

II. YOUR EMPLOYEE HANDBOOK

Simpson College has prepared this handbook to provide you with an overview of the College's policies, benefits, and rules. It is intended to familiarize you with important information about employment with the College, as well as provide guidelines for your employment experiences with us to foster a safe and healthy work environment. Please understand that this booklet only highlights College policies, practices, and benefits for your personal understanding.

The contents of this handbook are presented as a matter of information only. This handbook does not, either by itself or in conjunction with any other College documents, policy, procedure, action, practice, or verbal statement, create an employment contract, express or implied. Simpson College reserves the right to modify, revoke, suspend, terminate, or change any or all policies or procedures contained herein in whole or in part at any time with or without prior notice.

If any statement in this handbook is not clear to you, please contact the Director of Human Resources for clarification. This handbook supersedes any and all prior policies, procedures, and employee handbooks of the College.

Application of Employee Handbook to Faculty Employees. The policies in this Employee Handbook supplement those contained in the Faculty Handbook and the faculty contract and/or letter of appointment. Not all policies contained in this Employee Handbook apply to certain faculty members, and some policies will apply only in limited circumstances. In the event any policy in this Employee Handbook conflicts with an applicable policy in the Faculty Handbook or an applicable term of a faculty employment contract, the policy in the Faculty Handbook or contract likely will control. Questions regarding the application of specific policies contained in this handbook to faculty employees will be addressed by the Senior Vice President and Academic Dean and/or the Director of Human Resources, as applicable per the subject matter of the question.

Employment at Will.

Unless an employee has a written agreement that expressly specifies otherwise, all employees of the College are employed "at will" and can be terminated with or without cause at any time without prior notice. All statements contained in this Employee Handbook or any other College handbook, publication, employment application, recruiting materials, social media content, memoranda, or other materials provided to applicants or employees shall be interpreted consistently with this employment-at-will relationship. No officer or employee of the College has any authority to modify the "at will" status of any employee unless modification is expressly made in writing and has been expressly agreed to in writing by the President and ratified by the Board of Trustees.

Equal Employment Opportunity.

Simpson College provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, national origin, sexual orientation, gender identity, age, physical or mental disability, genetic information and background, marital status, status as a veteran or disabled veteran, or any other characteristic protected by applicable law. In addition, the College complies with applicable federal, state, and local laws governing nondiscrimination in employment. This policy applies to all terms and conditions of employment, including but not limited to hiring, placement, tenure status, promotion, termination, layoff, recall, transfer, leaves of absence, and compensation.

Anti-Discrimination and Anti-Harassment Policy.

Scope: This policy applies to all faculty, staff, employees (including student employees), independent contractors, and vendors, whether on a Simpson College campus, studying abroad, or participating in College-related/sponsored events. Compliance with this policy is a term and condition of employment.

All discrimination and harassment based on any characteristic protected by law and/or this policy is forbidden under all circumstances. Any person, regardless of position, who has been found to initiate, practice, conceal, promote, or overlook discrimination or harassment or who retaliates against other employees or members of the College community as a consequence of a complaint or investigation, will be disciplined up to and including termination of employment and/or removal from enrollment at the College.

In this connection, the College expressly prohibits any form of unlawful employee harassment based on race, color, religion, sex, national origin, sexual orientation, gender identity, age, physical or mental disability, genetic information and background, marital status, status as a veteran or disabled veteran, or any other characteristic protected by law.

Non-discrimination in employment. Simpson College is committed to equal employment opportunities and nondiscrimination. In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Simpson College are based on merit, qualifications, and abilities. The College does not discriminate on the basis of race, color, national origin, sex, sexual orientation, gender identity, religion, age, physical or mental disability, genetic information and background, marital status, status as a veteran or disabled veteran, or any other characteristic protected by applicable law in the administration of its employment policies or practices.

In an effort to achieve equal employment opportunities, qualifications deemed necessary for each open position shall be developed and set forth by the supervisor of the position.

Applicants for open positions shall be selected based solely on their merit as measured against those articulated job qualifications.¹

Harassment in employment is prohibited.

Definition of Harassment. Harassment is generally defined as unwelcome verbal or physical conduct or communication that is based upon an employee's or student's race, color, religion, sex, national origin, sexual orientation, gender identity, age, physical or mental disability, genetic information and background, marital status, status as a veteran or disabled veteran, or other applicable protected characteristics or class status, and:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or participation in an educational program or opportunity.
- Submission to or rejection of such conduct by an individual is used as the basis for an adverse employment or educational decision affecting the individual; or
- Such conduct has the purpose or effect of interfering with an individual's work or academic/learning performance or creating an intimidating, hostile, or offensive environment.

Sexual harassment may also include unwelcome requests for sexual favors or other verbal or physical conduct or communication of a sexual nature. All forms of harassment are prohibited by this policy.

Prohibited Conduct/Behavior. It is almost impossible for any harassment policy to include an exhaustive list of the behaviors that, depending upon their frequency or severity, may be harassing in nature and therefore prohibited by this policy. There are other types of behavior that could be considered a violation of this policy and result in sanctions, up to and including termination of employment or expulsion from the College. The College reserves the right to exercise its judgment in determining other types of prohibited behavior.

¹ ***Non-discrimination in education.*** Given that some employees may be students as well, and as set forth more fully in the Student Handbook, the College provides to students equal learning opportunities without regard to race, color, religion, sex, national origin, sexual orientation, gender identity, age, physical or mental disability, genetic information and background, marital status, status as a veteran or disabled veteran, or any other characteristic protected by law. In addition, the College complies with applicable federal, state and local laws governing nondiscrimination in education. No person shall be denied the benefits of, or be subjected to discrimination, in whole or in part, on the basis of the foregoing categories, or because they are regarded as possessing one or more of those protected characteristics, in any program or activity that is administered by, funded directly by, or that receives any financial assistance from Simpson College. Please see the Simpson College Student Handbook regarding the College's policies prohibiting discrimination and harassment in education, as well as the College's Sexual Misconduct Policy, attached as Appendix A to this Employee Handbook.

1. With respect to sexual harassment, the College prohibits unwelcome sexual advances; unwelcome requests for sexual favors; and all other unwelcome verbal or physical conduct or communication of a sexual or otherwise offensive nature. This conduct would include, but is not limited to:

- Touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body.
- Sexually suggestive touching
- Grabbing, groping, kissing, fondling
- Repeated requests for dates
- Lewd, off-color, or offensive sexually oriented comments, jokes, innuendoes, and statements.
- Cornering, chasing, limiting someone's movement, or physically threatening conduct, such as invading another's "personal space."
- Slurs, epithets, and terms based on sex or gender
- Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding a person's sex life, body, sexual activities, deficiencies, or prowess.
- Questions about a person's sex life or experiences.
- Sexual favors in return for employment requests or threats if sexual favors are not provided.
- Sexual assault or rape; threats of physical violence or harm, express or implied
- Leering, staring, stalking.
- Unwanted, offensive, derogatory, or explicit email, social media postings or messages, text messages, letters, poems, posters, videos, calendars, photographs, graffiti, or cartoons based on sex
- Offensive e-mail, text, or voicemail messages, blog or internet entries, including postings on Facebook, Instagram, Snapchat or other publicly available social media or networking sites
- Unwelcome sexual advances also include requests for a date with a student by a faculty member when the student is enrolled in the faculty member's class or is an advisee of the faculty member.
- Any other conduct or behavior deemed inappropriate by the College.

2. With respect to discriminatory or harassing conduct based on a protected characteristic other than sex, any type of unwelcome conduct based on the protected

characteristic, the submission to which is made a term or condition of the person's employment or participation in an academic or learning opportunity, or the submission or rejection of which is made the basis of decisions affecting the person's employment or educational participation, or which has the purpose or effect of creating an abusive, offensive, intimidating, or hostile work environment is prohibited by this policy.

Examples of the types of conduct expressly prohibited by this policy include, but are not limited to, the following:

- Slurs, epithets, and terms based on the protected characteristic
- Cornering, chasing, limiting someone's movement, or physically threatening conduct, such as invading another's "personal space."
- Offensive, denigrating, or hostile comments, jokes, innuendoes, and other statements based on the protected characteristics
- Foul or obscene language.
- Leering, staring, stalking.
- Offensive or explicit posters, social media messages or postings, videos, calendars, photographs, graffiti, or cartoons based on the protected characteristic
- Threats of physical violence or harm, express or implied
- Unwanted, offensive, or derogatory letters, poems, posters, calendars, photographs, graffiti, or cartoons based on the protected characteristic
- Unwanted, offensive, or derogatory e-mail, text, or voicemail messages, blog or internet entries, including postings on Facebook, Instagram, Snapchat, or other publicly available social media or networking sites.
- Any other conduct or behavior deemed inappropriate by the College.

This policy applies to all incidents of alleged harassment, including those which occur off-premises, or during off-hours, or where the alleged offender is a supervisor, coworker, or even a non-employee with whom the employee is involved, directly or indirectly, in a business or potential business relationship.

Reporting an Incident of Discrimination, Harassment, or Retaliation. Each member of the Simpson College community is responsible for creating an atmosphere free of discrimination and harassment. Further, employees are responsible for respecting the rights of their coworkers. Students are responsible for respecting the rights of their fellow students.

The College encourages prompt reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Reporting promptly allows the College to take prompt and effective action. While there is no fixed

reporting period under this policy, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Staff or faculty who believe they have experienced any job-related discrimination or harassment or believe that they have been treated in an unlawful, discriminatory manner should promptly report the incident to their immediate or direct supervisor or any department or division head, divisional vice president, or Cabinet member with whom they are comfortable. Faculty may also report incidents directly to the Senior Vice President and Academic Dean. Non-faculty employees may report incidents directly to the Director of Human Resources.

Please understand that the College takes complaints of discrimination and harassment very seriously. In the event your immediate or direct supervisor is the source of the alleged discriminatory or harassing conduct, or if you are simply uncomfortable discussing the issue with him or her, there is no need to follow any formal chain of command when filing a complaint or when discussing or expressing any issue of concern regarding alleged discrimination or harassment. You may bypass anyone in your direct chain of command and file your complaint or discuss or express any issue of concern with the Senior Vice President and Academic Dean or the Director of Human Resources at any time.²

In addition, the College encourages individuals who believe they are subjected to such conduct to promptly advise the offender that the behavior is unwelcome and to request it be discontinued. Often, this action alone will resolve the problem. The College recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Retaliation is prohibited.

The College prohibits any form of retaliation against any employee for filing a complaint under this policy or for assisting or participating in a complaint investigation. Similarly, the College prohibits any form of retaliation against any student who files a complaint under this policy or who assists or participates in a complaint investigation. Violation of this anti-retaliation policy will result in disciplinary action against the offending person, up to and including possible termination of employment and/or expulsion from the College.

² Students who believe they have been subjected to unlawful discrimination or harassment should immediately report the incident to the Dean of Students, or if the incident concerns sexual harassment, the Title IX Coordinator. If a student has a complaint of discrimination based on disability, the complaint should be made to the designated Section 504 Disability Coordinator. Please see the Student Handbook for details.

Investigation and Outcomes of an Incident of Harassment, Discrimination, or Retaliation.

Upon receipt, the College will undertake a prompt investigation and resolve all complaints in a timely and objective manner. While complete confidentiality cannot be guaranteed, all investigations will be conducted with as much discretion as possible under the circumstances, and information will be shared only on a “need to know” basis. If the College determines that an employee has violated this policy, appropriate disciplinary action will be taken against the offending employee, up to and including possible termination of employment. Remedial action for the reporting employee may also be taken depending on the circumstances and needs of the particular case. Cases of student harassment based on sex or otherwise falling within the coverage of the Simpson College Sexual Misconduct Policy will be handled, investigated, and resolved consistent with the procedures set forth in that policy.

The actual investigation of complaints may be assigned to other staff or to outside persons or organizations under contract with the College. Such delegation procedures will be used as determined by the President.

Misconduct constituting harassment, discrimination, or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling, or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, suspension without pay, or termination, as the College believes appropriate under the circumstances.

Sexual Misconduct Policy.

Simpson College affirms the rights of its community members to live, study, and work in an environment free from all forms of sexual misconduct, including sexual harassment, sexual violence, rape, sexual assault, domestic violence, dating/relationship violence, sexual exploitation, sexual manipulation, and/or stalking. Consistent with its obligations under Title IX of the Education Amendments of 1972, 20 U.S.C. §§1681 - 1688 and its attendant regulations (hereafter “Title IX”), the College has promulgated a Sexual Misconduct Policy that is set forth in Appendix A and is incorporated herein by reference.

Hate Symbols Policy.

The following policy applies to all staff, faculty, students, vendors, and others who conduct business with the College:

Simpson, as a private college in the liberal arts tradition, supports creative, thoughtful, and respectful discourse where conflicting perspectives are vigorously debated and thoroughly discussed. Simpson is dedicated to affording all members of the campus community the protections of free speech, expression, assembly, religion, and press available under the U.S. and Iowa constitutions and all applicable federal and state laws, consistent with the

College's mission and functioning. It is not the proper role of the College to shield people from ideas, expressions, and opinions they find unwelcome, disagreeable, or even deeply offensive.

At the same time, the College will not tolerate discriminatory actions that are so severe, persistent, or pervasive as to limit or deny a student's ability to participate in or benefit from an educational activity or program, or any actions that create an intimidating, hostile, or abusive environment. Severe, persistent, or pervasive discriminatory actions may include (but are not limited to) publicly displaying symbols of hate, racism, antisemitism, or terrorism. Examples of hate symbols include neo-Nazi symbols and flags, racist hand signs, hate group logos, and Confederate flags. In defining symbols of hate, the College will consult expert resources like the Anti-Defamation League (ADL) Hate Symbols Database. Alleged violations will be addressed through the adjudication processes specified in the student, faculty, and employee handbooks.

Simpson College deeply values civil discourse, and all members of the college community share the responsibility for maintaining a climate of mutual respect. In light of academic freedom, this policy does not restrict the display or discussion of these symbols when their use is relevant to the subject matter of a course. In a classroom or other educational settings and activities, the history and impact of symbols of hate may still be taught, discussed, or displayed in texts, presentations, or historical simulations if relevant to the course.

Genetic Information Non-Discrimination Act (GINA) Policy.

The College complies with Title II of the Genetic Information Non-Discrimination Act of 2008 (GINA), which protects applicants and employees from discrimination based on genetic information in hiring, promotion, termination, pay, fringe benefits, and all other terms and conditions of employment. "Genetic information" includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases and disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

In accordance with GINA, the College does not intentionally collect, maintain, or use genetic information about applicants or employees or their family members in any decision concerning whether to hire an applicant or the terms, conditions, or any aspect of employment of an employee. GINA permits certain limited circumstances under which an employer may acquire genetic information, such as:

- inadvertently obtaining the information,
- acquiring genetic information in connection with a wellness program, and certain privacy precautions are taken;
- acquiring family medical history in compliance with Family and Medical Leave Act (FMLA) certification provisions;
- acquiring the information through publicly available documents containing family medical history information;

- conducting genetic monitoring of biological effects of toxic substances in the workplace, and certain privacy precautions are taken; or
- providing DNA analysis services for law enforcement, and the information is necessary to rule out employee sample contamination.

Any genetic information collected in connection with the approved circumstances outlined above will be maintained in the same type of separate confidential files required for medical information under the Americans with Disabilities Act. Genetic information may not be disclosed without employee consent except in very limited circumstances.

Reporting Suspected Violations of GINA. If you believe or suspect the College has acquired, disclosed, or used genetic information in violation of GINA, or has otherwise discriminated against any applicant or employee on the basis of genetic information, promptly report the suspected violation to your supervisor, department or division manager, or the Director of Human Resources. There is no need to follow any formal chain of command when filing a complaint or when discussing or expressing any issue of concern regarding an alleged violation of GINA or alleged discrimination on the basis of genetic information. You may bypass anyone in your direct chain of command and file your complaint or discuss or express any issue of concern with the Human Resources Department at any time.

Retaliation Prohibited. The College prohibits any form of retaliation against any employee for filing a complaint under this policy or for assisting or participating in a complaint investigation. Violation of this anti-retaliation policy will result in disciplinary action against the offending employee, up to and including possible termination of employment.

Reasonable Accommodations for Persons with Disabilities.

The Americans with Disabilities Act (ADA), as amended, is a federal law that prohibits employers from discriminating against qualified applicants and individuals with disabilities and, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of Simpson College to comply with all applicable federal and state laws concerning the employment of persons with disabilities. Furthermore, it is our policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment. Simpson College will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so creates an undue hardship to the College.

Procedure for Requesting an Accommodation. Qualified individuals with disabilities may make requests for reasonable accommodation to their direct supervisor, department or division chair, or

the Director of Human Resources. Upon receipt of an accommodation request, the supervisor, department or division chair, or the Director of Human Resources will meet with the employee to discuss and identify the precise limitations resulting from the disability and the potential accommodation that Simpson College might make to enable the applicant or employee to perform the essential functions of the job.

The College will determine the feasibility of the requested accommodation considering various factors, including, but not limited to, the nature and cost of the accommodation, alternative available accommodations, the College's available financial resources and organization, and the accommodation's impact on the operation of the College, including its impact on the ability of other employees to perform their duties.³

Reasonable Accommodations for Pregnant Workers.

As required by the Federal Pregnant Workers Fairness Act (PWFA), the College will provide reasonable accommodation to employees and applicants with limitations related to pregnancy, childbirth, or related medical conditions, unless the accommodation will cause undue hardship to the College's operations.

An employee or applicant may request accommodation due to pregnancy, childbirth, or a related medical condition by contacting the Director of Human Resources. The accommodation request should include an explanation of the pregnancy-related limitations, the accommodation needed, and any alternative accommodation(s) that might be reasonable. Depending on the nature of the accommodation, the individual may be requested to submit a statement from a health care provider substantiating the need for the accommodation.

Upon receipt of a request for accommodation, Human Resources will contact the employee or applicant to discuss the request and determine if accommodation is reasonable and can be provided without significant difficulty or expense, i.e., undue hardship.

While the reasonableness of each accommodation request will be individually assessed, possible accommodation may include allowing the individual to:

- Sit while working.
- Drink water during the workday.
- Receive closer-in parking.

³ As an educational community committed to the success of every student, Simpson College strives to effectively respond to the needs of students with physical and learning disabilities in compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act. Please see the sections regarding residential and academic accommodations and the use service and emotional support animals of the Student Handbook for more information in this area.

- Have flexible hours.
- Receive appropriately sized uniforms and safety apparel.
- Receive additional break time to use the bathroom, eat and rest.
- Take time off to recover from childbirth.
- Be excused from strenuous activities and/or activities that involve exposure to compounds deemed unsafe during pregnancy.
- Temporary leave of absence or modification in work schedule or tasks

If leave is requested or provided as a reasonable accommodation, it may run concurrently with leave under the Family and Medical Leave Act and/or any other leave permitted by law. However, the College will not require an employee to take time off if another reasonable accommodation can be provided that will allow the employee to continue to work.

The College prohibits any retaliation, harassment, or adverse action due to an individual's request for accommodation under this policy or for reporting or participating in an investigation of unlawful discrimination under this policy.

Adopted June 1, 2024

Service and Emotional Support Animals.

Simpson College complies with all applicable laws regarding animals on campus, including the Fair Housing Act, the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the Iowa Civil Rights Act, and Iowa Code sections 216C.5, .10, and .11, and City of Indianola's Code of Ordinances Chapters 55 and 56, the provisions of which are incorporated herein by this reference. This policy does not confer contractual rights, and Simpson College reserves the right to amend this policy at any time, with or without prior notice. Other than Service Animals or approved Emotional Support Animals (as defined below), pets and animals are not permitted in Simpson College facilities except under the terms and conditions set forth in the Pets in the Workplace policy.

Definitions:

Approved Animal – "Approved Animal" means:

- A Service Animal (as defined below)
- An Emotional Support Animal (referred to herein as an "ESA", as defined below)
- A Service-Animal-In-Training (as defined below)

Disability – “Disability” means:

- a physical or mental impairment that substantially limits one or more of a person’s major life activities.

Owner – “Owner” means:

- in the case of a Service Animal, the person for whom the Service Animal is doing work or performing tasks;
- in the case of an Emotional Support Animal, the person the animal is assisting;
- in the case of a Service-Animal-in-Training, the person providing the training while the animal is on Simpson College’s campus;

Service Animal – A “Service Animal” means:

- A dog that has been individually trained to do work or perform tasks for the benefit of an individual with a Disability that are directly related to the individual’s disability (e.g., guide people who are blind, alert people who are deaf, pull a wheelchair, alert and protect a person who is having or is about to have a seizure, remind a person with mental illness to take prescribed medications, alert individuals to the presence of allergens, retrieving items such as medicine or the telephone, providing physical support and assistance with balance to individuals with mobility disabilities, helping persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or distractive behaviors, etc.). A service animal is not one that provides emotional support, well-being, comfort, companionship, or protection. Other species of animals, whether wild or domestic, trained, or untrained, are not service animals for purposes of this definition, except as described below.
- When reasonable, depending on the circumstances, a miniature horse that has been individually trained to do work or perform tasks for people with disabilities that are directly related to the individual’s disability. Miniature horses generally range in height from 24 inches to 34 inches measured to the shoulders and generally weigh between 70 and 100 pounds. In determining whether a miniature horse will be accommodated in the relevant areas of the College, the College will assess four factors: (1) whether the miniature horse is housebroken; (2) whether the miniature horse is under the owner’s control; (3) whether the facility can accommodate the miniature horse’s type, size, and weight; and (4) whether the miniature horse’s presence will not compromise legitimate safety requirements necessary for safe operation of the College and its programs and facilities.

Emotional Support Animal – “Emotional Support Animal” means:

- An ESA is a companion animal that a medical professional has determined provides benefit for an individual with a disability. ESAs alleviate one or more identified effects of a person’s disability. The animal’s presence must have a nexus with the person’s disability.

Service-Animal-in-Training – “Service-Animal-in-Training” means:

- A dog or miniature horse in the process of being trained to do work or perform tasks for the benefit of a person with a disability that directly relates to the disability of the individual.

Process for a Service Animal:

Simpson College requests any employee with a Service Animal to voluntarily notify the Director of Human Resources of the intent and need to bring a Service Animal to an on-campus work site. In connection with this notification, the Human Resources Department generally will follow the interactive registration process utilized by the Office of Student Accessibility Services for similar needs by students. Following this process will enhance the College’s ability to properly accommodate the needs of the employee and the service animal. Governing laws allow for two initial inquiries to be asked of an individual with a service animal on campus or in a public facility:

1. Is the dog /miniature horse a service animal required because of a disability?
2. What work or task(s) has the animal been trained to perform to assist you with your disability?

If it is readily apparent that the animal is trained to do work or tasks for the individual, no specific inquiries are permissible. To ensure that the interactive process does not violate applicable laws and regulations governing service animals or emotional support animals, it is recommended that these questions be asked only by approved University personnel.

Voluntary Registration of Service Animal with Student Accessibility Services:

In addition to notifying the Director of Human Resources, the Owner of a Service Animal that will be present in an on-campus work site is requested to voluntarily register the Service Animal with Student Accessibility Services, located on the main floor of Dunn Library

1. Notify SAS in writing of the Service Animal coming to campus.
2. Provide proof of Rabies vaccination and a report from a licensed veterinarian stating the animal is healthy and free of disease.

Guidelines for Service Animals:

- A Service Animal can accompany its Owner everywhere the Owner is allowed to go.
- Service Animals must be harnessed, leashed, or tethered, unless these devices interfere with the Service Animal’s work or the Owner’s disability prevents using these devices (in which case, the Owner must maintain control of the animal through voice, signal, or other effective controls).

Simpson College need not accommodate a Service Animal if:

- It is not housebroken;
- Its Owner cannot effectively control it; or

- It poses a direct threat to the health or safety of others (e.g., displays vicious behavior).

The care or supervision of a Service Animal is solely the responsibility of its Owner. Simpson College is not required to provide care, food, or a special location for the animal.

Approval of an Emotional Support Animal:

Contact the Director of Human Resources to discuss potential issues or concerns, overall, ESA considerations and process, and to provide registration information. The following will be requested:

- Requests for approval of an ESA are treated like any other request for employee accommodation under the Americans with Disabilities Act. While it is not necessary to submit a written request or to use the words “reasonable accommodation” or “emotional support animal” to request this accommodation, we encourage you to complete the Request for Accommodations Form and Confidentiality Statement or provide the information requested on that form in some other written format in order to avoid miscommunication and to have a record that a request was made. Documentation will be required.
- Documentation from the employee’s medical or mental health professional or primary healthcare provider confirming the employee seeking the accommodation has a disability, and the recommendation of an emotional support animal, and verification that the animal provides assistance and/or therapeutic support with respect to the disability.

Once the Human Resources Department has received the necessary documentation, the request and documentation will be reviewed, and further discussion will be held with those involved to reach a conclusion on whether to approve the requested accommodation and under what conditions.

Revised May 15, 2024

Religions Accommodation

Simpson College respects the religious beliefs and practices of all employees and will make, on request, an accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship on the College’s operations.

Requesting a Religious Accommodation. An employee whose religious beliefs or practices conflict with his or her job, work schedule, or with the College’s policy or practice on dress and appearance, or with other aspects of employment, and who seeks a religious accommodation, must submit a written request for the accommodation to his or her immediate supervisor. The written request will include the type of religious conflict that exists and the employee’s suggested accommodation.

Providing Religious Accommodation. The immediate supervisor will evaluate the request, considering whether a work conflict exists due to a sincerely held religious belief or practice and whether an accommodation is available that is reasonable and that would not create an undue hardship on the College’s operations. An accommodation may be a change in job, using paid leave or leave without pay, allowing an exception to the dress and appearance code that does not affect

safety requirements, or for other aspects of employment. If a supervisor is unable to grant the employee the time off requested, the supervisor should first discuss the employee's request with the Director of Human Resources prior to denying the request. If both the supervisor and the Director of Human Resources agree that the requested accommodation would create an undue hardship, the request will be denied, and alternative arrangements will be discussed with the employee.

If the supervisor is going to provide an accommodation, the supervisor and employee will meet to discuss the request and the decision on an accommodation. If the employee accepts the proposed religious accommodation, the immediate supervisor will implement the decision. If the employee rejects the proposed accommodation, he or she may appeal to the Director of Human Resources.

Adopted 6/1/2024

Staff Grievance Policy.

Policy Statement: Simpson College is committed to treating staff consistently in the application of policies and procedures and seeks to address problems and concerns in a timely manner. The College provides the following grievance procedures to promote prompt, reasonable resolutions to issues raised by staff.

Definition: A "grievance" is an official statement of a complaint about an act or decision of the College affecting an employee, which the employee believes to be based on an incorrect application or interpretation of a College policy or procedure. Complaints whose subject matters are already covered by other College processes, as outlined in the Simpson College Academic Catalog, the Faculty Handbook, or elsewhere in the Employee Handbook, are outside the scope of this Grievance Policy.

A grievance is not a claim of possible discrimination or harassment on the basis of race, color, religion, national origin, age, sex, sexual orientation, gender identity, genetic information, physical or mental disability, or status as a veteran or disabled veteran, or any other characteristic protected by law, or retaliation for filing a complaint or participating in the investigation of a complaint of discrimination or harassment. The College has existing policies describing how such claims will be handled.

Nor is this grievance policy an avenue for an employee to appeal or review a disciplinary action, performance appraisal, or criticism of workplace performance or conduct with which the employee disagrees. Rather, grievances are limited to those decisions impacting an employee that the employee believes are based on an incorrect application or interpretation of a College policy or procedure.

The Director of Human Resources will determine whether a filed grievance is within the scope of this policy or appropriately handled under another policy or procedure.

Grievance Resolution Process.

If an employee has a grievance to be resolved, the employee should begin with the informal step. The following timeline has been established to assist in handling matters expeditiously:

Step I – Informal Step

In many situations, disputes over the application or interpretation of policy can be resolved through communication between the parties involved. As such, the first step in the grievance resolution process is a discussion between the employee and their supervisor.

To initiate the informal resolution process, the employee should bring the matter to the attention of their immediate supervisor, either verbally or in writing, explaining the nature of the problem and the relief sought. The grievance must be filed within 5 working days of the event(s) that led to the grievance. This step occurs when the employee files the grievance with their immediate supervisor. The supervisor should then respond within three business days, if possible. If the supervisor provides a verbal response, the supervisor should also prepare a written response to record the receipt of the grievance and any action taken.

In situations where the Divisional Vice President is the direct supervisor, the informal step may be waived. However, if the employee would rather proceed directly to step two below, the employee may do so. The employee should submit their grievance in memo form to the Director of Human Resources. An appeal panel will be called to hear the grievance and provide a written recommendation to the President consistent with the procedures outlined in Step II below.

Step II – Formal Step

If the informal procedure fails to resolve the grievance to the employee's satisfaction and further action is deemed appropriate, the employee may proceed to Step II by submitting a written statement (memorandum) to the Director of Human Resources. This statement should be filed no later than 14 calendar days after the receipt of the supervisor's response. This statement should outline the relevant facts that form the basis of the employee's grievance, indicating the College policy that allegedly has been violated, and stating the resolution sought. The statement should also identify the supervisor who was involved in the informal step.

Upon receipt of the employee's written statement, the Director of Human Resources will:

- Advise the employee's divisional vice president or chair of the grievance and determine if the Step I procedure was followed. (If the Step I procedure was not followed, a referral back to Step I may be made unless the designated office determines such a referral is not likely to resolve the matter.)

- Begin the process of forming a three-member grievance panel, that will be responsible for hearing the grievance and providing a written recommendation to the President.

Members of the panel shall be chosen as follows:

- a. The supervisor and the employee will each submit the names of three fellow employees (in order of preference) from a list of individuals identified as willing to serve on an appeal committee. The list will be individuals appointed by the President who are serving two-year appointments to hear grievance matters. The Director of Human Resources will first identify a panel member from the list submitted by the employee, based on the employee's preference and the availability of that person. The second panel member will be identified in the same manner from the list submitted by the supervisor.
- b. The third panel member will be selected by the panel members named in the prior step. This individual will act as chair. If the two committee members cannot agree on a third member, they will number in ascending order their preference from the potential pool of employees who are serving on grievance hearings. The person receiving the lowest sum from the two lists will be appointed to the committee and act as chairperson.

Members of the appeal committee need to be impartial. They are not representatives of the party selecting them. If any committee member feels they cannot hear the grievance and give an unbiased opinion, they should excuse themselves. A replacement will be selected using the process described above.

After the grievance panel has been formed, the chairperson will designate a date and place to hear the grievance. The Director of Human Resources will assist the chairperson in the administrative arrangements and will be present for the hearing.

If the employee wishes, a fellow College employee may accompany them to the meeting to provide support. However, this effort at resolution is not to be regarded as an adversarial proceeding and is not subject to the legal procedures of a court of law. The presence of legal counsel at the meeting will not be permitted. Note-taking is allowed, but audio recording of the meeting is prohibited.

The function of the grievance panel shall be to determine, based upon the facts, whether or not the College followed its policy in the manner in which the employee was treated.

The panel will:

1. Prior to the hearing, all the documents prepared in Steps I and II above are given.
2. Both parties will be allowed to present all relevant facts directly to the committee and will present witnesses who have direct knowledge of the facts and can offer information about the grievance.
3. The meetings will be conducted privately.

4. The panel shall draft a recommendation based on the stipulated facts and the evidence brought forth during the appeal hearing.

The written recommendation from the appeal committee will be reported to the President within 15 working days after the conclusion of the appeal meeting.

The panel's recommendation will be consistent with College policy and will be advisory to the President, whose decision will be final and not subject to review under any other grievance procedure in force at the College. Copies of the President's decision will be provided to the employee, supervisor, divisional vice president, and Director of Human Resources.

The College shall not be responsible for any expenses associated with the appeal process which an employee may incur.

Remedies. At each step in the grievance resolution process, the individual representing the College may fashion an appropriate remedy that is consistent with their authority.

Documentation. There are no specific documents or forms to be used under this policy. As stated, there are a number of times when written communication is required. That communication will typically take the form of a memorandum.

Non-Retaliation Statement. Retaliation, or attempts to retaliate, against any individual who files a grievance or participates in any step of this procedure, is prohibited. Any person undertaking or attempting any retaliatory conduct is subject to disciplinary action, up to and including possible termination of employment, consistent with the employee's status, and College procedure and policy.

Updated: March 22, 2023

Employee Complaint Procedures for Accounting and Auditing Matters.

Any employee of the College may submit a good-faith complaint regarding accounting or auditing matters to the President of the College without fear of adverse action or retaliation. The College is committed to achieving compliance with all applicable accounting standards, accounting controls, and audit practices. The Audit and Compliance Committee of the College's Board of Trustees will oversee and address the treatment of employee concerns in this area.

In order to facilitate the reporting of employee complaints, the following procedures are established for (a) the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or audit matters ("Accounting Matters") and (b) the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

Receipt of Employee Complaints

- Employees with concerns regarding Accounting Matters may report their concerns to the President of the College in person or via telephone, e-mail, or regular mail.

- Employees with concerns about Accounting Matters implicating the President of the College may report their concerns directly to the Chair of the Audit and Compliance Committee via telephone, e-mail or regular mail as follows:

Deanna Strable-Soethout
Executive Vice President and Chief Financial Officer
Principal Financial Group
Mail Flow 711-6A36
711 High Street
Des Moines, Iowa 50392
515-247-5514
strable.deanna@principal.com

- Alternatively, employees with concerns regarding Accounting Matters may report their concerns to Campus Conduct Hotline by calling 1-877-943-5787. Campus Conduct Hotline is operated by an independent company, and no one at Simpson College will hear the caller's voice. Callers may choose to provide their name or remain totally anonymous.

Scope of Matters Covered by These Procedures

These procedures relate to employee complaints relating to any questionable accounting or auditing matters, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statements of the College;
- fraud or deliberate error in the accounting and maintenance of financial records of the College;
- deficiencies in or noncompliance with the College's internal accounting controls;
- misrepresentation or false statements to or by a senior administrator or accountant regarding a matter contained in the financial records, financial reports, or audit reports of the College;
- deviation from full and fair reporting of the College's financial condition;
- Improper financial transactions, including kickbacks or financial conflicts of interest; or
- Employee theft or misuse of college property or assets.

Treatment of Complaints

- Upon receipt of a complaint, the President or Chair of the Audit and Compliance Committee, as applicable, will (i) determine whether the complaint pertains to Accounting Matters and (ii), when possible, acknowledge receipt of the complaint to the sender. Complaints relating to Accounting Matters will be reviewed periodically by the Audit and Compliance Committee of the Board of Trustees with oversight by outside counsel, or such other persons as the Audit and Compliance

Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

- Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the President or Chair of the Audit and Compliance Committee, as applicable, with input from the Audit and Compliance Committee.
- The College will not discharge, demote, suspend, threaten, harass, or take any other adverse employment action against any employee in retaliation for the employee's good faith reporting of complaints regarding Accounting Matters.

Reporting and Retention of Complaints and Investigations

- The President or his/her designee will maintain a log of all complaints, tracking their receipt, investigation, and resolution, and shall prepare periodic summary reports thereof for the Audit and Compliance Committee.

Approved by Board of Trustees, October 21, 2005

Updated: January 2010

Pets in the Workplace.

For many community members, allowing pets in the workplace can greatly enhance the working and learning environment. This policy defines the terms and conditions under which a pet owner, as defined herein, may bring a pet to campus. This policy does not confer contractual rights, and Simpson College reserves the right to amend or terminate this policy at any time, with or without prior notice.

Definitions

For this policy, the following definitions will apply:

Pet Owner: Employees of the College, including faculty, staff, and temporary employees who own a domestic dog or cat that resides with and is cared for by the employee. A pet owner is limited to bringing one pet to the workplace. The definition of "pet owner" does not include students who are employees. Students should refer to the Student Handbook and the Residential Life Office for applicable policies on animals.

Pet: A domestic dog or cat that is owned by, resides with, and is cared for by an employee. No other animals are permitted. Feral cats or dogs are not permitted. A pet under this policy is not a service animal or an emotional support animal. Service animals and emotional support animals in the workplace or elsewhere on campus are governed by the policies concerning service animals and emotional support animals found in both the Employee Handbook and the Student Handbook.

Pet Owner Expectations

Work areas differ across the college, and some are more suitable than others for bringing pets, given the nature of the work and the employee's interactions with other employees, students, and the public. Prior to bringing a pet to a campus workspace, an employee must discuss and obtain the consent of their supervisor.

Each community member who is approved to bring a pet to campus must be respectful of others, recognizing that having a pet in the workplace is a privilege that bears the responsibility of proper hygienic care and attention to those pets and minimizing disruption to others while at work. Pets must be cared for in a responsible manner that ensures the safety of those on campus, as well as the safety of the pet.

Please also be aware of the need for heightened consideration of the sensitivities and vulnerabilities of fellow community members, including students, staff, faculty members, and visitors, who may suffer from allergies or who may have serious apprehensions about animals.

As a general policy, the College allows pets to be in College buildings and open space areas, as long as they are attended to and restrained at all times by their owner and their owner complies with the requirements of this policy.

Areas designated as those from which pets are prohibited are:

- Dining and food preparation areas
- Classrooms and labs
- Conference rooms or meeting spaces outside personal offices
- Computing and Telecommunications machine room
- Areas that are open to the public and commonly used, such as foyers and bathrooms, except as necessary to travel en route to permitted locations.
- Spectator seating and competition fields for outdoor athletic events and other buildings/open space areas as specifically posted.
- Any area or situation in which another person has raised a legitimate concern for health or other reasons about the presence of an animal, except as provided in, and subject to, the College's service animal and emotional support animal policies.

The College requires employees at all times to be in immediate proximity to their pet, maintain complete control of their pet, and to short-leash (6-8 feet) their pet in College-controlled buildings and open space areas, except when the pet is in a private office. To be considered attended to, a pet may not be left fastened to a stationary object. A pet may be left unattended in a private office by closing the door as long as a sign is placed outside of the office door indicating a pet is present inside. In no circumstances should a pet be left unattended in an office overnight.

Buildings with multiple users of the Pets in the Workplace program should develop a rotating schedule allowing for one pet in the building to accompany their owner per day.

When the pet owner is in their office, the door can remain open provided there is appropriate signage of a pet being present, and the pet could be adequately restrained quickly if necessary. Temporary door gates can be used if an office opens directly to the hallway. If having an open door results in any complaints or concerns by members of the college community in the vicinity, the door must be closed. Should any such complaints or concerns arise, it is the responsibility of the employee to use a closed door instead.

Pet owners need to provide notice that their pets will be present at meetings in their offices. Notification can be provided by adding to a syllabus or a general note in emails. If the pet owner receives notification that an individual wishes to meet in a space without the pet, the owner must arrange for a different meeting location.

Employees who are approved to bring their pet to work are solely responsible for ensuring that their private office and all other College-controlled buildings and open spaces remain undamaged and clean of pet feces and pet-caused dirt or debris. Clean-up should be thorough enough to avoid generating additional work for campus service staff or a non-pet owner-employee.

The College will seek restitution from the employee/owner for any pet-related damage to College-owned property, facilities, or grounds, and the employee/owner will be held financially responsible, per prevailing law, for any injuries to individuals caused by the pet. Under no circumstances will the College indemnify, defend, or hold harmless an employee/owner of a pet from claims arising from injuries or damages caused by their pet. Pet owners must maintain a homeowner's/renter's insurance policy that does NOT exclude dog bites or have specific breed exclusions.

Any pet owner must promptly clean up and properly dispose of pet waste. Waste should be disposed of properly in a trash receptacle outside.

The College reserves the right at all times to revoke the permission of a Pet Owner to have a particular pet in the workplace, especially when, but not limited to, the pet is not housebroken, the Pet Owner cannot effectively control it (physically, behavior that damages facilities or disturbs others; noise), or it poses a direct threat to the health or safety of others, including other pets in the workplace.

Pets Will

1. Be well socialized, housebroken, and in a clean, groomed, healthy condition with no fleas.
2. Be current on vaccinations, including DDTP and Rabies.
3. Be appropriately and currently licensed/registered by the relevant local authority.
4. Do not interrupt the work of others by barking or otherwise causing a disturbance.

Requirements BEFORE bringing the pet into the workplace

Before bringing a pet to campus, the pet owner will check first with others in the workplace to ensure that there are no concerns, such as allergies, etc. In the event of legitimate health problems, the pet may not be brought to that area.

The pet owner will also provide the following documentation to Human Resources. The pet may not be in the workplace prior to submission of all required documentation to, and approval by, Human Resources.

- Vet records stating the animal is healthy (i.e., free of transferable disease, parasites, and fleas)
- Rabies and vaccination certificates - regardless of the animal's age.
- A completed waiver of liability form.
- For dogs, proof of homeowner's or other policy of insurance that includes liability for injuries that are caused by pets and does not have an exclusion for the same or for particular breeds (failure to provide evidence of such coverage or coverage with a breed exclusion will result in denial of permission to bring the dog or the particular breed into the workplace).
- The animal must be kept clean and free of offensive odors.
- Photo of the animal.

Communication and Dispute Resolution

When a concern arises between a pet owner and a member of the campus community, and an agreement cannot be reached, the situation should be reported to Human Resources. The Divisional Vice President(s) or Athletic Director of the pet-owner and complainant, along with the Director of Human Resources, will determine, on a case-by-case basis, how any concern regarding a particular pet will be addressed and have the authority to make final determinations regarding any restrictions affecting a particular pet and any charges for damage caused by the pet. Under some circumstances, resolution may involve prohibiting the continued presence of the pet in the workplace and/or on campus. [Pets at Work Concern - Simpson College](#)

Retaliation against an individual requesting a change of meeting location or reporting a pet owner for violation of this policy will not be allowed. If retaliation occurs, the pet owner will be asked to discontinue bringing their pet to work.

The College also reserves the right to ask a pet owner to discontinue bringing their pet to campus if the procedures and guidelines in this policy are not being upheld.

These procedures and guidelines are subject to change without notice as determined by the College.

Approved: October 22, 2024