ADVANCING WORKFORCE DEVELOPMENT FOR MATURE WORKERS SINCE 1983

ASSOCIATES FOR TRAINING & DEVELOPMENT (A4TD)

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

PARTICIPANT HANDBOOK

with CT State Unit on Aging Policies Incorporated

A4TD is an equal opportunity employer that administers equal opportunity programs. Auxiliary aids and services are available upon request to individuals with disabilities. Free language access assistance is also available. Send an email to jquinn@a4td.org if you are need of these services.

Know your rights: Workplace discrimination is illegal.

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WELCOME FROM OUR CEO

Welcome to Associates for Training and Development!

We're glad you're here. As a participant in the Senior Community Service Employment Program (SCSEP), you'll have the chance to build new skills that can help you find a job. At the same time, you'll be making a difference in your community through your Community Service Assignment. Our shared goal is to support you in moving toward permanent employment.

This handbook is here to guide you. Inside, you'll find information about SCSEP policies, the terms of your participation, and the federal guidelines set by the U.S. Department of Labor. Think of it as a resource you can return to whenever you need clarity.

If you have questions or run into challenges, please reach out to your local SCSEP Case Management Participant Assistant. We're here to help you succeed, and your effort and cooperation are key to making this program work for you.

We look forward to working alongside you and celebrating your progress.

With best wishes,

S. Alex Fizz

CEO
Associates for Training and Development (A4TD)

All information contained in this handbook is subject to change without notice as a result of legislation or changes in Department of Labor or Associates for Training and Development (A4TD) SCSEP policies. Local SCSEP Case Management Participant Assistants will make every attempt to keep you informed of policy changes. For questions regarding areas not covered in this handbook, please contact us.

SECTION ONE - INFORMATION ABOUT ASSOCIATES FOR TRAINING AND DEVELOPMENT (A4TD) AND SCSEP

ABOUT ASSOCIATES FOR TRAINING AND DEVELOPMENT (A4TD)

Associates for Training and Development (A4TD) is a trade name for Vermont Associates for Training and Development, Inc. a private nonprofit 501(c)3 corporation founded in 1983 whose mission is to provide training and employment services to mature workers. This niche positioning has been very successful because of the company's commitment to coordination and collaboration at all levels - local, state, and national. The company's core values include a commitment to continuous quality improvement, customer focus, teamwork (internal), and partnerships (external). A4TD has built its extensive expertise in serving the diverse needs of older workers through operating programs such as the Senior Community Service Employment Program (SCSEP), and numerous demonstration projects with state and national partners.

A4TD serves hundreds of people per year in the SCSEP. Each participant receives ongoing training and support to help them move toward unsubsidized employment. While learning job-specific skills, SCSEP participants also provide a needed service to the community. The demand for this training has been overwhelming and the project has been oversubscribed since its inception.

NOTE: *Throughout the rest of this orientation handbook, we will revert to our acronym, A4TD.*

ABOUT SCSEP

The Senior Community Service Employment Program (SCSEP) is a community service and work-based job training program for older Americans. Authorized by the Older Americans Act, the program provides training for low-income, unemployed seniors. Participants also have access to employment assistance through American Job Centers.

SCSEP participants gain work experience in a variety of community service activities at non-profit and public facilities, including schools, hospitals, day-care centers, and senior centers. The program provides over 40 million community service hours to public and non-profit agencies, allowing them to enhance and provide needed services. Participants are normally scheduled to train for 20 hours each week. Occasionally, training schedules will increase or decrease based on program funding. If a change from the 20-hour routine is expected, participants and supervisors will be notified by SCSEP staff. Participants are paid the highest of federal, state, local, or

prevailing wage. This training serves as a bridge to unsubsidized employment opportunities for participants.

SECTION TWO -
TRAINING IN SCSEP

ELIGIBILITY

Eligibility requirements for SCSEP are: 1) you are at least age 55; 2) your family income was at or below 125% of the federal poverty guideline; 3) you live in our service area; and 4) you are unemployed.

Program eligibility must be recertified annually. To remain eligible for SCSEP, you must continue to meet all of these requirements.

Although an individual may meet the technical eligibility requirements for the SCSEP, this does not mean they are guaranteed enrollment; the SCSEP is not an entitlement program.

ASSESSMENT

As a participant in SCSEP, you will go through a process that will help identify your employment goals, barriers to employment, marketable skills, and your training needs. This information is gathered through an assessment process at the beginning of our work together.

HOST AGENCY ASSIGNMENT

At enrollment, you will be matched with a Community Service Assignment at a Host Agency that will provide you hands-on training. This is where you will get the majority of the training you will receive as a participant in SCSEP. The terms "Host Agency" and "training site" are interchangeable.

Your assignment at the Host Agency is not a job, but rather a practical training assignment.

We will work to match you with a Host Agency that is a great fit for you. It is possible that you will interview at multiple agencies before we find the right match. A Host Agency has the right to accept or decline to accept a participant. They can also ask that a participant be removed and

discontinue a training assignment at any time. If that occurs, we will do our best to find another Host Agency for you.
SCSEP regulations require that the training assignment provided by a Host Agency must create new – or expand existing – services. A Community Service Assignment cannot be used to displace Host Agency employees or reduce their paid work hours.

You will learn more about the Community Service Assignment and Host Agencies in the next section.

Please contact a local SCSEP Case Management Participant Assistant if you are having any problems or difficulties at your Host Agency. We want to help find ways to make your training better for you.

ORIENTATION

You will be provided an orientation to SCSEP by a local SCSEP Case Management Participant Assistant. They will explain all of the information contained in this Handbook and will fill out any additional paperwork that is necessary for enrollment. This is your time to ask questions about the program. You will be paid for program orientation, which occurs after you are determined to be eligible. Your local staff will help you complete your first timesheet.

INDIVIDUAL EMPLOYMENT PLAN

Shortly after your initial enrollment, local SCSEP staff will make an appointment to meet with you to develop your Individual Employment Plan (IEP). We use the IEP to map out your road to success in finding permanent employment.

Please tell your local Case Management Participant Assistant all of your ideas and training preferences when you are developing the IEP, as it will help them to build the best training plan for you.

PARTICIPANT MEETINGS

A4TD holds monthly "Network to Work" meetings. Your attendance at these meetings is mandatory and you will be paid for this time. For part of the day of a Network to Work meeting, you will go to the designated meeting location instead of going to your Community Service

Assignment at your Host Agency. During these meetings, there will be a job readiness skills training, an employer speaker, and the presentation of information on job search, employment trends and opportunities, and other relevant information. You will also get the opportunity to meet other SCSEP participants.

Your Host Agency supervisor will also have a schedule of the meetings, but you may want to remind them the day before you are going to be gone for the meeting.

You must attend the monthly Network to Work meeting. If for any reason you are unable to attend, please notify your local SCSEP Case Management Participant Assistant in advance. These meetings are a critical part of your participation in SCSEP.

TYPES OF TRAINING

A4TD will offer you various types of training, often utilizing the services of community partner organizations. This training will include occupational skills training at your Community Service Assignment or other classes including: computer, Adult Basic Education, job search skills, job readiness, and credentialed training that aligns with your IEP. You are expected to take advantage of these training opportunities. If there are job-related classes or trainings, please let us know. We will then determine whether it is a training we can provide.

PROGRAM PROMOTION

In the course of discussing or promoting our SCSEP program, A4TD may wish to include actual images and experiences of our program participants. There is an expectation of privacy with being a participant in the Senior Community Service Employment Program (SCSEP). Personally Identifiable Information (PII) will not be shared without written permission from the SCSEP participant. However, a participant's name, photograph, or information about their participation or experience in SCSEP may be used for promotional purposes or to advocate for increased support of SCSEP.

SECTION THREE - COMMUNITY SERVICE ASSIGNMENTS

TRAINING ASSIGNMENT DESCRIPTION

You will receive a Training Assignment Description that establishes your duties at the Community Service Assignment. When you sign this description, you are agreeing to the duties of the assignment as listed. You may only do duties that are listed in the Training Assignment Description and the Individual Employment Plan (IEP).

If you are asked to do other duties than those listed on the Training Assignment Description or IEP, please contact your local Case Management Participant Assistant or Career Navigator.

TRAINING HOURS

Host Agencies must be able to provide you with 20 hours of training per week. In most cases, you will be assigned to train at your Host Agency 5 days per week, 4 hours per day (for a total of 20 hours). There may be variations to these hours depending on your Community Service Assignment. ***You may never train for more than 8 hours in a day or 34 hours in a week.***

Participants are required to have a training schedule that includes a **minimum of 20 hours per week** at a Host Agency to remain appropriate for SCSEP. A participant may request a reduced schedule due to extenuating circumstances, such as a disabling condition, or they are in jeopardy of losing benefits due to earning too much money per month.

If you train for more than 4 consecutive hours, A4TD policy requires that you take a ½ hour unpaid break. This break must not be included in the hours you enter on your timesheet. According to Federal law, these breaks (typically lasting at least 30 minutes), are not work time and are not compensable.

Your hours will be determined by you, your local SCSEP Case Management Participant Assistant, and your Host Agency supervisor. The days and times you are scheduled to train at the Host Agency are listed on your Community Service Assignment Form. You are not allowed to train different or more hours.

If you are asked to train at a different time, or more hours than are listed on your Training Assignment Description, please contact your local SCSEP Case Management Participant Assistant or Career Navigator.

Payable training hours include:

1) on-site CSA hours at the designated host agency,
2) off-site in-person and remote (online) training hours,
    a. The class must be on the approved off-site training list or
    b. approved in advance by the Career Navigator (or DOP).
3) program documentation activities.
    a. Program documentation activities are recorded on the time sheet in the off-site training column.
    b. Four types of program documentation are recorded as Participant Required Activities (PRAs). The four program documentation activities that are PRA are:
        1. orientation to a program activity
        2. site-safety consultations
        3. assessments and IEPs
        4. the offer of a physical exam

Participants are not paid for time spent during case management helping participants apply for and complete forms for services and program at other agencies such as housing and heating assistance programs.

ABSENCES

If, for any reason, you are not able to train at your training site on a scheduled day, you must call your Host Agency supervisor and your local Case Management Participant Assistant at least 2 hours before scheduled training time. If those individuals are unavailable, you should leave a detailed voicemail with a call back phone number. Please note that three unexcused absences could result in termination from the SCSEP.

LENGTH OF ASSIGNMENT

The length of Community Service Assignments varies, and is determined by many factors. You may be assigned to a Host Agency until you are hired by that agency, hired by another employer, transferred to another Host Agency, or otherwise separated from the SCSEP.

DURATIONAL LIMIT

Our goal and expectation is that you train in the SCSEP for approximately twelve months, though the training time for each participant will depend on one's unique training needs. Under normal circumstances, the US Department of Labor(USDOL) has mandated that no one may remain in the program longer than 48 months in their lifetime. A4TD implements this durational limit with no possibility of extension beyond the 48-month limit.

In response to the COVID-19 pandemic, which had a widespread impact on SCSEP participants, USDOL has extended the individual durational limit by 12 months for all participants who were enrolled in SCSEP as of March 1, 2020, and for all participants who enroll during the six-month enrollment period from March 1, 2020 through August 31, 2020. (This change was communicated on May 28, 2020 in TEGL 22-19.) Participants enrolled as of September 1, 2020, will have a traditional duration limit of 48 months.

RESTRICTIONS

Driving:

You may not drive a motor vehicle as a part of your training duties. You may ride in a vehicle with your Host Agency supervisor if riding in a car aligns with your Training Assignment Description and IEP. The Host Agency must provide a certificate of insurance with A4TD as the named insured. Riding in a vehicle must be approved by the Director of Programs.

If you are asked to drive somewhere as a part of your training assignment, please contact your local SCSEP Case Management Participant Assistant or Career Navigator immediately.

Volunteering at your Host Agency:

You may not be a current or previous volunteer at the Host Agency where you will be training.

Political Activity:

You may not lobby or participate in partisan or nonpartisan political activities during hours for which you are paid by SCSEP. You may not lobby at any time as a representative of A4TD. You may lobby as a private citizen during non-training hours. A copy of the Political Activities Notice is attached to this handbook.

PERSONAL APPEARANCE / HYGIENE

SCSEP participants are expected to adhere to dress codes and norms established at their Host Agency. Dressing appropriately and maintaining excellent hygiene improves how you may be perceived and results in increased job readiness.

REQUEST FOR REASSIGNMENT

If you are having problems at your Host Agency, you should tell your local SCSEP Participant Assistant. Every effort will be made to resolve the problem and maintain your current assignment. You can request to be reassigned to another Host Agency if there is a very serious issue that cannot be resolved.

Your Host Agency can request that you be reassigned at any time. A4TD can also initiate a reassignment when we believe it is necessary.

EVALUATIONS

The Host Agency supervisor will be required to formally evaluate your work performance every 6 months as part of an IEP assessment. This will occur in an in-person meeting of you, your supervisor, and your local SCSEP Participant Assistant or Career Navigator. The Host Agency supervisor will provide comments on areas in which you are proficient and in which you need to improve. The resulting feedback and discussions are part of your training and are meant to be constructive feedback for you and will help you to develop the skills necessary to get and keep a permanent job.

REMOTE NON-TRAINING POLICY

Remote non-CSA training is any off-site training activity for SCSEP participants who are not at a Community Service Assignment (CSA). Remote non-CSA training includes pre-site, hybrid or training while a new CSA is being developed and assigned.

Participants With Technology:

Acceptable Training Activities:

- Training activities are outlined in the Approved Virtual Training Options List. Y:\VPN\General\1 - Forms\8 - Misc Forms\01 Flyers For Participant Information - ATSS
- If a participant would like to be paid for completing training activities other than the ones listed on the Approved Virtual Training Options List, that is acceptable if the activity is approved by the Career Navigator (CN) prior to the participant completing the activity. The Career Navigator will make a case note summarizing the reasons for approving a training option not on the approved list while taking into consideration a participant's job goal and IEP status. (If a training activity requires

A4TD assistance with tuition, the normal tuition assistance protocols established in the SCSEP SOP, Section 801 B, should be followed.)

- All training activities must be added to the Remote Non-CSA Training IEP.

Documenting Completion:

- When a participant completes a training activity they should save a hard or soft copy of their confirmation of completion, then submit it to the CN.
- The Career Navigator or CMPA will save the confirmation of completion to the participant's folder.

Participants Without Technology:

Effective remote training, and remote work is dependent on an individual's access to internet connectivity, technology, and ability to use that technology. It is for this reason that A4TD emphasizes digital literacy and computer skills training, and incorporates those items into every participant IEP. For participants who cannot access training online, SCSEP staff (Career Navigator and CMPA) will make a concerted and focused effort to provide them with the supportive services, referrals, and training opportunities that will empower them to do so. Additionally, A4TD has 4 job readiness workbooks that can be completed without technology. The workbooks should only be used as a last resort.

Acceptable Training Activities:

- A4TD job readiness workbooks (4)

Documenting Completion:

- Participants will provide their Career Navigator with completed workbook activities monthly.
- The Career Navigator or CMPA will review the materials for correctness and completion, and write a summary case note.

Timesheets:

Timesheets must be completed for remote non-CSA training hours. Participants must complete their own timesheet. SCSEP Program staff cannot complete a timesheet on the participant's behalf, unless it is an extenuating circumstance and approved by the Director of Programs.

- Remote non-CSA training hours should be recorded in the "offsite training" column of the timesheet. Normal timesheet polices apply including submitting a timesheet to A4TD's Finance team by email or fax as described at the top of the participant's timesheet.
- An Off-Site Tracking Log must be completed by any SCSEP Participant who is not training at a Host Agency. The Tracking Log will detail the off-site training activities for the hours recorded in the off-site training column of your timesheet. The Tracking Log must be submitted with a timesheet. Failure to submit your Tracking Log may result in a delay of payment.
- Once the timesheet is received by the Finance team, it will be forwarded to the appropriate Career Navigator for review.
- Career Navigators will speak (verbally or in writing) with the participant and verify and discuss the contents of their hours, sign the timesheet (in the host agency supervisor space), and submit the timesheet to the Finance team for processing.
- At the CN's discretion, they can allow a CMPA to verify hours with the participant. The Career Navigator must sign the timesheet regardless of who verifies the hours. **This step in the process cannot be omitted.**

- For any circumstance described above, if the participant does not return contact attempts from the Career Navigator (or CMPA at the Career Navigator's discretion), and does not verify that they completed the hours recorded on their timesheet, the Career Navigator will not sign the timesheet and the participant will not be paid until the hours have been verified.

Other activities related to program participation remain payable, as always. Other payable activities are program orientation, physical exam, safety consult details, assessments including IEP, and other necessary program activities including recertification preparation and attending program meetings / NTW meetings.

Remote Non-CSA Training IEP

It is important that training activities are organized, individualized, and documented. A Remote Non-CSA Training IEP will be established for any participant who completes remote non-CSA training per this protocol. The IEP will run alongside the participant's traditional IEP, which establishes their occupational goal, supportive service need, skills growth, etc. The Remote Non-CSA Training IEP will identify the training activities the participant will pursue, and document the dates that they begin and end.

- The Remote Non-CSA Training IEP is completed collaboratively between Program staff (Career Navigator and CMPA) and the participant at the onset of the remote non-CSA training activities. A case note should be made to record when the IEP is established.
- The IEP should be updated at least one every 6 months, at the same time that a traditional IEP is updated.

SECTION FOUR - FINDING A PERMANENT JOB

TRANSITIONAL TRAINING

The SCSEP is a transitional training program and is only temporary. You are required to seek employment as a condition of participation in the SCSEP.

An important and required step in your job search process is that you register with your local American Job Center. All participants are required to complete a monthly Job Search Activity Log and submit it at the Network to Work meeting each month.

Your IEP contains the agreed-upon steps you must take to obtain unsubsidized employment, and failure to honor IEP commitments will result in your termination from the SCSEP.

EMPLOYMENT PORTFOLIO

Developing a professional employment portfolio is a crucial step in finding a permanent job. Participants are required to have a completed resume and sample cover letter. If you do not have one at the time of enrollment, it will be a top priority to help you develop one. The American Job Center and other community organizations can assist in the development of these documents. Other items for the portfolio include professional references, certificates, and other relevant items.

EMAIL REQUIREMENT

Participants are required to maintain an active email account while enrolled in the SCSEP. Your local SCSEP Case Management Participant Assistant or Career Navigator can help you set up an account and will direct you to training on how to use your email.

APPLYING FOR JOBS

If you identify a job opening for which you are interested in applying, contact your local SCSEP Case Management Participant Assistant and s/he or a community partner (i.e. American Job Center) will help you prepare your resume, application, etc. Likewise, if we hear of a job that we think would be good for you, we will contact you. Also, you should apply for all jobs at your Host Agency for which you qualify. Your Host Agency already knows you, so they know your skills, abilities, and dedication.

We are here to help you in your job search in any way that we can. If you have questions, concerns, problems, or if you just need to talk about your job search, do not hesitate to call us. We want to help!

ONCE YOU FIND A JOB

If you are hired for a permanent job, contact SCSEP staff immediately.

When you find a permanent job and are ready to leave the SCSEP, you will be asked to come into the Mature Worker Resource Center to fill out paperwork to exit you from the program and complete your final timesheet. This paperwork asks for information about your new job. We collect this information for statistical reporting purposes.

EMPLOYMENT FOLLOW-UP

SCSEP legislation requires that A4TD track your employment success for 12-15 months after you exit the program. SCSEP staff will contact your employer a few times after you are hired to make sure everything is going well and to help resolve any issues that may prevent you from retaining that job. They will also gather information about your wages; this information is strictly confidential and is only gathered to report the success of the program to the federal government. When you enroll in the SCSEP you sign a Wage Information Release Form that authorizes A4TD to collect this information.

Do not be concerned about your employer knowing you were a part of the SCSEP. SCSEP staff will explain the program to them and the success you had in your training. Your participation in the SCSEP shows employers that you are dedicated to improving your skills and that you are able to learn new skills. Those are two qualities that all employers value.

CHANGING EMPLOYERS

If at any time you are no longer employed by the company that initially hired you from the SCSEP, please notify your local SCSEP Case Management Participant Assistant or Career Navigator. They may be able to help you find another job. If you've already found another job on your own, SCSEP staff will need that employer's information to continue to follow-up on your progress.

If at any time you are employed by a new employer, you must notify SCSEP staff who the new employer is so that they can continue to follow-up on your progress as required by the Department of Labor.

SECTION FIVE - PAYMENT OF TRAINING WAGES

EXPLANATION OF PAID ACTIVITIES

Participants are assigned to community service training sites for 20 hours per week. As a participant, you will be paid only for your hours of training. Sick, vacation, and holiday pay are not available to SCSEP participants. **You do have the option, however, to make up any hours you miss so long as you do this during the same pay period when you miss the hours. You must get approval** from your Host Agency and local SCSEP staff for your make-up schedule.

See **Section Five, Initial Orientation/First Timesheets,** for clarification of paid training hours and Participant Required Activities (PRA).

PAYROLL PERIODS AND PAYCHECKS

A payroll period covers 14 days beginning on a Sunday and ending the second Saturday**.** A list of pay periods and pay dates will be provided to you. Payroll is processed at the A4TD SCSEP home office the week after the end of the payroll period, and payments are issued that Friday. As long as you submit your timesheet accurately and on time, you should be paid as indicated in the payroll schedule provided.

If we do not receive a completed and legible timesheet on time,
we cannot pay you!

DIRECT DEPOSIT

Direct deposit of your paycheck is available and strongly encouraged. Direct deposit is where your wages are deposited directly into your bank account. You will receive a pay stub indicating the amount that was deposited. This is a very efficient and safe way for your wages to reach your bank. You are strongly encouraged to sign up for this service. Forms and instructions can be obtained from the local A4TD SCSEP Mature Worker Resource Center. If you are unable to receive direct deposit, you will be issued a Payroll Debit Card.

You will receive pay stubs in the mail, even if you utilize direct deposit.
Please keep copies of your own pay stubs.

TIMESHEETS

It is your responsibility to complete and submit your timesheet because this is a requirement of most jobs. Your Host Agency supervisor can help you if you have questions, and s/he is responsible for approving your timesheet.

INITIAL ORIENTATION / FIRST TIMESHEETS:

Participant's Duty to Certify Training Hours

This is a Jobs Training program, thus it is expected that participants will learn to submit accurate timesheets reflecting their training hours. The Participants Duty to Certify Training Hours document is form #12 in the Phase 1 packet. It is listed as form #7 for Recertification files. Participants are required to sign a certification statement that:

> ***I hereby certify my understanding that I may only be paid wages for time I have actually engaged in SCSEP training activities at my host site training assignment or in other approved off-site training opportunities. I further understand that it is my duty to verify the hours entered on my bi-weekly timesheet and when signing my timesheet, I am certifying that the hours being submitted for the payment of training wages to me are accurate and true.***

After you have been determined eligible for the program, your payable training hours are recorded on your timesheet. Payable training hours include:

- on-site CSA hours at the designated host agency,
- off-site in-person and remote (online) training hours,
    a. The class must be on the approved off-site training list or
    b. approved in advance by the Career Navigator (or DOP).
- program documentation activities.
    a. Program documentation activities are recorded on the time sheet in the off-site training column.
    b. Four types of program documentation are recorded as Participant Required Activities (PRAs). The four program documentation activities that are PRA are:
        1. orientation to a program activity
        2. site-safety consultations
        3. assessments and IEPs
        4. the offer of a physical exam

Participants are not paid for time spent during case management helping participants apply for and complete forms for services and program at other agencies such as housing and heating assistance programs.

Your local staff will demonstrate for you how to do this and provide a template. Local SCSEP staff can sign as "HA Supervisor" to verify the completion of these hours, and they can help you submit your first timesheet if needed.

HOST AGENCY HOURS:

You should record the exact hours spent training at the Host Agency next to the appropriate day of the week in the "Host Agency Training Hours" column. Only the hours you were physically present at the Host Agency should be recorded.

OFF-SITE TRAINING (MEETINGS AND TRAININGS NOT AT YOUR HOST AGENCY):

If you attended a Network to Work Meeting or another off-site training assignment (ex. Resume Writing, MS Office Suite computer training classes, etc.) as directed by SCSEP staff, you will put those hours in the appropriate "Off-Site Training Hours" column. Be sure to provide a brief description of the training in the column headed "Explanation of Off-Site Training".

PARTICIPANT REQUIRED ACTIVITIES (PRA):

It is not necessary to break out the different PRAs on the time sheet. Simply list the number of hours of PRA in the off-site column.

TOTAL HOURS:

Record the ***total*** of Host Agency Hours ***and*** Off-Site Training Hours **and** PRA Hours in the Total Hours column next to the appropriate day of the week.

If you need help figuring out what column to put hours in, you can always call your local SCSEP Case Management Participant Assistant.

SIGNATURES:

Participant**:** After you have entered all of your hours, be sure to sign your timesheet. **Never sign a blank timesheet**. Then give the timesheet to your Host Agency supervisor for completion.

Host Agency supervisor: At the end of your last day of training in the payroll period, have your Host Agency supervisor **fill in the in-kind information** (in the lower left corner of the timesheet) and **sign** your timesheet. Once your Host Agency supervisor reviews and signs your timesheet (ideally your last day of training in the payroll period), fax or email it to the SCSEP finance office using the 800# or email address printed in the upper left-hand corner of your timesheet. You should keep your original timesheet for your reference. You will not need to send that to us.

Before submitting your timesheet, be sure it has:

- ✓ *Your name*
- ✓ *Your Host Agency name*
- ✓ *Host Agency training hours entered for each day you trained*
- ✓ *The total Host Agency hours for the two-week pay period*
- ✓ *Off-site training hours entered as appropriate, including a description*
- ✓ *The total off-site training hours for the two-week pay period*
- ✓ *The grand total of Host Agency and off-site training hours*
- ✓ *Your signature*
- ✓ *Your Host Agency supervisor's signature*
- ✓ *Any in-kind donation information*

Timesheets must be submitted on time, (no later than 4 p.m. on the last Friday of the payroll period, unless you have received approval to train on Saturdays), according to the schedule provided. ***Any timesheets received after the due date will be processed in the following pay period and your paycheck will be delayed by two weeks.*** Therefore it is critical for you to submit your timesheets in a timely manner.

Only those timesheets that have both a participant and Host Agency supervisor signature will be processed.

FRAUDULENT TIMESHEETS

If it is discovered that you reported inaccurate hours on your Participant Timesheet, you will be immediately terminated from the SCSEP. Fraud can include reporting more hours than you actually trained at the Host Agency, reporting hours when you never actually showed up at the Host Agency, etc.

Participant Timesheet Audit Policy

Referencing the *Participant Orientation Handbook*, it is a SCSEP participant's responsibility to complete and submit their timesheet. The *Participant's Duty to Certify Training Hours Submitted on Timesheets* document further requires participants to: 1) certify their understanding that they can only be paid for wages for the time they actually are engaged in SCSEP approved training activities, and 2) verify the hours recorded on their bi-weekly timesheet are accurate and true.

To ensure participants are complying with their responsibilities outlined above, after each payroll, A4TD will audit participant timesheets by selecting a small random sample, using the Excel "Rand" function, of submitted timesheets so they can be reviewed and audited for accuracy and that policy was followed (as outlined above).
The process for verifying a submitted timesheet's accuracy is:

1. After each pay period, the VP of Programs (VPP) or their designee will use the payroll tally sheets and randomly select a minimum of 3 timesheets from each state. The timesheets selected will have recorded off-site training hours. The VPP or their designee will email the list, and copies of selected timesheets provided by Finance, to the staff member designated to audit the participant timesheets (referred to as "auditor")
2. The VPP will designate an A4TD staff member who is not part of the Program team to be the "auditor". The auditor will review and verify the accuracy of the timesheets. The auditor will:
    a. Contact, by phone, each participant whose timesheets is selected to be reviewed and audited.
    b. Confirm with the participant that: 1) they completed and submitted their timesheet, and 2) verify that the hours are accurate, true, and represent the training activities that they completed during the pay period.
3. The designee auditor will email the Finance Manager and send a scan of the Excel file used to perform a random sample and the timesheets audited, marked "Reviewed" or "Referred to VPP" and initialed. Any questionable timesheets discovered in this internal audit process will be reported to the VPP. Timesheets "Referred to VPP" will be case-noted in the participant's file documenting the exception discovered, what was done to resolve the exception and any follow up actions taken with staff, i.e. additional training, etc.

This policy works in tandem with the *Remote Non-CSA Policy* and the *Participant's Duty to Certify Training Hours Submitted on Timesheets* document.

At the discretion of the Finance Team, participant case notes for timesheets referred to the VPP, copies of audited timesheets and related Excel files used to perform random sample selections can be provided to A4TD's contracted financial auditor.

TRAINING SITE CLOSURE – SCHEDULED AND UNSCHEDULED

Scheduled: Participants are expected to make appropriate arrangements with their Case Management Participant Assistant concerning scheduled Host Agency closures (i.e. school vacations, business shutdowns, etc.). Because of the arrangements and approval required, you need to plan ahead for these situations.

Unscheduled: For training time lost due to unscheduled site closing (i.e. site closures due to loss of electricity, weather, etc.), you have **the option** to make up missed hours during the pay period. Note: unpaid time is not recorded on your timesheet.

As in the case of hours missed due to illness, you do have the option to make up any hours you miss due to unscheduled training site closure as long as it's during the same pay period. You must get approval from your Host Agency and local SCSEP Case Management Participant Assistant for your make-up schedule.

UNPAID LEAVE OF ABSENCE (HEALTH/PERSONAL EMERGENCY)

If you are going to be absent from your training site for more than 5 consecutive training days, you must request a Leave Of Absence (LOA) from your Case Management Participant Assistant, preferably in writing, which ***must be approved in advance of the requested dates*** (except in emergency cases). A Leave Of Absence request is not a guarantee and can be denied. The only acceptable reasons for a Leave Of Absence are personal illness / injury, care of a family member, and the development of a new Community Service Assignment.

TRAINING WAGE IMPACT ON OTHER BENEFITS

The SCSEP training wage you will be paid may or may not be considered when determining eligibility for other benefit programs such as subsidized housing, SSI (Supplemental Security Income), etc. Thus **it is your responsibility** to ascertain the impact of this training wage on your personal circumstances before you accept enrollment into the program. You should contact the administrators of your other benefit programs directly if you aren't sure how / if you will be affected.

If an organization/agency asks you to verify your SCSEP wages, you should scan, email, or fax the appropriate forms to the same email address or fax number used to submit your timesheet. Requests will be processed within 10 business days of receipt.

INCLEMENT WEATHER

A4TD does not offer paid time for participant absences due to inclement weather. You are required to call your training site and your local SCSEP Case Management Participant Assistant if

you feel your safety is threatened due to the weather and you opt not to travel to your training site. This is considered an excused absence and will be unpaid time.

JURY DUTY

If you are called for jury duty, you must notify your Case Management Participant Assistant and must provide the office with a *Notification to Serve* letter from the court. You have the option to make up missed hours during the pay period. You must get approval from your Host Agency and Case Management Participant Assistant for your make-up schedule.

UNEMPLOYMENT INSURANCE

You are not eligible for unemployment insurance benefits as a result of your participation in SCSEP.

SECTION SIX - PARTICIPANT RESPONSIBILITIES

As a participant in SCSEP, you have the following responsibilities:

SEEK EMPLOYMENT

Seeking employment is your primary responsibility. SCSEP is a jobs training program, designed to be temporary, and participants are required to seek employment as a condition of participation. Therefore, it is essential that you actively and genuinely seek a permanent job.

COMMIT TO YOUR TRAINING AND IEP

The SCSEP is a jobs training program and many types of training are provided to you to, including computer training. You are expected to participate fully in these training opportunities. Similarly you must conform to all requirements and expectations of your Individual Employment Plan (IEP) and Participant Terms of Acknowledgment.

AMERICAN JOB CENTER REGISTRATION

Participants in the SCSEP are required to register at the local American Job Center (AJC) for employment services immediately upon enrollment in the SCSEP and as stated in their IEP. Furthermore, participants are to review job openings at the AJC at least twice a month.

Participants are also required to keep their AJC registration updated so they remain active in the AJC job matching system while enrolled in the SCSEP.

USE OF A4TD ONLINE TRAINING PORTAL

We have a training portal on our website, www.a4td.org! This portal contains commonly needed program materials (like timesheets, this handbook, etc.) and also allows you to access training resources relevant to job search. It also contains monthly Network to Work meeting materials, which you should review and print prior to arrival at those meetings. You are expected to log in to the Training Portal and utilize its contents on a regular basis.

JOB SEARCH ACTIVITY LOG

You are required to complete a monthly Job Search Activity Log documenting your job search activities. You must turn this in to your local SCSEP Case Management Participant Assistant on a monthly basis at the Network to Work meetings.

ENLIST HOST AGENCY ASSISTANCE

Participants should inform their Host Agency supervisors of their employment goals and ask to be kept advised of job openings in the Host Agency.

REGULAR, ONGOING COMMUNICATION WITH SCSEP STAFF

As a participant in the SCSEP you are expected to communicate with your local SCSEP Case Management Participant Assistant or Career Navigator at least once per pay period. It is through this type of regular and ongoing communication that we can assist you in realizing your employment goals.

CHANGE IN CONTACT AND PERSONAL INFORMATION

Each SCSEP participant is responsible for notifying the local SCSEP Case Management Participant Assistant of changes in the following: a) address; b) phone number; c) emergency contact information; and d) household income or family size.

NOTIFY SCSEP STAFF IN THESE SITUATIONS

You must contact us in all of the following situations:

- **Absence from training:**
  - When you are unable to report to your scheduled training (you must also contact your Host Agency);
  - When you are unable to attend a Network to Work meeting;
- **Host Agency situations:**
  - When you are asked to perform duties other than those listed on your Training Assignment Description;
  - When you are asked to train at a different time, or more hours than are listed on your Community Service Assignment Form;
  - When you are asked to drive somewhere as a part of your Community Service Assignment, as this is prohibited;
  - When you encounter problems with your training assignment, duties, supervisors, co-workers or staff;
- **Injury:** When you are injured while at your assignment;

- **Schedule change:** When you want or need to make any changes to your scheduled training hours at your Host Agency;
- **Applying for jobs and interviewing:** When you apply for a job or go on an interview, so your job search efforts can be noted in your file;
- **Employment matters:**
    - When there are changes to your employment status;
    - If, after you exit from the program for a job, you are employed by a new/ different employer, so that A4TD SCSEP representatives can continue to follow-up on your progress as required by the Department of Labor.

SECTION SEVEN - SAFETY, ACCIDENT, AND HEALTH INFORMATION

A4TD holds your safety, welfare, and health in the highest regard. No task is so urgent that it cannot be done safely. By participating in the program, you are agreeing to exercise maximum care and good judgment in preventing accidents.

WORKERS COMPENSATION

All participants are covered by Workers Compensation. A4TD, not your Host Agency, provides the workers' compensation coverage for you.

ACCIDENT REPORTING

If you have an accident or suffer a work-related illness during your training assignment, notify your Host Agency supervisor immediately. The Host Agency supervisor will then evaluate the situation, call emergency help if necessary and report the incident to your local SCSEP Participant Assistant or Career Navigator. An "Incident Report" form must be completed by the Career Navigator as soon as possible.

FRINGE BENEFIT/PHYSICAL EXAM

SCSEP participants are offered a $40 subsidy to cover the cost of a physical examination. The physical examination is not a requirement for participation in the SCSEP. You may decide if you want the results of the physical examination to be shared with A4TD. You may refuse the physical examination through a signed waiver. If you accept this benefit, the doctor's bill should be sent to Associates for Training and Development, Inc., PO Box 107, St. Albans, VT 05478.

FIREARMS AND WEAPONS POLICY

To ensure that all participants, partners, and employees of A4TD remain safe, comfortable, and free of violence, A4TD prohibits the possession or use of dangerous weapons on company property, and during work hours.

All A4TD employees and participants are subject to this provision, including contract workers and temporary employees as well as visitors and customers on company property. A license to carry

the weapon does not supersede this policy. Any person in violation of this policy will be subject to disciplinary action, up to and including immediate termination.

“Company property” is defined as any A4TD office space or Mature Worker Resource Center, and surrounding areas such as sidewalks, walkways, driveways and parking lots under the company’s ownership or lease. This policy applies to all company-owned, rented or leased vehicles and all vehicles that come onto company property.

“Work hours” is defined as any time the employee is engaging in an activity associated with the SCSEP or A4TD. (For instance: employees may not be in possession of weapons at our offices, during Host Agency visits, or attending partner meetings.)

“Dangerous weapons” include firearms, explosives, and other weapons that might be considered dangerous or that could cause harm. Employees are responsible for making sure that any item they possess is not prohibited by this policy. If they are uncertain, they should consult with their supervisor.

A4TD reserves the right at any time and at its discretion to search all company-owned, rented or leased property, including vehicles, packages, containers, briefcases, desks, enclosures, etc., for the purpose of determining whether any weapon is being, or has been, brought onto its property or premises.

SECTION EIGHT - ADDITIONAL PROGRAM INFORMATION

TERMINATION POLICY

A4TD will provide and review with each participant at the time of enrollment a written copy of the Participant Termination Policy.

Reasons and Process for Termination

This termination policy will be applied fairly and consistently. Participants will be terminated only for the reasons listed below and not on the basis of age or any other protected characteristic. A4TD will seek to avoid termination whenever possible and will use progressive discipline when appropriate. Terminated participants will be referred to other potential sources of assistance, such as the American Job Center.

Termination Due to Provision of False Information

If at any time A4TD determines that a participant was incorrectly declared eligible as a result of false information knowingly given by the participant, A4TD will immediately give the participant written notice explaining the reason for termination and will exit the participant 30 days after issuing the written notice. The participant will be removed immediately from the Host Agency and placed on a Leave of Absence during the 30-day notice period.

Termination Due to Income Ineligibility Determined at Recertification

If A4TD finds a participant to be no longer program eligible, A4TD will immediately give the participant written notice explaining the reason for termination and will exit the participant 30 days after issuing the written notice. The participant will continue to train at the Host Agency assignment during the 30-day notice period.

Termination Due to Incorrect Initial Eligibility Determination

If at any time A4TD determines that it incorrectly determined a participant to be eligible for the program through no fault of the participant, A4TD will immediately give the participant written notice explaining the reason for termination and will exit the participant 30 days after issuing the written notice. The participant will continue to train at the Host Agency assignment during the 30-day notice period.

Termination Due to 48 Month Participation Limitation

No participant may exceed 48 months of SCSEP participation in their lifetime. A4TD will follow its Individual Durational Limit Policy and Procedure and give the participant written notice explaining the reason for termination at least 30 days prior to the exit date. The participant will continue to train at the Host Agency assignment during the 30-day notice period.

Termination Due to Becoming Employed During Enrollment

If A4TD finds a participant to be employed while also enrolled in SCSEP, A4TD will immediately give the participant written notice explaining the reason(s) for termination and will terminate the participant 30 days after it has provided the participant with written notice. The participant will be removed immediately from the Host Agency and placed on a Leave of Absence during the 30-day notice period.

Termination for Cause

Participants may be terminated for willful misconduct, intentional violations of reasonable program rules and directives, or failure to comply with the terms of the Individual Employment Plan (IEP) without good cause. Applicable reasons for termination include:

- Behavioral Issues:
  - Failure to respond to communications from SCSEP staff
  - Failure to cooperate in providing program eligibility information at recertification
  - Refusal or failure to perform assigned duties without good cause
  - Two or more unauthorized absences from the Host Agency/training site without good cause or proper notice, or a pattern of unexcused tardiness
  - Falsification of timesheets or other official records
  - Using or possessing any illegal drug, or being under the influence of alcohol during training time
  - Obscene, abusive, harassing, or threatening language or behavior
  - Insubordination (intentionally refusing to carry out the direction or instructions of a Host Agency supervisor or SCSEP staff member without good cause, or intentionally violating their IEP)
  - Theft or destruction of property
  - Intentional loss, damage, disclosure, or unauthorized use of property or information
  - Conviction of a felony or any drug-related crime committed during paid SCSEP time
- Job Search Issues:
  - Failure or refusal to search for a job

- Sabotaging a job interview
- A refusal to accept a job offer or referral to unsubsidized employment consistent with the IEP (with no extenuating circumstances that would hinder the participant from moving to unsubsidized employment)
- Failure to register and follow up with the local American Job Center
- A pattern of consistent and conscious failure to submit a Job Search Activity Log at monthly Network to Work meetings
- A pattern of consistent and conscious failure to utilize your American Job Center account at least twice a month (applicable to participants determined to be "job ready")

- Training Issues:
  - Refusal to accept a training site assignment that is consistent with their occupational goal
  - Refusal to participate in IEP-related training opportunities (including computer training)
  - Repeated failure to attend monthly Network to Work Meetings

Disciplinary / Termination Process

Outlined below is a progressive disciplinary process for terminating a participant. A4TD reserves the right to move to the appropriate step based on the seriousness of the violation. Violence, threatening behavior, or fraud are grounds for immediate termination.

- Step One: Documented Verbal Warning - A local staff person (the Career Navigator with feedback from the Case Management Participant Assistant) explains the issue of concern to the participant, issues a verbal warning, and documents the conversation in a casenote.
- Step Two: Participant Written Warning - With feedback from the Case Management Participant Assistant, the Career Navigator completes and presents to the participant a Written Warning. Once delivered, a copy is given to the participant, and a copy saved to the participant's file.
- Step Three: Corrective Action - The Director of Programs, with feedback from the Career Navigator, composes a Corrective Action Plan and presents it to the participant. The plan should contain specific steps or behaviors needed for the participant to become compliant with the program. Both parties sign the document and plans for regular progress evaluations are established. Every effort will be made to help the participant become compliant and be successful in the program. If all efforts are unsuccessful, a termination (Step Four) will occur.
- Step Four: Termination - The Director of Programs will write and sign a letter to the participant informing him or her of the reason(s) for termination and the effective date. This letter will inform the participant of his or her last day of training and advise that he or she is being placed on a 30 day unpaid Leave of Absence prior to

their exit date. This letter will specifically reference the infraction and include the person's right to appeal in accordance with the Complaint and Grievance Procedure outlined in the Participant Orientation Handbook. The termination letter will be sent certified mail to the participant's home address.

All termination notices will provide participants 30 days' notice before the termination becomes effective and will inform participants of their right to appeal the termination under the Complaint and Grievance Procedure. Participants may be placed on an unpaid leave of absence during this 30 day period. A copy of the grievance procedure will be attached to the termination notice.

COMPLAINT AND GRIEVANCE PROCEDURE

The purpose of this policy is to establish the process for the settlement of complaints and grievances filed by program applicants or participants. Individuals are expected to make a sincere effort to reconcile their differences at the lowest possible organizational level.

Complaint Process:

Step I:

This is the *Local Level*. At this level, the applicant / participant and the local SCSEP staff discuss the complaint informally. Complaints should be brought to the attention of the local SCSEP staff as soon as possible, within ten working days of the date of the relevant matter or incident. Complaints will be discussed with the intention of reaching a mutually acceptable resolution. In most cases, resolutions can be reached at this level. SCSEP local staff will inform the Director of Programs of the complaint and the results of this Step I discussion, then write a case note documenting the complaint, the discussion, and its outcome.

Step II:

If a satisfactory resolution cannot be reached at the local level, the complaint is put in writing and submitted to the *Program Management Level* within ten working days after the Step I decision. At this point the "complaint" becomes a "grievance". The written grievance should be submitted to:

Director of Programs
Associates for Training and Development
PO Box 107
St. Albans, VT 05478-0107

A4TD Program Management will issue a written decision to the complainant within ten working days. That decision will be determined and the letter will be composed in partnership with the

Vice President of Programs. A copy of the Complaint and Grievance Policy for Applicants and Participants will be included with this letter.

When a decision is rendered at the Step II level, the Vice President of Programs will provide a copy of the complaint and the decision to Executive Management. Any additional information that is pertinent to the issue (such as Warning Reports, Corrective Action Plans, Individual Employment Plans, etc.) must also be provided. This is to ensure that Executive Management has adequate information to review the case if a grievance escalates to Step III.

Step III:
If a satisfactory resolution cannot be reached at the *Program Management Level*, the written grievance may be submitted to A4TD Executive Management. This grievance must be filed within ten working days after receiving the Step II decision. The written grievance shall be submitted to:

Executive Management
Associates for Training and Development
PO Box 107
St. Albans, VT 05478-0107

At the *Executive Management Level*, a determination will be made whether a formal meeting between the parties is appropriate. A final written decision will be issued within ten working days following this meeting/determination and stored in the participant's file.

Step IV:

a. If the participant remains dissatisfied with the decision of A4TD, the written complaint will be forwarded to the Connecticut State Unit on Aging, as the state SCSEP funder. The Field Representative for the program will review the complaint; determine if all necessary action was taken; review the sub-grantee decision and decide if additional action is necessary. In doing so, the grantee will confer with all affected parties. If additional action is necessary, the Field Representative will provide written instructions to the sub-grantee. This instruction will include additional steps that shall be taken by the SCSEP staff and participant and will include a time frame for the completion of said actions. A written response from the SDA will be provided to the participant within one week of receipt, advising of the findings.

b. If the participant does not agree with the decision of the Field Representative, the participant may request that the written complaint be given to the Connecticut State Unit on Aging's Program Manager overseeing SCSEP. The Program Administration Manager will

review the complaint, confer with all affected parties and issue a decision. This will be the final disposition and the participant will receive written notification from the Program Administration Manager of the final resolution within two weeks of receipt. This written decision shall be provided to the sub-grantee also.

Contents of a Grievance:

A written grievance must contain the following information:

1. Name and contact information of the applicant / participant submitting the grievance (including mailing address, phone and email);
2. Identification of the Mature Worker Resource Center, Host Agency, Host Agency supervisor, or A4TD staff person involved;
3. The complainant's statement including:
    a. The issue or event that has caused the grievance;
    b. Specific reference to the pertinent policy, procedure, or regulation alleged to have been violated;
    c. Dates of alleged violations;
    d. Supporting documents;
    e. A statement of the specific remedial action sought;
    f. Information regarding the finding and results from previous Steps, I and/or II.

Other Types of Complaint:

Allegations of violations of Federal law which are not resolved under these procedures within 60 days, may be filed with the Director, Division of National Programs, Tools & Technical Assistance, Employment and Training Administration, U.S. Department of Labor, 200 Constitution Avenue, NW., Washington, DC 20210. Allegations determined to be substantial and credible will be investigated and addressed.

Complaints alleging a violation of the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964, of the Rehabilitation Act of 1973, of the Workforce Investment Act of 1998 (WIA), or their implementing regulations, may be mailed to the Director, Civil Rights Center, U.S. Department of Labor, Room N–4123, 200 Constitution Avenue, NW., Washington, DC 20210.

General Procedures:

It is the responsibility of all A4TD staff to act fairly, uniformly and without prejudice in determining the facts and to sincerely pursue resolutions that are satisfactory for everyone.

A4TD may in no way retaliate against an individual who has filed a complaint or grievance.

Definitions:

Complaint- an applicant's or participant's informal expression to their local SCSEP team of dissatisfaction with aspects of program participation, training, or conditions within the organization

Grievance- an applicant's or participant's express dissatisfaction, presented in writing, which has not been resolved to a satisfactory result through informal discussion with local SCSEP staff

Local SCSEP staff- usually consists of the Career Navigator with help if needed from the Case Management Participant Assistant

Program Management- the Director of Programs

Executive Management- the Vice President / Chief Operating Officer or designee, with support if needed from the President / Chief Executive Officer

SECTION NINE - POLICIES

PRIVACY ACT STATEMENT

This statement applies to forms used by the Department of Labor for the Senior Community Service Employment Program (SCSEP) that contain confidential data collected from SCSEP applicants and participants. It also describes the collection of this information and how the information will be used.

The Privacy Act of 1974, as amended, requires all Federal agencies, including the Employment and Training Administration (ETA) and its agents, to give the following facts to each person from whom it requests information:

- The statutory authority for the request;
- Why the information is needed;
- Whether it is voluntary or mandatory to provide the information;
- The effects of not providing information;
- The uses which may be made of the information;
- Whether disclosure of the Social Security Number (SSN) is mandatory or voluntary, by what statute or other authority the number is solicited, and what uses will be made of it.

These items are more fully explained in the following sections. If you have any questions about your rights and responsibilities under the Privacy Act, you should ask for assistance from your local SCSEP Case Management Participant Assistant.

THE DEPARTMENT OF LABOR'S AUTHORIZATION TO COLLECT INFORMATION

The Employment and Training Administration is an agency of the U.S. Department of Labor. The Department's authority to collect information from SCSEP applicants and participants is found in the Older Americans Act Amendments of 2000 (OAA Amendments), Pub. L 106-501, sections 503(f)(3)-(4); 42 USC 3056a(f)(3)-(4). Data collection documents are approved by the Office of Management and Budget (OMB).

WHY THE INFORMATION IS NEEDED

- The SCSEP needs information about age, citizenship, health, employability, behavior, family income, environment, and other matters related to your eligibility, assignment, and progress in the SCSEP. The information may be used to:
    - Determine whether your training and employment needs can best be met through

SCSEP or another program in your home community;
- Determine whether you meet all eligibility requirements for the SCSEP;
- Provide a basis for determining your progress in the SCSEP;
- Maintain a record of wages and other benefits received.

OBLIGATORY AND VOLUNTARY INFORMATION AND POSSIBLE CONSEQUENCES OF WITHHOLDING INFORMATION OR PROVIDING FALSE INFORMATION

- While there are no penalties under the law for refusing to supply information, the SCSEP requires the collection and maintenance of a wide range of personal information about you, including your Social Security Number, to satisfy enrollment requirements. Not supplying the requested information could delay or prevent you from enrolling and participating in the SCSEP.
- The provision of false information by you could lead to expulsion from the program or prosecution under the U.S. Criminal Code when such information is used to support a fraudulent claim to benefits.

How the Information is Used

In carrying out its responsibility under the OAA to administer the SCSEP program, the Department of Labor must sometimes disclose data from its records about you to another agency or individual without your specific written consent. Such disclosures may be made for the following reasons:

- To provide personnel, procurement, or benefit-related information to contractors and agencies to enable them to provide administrative functions for the program, including the maintenance of participant pay records;
- Disclose to researchers and public interest groups those records that are relevant and necessary to evaluate the effectiveness of the overall program and its various training components in serving different subgroups of the eligible population;
- To disclose information to the Office of Management and Budget in connection with its legislative review, coordination, and clearance activities;
- To provide statistical information to the news media or members of the general public for the purpose of promoting the merits of the SCSEP;
- To provide information to placement and welfare agencies, prospective employers, school, or training institutions to assist in participant employment;
- To provide information to Federal, state, and local agencies and community-based organizations to facilitate statistical research, audit, and evaluation activities necessary to insure the success, integrity, and improvement of the SCSEP and other employment and training programs;

- In addition, if a person about whom records are maintained submits a written request to a Member of Congress or his or her staff, and that request is forwarded to the U.S. Department of Labor, we may release the information to the Member of Congress or Congressional staff in response to the inquiry made on behalf of the subject of the record.

In accordance with the Privacy Act of 1974, as amended, A4TD has given you a copy of this statement, which explains how information that you or others might supply about yourself may be used.

DRUGS IN THE WORKPLACE

As a condition of continued enrollment in the SCSEP, you may not unlawfully use, be under the influence of, distribute, dispense, possess, or manufacture drugs or alcohol during paid training or meeting hours on A4TD or Host Agency property. Note: Any violation of this policy can result in disciplinary action up to and including your immediate termination from the SCSEP.

Use of legally prescribed medications is permitted as long as your use does not adversely affect your ability to satisfactorily perform duties, your safety, or the safety of others.

If you are found "guilty" (or entered a plea of "nolo contendere"), or sentenced to serve time, or both, for a federal, state, or city criminal drug statute violation that occurred during training assignment hours on Host Agency or A4TD SCSEP property, you must notify your local SCSEP Case Management Participant Assistant within five days of the verdict or sentencing.

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

1. A4TD's Commitment and Compliance

a. A4TD is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, A4TD expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment.

b. This A4TD policy complies with the Workforce Innovation and Opportunity Act's (WIOA) nondiscrimination regulations at 29 CFR part 38, including the discrimination complaint processing requirements of the regulations implementing Section 188 of WIOA. The

Section 188 regulations detail WIOA's nondiscrimination requirements; sections are referenced below.

c. WIOA Section 188 and 29 C.F.R. Part 38 prohibits discrimination (including harassment) against beneficiaries, applicants, and participants (as defined in the regulations) on the basis of citizenship status and participation in any WIOA Title I-financially assisted program or activity.

2. What is Harassment and who is Protected

a. Harassment on the basis of any protected characteristic is strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual, to include all applicants for participation into A4TD's programs, A4TD program participants, applicants for employment, and employees, and members of the public in their interactions with SCSEP (Section 188, 29 C.F.R. Part 38) because of race, color, or national origin (including limited English proficiency), (codified at 29 C.F.R. Part 31), religion, sex, (including pregnancy, childbirth and related medical conditions, transgender status, and gender identity), age, (29 C.F.R. Part 35), disability, (Section 504 of the Rehabilitation Act of 1973; DOL 29 C.F.R., Part 32) and political affiliation or belief, or any other characteristic protected by law and that:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Otherwise adversely affects an individual's employment opportunities.

b. **Racial or ethnic harassment is also prohibited** and is defined as any non-consenting conduct based upon race, ethnicity, or national origin that creates a hostile work environment. Racial or ethnic harassment may include threats, physical contact, pranks, vandalism, or verbal, graphic, or written conduct directed at an individual or individuals because of their race or national origin. This includes such things as racial or ethnic slurs, jokes, or offensive or derogatory comments. Even if actions are not directed at specific persons, a hostile environment is created when the conduct is sufficiently severe, pervasive, or persistent so as to unreasonably interfere with or limit the ability of an individual to perform his job.

c. **Harassing conduct includes**, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the

workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail).

d. **Individuals and Conduct Covered:** This policy applies to all applicants for participation into A4TD's programs, A4TD program participants, applicants for employment, and employees, and members of the public in their interactions with SCSEP, and prohibits harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to A4TD (e.g., an outside vendor, consultant or customer). Conduct prohibited by this policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

e. **Retaliation Is Prohibited:**

A4TD prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action.

3. Reporting Discrimination & Harassment

a. Any person who has been subjected to discrimination or harassment is encouraged to report it to their supervisor. Anyone who witnesses or becomes aware of discrimination or harassment should report such behavior to their supervisor. Reports of discrimination or harassment must be in writing and made within 180 days of the act or acts in violation. The complainant has two choices as to where to file the complaint. The complaint may be filed with A4TD's John Quinn, A4TD's VP of Administration and EO Officer (P.O. Box 107, St. Albans, VT 05478; 800-439-3307 x125 or TDD/TTY Relay 711; jquinn@a4td.org) or in VT, the VT Department of Labor EO Officers, or

b. Directly with the Director of the Civil Rights Center. The form to submit a written complaint to A4TD may be found here.

c. If the complaint is verbal, A4TD encourages the individual to complete the A4TD "Complaint Form" (link above), within 180 days of the act or acts in violation, or to file with the Director of the Civil Rights Center. If the individual refuses, the supervisor will document the verbal complaint and the decision not to submit a written complaint and forward the documentation to A4TD's VP of Administration and EO Officer (see contact information in Section 9, 3a). It is the complainant's choice whether to file with A4TD, with the Director of the Civil Rights Center, or not at all.

d. Upon receipt of the complaint, the VP of Administration and EO Officer (see contact information in Section 9, 3a) will provide the complainant with two initial statements. Statement one includes:
   1) An acknowledgment that A4TD has received the complaint;
   2) Notice that the complainant has the right to be represented in the complaint process;
   3) Notice of rights contained in 29 C.F.R. § 38.35;
   4) Notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages as required in 29 C.F.R. §§ 38.4(h) and (i), 38.34, and 38.36; and
   5) Notice that A4TD will issue a Notice of Final Action within 90 days of the date on which the complaint is filed.

   Statement two separates out each issue reported and includes for each separate issue:
   1) A statement whether A4TD will accept the issue for investigation, or reject the issue.
   2) The reason for each rejection.

e. The VP of Administration and EO Officer (see contact information in Section 9, 3a) will conduct an exploratory investigation with the parties concerned. A4TD will issue a Notice of Final Action within 90 days of the date on which the complaint is filed. Documentation on the results of the investigation, and supporting justification, will be kept for a minimum of three years from the date of final resolution.

f. **The Notice of Final Action will include:**
   1. For each issue raised in the complaint, a statement of either:
      - A4TD's decision on the issue and an explanation of the reasons underlying the decision; or
      - A description of the way the parties resolved the issue; and

   2. Notice that the complainant has a right to file a complaint with the CRC within 30 days of the date on which the Notice of Final Action is received, if the complainant is dissatisfied with A4TD's final action on the complaint.

g. If the complainant is not satisfied with the resolution offered by the VP of Administration and EO Officer (see contact information in Section 9, 3a) or if a Notice of Final Action has not been issued within 90 days, the complainant may submit the complaint by mail or

electronically with the Director of the Civil Rights Center within 30 days of the date on which the Notice of Final Action is received.

h. The complainant can choose to report Discrimination & Harassment to the Director of the Civil Rights Center. Submit complaints with the Director of the Civil Rights Center (CRC) using the CRC's Complaint Information Form and Privacy Act Consent Form, found at the CRC website. https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/external/how-to-file-complaint#Complaint

Mail the CRC's forms to:
Director, Civil Rights Center
U.S. Department of Labor
200 Constitution Ave., N.W., Room N-4123.
Washington, DC 20210

4. Alternate Dispute Resolution Option

a. The complainant may choose to resolve the complaint through an informal alternate dispute resolution (ADR) process or through a more formal customary complaint resolution process already described. The decision to use ADR or a customary process rests with the complainant. The complainant may attempt ADR at any time after the complainant has filed a written complaint with A4TD, but before a Notice of Final Action has been issued. A4TD cannot decline to participate in ADR if the complainant chooses this path.

b. Non-resolution and Breaches to Agreements reached through ADR Process

1) If ADR is attempted and the complaint is not resolved, the process moves to the customary complaint resolution process through A4TD or to the Director of the Civil Rights Center, as the complainant chooses.

2) Breaches of ADR Agreement directed to A4TD: A party to any agreement reached under ADR may notify the VP of Administration and EO Officer (see contact information in Section 9, 3a) in the event the agreement is breached. In such circumstances, the following rules will apply:

- The non-breaching party will notify the VP of Administration and EO Officer (see contact information in Section 9, 3a) within 30 days of the date on which the non-breaching party learns of the alleged breach; and
- The VP of Administration and EO Officer (see contact information in Section 9, 3a) will evaluate the circumstances to determine whether the agreement has been breached. If the VP of Administration and EO Officer (see contact

information in Section 9, 3a) determines that the agreement has been breached, the complaint will be reinstated and processed in accordance with A4TD's customary complaint resolution process. If the complaint is resolved, the VP of Administration and EO Officer (see contact information in Section 9, 3a) will document the resolution in writing in a notice of Final Action and submit such documentation to the parties involved and to the Vice President of Programs.

SEXUAL HARASSMENT POLICY

1) Sexual harassment is a form of sex discrimination and is illegal under state, federal, and often local law, and it is prohibited and against A4TD policy for any employee to sexually harass another.

2. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

   - Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
   - Such conduct is made either explicitly or implicitly a term or condition of employment; or
   - Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

3. Sexual harassment is a form of employee misconduct and discipline will be enforced against individuals engaging in sexual harassment and against supervisory and managerial personnel who knowingly allow such behavior to continue.

4. Retaliation against an employee for filing a complaint of sexual harassment, or for cooperating in an investigation of sexual harassment, is unlawful and prohibited.

5. Any employee who feels harassed should report it so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

6. **Examples of sexual harassment include:**

a. Unwelcome sexual advances or propositions
b. Suggestive or lewd remarks or gestures
c. Physical acts of a sexual nature
d. Displays or publications that are sexually explicit or demeaning (such as posters, cartoons, or drawings)
e. Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender

7. Reporting Sexual Harassment

a. Any person who has been subjected to sexual harassment is encouraged to report it to their supervisor. Anyone who witnesses or becomes aware of sexual harassment should report such behavior to their supervisor. Reports of discrimination or harassment must be in writing and made within 180 days of the act or acts in violation. The complainant has two choices as to where to file the complaint. The complaint may be filed with A4TD's VP of Administration and EO Officer (see contact information in Section 9, 3a) or directly with the Director of the Civil Rights Center. The form to submit a written complaint to A4TD's VP of Administration and EO Officer (see contact information in Section 9, 3a) may be found here.

b. If the complaint is verbal, A4TD encourages the individual to complete the A4TD "Complaint Form" (link above) within 180 days of the act or acts in violation, or to file with the Director of the Civil Rights Center. If the individual refuses, the supervisor will document the verbal complaint and the decision not to submit a written complaint and forward the documentation to the VP of Administration and EO Officer (see contact information in Section 9, 3a). It is the complainant's choice whether to file with A4TD, with the Director of the Civil Rights Center or not at all.

c. Alternatively, complaints may be filed with the Director of the Civil Rights Center, U.S. Department of Labor.

The complainant can choose to report Discrimination & Harassment to the Director of the Civil Rights Center. Submit complaints with the Director of the Civil Rights Center (CRC) using the CRC's Complaint Information Form and Privacy Act Consent Form, found at the CRC website. https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/external/how-to-file-complaint#Complaint

Mail the CRC's forms to:
Director, Civil Rights Center

U.S. Department of Labor
200 Constitution Ave., N.W., Room N-4123.
Washington, DC 20210

8. Supervisory Responsibilities

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to the VP of Administration and EO Officer (see contact information in Section 9, 3a).

9. A4TD Investigations of Complaints of Sexual Harassment

a. An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced immediately and completed as soon as possible, not to exceed 90 days. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

b. While the process may vary from case to case, investigations will be done in accordance with the following steps.

1) Upon receipt of written complaint, the VP of Administration and EO Officer (see contact information in Section 9, 3a) will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the accused to refrain from communications with the accuser), as appropriate.

- If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses;

2) The VP of Administration and EO Officer (see contact information in Section 9, 3a) will create a written documentation of the investigation (such as a letter, memo or email), which contains the following:

- A list of all documents reviewed, along with a detailed summary of relevant documents;
- A list of names of those interviewed, along with a detailed summary of their statements;
- A timeline of events;

- A summary of prior relevant incidents, reported or unreported; and

c. The VP of Administration and EO Officer (see contact information in Section 9, 3a) will document the basis for the decision and final resolution of the complaint, together with any corrective action(s).
    - Keep the written documentation and associated documents in a secure and confidential location.
    - Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.

d. For complaints filed with A4TD, the VP of Administration and EO Officer (see contact information in Section 9, 3a) will provide the complainant with two initial statements:

    Statement one includes:

    1) An acknowledgment that A4TD has received the complaint;
    2) Notice that the complainant has the right to be represented in the complaint process;
    3) Notice of rights contained in 29 C.F.R. § 38.35;
    4) Notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages as required in 29 C.F.R. §§ 38.4(h) and (i), 38.34, and 38.36; and
    5) Notice that A4TD will issue a Notice of Final Action within 90 days of the date on which the complaint is filed.

    Statement two separates out each issue reported and includes for each separate issue:
    1) A statement whether A4TD will accept the issue for investigation, or reject the issue.
    2) The reason for each rejection.

e. The VP of Administration and EO Officer (see contact information in Section 9, 3a) will conduct an exploratory investigation with the parties concerned. A4TD will issue a Notice of Final Action within 90 days of the date on which the complaint is filed. Documentation on the results of the investigation, and supporting justification, will be kept for a minimum of three years from the date of final resolution.

AMERICANS WITH DISABILITIES ACT

The Americans with Disabilities Act (ADA) is the federal civil rights law that prohibits discrimination against people with disabilities in employment, access to state and local government services, public accommodations, transportation and telecommunications. A4TD was an important advocate for passing the ADA in 1990, and has worked with government, businesses, other nonprofits, and individuals to implement the law. If you have a disability, A4TD will assist you in identifying ways to perform the responsibilities of your Community Service Assignment.

AGE DISCRIMINATION IN EMPLOYMENT ACT

The Age Discrimination in Employment Act is a federal public law intended to prohibit age discrimination in employment. This act was enacted in 1967 "to promote employment of older persons based on their ability rather than age; to prohibit arbitrary age discrimination in employment; to help employers and workers find ways of meeting problems arising from the impact of age on employment." All participants should become aware of their rights under this act.

NEPOTISM / CONFLICTS OF INTEREST ARISING FROM EMPLOYMENT/TRAINING

It is the responsibility of A4TD to conduct employment matters in a manner that avoids not only conflicts of interest, but also any appearance of a conflict of interest. Conflicts of interest may arise in: hiring employees; enrolling program participants; and the outside employment or activities engaged in by employees and/or program participants. This policy is intended as a guide to promote avoidance of conflicts of interest.

A4TD must ensure that neither they nor any Host Agency serves as a worksite for a SCSEP participant if a member of that participant's immediate family is engaged in a decision-making capacity (whether compensated or not) for A4TD or the Host Agency.

It is the policy of A4TD that no relative and/or domestic partner of an existing A4TD employee or participant may be hired and/or enrolled in a situation in which one relative exercises direct supervision over another. This policy applies to any employment decision, whether new hires and/or enrollments, promotions, or transfers within all A4TD locations.

Given the rural nature of some of the A4TD SCSEP service areas and the fact that A4TD employees and participants must be members of the local community, and given the mission of the organization to promote the availability of training and/or employment opportunities equitably for

all eligible individuals, relatives and/or domestic partners of an existing A4TD employee or participant may be employed and/or enrolled under the following limited circumstances only:

- A relative or domestic partner of an existing local Mature Worker Resource Center employee or participant will not be placed under the direct supervision of that relative or domestic partner. The prospective participant may be placed under the direct supervision of a different employee.

- A relative or domestic partner of an existing management employee will not be placed under the direct supervision of that relative or domestic partner. The prospective employee must be placed under the direct supervision of a different management employee.

Where a conflict of interest has arisen during employment and/or enrollment, A4TD will take all reasonable and practicable measures, including, but not limited to changes in supervision, job duties, and/or training location to avoid the conflict or appearance thereof.

DEFINITIONS:
Employment – working for A4TD in any permanent, limited, temporary full-time or part-time position.

Immediate Family / Relative – includes wife, husband, son, daughter, mother, father, brother, sister, son-in-law, daughter-in-law, mother-in-law, father-in-law, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, or grandchild, and any other person closely related through marriage.

POLITICAL ACTIVITIES NOTICE

Participants and A4TD representatives are free to engage in political activities; however, certain restrictions apply:

- No participant, or A4TD representative, may lobby or engage in partisan or nonpartisan political activity during hours for which the participant or A4TD representative is paid with SCSEP funds, including funds that are part of the non-Federal cost share. Lobbying is defined as any attempt to influence legislation by:
    - Stating a position on specific legislation to legislators or other government employees who participate in the formulation of legislation (known as direct lobbying; or,

- Urging your members or the general public to contact their legislators with a position on specific legislation (a "call to action") (known as grassroots lobbying).

- No participant, or A4TD representative, may be permitted to lobby or engage in partisan political activity in which the participant or A4TD representative represents himself or herself as a spokesperson for A4TD or for SCSEP.

- No participant may be assigned to the office of a member of Congress or a State or local legislator, and no participant may be assigned to the staff of any legislative committee.

- No participant may be assigned to the immediate office of any elected chief executive officer (or officers, if the office of chief executive is shared by more than one person) of a State government or unit of general local government, except that:
  - A unit of local government may serve as a Host Agency for a participant, provided that, prior to the assignment, documentation, which makes clear that such an assignment is nonpolitical, is provided to and approved in writing by A4TD.
  - Where an assignment is technically in such an office, but actually is to a program activity not in any way involved in a political function, documentation attesting to the non-political nature of the assignment is provided to, and approved in writing by, A4TD.

- No participant may be assigned to perform any political activity in the office of any other elected official. However, since under the responsibility of elected officials, there are non-political activities, the assignment of a participant to such non-political activity must be documented and must have the prior written approval of A4TD program management. An example of such an assignment is to the Mayor's Office for People with Disabilities, or a Congress person's office for human service referrals. While these are the offices of elected officials, the function of the office is to provide human services, and is not political in any way.

POLITICAL ACTIVITY NOTICE REQUIRED

A4TD shall display a Political Activities Notice and shall provide a copy of the notice to each participant and project staff member, so that all persons paid by federal funds are aware of their limitations in lobbying. The notice is a written explanation clarifying the law with respect to allowable and unallowable political activities and contains the address and telephone number of the Inspector General of the U.S. Department of Labor to whom questions regarding the enforcement of Chapter 15 of Title 5 of United States Code, may be addressed.

SCSEP FUNDS MAY NOT BE USED FOR LOBBYING

No SCSEP funds, including non-Federal share, may be used in any way to attempt to influence a member of Congress to favor or oppose any legislation or appropriation by the Congress, nor may be used in any way to attempt to influence a member of a State or local legislature to favor or oppose any legislation or appropriation by that legislature.

COVID VACCINATION POLICY

The safety of our participants enrolled in an A4TD program is the foundation of A4TD's COVID Vaccination Policy. A4TD follows and adheres to guidance from the Center for Disease Control (CDC) and the department of health for states where A4TD operates programs.

A4TD strongly encourages, but it is not a program requirement, that program participants (including A4TD participant assistants) receive the COVID-19 vaccine and booster vaccinations.

Participants that participate in an in-person community based internship must follow the COVID-19 safety policies of the organization that host them, including masking, vaccination, testing, social distancing, and any other requirements. If a participant fails to meet a policy stipulation, their internship will end. Removal from an internship for an unwillingness to follow an organizations COVID-19 safety policy could lead to program exit if a new training assignment/internship cannot be secured.

Other points of note:

- Per *A4TD's Reopening MWRC Protocols*, regardless of vaccination status, people that enter an A4TD Mature Worker Resource Center (MWRC) must follow CDC and state department of health mandates/guidelines regarding masking and social distancing.
- A4TD will comply with COVID-19 safety policies of an organization that hosts an A4TD MWRC.
- Program participants are entitled to a safe workplace. If one believes that COVID-19 safety requirements are inadequate and one feels unsafe, they should bring their concern to their A4TD contact. A4TD's VP of Programs will conduct a safety review.
- Participants are not required to attend their in-person community based internship if they feel unsafe. In these instances, participants will train remotely (see *A4TD's Remote Non-CSA Training Protocols*). This protocol is subject to change as the goal is to return all SCSEP participants to their in-person community based internship.

Sources:

1. https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html?s_cid=11350:cdc%20guidelines%20vaccinated:sem.ga:p:RG:GM:gen:PTN:FY21
2. https://www.cdc.gov/coronavirus/2019-ncov/your-health/quarantine-isolation.html
3. https://www.cdc.gov/coronavirus/2019-ncov/community/workplaces-businesses/index.html

SECTION TEN - EQUAL OPPORTUNITY IS THE LAW

Associates for Training and Development

EQUAL OPPORTUNITY IS THE LAW

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I–financially assisted program or activity.

The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access, to any WIOA Title I–financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination under a WIOA Title I–financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either: the recipient's Equal Opportunity Officer (or the person whom the recipient has designated for this purpose);

John Quinn, Vice President of Administration, Associates for Training and Development, P.O. Box 107, 3 Champlain Commons, Suite 2, St. Albans, VT 05478, 1-800-439-3307, ext.125, TDD/TTY Relay 711, jquinn@a4td.org

OR: **Director, Civil Rights Center (CRC), U.S. Department of Labor**
200 Constitution Avenue NW, Room N-4123, Washington, DC 20210
or electronically as directed on the CRC website at www.dol.gov/crc.

If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above). If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

Asociados para Capacitación y Desarrollo

La igualdad de oportunidades es la ley

La ley prohíbe que este beneficiario de asistencia financiera federal discrimine por los siguientes motivos: contra cualquier individuo en los Estados Unidos por su raza, color, religión, sexo (incluyendo el embarazo, el parto y las condiciones médicas relacionadas, y los estereotipos sexuales, el estatus transgénero y la identidad de género), origen nacional (incluyendo el dominio limitado del inglés), edad, discapacidad, afiliación o creencia política, o contra cualquier beneficiario, solicitante de trabajo o participante en programas de capacitación que reciben apoyo financiero bajo el Título I de la ley de Innovación y Oportunidad en la Fuerza Laboral (WIOA, por sus siglas en inglés), debido a su ciudadanía, o por su participación en un programa o actividad que recibe asistencia financiera bajo el Título I de WIOA.

El beneficiario no deberá discriminar en los siguientes áreas: decidiendo quién será permitido de participar, o tendrá acceso a cualquier programa o actividad que recibe apoyo financiero bajo el Título I de WIOA; proporcionando oportunidades en, o tratar a cualquier persona con respecto a un programa o actividad semejante; o tomar decisiones de empleo en la administración de, o en conexión a un programa o actividad semejante.

Los beneficiarios de asistencia financiera federal deben tomar medidas razonables para garantizar que las comunicaciones con las personas con discapacidades sean tan efectivas como las comunicaciones con los demás. Esto significa que, a petición y sin costo alguno para el individuo, los recipientes están obligados a proporcionar ayuda auxiliar y servicios para individuos con discapacidades calificados.

QUE DEBE HACER SI CREE QUE HA SIDO DISCRIMINADO

Si usted piensa que ha sido discriminado en un programa o actividad que recibe apoyo financiero bajo el Título I de WIOA, usted puede presentar una queja no más de 180 días después de la fecha en que ocurrió la presunta violación, ya sea con: El oficial de igualdad de oportunidad del recipiente (o la persona que el recipiente haya designado para este propósito);

John Quinn, Vice President of Administration, Associates for Training and Development, P.O. Box 107, 3 Champlain Commons, Suite 2, St. Albans, VT 05478, 1-800-439-3307, ext.125, TDD/TTY Relay 711, jquinn@a4td.org

O: Director, Civil Rights Center (CRC), U.S. Department of Labor
200 Constitution Avenue NW, Room N-4123, Washington, DC 20210
o electrónicamente como indica el sitio web del CRC www.dol.gov/crc.

Si usted presenta una queja con el recipiente, usted debe esperar hasta que el recipiente emita una decisión final escrita o que pasen por lo menos 90 días (lo que ocurra primero), antes de presentar una queja con el Centro de Derechos Civiles (CRC, por sus siglas en inglés) a la dirección mencionada previamente. Si el beneficiario no le entrega una decisión final escrita dentro de 90 días después de la fecha en que presento su queja, usted puede presentar su queja con el CRC antes que reciba la decisión final. Sin embargo, es necesario presentar su queja con el CRC dentro de 30 días después de la fecha límite de 90 días (en otras palabras, dentro de 120 días después de la fecha en presento la queja con el recipiente). Si el recipiente emite una decisión final escrita, pero usted no está satisfecho con él resultado o resolución, usted puede presentar una queja con el CRC. Usted debe presentar su queja con el CRC dentro de 30 días después que reciba la decisión final escrita.

SECTION ELEVEN – BABEL NOTICE

Associates for Training and Development Babel Notice

ENGLISH
NEED HELP UNDERSTANDING? This document contains important information about your rights, responsibilities, and benefits. Please call 800-439-3307 ext. 125 (TTD/TTY: 711) and we will connect you to free translation services.

ARABIC
يرجى .والمنافع ومسؤولياتك حقوقك حول مهمة معلومات على المستند هذا يحتوي الفهم؟ في مساعدة إلى تحتاج هل
المجانية الترجمة بخدمات بتوصيلك وسنقوم 800-439-3307 ext. 125 (TTD/TTY: 711) ب الاتصال .

BOSNIAN
Ne razumijete ovaj dokument i trebate pomoć? Ovaj dokument sadrži važne informacije o Vašim pravima, odgovornostima, i beneficijama. Molimo Vas nazovite 800-439-3307 ext. 125 (TTD/TTY: 711) da Vam omogućimo usluge besplatnog prijevoda.

BURMESE
နားလည်ရန် အကူအညီလ ိုပါသလ ား။ ဤမှတ်တမ်းတွင် သင်၏အခွင ်အရ ်း၊ တာဝန်မ ာ်ားနှင ် အက ်းရက ်းဇ ်းမ ာ်ားအရ ကာင်း် အရ ်းကက ်းရသာ အခ က်အလက်မ ာ်ားပါဝင်သည်။ ရက ်းဇ ်းပပ ၍ 800-439-3307 ext. 125 (TTD/TTY: 711) က ိုရခေါ်ပါ၊ ကျွန်ုပ်တ ို သည် အခမ ဘာသာပပန် ဝန်ရ ာင်မှုမ ာ်ားနှင ် သင ်က ိုက်သွယ်ရပ်းပါမည်။

CHINESE (Simplified)
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