's losing eligibility for coverage as a dependent child), you must notify the Plan Administrator within 60 days after the qualifying event occurs. You must provide this notice to Human Resources.**

### **How is COBRA continuation coverage provided?**

Once the Plan Administrator receives notice that a qualifying event has occurred, COBRA continuation coverage will be offered to each of the qualified beneficiaries. Each qualified beneficiary will have an independent right to elect COBRA continuation coverage. Covered employees may elect COBRA continuation coverage on behalf of their spouses, and parents may elect COBRA continuation coverage on behalf of their children.

COBRA continuation coverage is a temporary continuation of coverage that generally lasts for 18 months due to employment termination or reduction of hours of work. Certain qualifying events, or a second qualifying event during the initial period of coverage, may permit a beneficiary to receive a maximum of 36 months of coverage.

There are also ways in which this 18-month period of COBRA continuation coverage can be extended:

#### ***Disability extension of 18-month period of COBRA continuation coverage***

If you or anyone in your family covered under the Plan is determined by Social Security to be disabled and you notify the Plan Administrator in a timely fashion, you and your entire family may be entitled to get up to an additional 11 months of COBRA continuation coverage, for a maximum of 29 months. The disability would have to have started at some time before the 60th day of COBRA continuation coverage and must last at least until the end of the 18-month period of COBRA continuation coverage.

### ***Second qualifying event extension of 18-month period of continuation coverage***

If your family experiences another qualifying event during the 18 months of COBRA continuation coverage, the spouse and dependent children in your family can get up to 18 additional months of COBRA continuation coverage, for a maximum of 36 months, if the Plan is properly notified about the second qualifying event. This extension may be available to the spouse and any dependent children getting COBRA continuation coverage if the employee or former employee dies; becomes entitled to Medicare benefits (under Part A, Part B, or both); gets divorced or legally separated; or if the dependent child stops being eligible under the Plan as a dependent child. This extension is only available if the second qualifying event would have caused the spouse or dependent child to lose coverage under the Plan had the first qualifying event not occurred.

### **Are there other coverage options besides COBRA Continuation Coverage?**

Yes. Instead of enrolling in COBRA continuation coverage, there may be other coverage options for you and your family through the Health Insurance Marketplace, Medicaid, or other group health plan coverage options (such as a spouse's plan) through what is called a "special enrollment period." Some of these options may cost less than COBRA continuation coverage. You can learn more about many of these options at [www.healthcare.gov](http://www.healthcare.gov).

### **If you have questions**

Questions concerning your Plan or your COBRA continuation coverage rights should be addressed to the contact or contacts identified below. For more information about your rights under the Employee Retirement Income Security Act (ERISA), including COBRA, the Patient Protection and Affordable Care Act, and other laws affecting group health plans, contact the nearest Regional or District Office of the U.S. Department of Labor's Employee Benefits Security Administration (EBSA) in your area or visit [www.dol.gov/ebsa](http://www.dol.gov/ebsa). (Addresses and phone numbers of Regional and District EBSA Offices are available through EBSA's website.) For more information about the Marketplace, visit [www.HealthCare.gov](http://www.HealthCare.gov).

### **Keep your Plan informed of address changes**

To protect your family's rights, let the Plan Administrator know about any changes in the addresses of family members. You should also keep a copy, for your records, of any notices you send to the Plan Administrator.

### **Plan contact information**

St. Olaf College Office of Human Resources  
1520 St. Olaf Avenue, Northfield, MN 55057  
507-786-3068 | [hrstaff@stolaf.edu](mailto:hrstaff@stolaf.edu)

### **Re-Employment**

Employees who return to regular employment within twelve months after separation will receive credit for prior service toward recognition of years worked and will be included in the proper accrual schedule for benefits.



## **COLLEGE SERVICES AND ACTIVITIES**

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### **Archives (Shaw-Olson Center for College History)**

The Archives of St. Olaf College, housed in the Rolvaag Library, consist of non-current materials that record and exhibit the history and life of the College. Periodically, the Archivist requests faculty, administration, and staff members to deposit appropriate materials in the Archives. The Archivist, or a member of this staff, together with the faculty or staff member involved, shall select materials that shall be transferred to the archives. Materials not selected will be destroyed.

Materials may not be removed from the Archives for any purpose except by the written approval of the President of the College or the Archivist. The record of such approval and a signed receipt for materials withdrawn shall be kept by the Archivist.

### **Bookstore**

The Bookstore is located on the lower level of Buntrock Commons. St. Olaf employees, spouses, and dependents are eligible for a discount on their purchases with valid identification. This discount excludes food and beverages, health and beauty products, all recorded music, magazines/newspapers, and phone/gift cards. The Bookstore accepts St. Olaf department charges, as well major credit cards.

### **Chapel Attendance**

St. Olaf is a Christian community that includes faculty, administration, staff, and students as integral parts of the community. An important part of community life is the daily chapel service. Although employees are not required to attend, employees who so desire may attend morning chapel. Individuals interested in speaking at a daily chapel service are encouraged to contact the College Pastors' Office.

### **College Vehicles**

St. Olaf has a fleet of vehicles that are available for official business of the College. These are available to faculty, staff and recognized student organizations. Vehicles in the fleet include:

- Mini vans (7 passagers total)
- Vans (12 passagers total)

Anyone driving a College vehicle must have taken the Safe Driver Training Course offered each semester. You need to have this updated every two years. Vehicles will not be reserved/checked out without a College account number.

To reserve a vehicle, contact the Buntrock Commons Office. Key packets can be picked up at:

- Buntrock Information Desk - during the academic year
- Buntrock Office – during the summer

## **Food Service**

The following St. Olaf Food Service areas are located in Buntrock Commons. Employees have access to three separate dining areas in Buntrock Commons.

The Cage is open 7 days a week for breakfast, lunch and dinner.

The Kings' Room is open Sunday through Friday for lunch only. The Kings' Room is closed during the summer and during breaks.

Stav Hall (the cafeteria) is open Monday through Sunday for breakfast, lunch and dinner.

The Lion's Pause is a student-run food service area. They are open from 10:30 a.m. to Midnight Monday–Thursday and Sunday and 10:30 a.m. to 2:00 p.m. Friday and Saturday.

Norway Valley Café is located in Regents Hall of Natural Sciences and Mathematics. They are open 7:15 a.m.–2:15 p.m. Monday – Friday.

The food service hours of operation change when classes are not in session.

## **Identification Cards**

All St. Olaf employees will be issued a bar-coded picture Ole Card. The Ole Card will allow you access to the following services here on campus:

- Checking out library books or materials
- Use of the Tostrud Center
- Depositing money to an account and eating at The Cage, The Lion's Pause, Stav Hall, The Kings' Room, or Norway Valley Café and charging it to your card
- Purchasing items at the Bookstore and charging it to your card
- Verifying employment status for an employee discount at the Bookstore
- Use of copying machines
- For some employees, building access after-hours
- For some of the same services at Carleton College

Ole cards can be obtained at the Buntrock Commons office, room 007, located at the North end of the Crossroads. The first card is free. If the card is lost, it can be replaced but a replacement fee will be imposed.

## **ATM Machines**

ATM machines are located on the lower level of Buntrock Commons for employee convenience.

## **Library**

We encourage all College employees to make use of the electronic and print collections in Rolvaag Library, the Hustad Science Library (in Regents Hall of Natural Science), and the Halvorson Music Library (in the Music Building). Your College ID serves as your library card, allowing you to check out material and, in most cases, take it home.

In addition to specialized material in all disciplines of the liberal arts, the St. Olaf collection is rich in fiction, biographies, and history. The music library houses musical scores and recordings. You may take home videos and DVDs of feature films and documentaries.

St. Olaf College and Carleton College share a catalog ([bridge.stolaf.edu](http://bridge.stolaf.edu)), which allows you to search the two colleges' collections as if they were one. You may order any item from Carleton free of charge - delivery usually takes less than 24 hours. You may also visit the Carleton library, use their reference librarians, and check out their material in person.

More information about the collection, services, hours of operation, catalog, and print and electronic resources may be found at [www.stolaf.edu/library](http://www.stolaf.edu/library).

## **Notary Public Services**

Notary public services are available to all employees for no charge in the Registrar's Office and Treasurer's Office, both located in the Tomson Hall. Additional notary services may be available through other Administration departments. For a current list please refer to the Office of the Treasurer website: [www.stolaf.edu/offices/treasurer/](http://www.stolaf.edu/offices/treasurer/)

## **Parking and Registration Information**

All St. Olaf College employee vehicles must display a current parking permit when parked on St. Olaf College property. There is no charge for parking permits for faculty and staff. Registration cards and parking permits may be obtained at the Parking Office. In order to register a vehicle and obtain a permit, employees must provide the license plate number, state, make, model and color of vehicle. Employee vehicles must be parked only in areas designated for faculty and staff. Vehicles without a current parking permit or vehicles improperly parked will be ticketed. Employees are expected to abide by the St. Olaf College Motor Vehicle Policy, which can be found on the St. Olaf website.

## **Passport Services**

International & Off-Campus Studies makes arrangements for a representative of the Rice County Recorder's Office to come to campus twice a year (April & October) to accept passport applications. Passport photos are taken on the day of the visit. Check with International & Off-Campus Studies for specifics.

## **Post Office**

The St. Olaf College Post Office is located in Buntrock Commons. It provides the following business and personal services:

- Distribution of U.S. and campus mail, including intercampus mail with Carleton College.
- Mailing letters and packages through the following services: U.S. Postal Service, UPS, Federal Express, and DHL.

## **Print Center**

The St. Olaf Print Center, located in Buntrock Commons, is a full-service copy center offering 24-hour turnaround on most orders. Services available include: photo copying/printing, color copying/printing, folding, cutting, bookbinding, tabbing and laminating. It is also the campus resource for department paper supplies and campus stationery supplies.

## **Recreation / Tostrud Center**

The Recreation, Exercise Science and Athletics (RESA) facilities (Tostrud Center, Skoglund Center and Manitou Fieldhouse) are available to employees, as well as members of their immediate family, to provide them with the place and the opportunity to exercise as the College emphasizes mind, body and spirit.

For more information regarding access to these facilities, fees, schedule of hours, and list of services available visit: [www.stolaf.edu/recreation/](http://www.stolaf.edu/recreation/)

## **Room Scheduling**

Rooms can be reserved by using the R25 Room Reservation feature on the St. Olaf website.

## **St. Olaf Christmas Festival**

The St. Olaf Christmas Festival is one of the oldest musical celebrations of Christmas in the United States and features more than 500 student musicians. The festival is broadcast nationwide on public television and radio. College employees will be given an opportunity to request a maximum of two complimentary tickets each year. Additional tickets may also be purchased, subject to availability.

## **Safe Ride Escorts**

The Safe Ride program, under the direction of Public Safety, provides safe vehicular transportation for students, faculty and staff concerned about their personal safety both on-campus and to areas immediately adjacent to the campus. Safe Ride operates evenings on all days that classes are in session. Rides may be obtained by calling Public Safety. During the evening/early morning when Safe Ride is not operational, Public Safety will provide transports by calling the 24 Hour Dispatch number, x3666. This service is not designed to provide transportation to downtown locations and requests may be refused if deemed inappropriate. Requests for “group rides” will be denied.

## **Telecommunication Services**

The Office of Telecommunications is responsible for providing telephone service, the printed College telephone directory, the switchboard electronic directory, fax services, voice mail, audio and video conference calls, satellite downlinks, cable TV, and cellular telephones for departments. Fax services are available through this office for employee and student personal use for a nominal fee. Telephone and fax charges are billed once a month to all offices.

A booklet detailing the operation of these services and hands-on training in the use of these systems is available through the Office of Telecommunications, located on the lower level of Buntrock Commons. You may also check their website for more information at: <http://wp.stolaf.edu/telecom/>

# POLICIES AND PROCEDURES

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## Access to Personnel File

Minnesota law provides employees with certain rights relating to their personnel records. (See Minnesota Statutes Sections 181.960-181.965). St. Olaf College will comply with all requirements of the law. Employees are put on notice of the following rights and remedies provided by Minnesota law:

1. Employees, upon making a good faith written request, have the right to review their personnel record, as defined by the statute, up to once every six months. The record will be made available during the College's normal hours of operation, but not necessarily the employee's normal working hours, and at the employee's place of employment or other nearby location. St. Olaf College may require that the review be done in the presence of a College representative. If employees so choose, they may make a written request for a copy of the personnel record, which will be provided free of charge.
2. Former employees, upon making a good faith written request, have the right to receive a copy of their personnel record, as defined by the statutes, once each year after separation of employment for as long as the personnel record is maintained. The personnel records will be provided free of charge.
3. St. Olaf College will comply with the written request to review or provide a copy of the personnel records no later than seven (7) working days after receipt of the written request.
4. Employees and former employees have the right to submit a written position statement to the personnel record if the record contains any disputed information which the employee/former employee and St. Olaf College cannot agree to remove or revise. The written position statement may not exceed five written pages. The written position statement will be included along with the disputed information in the record for as long as the disputed information is maintained in the personnel record. A copy of the written position statement will also be provided to any other person who receives a copy of the disputed information from St. Olaf College after the written position statement is submitted.
5. If St. Olaf College and the employee have fully complied with the requirements related to disputed information, which are described in paragraph 4 above, no communication by the employee or St. Olaf College of information contained in the personnel records may be made the subject of any common law civil action for libel, slander, or defamation, unless St. Olaf College communicates information with knowledge of its falsity or with reckless disregard of its falsity.
6. If St. Olaf College refuses to comply with the personnel record statutes, employees and former employees may bring a civil cause of action seeking to compel compliance and may recover actual damages plus costs for a violation of

the statutes. In addition, the Minnesota Department of Labor & Industry can enforce the statutes and seek additional remedies and impose fines.

7. St. Olaf College may not retaliate against an employee for asserting the rights or seeking the remedies described above. Employers that retaliate against employees for exercising the rights or remedies described above may be liable for actual damages, back pay, reinstatement, costs, attorneys' fees and other make whole relief. In addition, the Minnesota Department of Labor & Industry may seek additional remedies and impose fines.
8. Information that properly belongs in the employee's personnel record, as defined in the statute, which is omitted from the personnel record provided by St. Olaf College to the employee may not be used by the College in certain legal proceedings, including administrative, judicial or quasi-judicial proceedings, unless St. Olaf College did not intentionally omit the information and the employee is given a reasonable opportunity to review the omitted information prior to its use.

## **Advancement of Salary**

The College does not advance payment of salaries and wages, except in unusual circumstances. Any advance payment must have prior approval of the VP/Treasurer.

## **Alcohol and Drug Use**

St. Olaf College desires to have a campus free of alcohol and illicit drugs and to operate all of its academic and co-curricular programs accordingly. It does so out of the conviction that this freedom will a) enhance the atmosphere for study, learning, growth, work, and wellness; b) support members of the community affected by, or concerned with, the abuse of alcohol and illicit drugs; c) respect the decisions of those who choose not to use alcohol or illicit drugs; and d) promote a caring environment.

Since we recognize that members of the community may, within applicable federal, state, and local law, choose to use alcohol, St. Olaf College will actively educate the members of the campus community about alcohol and drugs and provide help for those affected by substance abuse problems. In addition, the College will provide social activities which do not rely on alcohol or illicit drugs and will maintain a supportive climate for those who choose not to use these substances.

Employees who are convicted of a criminal drug-statute violation that occurred in the workplace are required to inform their supervisor or department head.

At the same time, the College realizes that employees may have a problem of substance abuse which they are not able to control, but would like to overcome. The College supports employees with substance abuse problems who seek treatment to overcome such problems. Employees who wish to seek assistance may discuss such plans with their supervisor or contact the Employee Assistance Program (EAP). The

supervisor and the employee will meet with the Director of Human Resources to make arrangements for a leave for treatment if necessary.

### **Policy Statement**

The possession, distribution, or consumption of alcoholic beverages is prohibited on the St. Olaf campus, on land owned by the College, and in College-owned honor and language houses. The consumption of alcoholic beverages is prohibited at all College-sponsored functions, no matter where located, that include students.

St. Olaf prohibits the unlawful possession, distribution, or use of illicit drugs and/or controlled substances on any property owned by the College or in any program or activity sponsored by the College in any location.

Anyone violating College policy regarding alcohol, illicit drugs, and/or controlled substances will be subject to disciplinary action.

## **Animal Policy**

### **Definitions**

"Animal" for the purposes of this policy, shall mean any animal other than a human.

"Their human" shall mean the owner or keeper of the animal.

### **Applicable Public Law**

Any person bringing an animal(s) onto the property of St. Olaf College should be aware that the City Code of Northfield applies to their visit. Please refer to Part II, Chapter 10, Article II, 10-31 through 10-98 of the Northfield City Code. The Americans With Disabilities Act also applies as it pertains to Service Animals.

### **Service Animals**

Service animals are legally defined (Americans With Disabilities Act) and are trained to meet disability-related needs of their handlers. Federal laws protect the rights of individuals with disabilities to be accompanied by their service animals in public places. St. Olaf will comply with all applicable laws pertaining to service animals.

### **Animals in Buildings**

No animals are allowed in St. Olaf College's public buildings with the exception of animals required for use in teaching and research or service animals. If the requirement for an animal in teaching or research is questioned, the Dean of the College will make a final determination. The Dean of Students has authority over the policy in the residence halls and College houses.



## **Animals on the Grounds**

Animals must be leashed and under the direct control of their human. Animals running freely will be reported to the City of Northfield Animal Control Officer for pickup as provided for in the City Code.

All animal feces must be picked up and properly disposed of by the associated human.

Animals that are tied up and unattended are not under the direct control of their human and are also subject to pickup.

Animals that are left in their human's vehicle will be reported if they appear to be neglected or under duress from heat, inadequate ventilation, or severe cold.

St. Olaf reserves the right to remove from the campus or report to the City of Northfield Animal Control any animal who, because of noise or other factors, is deemed a disturbance on campus. Students and employees who fail to cooperate with requests to remove their animals shall be subject to appropriate discipline.

## **Reporting Violations**

Persons who wish to report violations of this policy may call St. Olaf Public Safety, #3666.

## **Code of Conduct**

### **Introduction**

St. Olaf College (the College) has built and maintained its reputation for integrity and honesty by following the highest standards in its practices. These standards go beyond the requirements of the law. All of us contribute to this reputation every day by the way we conduct ourselves. This Code of Conduct applies to all employees of the College. As appropriate standards of conduct cannot always be defined by strict rules, this Code of Conduct cannot address every situation that you may confront in the day-to-day conduct of your many activities at the College. This Code can, however, give you guidance and direct you to resources to help you make the right decisions.

### **Human Resources Department and Campus Conduct Hotline**

The Human Resources Department is here to assist you in adhering to your ethical and legal responsibilities, and to contact the appropriate individuals that are responsible for investigating allegations of conduct that conflicts with our responsibilities, as set forth in this Code of Conduct or otherwise, or violates applicable law. You are expected to promptly report any conduct that you believe violates the ethical and legal responsibilities of a St. Olaf College employee. Such reports may be made on a confidential and/or anonymous basis. You may report such conduct to your supervisor or to a member of the Human Resources Department. Such persons will strive to maintain the confidentiality of any report to the maximum extent consistent with fair and rigorous review of the conduct. Alternatively, if you wish to remain anonymous, you may report such conduct by calling the Campus Conduct Hotline at 1-866-943-5787.

Retaliation against anyone who reports suspected conduct that is believed to violate the ethical or legal responsibilities of a St. Olaf College employee is strictly prohibited. You will not suffer any penalty for reporting in good faith any suspected violation.

### **General Policy**

It is the College's policy to observe and comply with all laws, rules and regulations applicable to the conduct of its business in all countries in which it operates. Involvement in, or the use of the College assets for, any unlawful purpose is strictly forbidden. As the College's employees, we are required not only to avoid any unlawful activity, but also any activity that would reflect unfavorably on the College. The College is committed to the highest standards of business and personal ethics for itself and its employees because acting in accordance with such standards is morally and legally right. The College's success depends on a multitude of factors, which include its reputation for integrity and on the trust of the public, the college community, donors, suppliers, students and government and regulatory authorities.

### **Ask First**

As noted above, this Code of Conduct cannot address every situation that you may confront in the day-to-day conduct of your many activities at the College. This is especially true because our work, as guided by the Mission Statement of the College, is complex and the right thing to do may not always be clear. The College does not expect you to always determine the right answer to complex questions of law or ethics on your own. Instead, if you encounter a situation where the application of the guidelines contained in this Code is not clear or seems inappropriate, you should consult with your supervisor or a member of the Human Resources Department. In short, if you are uncertain about any situation, ask for guidance.

### **Discipline**

Failure to comply with this Code of Conduct may result in disciplinary actions consistent with the College's employment policies or agreements. Such disciplinary actions up to and including warnings, suspensions (with or without pay), termination of employment or other actions as may be appropriate under the circumstances may be taken, for example, for the following:

- ◆ Authorizing or participating in activities that violate this Code of Conduct.
- ◆ Deliberately failing to report conduct that you believe violates this Code of Conduct or withholding relevant and material information concerning a suspected violation.
- ◆ Retaliating directly or indirectly—or encouraging others to do so—against an employee who reports a suspected violation of this Code of Conduct.

This list is not intended to be exhaustive and other incidents and behaviors can also result in disciplinary action, including termination.

### **Conflicts of Interest**

In order to thrive, the College must have the loyalty of each of its employees. As an employee, you must be free of conflicting interests in the performance of your duties for

the College because conflicts of interest might influence your judgment and cause you to make a decision that is not in the best interest of the College. As a general guideline, you must avoid any situation where your personal interests could conflict with, or create the appearance of conflicting with, the interests of the College.

For more specific guidelines regarding conflicts of interest, please see the College's Conflict of Financial Interest Policy. If you have any doubt or concern that a situation may create a conflict of interest, or the appearance of a conflict of interest, you should discuss your concern with your supervisor, the Treasurer, or a member of the Human Resources Department.

### **Fraud**

The College will not tolerate fraudulent business practices. All employees of the College play an important role in detecting, reporting and preventing fraud. If you detect, or are suspicious of, fraudulent activities, you are required to immediately report your concern to your supervisor, the Treasurer, or to a member of the Human Resources Department, or by calling the Campus Conduct Hotline.

### **Use of Assets**

The College's assets are to be used solely for the benefit of the College. You are responsible for assuring that any assets of the College that you are responsible for are used only for valid College business purposes. You may not use the College's assets to provide personal gain for yourself or others. You may not loan, borrow, donate, sell or dispose of any of the College's assets unless you are specifically authorized to do so.

### **Confidential Information**

It is very important that you comply with laws governing disclosure of student and other protected information and appropriately safeguard the College's confidential information and refuse any improper use or disclosure of the confidential information. In terms of the College's confidential information, our basic guidelines are as follows:

- ◆ You should only discuss confidential information with others within the College on a need-to-know basis. If you provide or discuss confidential information with another employee within the College, you should ensure that such person is aware of its confidential nature. You should not share confidential information with individuals who are not employees of the College unless they are under contract with the College and bound by a non-disclosure agreement.
- ◆ All employees with access to student information are expected to be conversant with the requirements of the Family Education Rights and Privacy Act (FERPA). See: <http://wp.stolaf.edu/registrar/ferpa/>
- ◆ You must guard against accidental disclosure of confidential information. If you have access to the College's computer systems, including portable devices such as laptops, tablets, or smartphones, you are responsible for taking precautions necessary to prohibit unauthorized access to the system, including safeguarding your passwords or other means of entry.

## **Corporate Records**

The College's corporate records, including, but not limited to, business records, accounting records, time sheets, student records, expense reports, bills, payroll, service records, reports to government agencies and other essential records, are to be prepared and maintained with accuracy, honesty and in strict compliance with applicable laws or procedures. These records are the basis for managing the College's business and for fulfilling its obligations to its employees, donors, suppliers, students and regulatory authorities.

If you determine that there has been an omission from, or inaccuracy in, the College's corporate records, you should immediately report such omission or inaccuracy to your supervisor or to a member of the Human Resources Department, or by calling the Campus Conduct Hotline

## **Compliance with Government Investigations**

It is the College's policy to cooperate with governmental agencies and authorities in their proper performance of inquiries or investigations. If you receive a request from a governmental entity, either oral or written, for information that you do not ordinarily provide to the government in the regular course of your job, such request should be forwarded to your supervisor.

If you are asked to participate in responding to a governmental request, you should provide truthful and accurate information. You should never destroy documents in response to an investigation. For more specific guidelines regarding the College document retention policy, please see the College's "Record Retention/Destruction Policy" on the College's website.

## **Global Practices**

It is the goal of the College to be a good corporate citizen in each country in which it operates. The College can achieve this goal only if its employees obey all of the laws and regulations of, and respect the lawful customs of, all countries in which the College operates. If you are unsure about appropriate business behavior in another country, be sure to speak with your supervisor or a member of the Human Resources Department.

## **Dealing With Donors, Suppliers and Students**

The College's viability depends on the quality and value of its services and the respect and confidence that it instills in its donors, suppliers and students. It is your responsibility to treat all persons with whom you conduct business honestly, fairly and objectively.

## **Bribery and Kickbacks**

The College will not pay bribes or kickbacks to any person for any purpose, including for the purpose of obtaining or rewarding favorable treatment in a business transaction or for the purpose of influencing the judgment or actions of another. Such practices are not only unethical, but in many cases both in the United States and in other countries, are illegal.

### **Gifts, Entertainment and Other Items of Value**

Occasionally, people or companies with whom the College conducts business may offer gifts, entertainment or other items of value in appreciation for their business relationship with the College. While the College recognizes that it is advantageous to develop and maintain good business relationships, we also require that our employees guard against engaging in any activity, or accepting gifts, entertainment or other items of value, that may encourage, or give the perception of encouraging, inappropriate favoritism toward any person or company.

It is never appropriate for you to solicit or accept a gift of money or for you to solicit a nonmonetary gift, entertainment or other item of value for your own personal benefit from any person or company. You may accept unsolicited, nonmonetary gifts, entertainment and other items of value from a person or company that does, or is seeking to do, business with the College if such gift, entertainment or item is of nominal value (generally less than \$50) and you report the same to your supervisor. Gifts, entertainment and other items of more than nominal value may be accepted only if approved in advance by your supervisor. If you have any doubt or concern that the receipt of any gift, entertainment or other item of value may be inappropriate, or cause the appearance of impropriety, you should discuss the same with your supervisor or a member of the Human Resources Department.

### **Business Defamation**

You may not make false or misleading remarks about individuals or organizations or their products and services. In particular, you may not make false or misleading remarks about the College's competitors or their products, services or employees. All comparisons between the College services and those of a competitor must be accurate and factual. You must accurately represent the College services in all marketing, advertising and sales contacts.

### **Contacts with News Media**

The College strives to maintain a positive working relationship with the news media. The College is as open and candid with the media as possible, but there are times when we cannot or will not provide requested information. Confidential information that cannot be released is addressed above. It is the College's policy to cooperate with the media in a professional and timely manner by providing appropriate information. In order to do this, all calls or inquiries from the media must be forwarded to the Communications Department.

### **Harassment**

The College prohibits and does not tolerate unlawful harassment of employees, contractors, vendors, students or visitors. The College also prohibits consensual relationships between a faculty or staff member and any student enrolled at the College. For more specific guidelines, please see the sections of your Employee Handbook entitled "Harassment Policy," "Sexual Harassment Policy," and "Consensual Relations." If you believe you have been the victim of harassment in violation of this policy, you

should immediately contact the Director of Human Resources or the Campus Conduct Hotline.

### **Nondiscrimination and Equal Opportunity**

The College is strong because of the strength of its employees. For that reason, the College seeks to provide a work environment where all employees have an equal opportunity to reach their full potential and contribute to the College's success. You must not discriminate against any employee or applicant for employment because of race, color, creed, religion, gender, gender identity, gender expression, sexual orientation, age, national origin, disability, marital status, status with regard to public assistance or any other classification protected by law. Further, you must not refuse to conduct business with any person on the grounds of that person's race, color, creed, religion, gender, gender identity, gender expression, sexual orientation, age, national origin, disability, marital status, status with regard to public assistance or any other status protected by law. For more information about the College's nondiscrimination policy, see the policies entitled "Equal Opportunity Employer" and "Harassment Policy" in the College Faculty and Staff Handbooks. If you believe you have been discriminated against in violation of this policy, you should contact a member of the College's Human Resources Department or the Campus Conduct Hotline.

### **Safety, Violence and Health**

The College is committed to providing a safe and healthy workplace for its employees and visitors. It is the College's policy to comply with all applicable health and safety laws and regulations and to insist that work be done in a healthy, safe and responsible manner.

In order to create an environment free from threats, violence and intimidation, the College is committed to a policy of zero tolerance for violence. You are not permitted to have firearms or other weapons on the College property at any time. Individuals who possess a valid permit to carry a concealed weapon may, however, keep the weapon locked in the trunk or glove compartment of their vehicle in the parking lot. If you observe weapons to be present on the College property, you should dial 911 if it is an emergency situation, or otherwise immediately contact the Public Safety Office, your supervisor or Human Resources.

### **Environment**

The College is committed to maintaining the environment and minimizing the impact of its business operations on the land, air and water. This commitment can be met only through your awareness and cooperation in conservation and recycling efforts.

In the United States, federal, state and local regulatory agencies exist to monitor and enforce compliance with laws and regulations affecting environmental protection. It is the College's policy to comply with both the letter and the spirit of the laws and regulations imposed by these agencies and to exhibit a cooperative attitude with inspection and enforcement personnel from the agencies. In keeping with this spirit, you should report to your supervisor or to a member of the Human Resources Department any conditions that you perceive to be hazardous to the environment.

## **Drug-Free, Alcohol-Free and Smoke-Free Environment**

The College is committed to providing a safe, efficient and productive workplace, and, therefore, offers its employees a drug-free, alcohol-free and smoke-free working environment. Employees are to comply with all State and Federal laws related to drugs and alcohol. Please refer to the Faculty and Staff Employee Handbook section: “Alcohol and Drug Use”. Individuals who operate College vehicles, machinery or equipment must exercise caution when using certain prescription medications. In addition, use of or involvement with illegal drugs outside of your employment with the College will not be tolerated because it can negatively affect your ability to do your job, and the College’s reputation and ability to conduct business. The only exception to this policy permits alcoholic beverages to be served at some official social or business functions sponsored by the College.

The College expects that you will use good judgment in work-related social settings, particularly when participating in events where alcoholic beverages are served.

The College’s buildings are smoke-free environments. As such, you must not smoke anywhere inside these buildings. Additionally, employee meetings conducted off of the College’s property are, when practicable, smoke-free.

## **Community and Political Activities**

The College is committed to upholding and contributing to the political, legal and governmental processes of the local, state and federal governments of the United States and other countries in which the College operates. The College recognizes that participation by citizens in civic and political activities is necessary for communities and the democratic system to properly function. The College encourages you, as an individual citizen, to exercise your right to vote, to participate actively in community activities and the political process, to be informed on public issues, to be informed on positions and qualifications of public officials and candidates for public office, and to support the issues, candidates and parties of your choice.

When you are involved in any community and political activities, you must at all times make clear that your views and actions are your own and not those of the College. You must not use the College’s name, either directly or indirectly, to endorse any public issue, political candidate or political party, unless previously approved by the President or Provost. You may not make community donations or political contributions on behalf of the College, unless previously approved by the President or Provost.

If you have any questions about what is or is not proper with respect to community or political activities, you should consult with your supervisor or a member of the Human Resources Department.

## **Conclusion**

As a St. Olaf College employee, you are expected to understand and comply with this Code of Conduct. If there are any concerns as to how to deal with ethical questions or questions regarding this Code, you should contact your supervisor or a member of the Human Resources Department. If you believe that any of policies in this Code of

Conduct has been violated, you should contact your supervisor, a member of the Human Resources Department, or the Campus Conduct Hotline.

## **Confidential Information**

Employees may have access to confidential information about St. Olaf, its students, employees, alumni, and donors. Such information must never be discussed with anyone who does not have a legitimate need to know. Employees should discuss departmental policy regarding release of information with their supervisor.

St. Olaf College is guided by FERPA (Family Educational Rights and Privacy Act, 1974) in providing privacy of student records. FERPA deals specifically with the education records of students, affording them certain rights with respect to those records. For specific guidelines regarding the release of student information, contact the Office of the Registrar.

The Payroll Office will respond to requests to verify employment of an individual, their title and dates of employment. No other information will be released without a written authorization from the employee or former employee named in the request. However, information required by government agencies or court orders will be released without such a release request.

## **Conflict of Financial Interest for Employees**

Relationships between higher education institutions and government, nonprofit, and business sectors have increased greatly over the past several decades. St. Olaf College recognizes that many such relationships benefit the College's mission and its students. At the same time, the College strives to vigilantly guard against both actual and perceived abuses of these relationships. As professionals, those engaged in relationships with external entities have a responsibility to ensure that those relationships do not create any actual or perceived conflicts of interest, and to fully disclose all relevant information about potential conflicts of interest.

**1. Policy Statement.** It is the policy of St. Olaf College that all employees who make decisions that influence the financial actions of the College or its students must do so in accordance with the highest professional and ethical standards. In order to preserve the integrity and reputation of the College, such an employee is expected to avoid giving an unfair advantage—or even the appearance of an unfair advantage—to any person or organization (a “Vendor”) doing business with the College or its students. To comply with this policy, an employee must be aware of and seek to avoid any situation where the employee's personal interests conflict with the interests of the College and/or the students it serves, and where the College's interests conflict with the purchasing interests of its students. It is particularly important for an employee to avoid conflicts of interest when the employee is in a position to:



- (1) enter into contracts on behalf of the College; or
- (2) influence purchasing decisions made on behalf of the College; or
- (3) influence the purchasing decisions of students at the College.

An employee who is in a position to do any of the above is referred to in this policy as a “Responsible Person.”

**2. Procedure When a Conflict of Interest Arises.** The College cannot guard against a Vendor’s improper influence over the actions of a Responsible Person unless the College is aware of potential conflicts of interest. Therefore, any employee of the College who becomes aware that a conflict of interest may exist, regardless of whether the Responsible Person is himself or herself, or another, must disclose to his or her immediate supervisor and the Vice President and Treasurer that an employee’s relationship with a Vendor may produce a conflict of interest. The supervisor and the Vice President and Treasurer will assist in determining whether there is a conflict of interest, and if there is, will determine the course of action necessary to protect the interests of the College and/or its students.

If a Responsible Person is uncertain about whether a relationship with a Vendor could create an actual or apparent conflict of interest, he or she should always err on the side of disclosure so that the College is aware of the situation. However, a Responsible Person is not required to disclose a relationship with a Vendor if he or she is certain that no actual conflict exists and that no reasonable person would perceive that a conflict exists.

**3. Areas in Which a Conflict of Interest May Arise.** A conflict of interest may arise when a Vendor has, or could reasonably be believed to have, improper influence over the actions or judgment of a Responsible Person.

#### **a. Examples of Vendors**

A Responsible Person should be especially alert to conflicts of interest that may arise in the Responsible Person’s relations with:

- (1) Vendors that supply goods and services to the College, or to students of the College in connection with their attendance at the College;
- (2) Vendors from whom the College leases property, equipment or real estate; or from whom its students lease property, equipment or real estate in connection with their attendance at the College;
- (3) Vendors of student loans or other financial aid, or representatives of such Vendors, with whom the College is dealing or planning to deal.

#### **b. Examples of Relationships That May Produce a Conflict**

A Vendor's influence, or apparent influence, over a Responsible Person is most likely to result from either a personal or a financial relationship between the Responsible Person and the Vendor with whom the Responsible Person deals. A Vendor's influence or apparent influence over a Responsible Person also can result from offers made by the Vendor to finance trips, travel, seminars, educational materials, or the like, that may in fact benefit the College or its students, but that also may be perceived as providing personal benefit to the Responsible Person or inappropriate benefit to the College.

The following relationships commonly produce a conflict of interest:

- (1) A Responsible Person, or a family member of the Responsible Person, has an investment or ownership interest in the Vendor.
- (2) A Responsible Person, or a family member of the Responsible Person, has a compensation arrangement with the Vendor. A compensation arrangement specifically includes any payment to a Responsible Person from a Vendor in return for service on an advisory board or advisory panel related to the Vendor's business.
- (3) A Responsible Person, or a family member of the Responsible Person, is an officer, director, or employee with substantial influence over the actions of the Vendor.
- (4) A Responsible Person, or a family member of the Responsible Person, has received a gift or favor of more than nominal value (in excess of \$25) from a Vendor.
- (5) A Vendor has paid for, or reimbursed a Responsible Person for, goods or services of more than a nominal value, even if those goods or services assists the Responsible Person in carrying out his or her duties for the College, or lodging, meals, travel, or tuition in connection with a conference, travel abroad scouting trip, or training seminar.
- (6) A Vendor who offers services or goods to the College's students in connection with their attendance at the College has provided a financial or other benefit to the College for which the College has not paid a fair market value price.
- (7) A Responsible Person, who is a faculty member, assigns a textbook that he or she has written and for which he or she receives a royalty payment from the publisher for each textbook sold. (The College recognizes that in almost all cases, such assignments are made for appropriate academic reasons. This policy is not intended to deter or prohibit faculty from assigning books or articles that they have written; it merely requires that such situations be disclosed so that the College is aware of them.)

### **c. Examples Where No Conflict Exists**

Examples of situations where no actual or perceived conflict exists include:

- (1) The Responsible Person selects a vendor and it so happens that, unbeknownst to the Responsible Person, the stock of the vendor is among dozens of stocks that are selected by and held in a large mutual fund in which the Responsible Person owns shares.

(2) The Responsible Person, who is a faculty member, receives no personal, financial, or business benefit from assigning a particular textbook that happens to be published by the same publisher that published a different book written by the Responsible Person.

(3) A Responsible Person, or a family member of the Responsible Person, has received a gift or favor of nominal value (less than \$25) from a Vendor.

4. Violations of the Conflicts of Interest Policy. A Responsible Person who fails to disclose a relationship required to be disclosed under this policy is subject to discipline up to and including termination or dismissal. Other employees who fail to make such disclosures also may be subject to discipline or termination or dismissal.

## **Conflict of Financial Interest for Grant-Funded Research or Other Academic Projects**

1. **Policy Statement.** In accordance with federal regulations and in keeping with St. Olaf's commitment to the highest standards of integrity and ethics in research, St. Olaf College has a responsibility to assess and manage any actual, potential or perceived conflicts of interest that may be presented by research grant applications and the financial interests of researchers. Researchers who propose to receive funds from an external source for research or academic projects must disclose any significant financial interest that may reasonably appear to be affected by external funds. A possible conflict of interest does not preclude acceptance of external funding, but appropriate disclosures or other safeguards may need to be implemented and accepted by both the researcher(s) and the College.

### **2. Definitions.**

a. For purposes of this Policy, the term "Researcher" shall mean the principal investigator, the co-principal investigator and any other person who is responsible for the design, conduct, or reporting of research or other educational activities funded or proposed for funding by the National Science Foundation ("NSF"), the Public Health Service ("PHS"), or any other external public or private entity. Any individual responsible for a task that could have a significant effect on the research design, conduct or reporting is considered to be a Researcher, even if the individual does not have sole or primary responsibility for the task or the research.

b. For purposes of this Policy, the term "Significant Financial Interest" means anything of monetary value, including salary or other payment for services (consulting fees, honoraria, paid authorships), equity interests, and intellectual property rights. While this term is intended to be read broadly, the following items of monetary value will not be considered a Significant Financial Interest: (i) salary or other remuneration from St. Olaf College, (ii) income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities; (iii) income from service on advisory committees or review panels for public or non-profit entities; (iv) an equity interest that, when aggregated for the Researcher and the Researcher's spouse and dependent children, does not

represent more than a 5% ownership interest in any single entity and does not exceed \$5,000 in value as determined through reference to public prices or other measures of fair market value; and (v) salary, royalties or other payments, from an entity other than St. Olaf College that when aggregated for the Researcher and the Researcher's spouse and dependent children exceed \$5,000 during the preceding twelve-month period.

2. Procedure. Each Researcher must complete and sign a Disclosure of Financial Interest Form, at the time of application for an award and annually for the duration of the award. The form requires researchers to disclose Significant Financial Interests: (i) that would reasonably appear to be affected by research or educational activities funded or proposed for funding by an external source, such as the NSF or PHS; or (ii) in entities whose financial interests would reasonably appear to be affected by such activities, or (iii) that reasonably appear to be related to the Researcher's Institutional Responsibilities. A copy of this form is available from the Office of Government and Foundation Relations. Additional disclosures may be required based on the specific grant or other funding requirements.

The Assistant Provost has been designated to review disclosures of Significant Financial Interests, to determine whether an actual, potential or perceived conflict of interest exists, and to determine what conditions or restrictions, if any, should be imposed by the College to manage, reduce or eliminate such actual, potential, or perceived conflict of interest. A conflict of interest exists when the Assistant Provost reasonably determines that a Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of research or educational activities funded by the grant.

Examples of conditions or restrictions that might be imposed to manage, reduce or eliminate conflicts of interest include, but are not limited to:

- a. public disclosure of Significant Financial Interests;
- b. monitoring of research by independent reviewers;
- c. modification of the research plan;
- d. disqualification from participation in the portion of the funded research that would be affected by significant financial interests;
- e. divestiture of Significant Financial Interests; or
- f. severance of relationships that create conflicts.

If the Assistant Provost determines that imposing conditions or restrictions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a Significant Financial Interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare, then the College may allow the research to go forward without imposing such conditions or restrictions.

**3. Enforcement and Violations.** A Researcher who fails to disclose a Significant Financial Interest or to comply with the conditions or restrictions imposed by the College is subject to discipline up to and including termination or dismissal.

The Assistant Provost is responsible for keeping the NSF's Office of the General Counsel, the PHS, and other relevant public and private entities appropriately informed if the College finds that it is unable to satisfactorily manage a conflict of interest.

The College shall maintain records of all financial disclosures and of all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any NSF or other administrative or legal action involving those records, whichever is longer. The College shall strive to maintain the confidentiality of all financial disclosures; however, such disclosures may be subject to government audit, court subpoena, or other legally required disclosure.

Collaborators from other institutions must either comply with this policy or provide a certification that their institutions are in compliance with federal regulations regarding research conflicts of interest and that they have complied with their institutional policies with regard to disclosures of significant financial interests.

## **Consensual Relations**

### **Rationale and Definition**

A Consensual Relationship as that term is used in this policy is one in which two members of the St. Olaf College community are engaged by mutual consent in a romantic or sexual relationship. When such a relationship involves people who differ in power within the College community, it is of special concern because of the potential for conflict of interest and/or abuse of power. Decisions that must be made free from bias or favor may come under question when made by a person who may benefit from or be harmed by the decisions. The mere appearance of bias resulting from a Consensual Relationship may seriously disrupt the academic or work environment. Equally important, such relationships have the potential to undermine our sense of community, mutual trust, and support.

The seeds of harassment and sexual harassment can exist in Consensual Relationships of any kind that involve differences of status or power. For these reasons, St. Olaf College has adopted the following policy with respect to Consensual Relationships and places all employees on notice that the College views Consensual Relationships by a College community member with a College community member over whom he or she has authority as unwise and of a high risk, especially when students are involved.

### **Consensual Relations Policy**

- A. St. Olaf College strongly discourages Consensual Relationships between:
  1. A supervisor and an employee who is subordinate to that supervisor
  2. An administrator and a faculty member in a unit under that administrator's direction

3. An administrator and a staff member in a unit under that administrator's direction
  - B. St. Olaf College prohibits Consensual Relationships between a faculty or staff member and any student enrolled at the College. St. Olaf College also strictly prohibits within a Consensual Relationship between employees or students any behavior in violation of the College's harassment policy.

A member of the College community who violates the prohibition in part B above will be subject to discipline, up to and including dismissal. In situations involving the discouraged behavior in part A, the College reserves the right to transfer employees, rearrange reporting arrangements, or take other action, including disciplinary action, to remedy any situation deemed inappropriate.

### **Reporting Apparent Violations and Procedures for Action**

Any member of the College community who has reason to believe that a violation of the Consensual Relations Policy prohibitions in Part B has occurred or that a College community member's engaging in the discouraged behavior in Part A is adversely affecting another College community member or the College should immediately contact the Provost, Vice President, Dean of Students, or Associate Dean supervising the person believed to be in violation of the policy, to express his/her concern and to explain the basis for concern. Individuals can also contact the College's Affirmative Action Officer or the Office of Human Resources. Administrators contacted are responsible for working with Human Resources and/or Student Services to see that the matter is investigated and/or acted upon appropriately. Any concern about violations at the Dean/Vice President/Provost level may be taken to any of the above-listed persons, or to the President, who shall take, or cause to be taken, appropriate action. If a student believes that he or she has been subjected to sexual harassment, he or she also may file a grievance under the student grievance policy published in "The Book."

### **Education**

St. Olaf College provides educational opportunities to acquaint members of the College community with the specific provisions of this policy to promote better understanding of the difficult issues which may arise as a result of Consensual Relationships between members of the College community.

### **Crime Awareness and Campus Security Act (Clery Act)**

This legislation requires all colleges and universities to distribute information regarding certain campus regulations, campus safety and security policies and crime statistics to all students and employees on an annual basis. The Clery Act includes crime prevention program descriptions, procedures to follow to report criminal activity, campus facility security, authority of campus security officers, drug and alcohol abuse prevention efforts and crime statistics for the past three calendar years based on geographic location.

The Clery Act is posted on the St. Olaf College website. A paper copy of the Clery Act may be obtained upon request from the Dean of Students Office, Admissions Office, Human Resources Office, or Public Safety Office.

## **Disciplinary Procedures**

While the College will strive to maintain a progressive disciplinary procedure, it reserves the right to take any disciplinary action it deems appropriate at any time and without prior notice when warranted in the opinion of the College.

The College seeks to have a disciplinary system which is fair, firm and consistent. Disciplinary actions may include but are not limited to: withholding of a salary increase, counseling, oral warning, written warning\*, suspension (paid or unpaid), demotion, or termination.

The immediate supervisor, together with Human Resources, will decide appropriate discipline based upon the circumstances in each case.

Disciplinary action involving suspension and termination should be reviewed with Human Resources. All terminations must be approved by the President in advance or by the VP/Treasurer in the President's absence.

\*Written warnings must be forwarded to Human Resources for inclusion in the employee's personnel file.

## **Emergency Procedures**

If there is a criminal, medical, or safety emergency, **immediately call 9-911**. Be sure to calmly provide complete, accurate information.

Contact Public Safety (x3666) for security or medical situations that are not emergencies.

Send someone to the front door of the building to direct those summoned for help to the scene of the emergency.

## **Fire Alarms**

All persons must evacuate a building when the fire alarm sounds. Staff should leave doors closed and unlocked and move quickly and orderly to the nearest exit. Stay a safe distance from the building until the "All Clear" signal is given by Public Safety or firefighting personnel.

## Severe Weather Warnings

Tornado watches and warnings, or other strong storms are not uncommon in Minnesota.

- Know the location of the nearest emergency shelter for your facility.
- Check building postings for the location of emergency shelters.

A **TORNADO WATCH** means conditions are right for a tornado to develop. Continue with normal activities, but continue to monitor the situation.

A **TORNADO WARNING** means radar or weather spotters have identified a tornado. The emergency sirens will sound a steady tone for three minutes or longer if there is danger in the immediate area.

In the event of a warning, take the following actions:

- Seek immediate shelter (individuals with disabilities, follow the same procedures). When the warning siren sounds, seek shelter, preferably in a basement or below ground evacuation location. A steel formed or reinforced concrete building will provide some protection.
- In a multi-story building, seek shelter in an interior hallway or a lower floor.
- Stay away from outside walls, exterior doors, and glass windows or partitions. Do not open windows.
- Basements and interior hallways or rooms on lower floors offer good shelter.
- In vehicles, get out and seek shelter in a nearby well-built structure. If you cannot find a structure nearby, seek out a ditch or ravine, which can offer some protection. Lie face down, with hands covering your head.
- After the all clear, leave badly damaged buildings if it is safe to do so. Elevators may not work in damaged buildings; the electrical power may be out or there may be damage to the elevator equipment.
- If you are surrounded by debris, be aware that removing some of it can cause other debris or part of the building to collapse. If it is not safe or possible to leave the area, stay there until assisted out.
- Do not attempt to return to the building unless directed to do so by emergency personnel.
- Do not attempt to turn on or off any utilities or other equipment.
- Report all injuries and damage by calling 911 or Public Safety at extension 3666.



## **Employee Yearly Reviews**

The purposes of the yearly review process are to promote communication and provide useful feedback about job performance based on a current job description, to facilitate better working relationships, to provide a historical record of performance and to contribute to professional development. The College strives to conduct yearly reviews on an annual basis.

## **Equal Opportunity Employer**

It is the policy of St. Olaf College policy to provide equal opportunity to all employees and applicants for employment in accordance with all applicable equal employment opportunity laws, directives and regulations of federal, state, and local governing bodies or agencies thereof.

St. Olaf College does not discriminate against employees or applicants for employment because of race, color, creed, national origin, gender, gender identity, gender expression, marital status, age, disability, sexual orientation, status with respect to public assistance, religion (except to the extent religion may be a consideration permitted under law), or any other protected class status.

St. Olaf College will take affirmative action to maintain its goal that all employment practices are free of such discrimination. Such employment practices include, but are not limited to, the following: hiring, promotion, demotion, transfer, recruitment or termination, rates of pay or other forms of compensation, and selection for training.

## **Equal Opportunity Coordinator**

The Equal Opportunity Coordinator is the Vice President for Human Resources. The Coordinator is responsible for overseeing the College's compliance with all state and federal equal opportunity laws to which the College is subject. The Coordinator receives and seeks to resolve complaints about discrimination on the basis of race, color, creed, national origin, gender, gender identity, gender expression, marital status, age, disability, sexual orientation, status with respect to public assistance, religion, or any other protected class status. If you believe the College's Equal Opportunity Employer policy has been violated, you should contact the Equal Opportunity Coordinator.

## **First Report of Injury**

The College carries worker's compensation insurance to reimburse medical expenses and to continue wages in the event of a covered occupational illness or accident incurred in the course of employment. Any employee must immediately notify Human Resources of any work injury/illness. The Worker's Compensation contract requires that a First Report of Injury be filed immediately with the insurance carrier. Forms to report the injury or illness can be found on the Human Resources website under Employee Forms.

## **Sexual Misconduct Policy**

St. Olaf College is committed to a respectful, safe, and healthy environment and does not tolerate sex discrimination, sexual harassment, or sexual misconduct in any form. Prohibited behaviors include, but are not limited to, unwelcome sexual conduct or communication, rape and other forms of sexual assault, domestic violence, dating violence, and stalking. These behaviors are not only violations of an individual's rights and dignity, but are also attacks on our college community and violations of college policy. In addition, some forms of these behaviors are crimes.

St. Olaf is also committed to promptly, impartially, and equitably addressing and resolving all reports of sex discrimination, sexual harassment, and sexual misconduct. When the college finds that such behavior has occurred it will take steps to stop the behavior, to prevent its recurrence, and to remedy its effects.

Information including Title IX contacts, definitions, policies, what to do, how to file a report, and additional resources can be found at <http://wp.stolaf.edu/title-ix/policy/>.

## **Harassment Policy**

St. Olaf College is committed to creating and maintaining an environment in which all members of the St. Olaf community students, faculty, and staff are treated with respect and dignity, free from harassment. Faculty, staff, and students are together responsible for maintaining an educational and working environment that is harmonious with the College's mission.

Harassment consists of unwelcome conduct based on a person's race, color, creed, religion, national origin, gender, gender identity, gender expression, sexual orientation, disability, age, marital status, status with regard to public assistance, or any other protected class status when submission to such conduct:

- Is a condition of employment or academic advancement or
- Is a basis for an employment or academic decision or
- Interferes with an individual's job or academic performance or
- Creates an intimidating, hostile, or offensive work or academic environment

Harassment of any member of the St. Olaf community by another community member is prohibited.

## **Sexual Harassment Policy**

Sexual harassment is a form of sex discrimination. It includes unwelcome conduct such as sexual advances, requests for sexual favors, sexually motivated physical contact, or other verbal, nonverbal or physical conduct or communication of a sexual nature when:

- Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's educational experience or employment, or the

- individual's submission or rejection of such conduct is used as the basis of an educational program or activity decision or employment decision affecting such individual; or
- Such conduct has the purpose or effect of substantially and unreasonably interfering with an individual's education or employment or creating an intimidating, hostile, or offensive educational or work environment.

Sexual harassment is distinguished from a voluntary sexual relationship by the introduction of the element of coercion, threat, hostility, or unwanted attention of a sexual nature. Actions that can constitute sexual harassment include:

- Unwelcome sexual flirtations, advances, or propositions;
- Requests for sexual favors;
- Verbal abuse of a sexual nature, obscene language, off-color jokes, verbal commentary about an individual's body, sexual innuendo, and gossip about sexual relations;
- The display of derogatory or sexually suggestive posters, cartoons, drawings, objects, notes, letters, emails, or text messages;
- Visual conduct such as leering or making gestures;
- Videotaping or taking photographs of a sexual nature without consent;
- Cyber harassment, including but not limited to disseminating information, photos, or video of a sexual nature without consent;
- Engaging in conduct of a sexual nature which creates an intimidating, hostile, or offensive academic or work environment (e.g., sexually-oriented jokes, offensive physical contact, obscene messages and gestures); and
- Punishing or threatening to take adverse action against a subordinate or student for refusing to comply with sexual demands.

Although certain forms of sexual harassment may seem self-evident, recognizing such behavior when it is happening can be difficult. In making such an assessment, one should consider whether the behavior:

- Is offensive, unwanted or both;
- Interferes with one's ability to enjoy his or her employment or academic environment;
- Interferes with job or academic performance; or
- Causes unnecessary discomfort, humiliation or harm to oneself or others around one.

If at any time you experience any of these behaviors, you should immediately contact the Vice President for Human Resources or another Investigating Officer. Faculty and employees are reminded to review the College's Consensual Relations policy for other guidance relating to romantic relationships.

## Harassment Complaint Process

Concerns of harassment should be directed to an Investigating Officer. These are: the Director of Human Resources, Provost and Dean of the College, Assistant Provost, or a professional member of the Dean of Students staff. Arrangements will be made to have the allegations investigated and complaints resolved appropriately.

The College will determine what type of investigation is appropriate given the circumstances. If it is determined that the matter can be resolved informally through discussion and education, the College may opt to respond through less formal means. If the investigator deems the offending conduct to be severe or pervasive, a more formal investigation may be deemed appropriate.

A formal complaint process will include the questioning of witnesses. The Investigator will ask to hear the particulars of the complaint. Complaints will be handled in as discrete and confidential a manner as possible. However, in order to aid in conducting a thorough investigation, the College cannot promise complete confidentiality.

The Investigator will investigate the facts of the complaint. The Investigator will seek facts to ascertain the circumstances of the complaint and generally will request that witnesses keep the discussion about the complaint confidential. All documentation regarding the investigation will be kept in a confidential file within the Human Resources Office. It will not be part of an individual's personnel file.

If a violation of the harassment or sexual harassment policy has occurred, the College will take prompt and responsive action including (but not limited to) counseling or education on appropriate behavior, a requirement of behavioral changes, a written warning and/or other disciplinary actions, up to and including termination of employment or enrollment. Any written disciplinary action will be included in the individual's personnel file.

## Non-Retaliation Policy

Individuals involved in a harassment complaint must take care to neither say nor do anything that could be perceived as retaliation toward the complainant or any witnesses. Retaliation against any faculty, staff or student for making a complaint under this policy, or for participating in an investigation under this policy, is strictly prohibited and will result in disciplinary action. If an individual believes he or she has been the subject of such retaliation, he or she should notify one of the Investigators as listed on the previous page.

Both the complainant and the accused are encouraged to seek counsel through the College's Employee Assistance Program or other support mechanisms available on or off campus. Assistance in locating appropriate support may be requested from the Human Resources Office.

## Group Health Plans Notice of Privacy Practices

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

This Notice of Privacy Practices (the “Notice”) describes the legal obligations of the St. Olaf College Medical Benefits Plan, the St. Olaf College Dental Plan, the Medical Reimbursement Benefit component of the St. Olaf College Flexible Benefits Plan, the St. Olaf College Employee Assistance Program, and the Emeriti Retiree Health Plan for St. Olaf College (together, the “Plans”) and your legal rights regarding your Protected Health Information held by the Plans under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH Act). Generally, your Protected Health Information (also called “PHI”) is information meeting these conditions:

- You can be identified from the information,
- The information relates to your past, present, or future health, or to your health care, or to payment for your health care, and
- The information was created, received, transmitted or maintained by the Plans.
- Your PHI includes any genetic information as defined in the Genetic Information Nondiscrimination Act of 2008 (“GINA”).

HIPAA and HITECH require that PHI used or disclosed by the Plans in any form, whether electronically, on paper, or orally, be kept properly confidential. These laws also give you significant rights to understand and control how your PHI is used. HIPAA provides penalties for covered entities that misuse PHI.

As required by HIPAA, we have prepared this explanation of how we are required to maintain the privacy of your health information and how we may use and disclose your health information.

We may use and disclose your health information for treatment, payment and healthcare operations.

- Treatment means providing, coordinating, or managing healthcare and related services by one or more healthcare providers. An example of this would include case management.
- Payment means such activities as obtaining reimbursement for services, confirming coverage, billing or collection activities, and utilization review. An example of this would be adjudicating a claim and reimbursing a provider for an office visit.
- Healthcare operations include the business aspects of running our health plans, such as conducting quality assessment and improvement activities, auditing

functions, cost-management analysis, and customer service. An example would be an internal quality assessment review. We may disclose your PHI for underwriting, premium rating, or other activities relating to the creation, renewal, or replacement of a contract of health insurance or health benefits. However, we cannot use your medical information that is genetic information for underwriting purposes.

We may also create and distribute de-identified health information by removing all references to individually identifiable information.

We may contact you to provide information about treatment alternatives or other health-related benefits and services that may be of interest to you.

We may contract with individuals or entities known as Business Associates to perform various functions on our behalf or to provide certain types of services. In order to perform these functions or to provide these services, Business Associates will receive, create, maintain, transmit, use, and/or disclose your PHI, but only after they agree in writing with us to implement appropriate safeguards regarding your PHI. For example, we may disclose your PHI to a Business Associate to process your claims for benefits under the Plans or to provide support services, such as utilization management, pharmacy benefit management, or subrogation, but only after the Business Associate enters into a Business Associate contract with us.

The uses and disclosures listed above are the most common uses and disclosures the Plans may make of your PHI. However, in special circumstances, there are additional purposes for which we may use or disclose your health information:

- Required by Law. We will disclose your PHI when required to do so by federal, state, or local law. For example, we may disclose your PHI when required by national security laws or public health disclosure laws.
- To Avert a Serious Threat to Health or Safety. We may use and disclose your PHI when necessary to prevent a serious threat to your health and safety, or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat. For example, we may disclose your PHI in a proceeding regarding the licensure of a physician.
- To St. Olaf College. For the purpose of administering the Plans, we may disclose to certain employees of St. Olaf College PHI. However, those employees will only use or disclose that information as necessary to perform plan administration functions or as otherwise required by HIPAA, unless you have authorized further disclosures. Your PHI cannot be used for employment purposes without your specific authorization.
- Organ and Tissue Donation. If you are an organ donor, we may release your PHI after your death to organizations that handle organ procurement or organ, eye, or

tissue transplantation or to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation.

- Military. If you are a member of the armed forces, we may release your PHI as required by military command authorities. We may also release PHI about foreign military personnel to the appropriate foreign military authority.
- Workers' Compensation. We may release your PHI for workers' compensation or similar programs, but only as authorized by, and to the extent necessary to comply with, laws relating to workers' compensation and similar programs that provide benefits for work-related injuries or illness.
- Public Health Risks. We may disclose your protected health information for public health activities such as prevention or control disease, injury, or disability; reporting of births and deaths; reporting child abuse or neglect; reporting reactions to medications or problems with products; notifying people of recalls of products they may be using; notifying a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition; notifying the appropriate government authority if we believe that a patient has been the victim of abuse, neglect, or domestic violence. We will only make this last disclosure if you agree, or when required or authorized by law.
- Health Oversight Activities. We may disclose your PHI to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections, and licensure. These activities are necessary for the government to monitor the health care system, government programs, and compliance with civil rights laws.
- Lawsuits and Disputes. If you are involved in a lawsuit or a dispute, we may disclose your PHI in response to a court or administrative order. We may also disclose your PHI in response to a subpoena, discovery request, or other lawful process by someone involved in a legal dispute, but only if efforts have been made to tell you about the request or to obtain a court or administrative order protecting the information requested.
- Law Enforcement. We may disclose your PHI if asked to do so by a law-enforcement official in response to a court order, subpoena, warrant, summons, or similar process; to identify or locate a suspect, fugitive, material witness, or missing person; about the victim of a crime if, under certain limited circumstances, we are unable to obtain the victim's agreement; about a death that we believe may be the result of criminal conduct; and about criminal conduct.
- Coroners, Medical Examiners, and Funeral Directors. We may release PHI to a coroner or medical examiner. This may be necessary, for example, to identify a

deceased person or determine the cause of death. We may also release medical information about patients to funeral directors, as necessary to carry out their duties.

- National Security and Intelligence Activities. We may release your PHI to authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.
- Inmates. If you are an inmate of a correctional institution or are in the custody of a law-enforcement official, we may disclose your PHI to the correctional institution or law-enforcement official if necessary (1) for the institution to provide you with health care; (2) to protect your health and safety or the health and safety of others; or (3) for the safety and security of the correctional institution.
- Research. We may disclose your protected health information to researchers when the individual identifiers have been removed; or when an institutional review board or privacy board has reviewed the research proposal and established protocols to ensure the privacy of the requested information, and approves the research.
- Government Audits. We are required to disclose your PHI to the Secretary of the United States Department of Health and Human Services when the Secretary is investigating or determining our compliance with the HIPAA privacy rule.

Any other uses and disclosures will be made only with your written authorization. For example, you can authorize us to disclose your PHI to your personal representative. We cannot sell your protected health information, and we cannot use or disclose your protected health information for marketing purposes, unless we first have your authorization. You may revoke such authorization in writing and we are required to honor and abide by that written request, except to the extent that we have already taken actions relying on your authorization.

You have the following rights with respect to your Protected Health Information, which you can exercise by presenting a written request to the Privacy Official, St. Olaf College.

- The right to request restrictions on certain uses and disclosures of Protected Health Information, including those related to disclosures to family members, other relatives, close personal friends, or any other person identified by you. We are, however, not required to agree to a requested restriction. If we do agree to a restriction, our agreement must be in writing, and we must abide by it (except in an emergency) unless you agree in writing to remove it.
- The right to receive confidential communications of Protected Health Information from us by alternative means or at alternative locations.
- The right to inspect and obtain copies, including electronic copies, of your Protected Health Information that may be used to make decisions about your Plan benefits. If



the information you request is maintained electronically, and you request an electronic copy, we will provide a copy in the electronic form and format you request, if the information can be readily produced in that form and format; if the information cannot be readily produced in that form and format, we will work with you to come to an agreement on form and format. If we cannot agree on an electronic form and format, we will provide you with a paper copy.

- The right, upon written request, to amend your Protected Health Information, subject to certain conditions.
- The right to receive an accounting of non-routine disclosures of Protected Health Information.
- The right to be notified in the event that we (or a Business Associate) detect a breach of your unsecured PHI.
- If you receive this notice electronically or on a website, we have the obligation to provide and you have the right to obtain a paper copy of the current Notice of Privacy Practices from us every three years.

With only limited exceptions, we will send all mail to the employee. This includes mail relating to the employee's spouse and other family members who are covered under the Plan, and includes mail with information on the use of Plan benefits by the employee's spouse and other family members and information on the denial of any Plan benefits to the employee's spouse and other family members. If a person covered under the Plans has requested restrictions or confidential communications, and if we have agreed to the request, we will send mail as provided by the request for restrictions or confidential communications.

We are required by law to maintain the privacy of your Protected Health Information and to provide you with notice of our legal duties and privacy practices with respect to Protected Health Information. We are required to provide notice to you if ever there is a breach of your unsecured Protected Health Information.

This notice is effective as of April 14, 2004 and updated July 1, 2018, and we are required to abide by the terms of the Notice of Privacy Practices currently in effect. We reserve the right to change the terms of our Notice of Privacy Practices and to make the new notice provisions effective for all Protected Health Information that we maintain. We will post and you may request a written copy of a revised Notice of Privacy Practices from Human Resources or the Privacy Official.

**You have recourse if you feel that your privacy protections have been violated. You have the right to file a formal, written complaint with us at the address below, or with the appropriate regional office of the Department of Health & Human Services, Office of Civil Rights, about violations of the provisions of this notice or the policies and procedures of the company. We will not retaliate against you for filing a complaint.**

Please contact us for more information or to communicate a complaint:  
 Health Plan Privacy Officer  
 Human Resources Department  
 St. Olaf College  
 1520 St. Olaf Avenue  
 Northfield, Minnesota 55057-1098  
 (507) 786-3068

For more information about HIPAA or to file a complaint, the regional office for Minnesota is:  
 U.S. Department of Health and Human Services  
 Office for Civil Rights  
 Region V  
 233 N. Michigan Ave., Suite 240  
 Chicago, IL 60601  
[www.hhs.gov/ocr/privacy/hipaa/complaints/](http://www.hhs.gov/ocr/privacy/hipaa/complaints/).

## **Information Technology (IT) Computing Policies**

IT provides the St. Olaf community with both computing and A/V technologies.

### **St. Olaf Computing Policies**

The St. Olaf computing systems and campus network support the academic mission and business functions of the College. As a result, recreational uses of the campus network and Internet are highly discouraged; in some cases access may be blocked. Individual supervisors may prohibit all forms of recreational computing (personal email, web surfing, etc.) and all new employees are encouraged to consult with their supervisor regarding individual office policies.

As a member of the St. Olaf community, you are expected to know and abide by the computing policies set by IT and the Academic Computing Policy Board. In addition, you are also expected to abide by all State and Federal laws that pertain to information technology use. Please familiarize yourself with the campus policies at: <http://wp.stolaf.edu/it/policies/>

### **Privacy of Employee Electronic Files**

All information on St. Olaf servers, desktop computers or on computer storage medias, including electronic mail, is considered College property. While IT makes every reasonable effort to ensure the security of electronic files, employees should be aware of the following:

- Any individual using the St. Olaf College systems and networks from any computer automatically consents to the monitoring of their activities in the course of systems maintenance or security related investigations. In addition, in order to conduct the College's business and assure compliance with college policies and the law, the College may need to monitor or review electronically stored information. If, in the course of such monitoring, systems personnel reveal possible evidence of criminal activity or College policy violations, systems personnel may provide the evidence of such monitoring to the College or law enforcement officials.

- Select employees of IT have access to all information stored on the St. Olaf servers. Those employees may include the managers of the campus servers maintained by IT and/or IT student workers whose responsibilities are associated with the servers. Such access is necessary in order for IT employees to perform their duties, and is normally exercised upon the request of the account owner, in cases of systems security and performance problems, upon presentation of warrants, subpoenas, or court orders, or upon the request of an individual's supervisor. Supervisors requesting access to an employee's computer files must first consult with the Human Resources Office and must present a valid work-related issue or need or convincing evidence of probable cause related to a violation of federal or state regulations or College policies before IT staff will access files.
- Every electronic file and email message stored on the St. Olaf servers are backed up and, therefore, are reproducible and may be subpoenaed in the event of a court case. Users should be aware of this when creating files and email messages intended for individuals both on and off campus.
- Email correspondence should not be considered private. The individual to whom one sends an email message may allow another person to access the mail message or may forward it to others. In addition, while St. Olaf makes every effort to ensure the security of email messages routed on the College network, email messages sent via the Internet are not guaranteed that same level of security and privacy.
- Personal files and email stored by employees on their College provided desktop computer or on the St. Olaf servers should not be considered private. In the course of routine maintenance, upon the request of the immediate supervisor, or upon the presentation of warrants, subpoenas, and court orders personal files may be accessed by IT staff.
- Information posted to the World Wide Web is not private and in most cases is readable by other individuals around the world. While it is possible to restrict direct access to on-campus users only, this does not preclude wider distribution of materials. Users should consider carefully the content and nature of materials posted to the Web in light of these realities.

Entering computer accounts or reading electronic files without proper authorization is considered misuse of computers. Individuals suspected of accessing others' files without permission will be referred to the appropriate office for action. The College's policy statement on the Misuse of Computers policy can be found at: [www.stolaf.edu/services/iit/policies/misuse.html](http://www.stolaf.edu/services/iit/policies/misuse.html)

## Keys

Careful control of keys is necessary to protect College property from fire, theft, vandalism, and unauthorized use. Employees entrusted with keys accept responsibility to: keep keys in a safe place at all times; refuse to lend the keys to anyone but the

supervisor; prevent the keys from being copied. Report immediately to the supervisor misplaced, lost, stolen, or damaged keys.

The supervisor will arrange for keys to be issued/transferred. All keys must be returned upon termination of employment.

## **Occupational Safety and Health Act (OSHA)**

St. Olaf College is committed to providing a safe place to work, which is free from hazards or conditions that could cause injury or serious physical harm. All employees are expected to comply with all safety and health standards, rules, regulations or orders issued by the College as well as those of the federal and state occupational safety and health laws.

Unsafe working conditions should be reported immediately by employees to their supervisor or department head.

## **Outside Employment and Activities**

The College recognizes that employees may have outside employment or activities; such activity should not interfere with the employee's performance of their duties to the College and its students or place the employee in a position of conflict of interest.

A conflict of interest may be defined as any situation in which the outside employment/activity would or could reasonably be perceived to conflict with the best interests of the College or with the employee's performance of their College duties. Use of College resources to perform outside work (e.g. supplies, facilities, electronic resources, equipment, staff) may not be charged to or supplied by the College.

## **Personal Telephone/Fax Use**

The College recognizes the need for occasional personal phone and fax usage by employees during normal business hours. Such activity should be limited and not interfere with an employee's work.

Employees are expected to reimburse the College for personal long-distance telephone or fax usage at the indicated rate on the departmental billing provided by Telecommunications.

## **Reasonable Accommodation**

Consistent with the spirit of the Americans With Disabilities Act (ADA), St. Olaf College will attempt to reasonably accommodate employees who have disabilities. Employees who believe that they have such needs should contact the Human Resources Office.

## **Smoking Policy**

In an effort to create a more smoke-free environment on campus, not only for the benefit of those who work here, but also for the benefit of students and visitors, the policy of the College is that there will be no smoking in any building on campus.

## **Travel Guidelines**

The College appreciates the efforts of those who travel on its behalf. It is the responsibility of each individual employee to comply with the St. Olaf College travel policy. Travel policy guidelines can be found on the Treasurer's Office website or by contacting the Treasurer's Office. Supervisors are responsible for authorizing travel, then reviewing and approving travel reimbursements in compliance with the College travel policy. Reimbursed expenses must be reasonable, necessary, documented and properly authorized. Employees should neither gain nor lose personal funds because of College business travel.

## **No Weapons on Campus Policy**

The personal possession of handguns in all campus buildings and on all campus property is strictly prohibited. This prohibition applies to all employees, independent contractors, and visitors, including those who have a valid permit to carry a concealed weapon. Individuals who possess a valid permit to carry a concealed weapon may, however, keep the weapon locked in the trunk or glove compartment of their vehicle in the parking lot. Employees, independent contractors and temporary employees also are prohibited from possessing handguns or other weapons while operating a College vehicle or while engaging in College business off-premises, except in the individual's own home. This weapons prohibition does not apply to authorized security or law enforcement personnel.

If you are aware that a student, co-worker, visitor, or other individual possesses a handgun or other weapon in violation of this policy, you should immediately report the conduct at issue to Public Safety at 3666 or the Northfield Police at 911.

Use of weapons, violence and threats of violence are strictly prohibited on campus and at any St. Olaf-related off-premise event. If you become aware of a threat of violence or other harm to persons or property, you should take the following action, even if you think the threat may be only a joke:

- (1) Obtain emergency assistance in any situation that you feel is an emergency
- (2) Take immediate action to protect yourself and others from harm where you can do so safely
- (3) Advise one of the following people of the situation: Immediate Supervisor, Public Safety (x3666) or the Northfield Police.

Any violation of this policy by employees, independent contractors, and visitors will result in disciplinary action, up to and including immediate termination of employment or presence on campus.

## **Inclement Weather**

St. Olaf College is generally open for business year-round and rarely closes as a result of snow or other inclement weather situations. In the event of a snow/ice storm, or other inclement weather, the following procedures shall be in effect:

- The Director of Facilities shall report details of current campus conditions to the Vice President/CFO. The VP/CFO, in consultation with the Director of Facilities and the Provost, shall consider current campus conditions along with information from external sources (i.e., weather radar, road conditions, public school closings, etc.) and make a recommendation to the President (or designee) to hold classes as normal, consider a late start, cancel campus events, or close the college.
- The President (or designee) shall make the decision to hold classes as usual, implement a late start, cancel campus events, or close the college. Unless there is an announcement otherwise, faculty and staff should assume that the College is open and operating normally.
- The Chief Marketing Officer will convey Information regarding a late start, event cancellations, or college closing to the campus community via the [Ole Alert](#) system and an all-campus email. Public notifications will be made on KYMN radio, KDHL, and other media outlets as appropriate.

In general, employees who would like to leave early due to poor road conditions are advised to use their own discretion regarding their health and safety, but may be required to use accrued holiday, vacation, or compensation time to cover any absences. Certain employees may be required to work in spite of the weather to provide essential services or address an emergency situation. In all cases, employees should check with their supervisor regarding alternative arrangements for work assignments. Supervisors are advised to grant approval of all employee-requested leave in inclement weather situations.

- Winter road condition information is available online from the [Minnesota Department of Transportation](#).
- Community-wide warnings for dangerous weather are sent automatically to cell phones and are provided by the National Oceanic and Atmosphere Administration through FEMA's Wireless Emergency Alerts. Check with your cell phone or wireless provider regarding access to the Wireless Alert system. Alerts are sent automatically, are automatically targeted to the affected area, and rebroadcast until the emergency has passed and there is no longer a threat to the affected area. Wireless Emergency Alerts are free and there is no need to sign up. [Click here for more information about Wireless Emergency Alerts.](#)

- Other forms of notification include sirens, the Minnesota Emergency Alert System, and other local media. We encourage the use of a NOAA weather radio, local media, or mobile phone apps to keep tabs on severe weather.

# SUPPORTING DOCUMENTS

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## FLSA Safe Harbor

### Deductions from Salaries of Exempt Employees

It is the policy of the College to fully comply with the Fair Labor Standards Act. In keeping with this commitment, the College will pay exempt employees their full salary for any workweek in which they perform work, regardless of the number of days or hours worked, subject only to deductions that are permitted by law. Full day deductions from pay that are permitted by law include, for example, deductions for personal time off, sick days before or after eligibility for paid sick leave, or deductions for infractions of written workplace conduct rules. Full or partial day deductions may be made from the salaries of exempt employees for infractions of safety rules of major significance or for use of intermittent leave under the Family and Medical Leave Act policy.

It is further the policy of the College to promptly investigate and correct any improper payroll deductions or other payroll practices that do not comply with the Act. If an employee believes that an improper payroll practice—such as an improper deduction from an exempt salary—has occurred, he or she may make a complaint to the Human Resources Office. HR will see that the matter is appropriately reviewed, and the employee will be reimbursed for the amount of any inappropriate deduction taken.

## Your Rights to Continuation Coverage

### Effective As of September 1, 2004

Under a federal law that is commonly known as COBRA (Public Law 99-272, Title X), most employers sponsoring “group health plans” are required to offer employees and their families the opportunity for a temporary extension of health coverage (called “continuation coverage”) in certain instances where coverage under the Plan would otherwise end. The dental plan, the health care reimbursement, the medical plan and Employee Assistance Plan (EAP) qualify as “group health coverage” for purposes of COBRA (each a “COBRA plan”). This notice generally explains COBRA continuation coverage, when it becomes available to you and your family, and what you need to do to protect the right to receive it. This notice gives only a summary of your COBRA continuation coverage rights. Both you and your spouse should take the time to read this notice carefully.

Life insurance is covered by the Minnesota Continuation laws. This law provides employees with the opportunity to continue life insurance for up to 18 months.

### If You Have Questions

Questions concerning each COBRA plan or your COBRA continuation rights should be addressed to the Plan Administrator. The Plan Administrator is St. Olaf College. The Plan Administrator is responsible for administering COBRA continuation coverage. The party responsible for administering COBRA continuation coverage, or that party's address and telephone number, may change from time to time. For the most recent



information, check the Plan's most recent Summary Plan Description (if you do not have a copy, you may request one from the Plan Administrator.)

***Continuation coverage under the health care reimbursement portion of the Flexible Benefits Plan may not be available in certain circumstances. Please contact Human Resources for further information.***

If you have questions about your rights under ERISA, including COBRA, HIPAA, and other laws affecting group health plans, contact the nearest Regional or District Office of the U.S. Department of Labor's Employee Benefits Security Administration (EBSA) or visit the EBSA website at <http://www.dol.gov/ebsa/>. Addresses and phone numbers of Regional and District EBSA Offices are available through EBSA website

### **What is COBRA Continuation Coverage?**

COBRA continuation coverage is a continuation of plan coverage when coverage would otherwise end because of a life event known as a "qualifying event." Specific qualifying events are listed later in this notice. After a qualifying event, COBRA continuation coverage must be offered to each person who is a "qualified beneficiary." A qualified beneficiary is someone who will lose coverage under the Plan because of a qualifying event. Depending on the type of qualifying event, employees, spouses or former spouses of employees, and dependent children of employees may be qualified beneficiaries. Under the Plan, qualified beneficiaries who elect COBRA continuation coverage must pay for COBRA continuation coverage.

Sometimes, filing a proceeding in bankruptcy under title 11 of the United States Code can be a qualifying event. If a proceeding in bankruptcy is filed with respect to the College, and that bankruptcy results in the loss of coverage of any retired employee covered under a COBRA plan, the retired employee is a qualified beneficiary with respect to the bankruptcy. The retired employee's spouse, surviving spouse, and dependent children will also be qualified beneficiaries if bankruptcy results in the loss of their coverage under the COBRA plan.

If you are an employee of the College covered by a COBRA plan you have a right to choose this continuation coverage if you lose your group health coverage under the COBRA plan because of either of the following reasons:

- (1) A reduction in your hours of employment or
- (2) The termination of your employment (for reasons other than gross misconduct on your part).

If you are the spouse of an employee covered by a COBRA plan, you have the right to choose continuation coverage for yourself if you lose group health coverage under the COBRA plan for any of the following reasons:

- (1) The death of your spouse
- (2) A termination of your spouse's employment (for reasons other than gross misconduct) or reduction in your spouse's hours of employment

- (3) Your spouse becomes entitled to Medicare (Part A, Part B, or both)
- (4) Divorce or legal separation from your spouse. If an employee cancels coverage for his or her spouse in anticipation of a divorce or legal separation, and a divorce or legal separation later occurs, then the divorce or legal separation will be considered a qualifying event even though the ex-spouse lost coverage earlier. If the ex-spouse notifies the administrator within 60 days after the divorce or legal separation and can establish that the employee cancelled the coverage earlier in anticipation of the divorce or legal separation, then the COBRA coverage may be available for the period after the divorce or legal separation.

In the case of an employee's dependent child who is covered by a COBRA plan (including a child born to or placed for adoption with a covered employee during the COBRA continuation period and alternate recipients under QMCSOs), he or she has the right to continuation coverage if group health coverage under the COBRA plan is lost for any of the following reasons:

- (1) The death of a parent-employee
- (2) The termination of a parent-employee's employment (for reasons other than gross misconduct) or reduction in a parent-employee's hours of employment with the College
- (3) Parents' divorce or legal separation
- (4) A parent becomes eligible for Medicare (Part A, Part B, or both)
- (5) The dependent ceases to be eligible under the Plan as a "dependent child" (normally age 26)

### **When is COBRA Coverage Available?**

The Plan will offer COBRA continuation coverage to qualified beneficiaries only after the Plan Administrator has been timely notified that a qualifying event has occurred. When the qualifying event is the end of employment or reduction of hours of employment, divorce, death of the employee, or enrollment of the employee in Medicare (Part A, Part B, or both), or commencement of a proceeding in bankruptcy with respect to the employer, the employer must notify the Plan Administrator of the qualifying event within 30 days of any of these events.

### **IMPORTANT: You Must Give Notice of Some Qualifying Events**

For the other qualifying events (divorce or legal separation of the employee and spouse or a dependent child's losing eligibility for coverage as a dependent child), you must notify the Plan Administrator. The Plan requires you to notify the Plan Administrator in writing within 60 days after the later of the qualifying event or the loss of coverage using the procedures specified below. If these procedures are not followed or if the notice is not provided in writing to the Plan Administrator during the 60-day notice period, any spouse or dependent child who loses coverage will NOT BE OFFERED THE OPTION TO ELECT CONTINUATION COVERAGE.

## How is COBRA Coverage Provided?

Once the Plan Administrator receives timely notice that a qualifying event has occurred, COBRA continuation coverage will be offered to each of the qualified beneficiaries. Each qualified beneficiary will have an independent right to elect COBRA continuation coverage. Covered employees may elect COBRA continuation coverage on behalf of their spouses, and parents may elect COBRA continuation coverage on behalf of their children.

For each qualified beneficiary who timely elects COBRA continuation coverage, COBRA continuation coverage will begin on the date of the qualifying event. If you or your spouse or dependent children do not elect continuation coverage within the 60-day election period, **YOU WILL LOSE YOUR RIGHT TO ELECT CONTINUATION COVERAGE.**

COBRA continuation coverage is a temporary continuation of coverage. When the qualifying event is the death of the employee, enrollment of the employee in Medicare (Part A, Part B, or both), your divorce or legal separation, or a dependent child losing eligibility as a dependent child, COBRA continuation coverage lasts for up to 36 months.

When the qualifying event is the end of employment or reduction of the employee's hours of employment due to a military leave that qualifies under the Uniformed Services Employment and Reemployment Rights Act ("USERRA"), COBRA continuation coverage lasts for up to 24 months.

When the qualifying event is the end of employment or reduction of the employee's hours of employment, COBRA continuation coverage lasts for up to 18 months. There are three ways in which this 18-month period of COBRA continuation coverage could be extended.

### Disability extension of 18-month period of continuation coverage

If you or anyone in your family covered under the Plan is determined by the Social Security Administration to be disabled and you notify the Plan Administrator in a timely fashion, you and your entire family can receive up to an additional 11 months of COBRA continuation coverage, for a total maximum of 29 months. The disability would have to have started at some time before the 60th day of COBRA continuation coverage and must last at least until the end of the 18-month period of continuation coverage. You must make sure that the Plan Administrator is notified in writing of the Social Security Administration's determination within 60 days after the date of determination and before the end of the 18-month period of COBRA continuation coverage. The Plan requires you to follow the procedures specified below, entitled "Notice Procedures." In addition, your notice must include the name of the disabled qualified beneficiary, the date that the qualified beneficiary became disabled, and the date that the Social Security Administration made its determination. Your notice must also include a copy of the Social Security Administration's determination. If these procedures are not followed, or if the notice is not provided in writing to the Plan Administrator within the required period, then there will be no disability extension of COBRA continuation coverage.

## **Second qualifying event extension of 18-month period of continuation coverage**

If your family experiences another qualifying event while receiving 18 months of COBRA continuation coverage, the spouse and dependent children in your family can get up to 18 additional months of COBRA continuation coverage, up to a maximum of 36 months, if notice of the second qualifying event is given properly to the Plan. This extension may be available to the spouse and dependent children receiving continuation coverage if the employee or former employee dies, becomes entitled to Medicare (Part A, Part B, or both), or gets divorced or legally separated, or if the dependent child stops being eligible under the Plan as a dependent child, but only if that event would have caused the spouse or dependent child to lose coverage under the Plan had the first qualifying event not occurred. In all of these cases, you must make sure that the Plan Administrator is notified in writing of the second qualifying event within 60 days of the second qualifying event. The Plan requires you to follow these procedures specified below, entitled “Notice Procedures.” Your notice must also name the second qualifying event and the date it happened. If the second qualifying event is a divorce, your notice must include a copy of the divorce decree. If these procedures are not followed or if the notice is not provided in writing to the Plan Administrator within the required 60-day period, then there will be no extension of COBRA continuation coverage due to a second qualifying event.

## **Medicare extension for spouse and dependent children**

If a qualifying event is the employee’s termination of employment or reduction of hours, and the employee became entitled to Medicare benefits less than 18 months before the qualifying event, then the maximum coverage period for the spouse and dependent children will end 36 months after the date the employee became entitled to Medicare (but the covered employee’s maximum coverage period will be 18 months). For example, if a covered employee becomes entitled to Medicare 8 months before the date on which his employment terminates, COBRA continuation for his spouse and children can last up to 36 months after the date of Medicare entitlement, which is equal to 28 months after the date of the qualifying event (36 months minus 8 months).

## **Birth or Adoption of Child while on COBRA Continuation Coverage**

If, while you are a Qualified Beneficiary receiving continuation coverage under COBRA, a child is born to you or you adopt a child, you must notify the Plan Administrator within 30 days of the birth or adoption to add that child to your continuation coverage. The Plan requires you to follow these procedures specified below, entitled “Notice Procedures.” IF YOU FAIL TO PROPERLY NOTIFY THE PLAN ADMINISTRATOR, YOU MAY NOT BE ABLE TO ADD THE CHILD TO YOUR CONTINUATION COVERAGE.

## **Notice Procedures**

Any notice that you provide must be in writing. Oral notice, including notice by telephone, is not acceptable. To provide notice to the Plan Administrator you must mail your notice to the Human Resources Office at this address:

St. Olaf College  
1520 St. Olaf Avenue  
Northfield, MN 55057

(For the most recent information, check the Plan's most recent Summary Plan Description. If you do not have a copy, you may request one from the Plan Administrator.)

If mailed, your notice must be postmarked no later than the last day of the required notice period. Any notice you provide must state the name of the Plan, the name and address of the employee covered under the Plan, and the name(s) and address(es) of the qualified beneficiary(ies). Your notice must also name the qualifying event and the date it happened. If the qualifying event is a divorce, your notice must include a copy of the divorce decree.

## **Keep Your Plan Administrator Informed of Address Changes**

In order to protect your family's rights, you should keep the Plan Administrator informed of any changes in the addresses of family members. You should also keep a copy, for your records, of any notices you send to the Plan Administrator.

## **The Uniformed Services Employment And Reemployment Rights Act (USERRA)**

USERRA protects the job rights of individuals who voluntarily or involuntarily leave employment positions to undertake military service. USERRA also prohibits employers from discriminating against past and present members of the uniformed service, and applicants to the uniformed service.

## **Reemployment Rights**

You have the right to be reemployed in your civilian job if you leave that job to perform service in the uniformed service and;

- You ensure that your employer receives advance written or verbal notice of your service
- You have five years or less of cumulative service in the uniformed service while with that particular employer
- You return to work or apply for reemployment in a timely manner after conclusion of service and

- You have not been separated from service with a disqualifying discharge or under other than honorable conditions.

If you are eligible to be reemployed, you must be restored to the job and benefits you would have attained if you have not been absent due to military service or, in some cases, a comparable job.

## **Rights to be Free from Discrimination and Retaliation**

If you:

- are a past or present member of the uniformed service;
- have applied for membership in the uniformed service; or
- are obligated to serve in the uniformed service;

then an employer may not deny you any of the following because of this status:

- initial employment
- reemployment
- retention in employment
- promotion or
- any benefit of employment

In addition, an employer may not retaliate against anyone assisting in the enforcement of USERRA rights, including testifying or making a statement in connection with a proceeding under USERRA, even if that person has no service connection.

## **Health Insurance Protection**

If you leave your job to perform military service, you have the right to elect to continue your existing employer-based health plan coverage for you and your dependents for up to 24 months while in the military.

Even if you don't elect to continue coverage during your military service, you have the right to be reinstated in your employer's health plan when you are reemployed, generally without any waiting periods or exclusions (e.g., pre-existing condition exclusion) except for service-connected illnesses or injuries.

## **Enforcement**

The U.S. Department of Labor, Veterans Employment and Training Service (VETS) is authorized to investigate and resolve complaints of USERRA violations.

For assistance in filing a complaint, or for any other information on USERRA, contact VETS at 1-866-4-USA-DOL or visit its website at [www.dol.gov/vets](http://www.dol.gov/vets). An interactive online USERRA Advisor can be viewed at [www.dol.gov/elaws/userra.htm](http://www.dol.gov/elaws/userra.htm).

If you file a complaint with VETS and VETS is unable to resolve it, you may request that your case be referred to the Department of Justice or the Office of Special Counsel, depending on the employer, for representation. You may also bypass the VETS process and bring a civil action against an employer for violations of USERRA.

The rights listed here may vary depending on the circumstances. This notice was prepared by VETS, and may be viewed on the internet at this address: [www.dol.gov/vets/programs/userra/USERRA\\_Poster.pdf](http://www.dol.gov/vets/programs/userra/USERRA_Poster.pdf). Federal law requires employers to notify employees of their rights under USERRA, and employers may meet this requirement by displaying this notice where they customarily place notices for employees. USERRA protects the job rights of individuals who voluntarily or involuntarily leave employment positions to undertake military service. USERRA also prohibits employers from discriminating against past and present members of the uniformed service, and applicants to the uniformed service.

**NOTE:** If you are unable to access the web links listed in this handbook, please contact the Human Resources Office for paper copies of the material.