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Senior Community Service Employment Program (SCSEP) Handbook

For SCSEP Job Seekers and Training Sites for Indiana
Department of Workforce Development Programs

The Senior Community Service Employment Program (SCSEP) is funded by a U.S. Dept. of Labor grant administered by the Indiana Department of Workforce Development (IDWD) and operated locally by VANTAGE Workforce Solutions

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SCSEP Welcome and Job Seeker Introduction

WHY ARE WE HERE TOGETHER?

Welcome to the SCSEP (Senior Community Service Employment Program). You are now a partner in the only National work-training and employment program exclusively for people 55 and older. We are happy that you are able to participate in this work-training program. This handbook is designed to provide you with:

- An introduction to the organizations that are making it available to you;
- An overview of the program;
- A description of the processes and stages of this program;
- Your responsibilities and benefits;
- Forms and other information you need to participate in this program.

Your Goals

Your Goals in entering this program should include:

- Upgrading job skills and work experience by attending training sessions and through a “work-training” experience providing community service;
- Seeking improved employment opportunities beyond this program;
- Improving your living situation through paid training while connecting with your community and preparing for work;
- Pursuing the work and community related goals you may have;
- Pursuing additional skill improvement through programs and developing a comprehensive plan to do so: this plan is called the “Individual Employment Plan” (IEP), and we help you create it;
- Finding unsubsidized employment.

Program Goal

The overall goal of this program is to help you build skills that improve your ability to find employment. This goal is achieved by providing a combination of useful part-time Work-Training Assignments and traditional training, while promoting transition to Unsubsidized Employment.

To these ends, the combined partners’ goals are:

- To assist you (the Job Seeker) in developing marketable skills so you may secure unsubsidized employment in today's market and remain self-sufficient for a longer, more vital life-span, and
- To assist the Training Sites in providing needed Community Services that they would not otherwise be able to achieve without the help of the Job Seekers.

Additionally, other resources are often available that will improve your ability to contribute to your community or to a private organization and ultimately find work.¹ Job Seekers find that with these improved skills and experience, they obtain better employment. Furthermore, the sponsors of this program, VANTAGE Workforce Solutions and the Indiana Department of Workforce Development, are excited about your participation and can offer suggestions, support, and services – including resume-writing, interviewing skill development, workshops, etc. to help you meet your employment goals. We are eager to work in collaboration with you to achieve these goals.

VANTAGE Aging Introduction

What is VANTAGE Aging? What are we doing?

VANTAGE Aging, incorporated in 1975 and formerly known as Mature Services, Inc., is a non-profit agency, working to serve individuals, families, and communities by providing a variety of direct services to older adults. Over the past 40 years, we have worked with the local and state Agency on Aging, the ADM Board, RSVP, HUD, OASIS, American Job Centers, and others to provide chores, nutrition, recreation, visiting nurse services, home health care, and employment assistance programming.

VANTAGE Workforce Solutions, a division of VANTAGE Aging provides the training, personal skills, and job search techniques that will help you enter or re-enter the workforce as quickly and as easily as possible. The SCSEP mission is clear...

To provide community-based services designed to train, motivate and empower the mature job seeker;

To maintain an active partnership with employers to increase employment opportunities for mature workers.

Beginning in 1977, VANTAGE Aging, then known as Mature Services, began subcontracting with a National Grantee to provide local administration of SCSEP. In 1992, we became a sub-grantee to the State of Ohio. We began with 43 positions in Summit County, Ohio and have now expanded to over 600 positions in 38 counties throughout Ohio. In July of 2023 Vantage became the sole subgrantee for the State of Indiana.

¹ Exact services available vary by location and over time. The SCSEP program is designed to be used with other programs when needed and if available.

Indiana Department of Workforce Development

Indiana, through its partnerships with Title I programs, WorkOne American Job Centers (AJCs) and SCSEP providers, assists participants with training opportunities, computer resources, and connections to community partners to secure unsubsidized employment. Indiana is working with its sub-grantees to provide and align training to meet both current future and job opening. The Indiana Department of Workforce Development currently operates its SCSEP program under a sub-grant to Vantage Aging.²

SCSEP Overview

What is the SCSEP?

The Senior Community Service Employment Program (SCSEP) is a work-training and employment program which encourages and lengthens self-sufficiency by supplementing income while providing work-training, increased marketability, and opportunities for and transition into unsubsidized employment for individuals ages 55 and over. In order to participate, a person's family income must fall within annually established Federal Income Guidelines.

SCSEP is federally funded and monitored by the Department of Labor (DOL) through the Older American's Act Title V Program. Program services are administered and provided by DOL and Grantee organizations like the Indiana Department of Workforce Development and VANTAGE Aging.

VANTAGE Aging provides these services by partnering with local non-profit and government facilities, known as "Training Sites," the local county "One-Stop System" training and employment services, local employers interested in hiring mature workers, and qualifying people 55 and older, the "Job Seekers," to create universal services that will maximize the Job Seekers' ability to achieve their employment goals.

To qualify as a Job Seeker for this program, you must meet certain requirements:

- Be unemployed and 55 years of age or older;
- Have the qualifying level of income;
- Be willing and able to provide community service and attend training;
- Be willing to develop a personalized "Individual Employment Plan" (IEP) -- don't worry, we'll give you plenty of help and encouragement;
- Understand your responsibility to seek and secure unsubsidized employment as a condition of participation.

Goals of SCSEP

The goals of this program are to:

- Upgrade job skills of the mature person for job placement;
- Provide added income during work-training;
- Help the mature person get involved in his/her community;
- Provide the local program community with needed services;
- Help the mature worker find unsubsidized employment to increase their income and create opportunities for new Job Seekers to benefit from the program.

SCSEP History and Today

History

During the 1960s, President Lyndon Baines Johnson announced his “War on Poverty” campaign. The Senior Community Service Employment Program (SCSEP), Title V of the Older Americans Act, was a product of that campaign which launched a pilot program called Operation Mainstream. The success of this pilot program resulted in the initial federally funded program known as the Senior Community Service Employment Program (SCSEP), which has been continuously funded since its inception. SCSEP continues to respond to the unfortunate reality that many mature people seek work with outdated skills and that economic changes often result in mature persons losing work or being forced into retirement before they are financially ready. Additionally, many older workers, especially women, may find themselves seeking work for the first time (or returning after many years of homemaking) because of family changes and in need of gaining updated skills.

Today

Experience has shown that mature individuals can modernize and improve their skill levels in a wide range of activities. Additionally, by working closely with local SCSEP Staff, Job Seekers create a plan that aligns work-training with traditional learning and other support services, allowing them to focus their efforts more effectively. The ultimate result is that SCSEP Job Seekers can develop skills and behaviors that result in greater employability, facilitating their transition into unsubsidized employment.

SCSEP makes use of additional programs and services to provide Job Seekers with more complete work-training and support. As they go through the initial assessments and develop Individual Employment Plans (IEPs), SCSEP Job Seekers will help to identify barriers they face, and then work with their Regional Directors and use the IEP to design

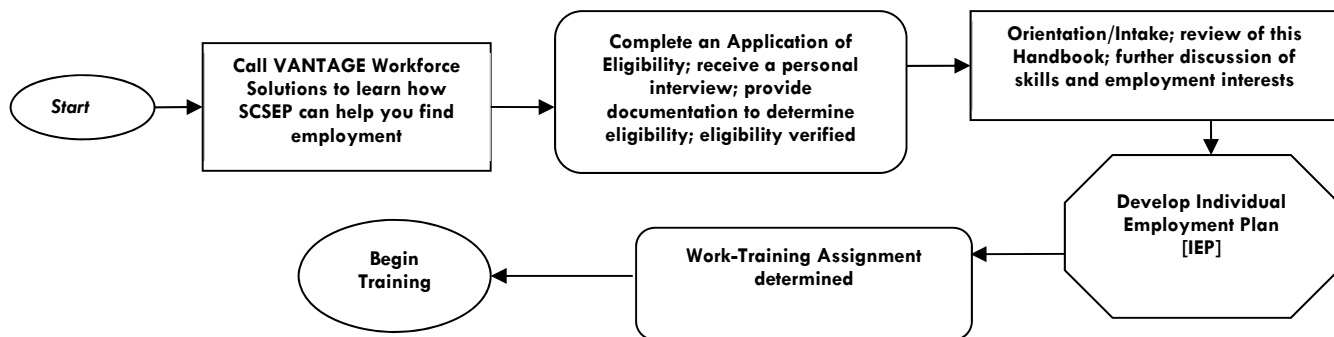
specific plans to overcome those barriers whenever possible.² These additional services are designed to enhance not only job obtainment, but also retention. “Retention” means keeping the unsubsidized job. The local Regional Director must do periodic follow-ups over a 15-month period after an individual exits the program to determine that employment has continued and to collect wage information as required by DOL.

Job Seekers are asked to save pay stubs and notify VANTAGE Workforce Solutions of any changes in address and/or phone numbers, in addition to keeping the Regional Director current on the status of the job during this follow-up period. This will greatly assist the Regional Director in collecting this important follow-up information to complete the Job Seekers’ files after they secure employment.

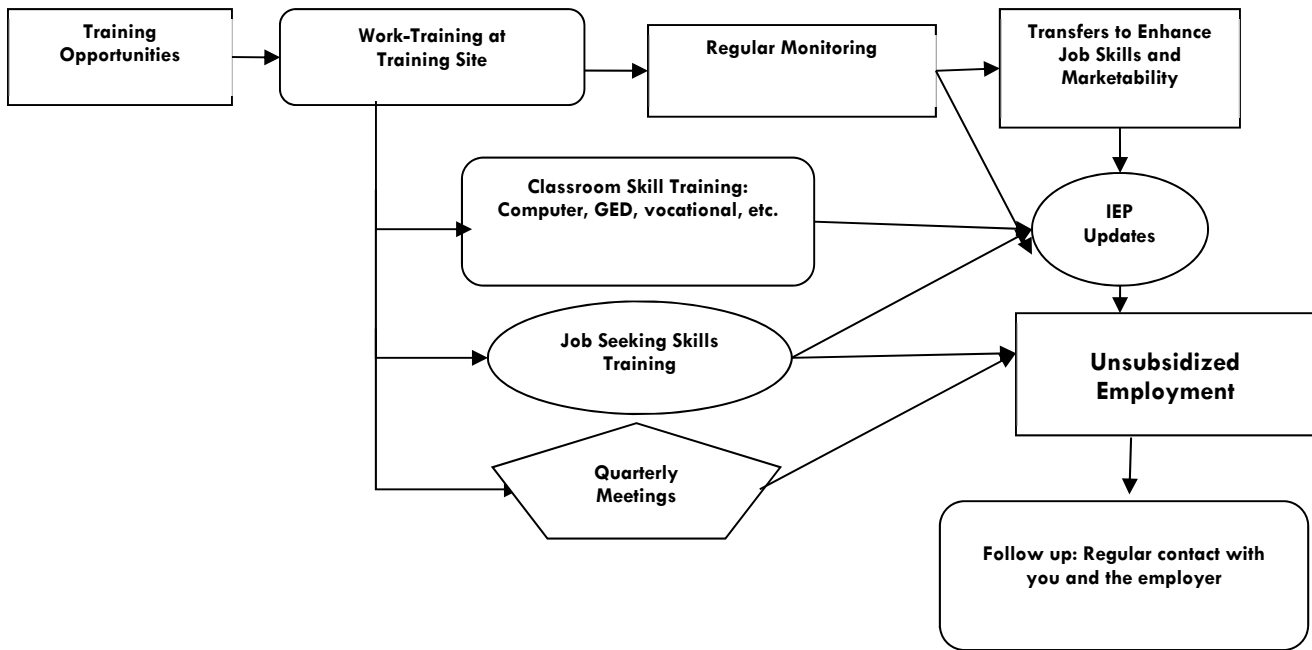
As of July 1, 2007, changes were implemented which reduce the time a Job Seeker may be enrolled in SCSEP. *Individual enrollments must average no more than 27 months in duration. In addition, Job Seekers have 48 months life-time to utilize the services of this program. This means that it is imperative that Job Seekers find unsubsidized employment as quickly as possible – hopefully within 3 to 9 months of enrollment, allowing for time remaining for additional work experience and assistance, should it be needed in the future. This time allowance is monitored by the DOL and takes into account all work-training time accumulated from all SCSEP providers in the country for each Job Seeker. It is vital to the success of each Job Seeker that they understand these restrictions, and that they work to achieve unsubsidized employment as quickly as possible.*

SCSEP Process

As a SCSEP Job Seeker, it is very important that you have a good understanding of the process you are undertaking, as well as the terms people will be using around you. This section will present a simple visualization of the process from your point of view. Directly following this visualization is a brief description of some of the more important terms that you need to know as you interface with people in the SCSEP program.



² Not all services are available in all locations due to funding constraints. Job Seekers are encouraged to discuss barriers with their Regional Director and take advantage of additional services as well as self-help approaches.



Process Description

Initial Assessment (Application of Eligibility) and Eligibility Determination

This step consists of completing an Application of Eligibility including your background, work history, interests and skills, documentation of household members and income, a personal interview, and determination of your willingness and ability to utilize the program and achieve the program goal of unsubsidized employment. Your eligibility will be reviewed before you can be sent for an interview at a prospective training assignment and complete the intake/enrollment process

Assignment to Work-Training Training Site

Once eligibility has been determined and a pre-assessment of skills, interests, and needs are completed, you will be sent for an interview at an appropriate Training Site. Both you and the Training Site will be looking to make a match. We will want the work-training assignment to provide the skills that we have identified as needed for you to be marketable in the type of employment in which you are most likely to succeed. You and the designated trainer at the training site will be determining your suitability and/or fit for that particular agency work-training assignment. Depending on your skill level, the SCSEP Regional Director may refer you to pre-assignment training to help you enhance your skills to help you adjust to the training assignment and develop the skills needed to conduct your required job search leading to employment outside of the program.

Orientation/Intake

Once a potential training site has been identified and your desire to achieve the program goals has been established, you will meet with the local Regional Director who will conduct an in-depth review of your Initial Assessment which provides the foundation for your Individual Employment Plan (IEP) or step-by-step roadmap of training and related activities to bring you to an appropriate training assignment and ultimately, unsubsidized employment within three to nine months of enrollment; completion of the Intake packet, including a review of this handbook and an explanation of program policies and important forms. It is important that you ask all the questions that you might have during this process so that you have a full understanding of the goals and expectations of the program before being assigned to your work-training assignment.

Individual Employment Plan (IEP)

The Individual Employment Plan or IEP is the most important document that you will create in this program. You will create this IEP in conjunction with your Regional Director. The IEP serves as your personal plan for success and is designed to specifically assist you in meeting your goals and the goals of the program. You should refer to your IEP often throughout your participation to ensure that you are “on course.”

IMPORTANT: The IEP is an agreement similar to a contract. You are agreeing to participate in training and other activities and set goals. Your goals may stretch your current abilities, and this is very important and appropriate. Additionally, you want to make sure your goals are SMART by working with your Regional Director. SMART goals are:

- S = Specific**
- M = Measurable**
- A = Attainable**
- R = Realistic**
- T = Timely**

Your IEP may identify the need for vocational courses, GED preparation, or computer training that requires attendance in a “classroom” environment either in-person or virtually where you may have workbooks, exercises, and reading assignments. Other skills training may require self-guided efforts. The number of learning opportunities that are available through the SCSEP Program varies by Job Seeker and is only limited by local resources.

Refusal to follow through with steps outlined and agreed upon in the IEP is cause for corrective action. Job Seekers and/or Training Sites will be given a warning letter and a chance to return to compliance with the IEP; however, continued failure to cooperate in

this process will result in the exit of the Job Seeker and may result in cancellation of the Training Site Agreement.

Training Site Work-Training Site

The Work-Training Site is the heart of the SCSEP Program. By training at a community-based organization, government agency, or non-profit agency, you are building the skills and behaviors you need to be successful in obtaining a job and keeping it. You will learn the skills required for the training site position and receive performance feedback from your Work-Training Site (and your Regional Director). Lastly, work-training in a realistic “job environment” provides learning and feedback that will help you be successful long-term.

Work-Training Assignment Description (WTAD)

Your Regional Director works together with the work-training site to develop the Work-Training Assignment Description or WTAD, for each position. Job Seekers spend 20 hours a week involved in their work-training activities. These hours include work-training time at the assigned site and, possibly, other required program activities, like: computer classes, quarterly meeting, or other activities as stated in the IEP. The WTAD, like the IEP, may only be updated with the approval of the Regional Director to meet the IEP, Job Seeker, and program goals.

Evaluation/Monitoring

SCSEP is a work-training program. Honest and accurate evaluation is important to identify progress and satisfactory learning and to determine what additional activities or resources are needed to help you be successful in finding unsubsidized employment. You and the Training Site will periodically be monitored, your IEP will be updated, and you may even be transferred to another training assignment that is able to provide more extensive training needed to help you achieve success.

Unsubsidized Employment

This is where you take an unsubsidized job off the SCSEP Program. This job may be with your training site or another employer. Unsubsidized Employment is the goal of the program and will provide you with additional benefits including increased income, continued independence, and personal satisfaction.

Follow-up

Helping SCSEP Job Seekers retain the jobs they have worked so hard to obtain is an integral part of the SCSEP Program. The Regional Director or his/her assistant will contact you/your employer periodically, for up to 15 months after placement in

unsubsidized employment, to see how you are doing in your job. The Regional Director will also be asking for information on your earnings during this time. Please remember to keep your pay stubs through-out this follow-up period so we can accurately complete our follow-up reports. Additionally, we may be able to recommend resources to help you overcome barriers that may affect your continued employment, including meeting with you and your employer to help iron out issues, or we may be able to refer you to additional employment opportunities.

What You Can Expect

Throughout your participation in SCSEP, you should expect people to be respectful.

The following list is not intended to be all inclusive, but rather, to give you an example of how you can expect to be treated and to provide insight into the philosophy behind the services provided.

You can expect to:

- Be treated as a co-worker at a work-training site, NOT free help;
- Use your own good common sense: if you do not understand or something is not clear, ask for clarification from your Regional Director or other VANTAGE Aging staff;
- Have a suitable³ work-training assignment that coincides with your personal preferences, skills, life experience, AND one that will help you achieve the goals in your IEP;
- Know about the work-training site, its policies, people and programs, as well as what is expected of you;
- Have a Work-Training Assignment Description (WTAD) that accurately reflects the tasks and responsibilities of your work-training;
- Participate in updating the IEP periodically with your Regional Director to address newly identified needs or barriers to employment and resources to assist you in overcoming them;
- Obtain timely and effective skills training that is appropriate for your plan and will support your ability to assume additional responsibilities at your work-training site, as well as securing unsubsidized employment;
- Have a safe, orderly and designated place at the work-training site that is conducive to performance and learning;

³Suitable means that the work-training assignment will provide the Job Seeker opportunity to learn new skills or demonstrate existing skills. The work-training assignment may serve to provide recent work history, experience, references, and/or complement other training efforts to improve marketability for employment.

- Have patient, respectful, thoughtful, and motivating guidance from an informed trainer at your training site;
- Have diverse learning experiences that will lead to increased capability to find unsubsidized employment. (This may require transfer to one or more work-training assignments and will be documented in your IEP.)

SCSEP Program Detail and Policies

Things you must know about SCSEP and your benefits and responsibilities!

Acceptance of Gifts

Job Seekers and members of their immediate families are prohibited from accepting gifts, favors, loans, free services, or other items of value, including money, intended to reward or influence official actions, from a client or employee of any agency which funds or has an Agreement with VANTAGE Aging

Accidents

Any Job Seeker who experiences a Work-Training related accident must immediately report the accident to the Work-Training Site. Even accidents that do not require medical treatment must be reported.

The Job Seeker and the Work-Training Site will jointly complete the Accident Report and fax it to the VANTAGE Aging Human Resources Department (FAX 330-515-5600) and the Regional Director before the end of the workday. If there are witnesses to the accident, a written statement from each eyewitness is also required.

The Accident Report for SCSEP Job Seekers can be found on the website, www.vantageaging.org, along with specific instructions. Questions may be directed to the Director of Human Resources at extension 173 at the National Office, 330 253-4597.

Attendance

Regular attendance is essential to the operation of the work-training site. Early notification of your ability to attend or arrive at your scheduled time allows managers and trainer to plan staff and fill-in work. You are responsible for notifying both your training site and your local Regional Director a minimum of 30-minutes before the scheduled reporting time. Good attendance is an important factor of the IEP and performance reviews, is required to get and retain unsubsidized employment, and is necessary to receive a reference when seeking unsubsidized employment.

Any Job Seeker absent from the work-training assignment for three consecutive days without proper notification and authorization shall be considered to have resigned from the assignment and may be exited from the SCSEP Program. In addition, recurring tardiness or absences will result in exit from the SCSEP Program.

Background Checks

Any background checks required by a Training Site will be completed and paid for by that Training Site.

Breaks at the Work-Training Assignment

Whenever a Job Seeker's work-training assignment is in excess of six (6) hours in any one day, the Job Seeker is encouraged to take a minimum of a half hour break for lunch, which must be shown on the time sheet. When a Job Seeker takes a break for lunch, indicate the time left and the time returned to the work-training assignment on the time sheet. This is unpaid time. Each Job Seeker may choose to take a 15-minute break per four to six-hour day (this time is included in the hours worked). Job Seekers may not clock out 15 minutes early in lieu of a break and count it as time worked.

<i>Hours on Assignment</i>	<i>Paid 15-minute break</i>	<i>Unpaid 30-minute break</i>
Up to six (6) hours in any one day	15-minute break may be taken without signing out and back in on time sheet.	
In excess of six (6) hours in any one day		30-minute (minimum) lunch break should be taken; Job Seeker must sign out and back in on time sheet.

Change in Contact Information

Each Job Seeker is responsible for notifying his or her local Regional Director of changes in:

- Address
- Phone Numbers
- Income
- Household size
- Emergency contact information

Classroom and Educational Training Policy

Job Seekers may have classroom, instructor-led, training goals developed as part of the IEP. These may include certification in a computer program or getting a GED, for example. Other training may be required that is self-taught or self-paced through a computer lab, or through group meetings. In all cases, the training must be documented in the IEP. SCSEP may be able to pay for all or part of this training.

Vantage Staff will work with you to acquire the necessary documentation to submit for approval of payment prior to the beginning of any such training as well as assist you with a separate time sheet for this training. The training facility trainer will sign the time sheet verifying the hours the Job Seeker was in attendance. The Regional Director must also sign the time sheet before it is submitted to Payroll. Online training classes will only be approved if the Regional Director is able to verify the in and out times for the training activity. These hours will be a part of the Job Seeker's regular 20 hours a week and are not considered hours in addition to the work-training assignment.

All training of a SCSEP Job Seeker must be documented for the SCSEP project even if funded through other sources or self-led.

Compensation

Due to Indiana having no state minimum wage and the federal minimum wage being extremely low, Vantage has decided to make use of prevailing wage, as allowed by DOL SCSEP regulations. Prevailing wage uses data from the Bureau of Labor Statistics and is dependent upon the career pathway in which Job Seekers are training. The Job Seeker's exact wage will be provided at enrollment and at the time of any transfer to another training site. All training activities outside of your training site will also be paid at the prevailing wage of your current career pathway.

Computer and Internet Use

Computers should be used for training purposes, only, including research and work-training assignments. Computers should not be used for personal use, surfing the internet, or entertainment. Training site policies must be followed.

Internet access at your Work-Training Site is for business and training purposes, ONLY. Personal, surfing the internet, or entertainment use of the Internet may result in disciplinary action, including immediate exit from SCSEP.

Job Seekers should keep in mind that computer resources are owned by the training site and can be searched at any time. If a Job Seeker notices anything questionable when using the computer or internet, he/she must report it immediately to the training site.

Confidentiality

Confidentiality of work-training site information, procedures, staff and clients is required. Confidentiality policies of the work-training site will be explained and followed; however, sound judgment is also required. Job Seekers will sign a Confidentiality Statement during Orientation with the Regional Director, and may also be required to sign a Confidentiality Statement during orientation at the work-training site. A breach in confidentiality is grounds for exit from the SCSEP Program.

Direct Fund Raising/Revenue Producing

Job Seekers may not be involved in direct fund raising/revenue producing activities for the Training Site. Trainees may not handle receipts from the sale of items for fund raisers, utility bills, nor solicit funds in the name of the Training Site.

Discrimination

Training site discrimination based on race, creed, color, sex, age, disability, national origin, religion, political affiliation, ethnicity, sexual orientation, HIV Infection, AIDS Related Complex or AIDS, as governed by applicable State and Federal laws, is prohibited. Additionally, training site sexual harassment is prohibited. SCSEP Job Seekers must report discrimination or harassment to the local Regional Director.

It is also the policy of VANTAGE Aging that no person be excluded from participation in this program because of race, creed, color, sex, age, disability, national origin, religion, political affiliation, ethnicity, and sexual orientation, HIV Infection, AIDS Related Complex or AIDS.

Drug Free Work-Training Site Policy

The unlawful manufacture, distribution, dispensing, possession or use of controlled substances, alcohol, medical marijuana, or other is prohibited at VANTAGE Aging offices and while on assignment at any other Training Site assigned by VANTAGE Aging. This policy is part of the VANTAGE Aging Personnel Practices.

Policy for Job Seeker Impairment:

- If a Job Seeker of VANTAGE Aging appears to be impaired while on duty, training site staff shall remove him/her from the Work-Training Site and inform the local Regional Director immediately.

- If a Job Seeker appears to be impaired for reasons other than drugs or alcohol, the Regional Director shall request that the Job Seeker obtain a physician's release before the Job Seeker may return to his/her work-training assignment.
- If the use of drugs or alcohol is suspected, the Regional Director may require the Job Seeker to submit to a drug/alcohol screening. If the screening reveals the presence of illicit drugs, prescription drug levels at an abuse level, or prescription drugs which are not prescribed for the Job Seeker, or alcohol, the Job Seeker must pay for the testing.
- If the Job Seeker shows no evidence of drugs, VANTAGE Aging will pay for the testing. Refusal to submit to testing, when required by the training site and/or the Regional Director, is grounds for immediate dismissal:
 1. If a Job Seeker's screening reveals the presence of alcohol and/or drugs, VANTAGE Aging may require the Job Seeker to submit to an assessment of his/her substance use;
 2. VANTAGE Aging has the right to require the Job Seeker to adhere to the recommendations of the assessor, to release information to VANTAGE Aging to confirm such, as a condition of continued enrollment;
 3. VANTAGE Aging assumes no financial responsibility for assessments, counseling, or treatment;
 4. Any Job Seeker who is convicted of any criminal drug statute must notify the Agency, in writing, of such conviction no later than five days after said conviction: VANTAGE Aging will notify any pertinent licensing boards, as required by law;
 5. Should the Agency provide a drug free awareness program for Job Seekers, attendance at an in- service on this subject will be mandatory.

Prescription Drugs and Non-Prescription Medications:

The appropriate use of legally prescribed drugs and non-prescription medication is not prohibited. However, the use of any substance that carries a warning label that indicates that mental functioning, motor skills or judgement may be adversely affected must be reported and medical advice should be sought, as appropriate, before performing work-related duties. All Job Seekers must notify their Work-Training Site prior to their scheduled starting time when taking any prescription or non-prescription medication that may interfere with the safe and effective performance of their duties. Certification of fitness to work from a medical doctor may be required before the Job Seeker will be allowed to continue working.

Because VANTAGE Aging received federal funding, the agency will follow federal guidelines on Controlled Substances. Marijuana is classified as Schedule I Controlled Substance and will be considered an illegal drug for purposes of this program, regardless of medical prescription, and any possession, sale or use is

prohibited while on duty. Impairment from medical marijuana while on duty is also prohibited under this program.

Duration of Program Participation

The length of time a SCSEP Job Seeker is in training with SCSEP depends upon his/her goals as represented on the IEP. Typically, the target to complete your training and find unsubsidized employment should average between 3-9 months. Individuals are exited from the program once they find unsubsidized employment, or for other reasons including but not limited to: voluntary exits, health or medical exclusions, institutionalization, or involuntarily based on specific instances as outlined in our termination policy. Additionally, the Federal Guidelines limit the duration of participation to an average of 27 months for an individual enrollment and a maximum of 48 months life-time.

Eating

The policies of the Work-Training Site must be followed. In general, do not eat or drink in computer labs or around expensive equipment. If you have any doubts, inquire with your training site.

Employment/Unemployment Compensation

SCSEP Job Seekers are not employees of the SCSEP or the Work-Training Site Agency. This Handbook, associated procedures, forms, etc. do not constitute a “work” contract or a guarantee to obtain work. SCSEP Job Seekers who exit the program are not entitled to unemployment compensation.

Funerals

SCSEP Job Seekers may be excused to attend funerals. You must notify your Work-Training Site and your local Regional Director as soon as possible before leaving or missing work-training. As with other types of absences, the Job Seeker may make up the missed hours with-in the same pay period.

Grievance Procedure

SCSEP Grantees are required to provide the Job Seeker with a formal process to file a grievance or complaint. Any SCSEP Job Seeker who believes that he/she is the victim of harassment, discrimination, or dangerous/abusive treatment, must begin following the procedure steps as soon as possible following the event. During your orientation and enrollment appointment, all termination processes for the following Grievance Procedure will be explained to you by the Regional Director.

As noted earlier, VANTAGE Aging administers this SCSEP Program as a sub-grantee of the Indiana Department of Workforce Development.

VANTAGE Aging
Senior Community Service Employment Program
388 S. Main St., Suite 325
Akron, OH 44311

TITLE V TRAINEE GRIEVANCE PROCEDURE

In accordance with the VANTAGE Aging Title V Program, any Applicant or Job Seeker may file a grievance if he/she believes him/herself to be the subject of discrimination on the grounds of race, creed, color, sex, age, disability, national origin, religion, political affiliation, ethnicity, sexual orientation, HIV Infection, AIDS Related Complex or AIDS. In addition, a grievance can be filed if an Applicant or Job Seeker believes him/herself to be the subject of differential, irregular, or illegal treatment.

The steps of the grievance procedure are as follows:

Step 1 -- The Job Seeker/Applicant [hereinafter referred to as "Complainant"] who has a grievance will *VERBALLY* discuss the grievance with the local Regional Director within five working days after knowledge of the grievance or reason for the grievance has occurred. The Regional Director will attempt to act on or resolve the grievance within five working days.

Step 2 -- If the Regional Director fails to act on or resolve the grievance within five working days, it may be submitted by the Complainant, *IN WRITING*, to the Director of Regional Operations of VANTAGE Workforce Solutions, 388 S. Main St., Suite 325, Akron, OH 44311, within five working days.

Step 3 -- Upon receipt of the *WRITTEN GRIEVANCE*, the Regional Director of Workforce Operations has five working days to act upon or resolve the grievance. If he/she fails to do so, or if the issue is not resolved to the satisfaction of the Complainant, the grievance may be submitted *IN WRITING* to the Director of Workforce Development for VANTAGE Workforce Solutions' Title V Program, 388 S. Main St., Suite 325, Akron, OH 44311, within five working days.

Step 4 -- The Director of Workforce Development for VANTAGE Workforce Solutions' Title V Program shall have five working days to act upon or resolve the grievance. If he/she fails to do so, or if the issue is not resolved to the satisfaction of the Complainant, the grievance may be submitted *IN WRITING* to the President/CEO of VANTAGE Aging, 388 S. Main St., Suite 325, Akron, OH 44311, within five working days.

Step 5 -- The President/CEO shall consider such *WRITTEN* communication and hold a hearing to discuss the grievance with the Complainant present. In addition to being

present, the Complainant will also have an opportunity to call witnesses on his/her own behalf. This will take place within ten working days of notice to the President/CEO of VANTAGE Aging. The President/CEO will submit his/her decision within five working days.

Step 6 -- If the issue cannot be resolved, the Complainant may request, *IN WRITING*, a review of the issue by the Board of Directors of VANTAGE Aging, 388 S. Main St., Suite 325, Akron, OH 44311, within five working days of the President/CEO's decision. The Board of Directors will respond within fifteen days of receipt of the *WRITTEN* request.

Step 7 -- If the issue alleging violations of law, other than discrimination, still remains unresolved within 30 days as a result of the combined complaint resolution procedure of a Project Sponsor (VANTAGE Aging), the Workforce Solutions Division, or Board of Directors described above, the Complainant may file the grievance 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.

U. S. Department of Labor Review

U.S. Department of Labor regulations which govern the Senior Community Service Employment Program (SCSEP) (20 CFR 641.910 (b)) provide that except for complaint alleging violations of the law for complaint alleging discrimination as described in Section 12 of this Policy and Procedure, the department shall limit its review to determine whether the appeals' procedures of the Project Sponsor, the VANTAGE Aging, Title V Program, were followed.

Step 8 -- A complaint alleging discrimination on the basis of race, creed, color, sex, age, disability, national origin, religion, political affiliation, ethnicity, sexual orientation, HIV Infection, AIDS Related Complex, or AIDS which is not resolved within 60 days as a result of the combined complaint resolution procedure of a Project Sponsor (VANTAGE Aging), the Workforce Solutions Division, or the Board of Directors described above, may be filed with: Director, Office of Civil Rights, U.S. Department of Labor, (*Room N-4123, 200 Constitution Avenue, NW,*) Washington, D.C. 20210.

Holidays

There are no paid holidays for Job Seekers enrolled in the Senior Community Service Employment Program. If the Training Site is closed on the day that a Job Seeker is normally scheduled to be at his/her work-training assignment, the Job Seeker may make up the hours. However, the hours may only be made up during the same pay period with the approval of the Work-Training Site.

Training Site Orientation

The Training Site will provide an orientation for all Job Seekers upon their first day of Work-Training. This orientation will include, but is not limited to:

- information on the Agency background and purpose,
- the services it provides to the community,
- the location(s) and use of fire extinguishers and alarms,
- the posted designated route(s) of escape in the event of a fire,
- a review of all other severe weather and disaster action plans.

Job Search Log

Job Seekers will complete a Job Search Log for all Job Search Activities assigned by the Regional Director.

- A Job Seeker may be assigned to complete a certain number of employer contacts each pay period, requiring the completion of a job search log;
- A Job Seeker may be assigned to a “split,” where the Job Seeker will be at the Work-Training Assignment for less than 20 hours a week and have the difference in hours a week as paid job search activity: requiring the completion of a separate time sheet for job search hours and a job search log;
- A Job Seeker may be assigned to total paid job search activity: again, requiring the completion of a time sheet for job search and a job search log.

The Regional Director will instruct the Job Seeker in allowable job search activities that meet the guidelines for payment.

Jury Duty or Court Summons

When a Job Seeker is summoned to serve Jury Duty, he/she will be paid for the normally scheduled Work-Training Assignment hours for that day as follows:

- The Job Seeker must attach to his/her time sheet a statement signed by an appropriate Court Officer;
- The amount received from the court will be deducted from the daily earnings, not to exceed the total daily earnings;
- This does not apply if the Jury Duty occurs at some time other than when the Job Seeker is regularly scheduled to be at the Work-Training Assignment in the SCSEP.

A Job Seeker must honor any and all subpoenas or summons for court appearance issued to him/her including cases of Workers' Compensation, Unemployment Compensation Hearings, and summons due to personal involvement such as a traffic violation. Job Seekers will not be paid for training missed due to such subpoenas or summons.

However, as with other types of absences, the Job Seeker may make up the missed hours with-in the same pay period, if possible.

Mail / E-mail / Voice Mail / Cell Phone Use

The address for VANTAGE Aging, your local VANTAGE Workforce Solutions office, or your Work-Training Site is not to be used for personal mail. Mail equipment, postage, and mail supplies are not to be used. Your training site may allow limited e-mail use. Agency voice mail should not be used for personal messages. Your cell phone should not be used to make personal calls when you are at your Work-Training Assignment. Excessive use of your cell phone on assignment is cause for exit from the SCSEP.

Maintenance of Effort

SCSEP regulations state that the Work-Training Assignments provided by Training Sites are to "Create new and/or expand existing community services," only. These Community Service Assignments:

- must only be in addition to budgeted employment which would otherwise be funded by the Training Site without assistance under Title V;
- should result in an increase in employment opportunities in addition to those which would otherwise be available;
- must not result in displacement of currently employed workers, including partial displacement such as reduction in hours on non-overtime work, wages, or employment benefits;
- must not impair existing contracts for service or result in the substitution of these federal funds for other funds in connection with work that would otherwise be performed;
- shall not substitute work-training assignments for existing federally-assisted jobs;
- shall not assign or continue to assign a Job Seeker to perform duties which are the same or substantially the same as that performed by any other person who is on layoff.

Should any Training Site, due to funding changes, lay-off paid staff, the local Regional Director will review the Work-Training Assignment Description(s) of Job Seeker(s) assigned to said Training Site to determine whether any assignment will now constitute Maintenance of Effort. Upon completing this review, the local Regional Director will remove any such Job Seekers/assignments from that Training Site whose work-training assignment descriptions constitute Maintenance of Effort. SCSEP Job Seekers may not be assigned to those duties for two years after such lay-off has occurred.

Should it be determined by VANTAGE Aging and/or the DOL that a Job Seeker has been working in a Maintenance of Effort assignment, the entire wages and fringes spent on the Job Seeker(s) in the assignment(s) so determined at any Training Site must be repaid to the DOL SCSEP Program for the duration (all months and/or years) of such assignment(s). All efforts will be made to retrieve these monies from the said Training Site.

Mileage

A Job Seeker will be paid mileage if there is a need to travel over 15 miles, each way, to a Quarterly Meeting or Training Activity. To be reimbursed for mileage for a Quarterly Meeting or Training Activity, a Job Seeker must submit a VANTAGE Aging Mileage Report showing the total miles driven each way. Payroll will make the appropriate calculations for reimbursement. Reimbursement will be for miles in excess of 15 miles each way. No one is paid for the first 15 miles. In addition, proof of auto liability coverage, and a copy of a valid driver's license must be on file at VANTAGE Aging.

If a Job Seeker has relocated to the state of Indiana, they have 60 days to obtain an Indiana driver's license.

The Training Site must pay for any mileage required in performing any regular Work-Training Assignment duties. In this case, a Job Seeker must also supply proof of auto liability coverage, as set by the State of Indiana, and a copy of a valid driver's license. Additional coverage may be required. Should the Job Seeker's work-training assignment description include driving a Training Site Vehicle, the Training Site must assure that their vehicle Liability Insurance includes coverage for the Job Seeker (any assigned/designated driver).

Nepotism

No Training Site can serve as a worksite for a Job Seeker in a SCSEP community service assignment if a member of that person's immediate family is engaged in a decision-making capacity (whether compensated or not) for that Training Site.

One-Stop Registration

Job Seekers in SCSEP are required to register online at IndianaCareerconnect.com or their local WorkOne office for employment services immediately upon enrollment in SCSEP and to supply the Regional Director with verification of registration as stated in the IEP.

Obligation to Find Employment

SCSEP Job Seekers are required to seek employment as a condition of participation in SCSEP, and each IEP specifies the agreed upon steps to be taken in this pursuit. Failure to meet the obligation to seek and find employment will result in exit from the SCSEP Program. The following activities are required:

- Attendance at meetings and trainings as agreed;
- Rotational assignments (work-training sites) as applicable to meet the goals of the IEP;
- Commitment to employment – applying for jobs, using available resources to identify opportunities, participating in job seeking skill workshops or Job Club, taking classes to enhance skills and marketability, etc.

Outside the SCSEP Program Employment

Applicants must be unemployed at the time of application. If a Job Seeker becomes employed, either full or part-time, while enrolled, he/she will be immediately exited from the SCSEP as having obtained unsubsidized employment.

Participation in the Foster Grandparent Program, the Senior Companion Program, the Senior Demonstration Programs, and the Retired Senior Volunteer Program are not considered employment under the SCSEP. Job Seekers may not be assigned to a work-training assignment where they are volunteering in one of these programs.

Overtime and Volunteering at Training Site

Overtime is not permitted under SCSEP regulations. Job Seekers may not exceed 40 hours in any one week at the Work-Training Assignment, Work-Training Sites are not permitted to provide any form of additional compensation to SCSEP Job Seekers. Such compensation is considered unsubsidized employment which requires the exit of the Job Seeker.

Volunteer work should not occur in the Training Site where the Job Seeker is assigned. In the context of an assignment, it is often very difficult to determine whether volunteer work is truly voluntary. Wage and hour laws would require payment of such labor for an

employee (that is, an employer cannot pay an employee for certain hours of work and accept additional hours of work as volunteered), and the SCSEP regulations require that Job Seekers be paid for all community service work. For these reasons, the Job Seeker should only volunteer at an organization other than his or her own Training Site. Job Seekers will not be assigned to a training assignment where they are actively volunteering or have volunteered in the past.

Paid Time Off / Vacation/Sick Time

There is no paid vacation, paid time off, or paid sick leave for SCSEP Job Seekers. SCSEP Job Seekers may make up missed hours or days during the same two-week pay period without loss of hours or compensation. This may be extended into the next pay period with pre-approval of the Regional Director. All absences must be approved by the local Regional Director and the Work-Training Site prior to taking time off and making up missed hours. In addition, the training site must determine that there is enough work for the hours to be made up. Job Seekers are not approved to work more than 40 hours in any week when making up missed time. A leave of absence will not be granted to individuals who are making up missed time.

Banking of hours is prohibited and constitutes falsification of a time sheet or fraud, and is cause for immediate exit of the Job Seeker from SCSEP and possible cancellation of the Training Site Agreement.

Pay Checks, Direct Deposit, and Earnings Statements

VANTAGE Aging operates a computerized payroll system based on a two-week schedule. Job Seekers receive their pay by direct deposit. Direct Deposit Statements are mailed on the Wednesday prior to each payday Friday. There are 26 pay dates per year. It takes two weeks to process a time sheet. This means a Job Seeker will receive a pay two weeks after turning in a time sheet and every two weeks thereafter as long as the Job Seeker is in the Program and submits time sheets by the processing deadline: by 5 pm the Monday following the end of a pay period.

Personal Appearance

SCSEP Job Seekers are expected to adhere to work-training site dress codes and norms. You are advised to dress appropriately and exercise excellent hygiene as it improves how people perceive you and results in a better work-training environment. Your local Regional Director should be able to refer you to a Dress for Success or similar agency to get appropriate clothing at little or no cost.

Physical Examination

Each Job Seeker shall be offered the opportunity to take a physical examination after enrollment (start of work-training assignment) and annually. The physical is a fringe benefit and not an eligibility criterion. The current maximum allowable reimbursement for “out-of-pocket” expenses is \$125.00. Individuals submitting their receipts for reimbursement are required to submit them to the payroll department within 10 days of the exam. The results of the physical exam are the private property of the Job Seeker. The Job Seeker may, at his/her option, provide a copy of the exam results to VANTAGE Aging. A Job Seeker may waive the physical exam, which will be documented through a signed waiver.

Physician’s “Return to Work Notice”

A physician’s “Return-to-Work Notice” may be required when a Job Seeker is absent due to an injury resulting in an emergency room visit or any hospitalization even if it occurs over the weekend. In addition, such a “return-to-work notice” may be required for multiple days of absence due to illness.

Political Activities

Projects that are funded by SCSEP may not involve political activities. SCSEP Job Seekers and SCSEP Staff are not permitted to engage in partisan or non-partisan political activities during Work-Training Assignment hours. Political Activities are defined as “partisan association or affiliation with one particular political party” and refers to participation in campaigns or elections involving primaries, partisan ballots, or candidates.

Job Seekers are not permitted to participate in any of the following during Work-Training hours;

- Soliciting or selling political party tickets;
- Engaging in partisan political activities in which they represent themselves as a spokesperson of the SCSEP program of the Ohio Department of Aging (ODA) or VANTAGE Aging;
- Campaigning by writing literature, distributing materials, or making speeches on behalf of a candidate for partisan political office;
- Engaging in activities at the polls, such as soliciting votes;
- Lobbying to influence in any way any member of Congress or any state’s General Assembly.

Job Seekers are permitted to participate in any of the following when they are not at the Work-Training Site:

- Registration and voting;
- Expressing their personal opinion;
- Voluntarily contributing to candidates or organizations;
- Attending open political rallies;
- Signing nomination petitions in support of individuals;
- Displaying signs or wearing political badges or buttons.

Job Seekers may work on Election Day at the polls for a County Board of Elections only if this procedure is followed:

1. The Job Seeker does not perform his/her Work-Training Assignment at the Training Site at any time on that day;
2. The Job Seeker advises his/her Work-Training Site and the local Regional Director in advance.

Political Activities and Job Seeker involvement are governed by Chapter 15 of Title V of the United States Code. Questions concerning the United States Code should be made in writing to the Inspector General, U.S. Department of Labor, Washington, D.C. All other questions concerning partisan politics or involvement with any candidate for partisan elected office should be addressed to the local Regional Director prior to any involvement.

Prohibited Additional Compensation

No reward, gift, or other form of compensation shall be received from any source for a SCSEP Job Seeker's performance of his/her duties. This means that SCSEP Job Seekers are prohibited from accepting additional work hours (with or without pay) or any other form of bonus. Again, this would be considered employment and would require the exit of the Job Seeker from SCSEP as employed.

Reassignment (Transfer) Policy

Periodically, the SCSEP Job Seeker may be required to transfer work-training assignments due to any one or a combination of factors, which include, but are not limited to:

- Fulfillment of IEP goals, the establishment of new goals or modifications of existing goals;
- Work-Training Site changes that require modification or elimination of training opportunities. This may happen when the "Work-Training Assignment Description" (WTAD) or the Training Site Agreement between the SCSEP Program and the Work-Training Site is modified or terminated. Changes in

the WTAD may not always allow for 30-day notice of impact to SCSEP Job Seekers.

- Changes in SCSEP funding or the non-profit status of the Work-Training Site;
- General performance of the Job Seeker and/or problems with the Work-Training Site;
- Re-evaluation of the Job Seeker's skills and aptitudes that indicates a change in the Work-Training Assignment.

Notice of reassignment will be provided to the Job Seeker and will include changes to the IEP. As such, the Job Seeker should fully participate in the IEP changes and be fully aware of impacts to work-training assignments. Notification of pending changes will be provided to both the work-training site and the Job Seeker at least two weeks in advance whenever possible. Changes in program funding or the status of a work-training site may require immediate reassignment.

Referral of SCSEP Candidates

Local County One-Stops and Training Sites are encouraged to refer candidates that appear to meet SCSEP Requirements to the local Regional Director. However, the enrollment, assignment of Job Seekers to Work-Training Sites, transfers and exits are the sole responsibility of the Regional Director in concert with the Job Seeker's IEP.

Required Meetings

Regional Directors may require Job Seekers to attend regular meetings during the Program Year. The Regional Director will notify both the Job Seeker and the Work-Training Site of the date and time of each required meeting in advance. Job Seekers are required to attend these meetings. Job Seekers who fail to attend these meetings are subject to disciplinary actions including a Warning Letter and Exit from SCSEP for cause. These meetings provide information and training that is helpful to the Job Seeker, his/her health, safety, victim assistance, and activities leading to his/her unsubsidized employment.

Safety at the Work-Training Site

SCSEP holds safety as a critical program element. The safety and welfare of Job Seekers is paramount. No task is so urgent that time cannot be taken to do it safely. Job Seekers and Work-Training Sites are expected to exercise good judgment in preventing accidents. The following requirements should be followed at all times:

1. Follow every precaution and safety rule at the work-training site.

2. Report any unsafe conditions, equipment, or practice at the work-training site to your Regional Director.
3. Read safety precautions provided by the program and the work-training site.
4. Use all personal protective equipment required for the tasks being performed, as well as protective/appropriate clothing.
5. Accept any opportunities to serve on safety committees, attend safety training sessions, and otherwise promote safe working conditions for yourself and co-workers.
6. If an accident occurs, seek first aid and support for any injuries first, however minor they may seem; then report the accident to both your work-training site and your Regional Director. He/she will contact the HR person at the National VANTAGE Aging Office to get the Workers' Compensation process started

The Local Regional Director will conduct an Annual Site Safety Inspection as required by SCSEP. Any problems observed during this inspection will be noted in the report, and the Training Site will be given directives for correcting the findings and time frames for completing these corrections. Failure to handle these corrections within the prescribed time frames will result in termination of the Training Site Agreement and re-assignment of all Job Seekers.

Sick Leave Policy

Absences for illness may be made up during the current pay period or, if necessary, during the immediately following pay period, not to exceed a total of 40 hours on assignment in any one week (pay weeks are Saturday through Friday).

Smoking

Smoking is prohibited in all VANTAGE Aging's facilities and vehicles. Job Seekers are expected to follow the smoking policies of the Work-Training Site and VANTAGE Aging. If smoking is allowed at all, it should be kept to breaks. Taking frequent smoking breaks abuses the privilege of having breaks, limits the job seeker's ability to perform the tasks associated with their work-training, and will likely lower the job seeker's performance evaluations.

Supervision at the Work-Training Assignment

The Training Site must provide adequate supervision for Job Seekers. If the designated trainer is not on hand, there must always be a back-up staff person present. No Job Seeker should be the only representative on the premises at any Training Site. In addition, no Job Seeker may supervise another Job Seeker or any other worker at the Training Site. Supervision is a staff assignment and Job Seekers may not provide supervision services as part of their work-training assignment.

Term of Project and Participation

Current funding for the SCSEP Program and VANTAGE Aging, is only assured for one year at a time. While we anticipate continued funding, this funding is not guaranteed.

Funding may be shifted to different organizations or areas when SCSEP positions are put out for bids. In this case, Job Seekers may find that they will be transferred to other sponsors of SCSEP. Whatever the circumstances, SCSEP Job Seekers are urged to take advantage of the services and training provided, and to seek unsubsidized employment in a timely manner.

Termination/Exit (SCSEP – Notice of Involuntary Termination)

This termination/exit procedure applies to VANTAGE Aging' Job Seekers funded directly by the U. S. Department of Labor and as a sub-grantee of the Indiana Department of Workforce Development. VANTAGE Aging Inc. will provide each Job Seeker a written copy of the termination policy, as outlined in the SCSEP Manual, at the time of enrollment. The termination policy will be verbally reviewed with each Job Seeker and the Job Seeker will sign an Orientation Form acknowledging receipt of the termination policy, grievance procedure, and other program information. The Job Seeker's signature also acknowledges that VANTAGE Aging's staff has fully explained, to the Job Seeker's satisfaction, all items listed on the Orientation Form.

The Termination Policy will be followed fairly and equitably when terminating Job Seekers. Job Seekers will not be terminated based on age; there is no upper age limit for participation in the Senior Community Service Employment Program. Job Seekers being exited for cause will be given the opportunity for corrective action through a three-step progressive discipline process prior to an involuntary termination except in cases involving fraud, serious harm, or imminent threat to the health, safety, property, self, or others.

Involuntary Termination Policy – All involuntary terminations will be consistent with the administrative guidelines issued by the U. S. Department of Labor. All termination notices will be provided to SCSEP Job Seekers 30 days before the termination becomes effective and will inform Job Seekers of their right to appeal the termination using VANTAGE Aging's Grievance Procedure. Each Job Seeker will also receive a copy of the grievance procedure with their 30-day termination notice. Appropriate referrals may also be made to other potential sources such as the One-Stop delivery system to assist the Job Seekers in finding employment or other supportive services that can lead to self-sufficiency.

There are (6) six reasons for an involuntary termination:

1. **Fraud:** Job Seeker knowingly provided false information and was incorrectly declared eligible - If at any time VANTAGE Aging determines that a Job Seeker was incorrectly declared eligible as a result of false information knowingly provided by the Job Seeker, VANTAGE Aging will immediately give the Job Seeker a 30-

day written notice explaining the reason(s) for the termination and will terminate the Job Seeker 30 days after it has provided the Job Seeker with the written notice. The Job Seeker will be immediately removed from the training site and placed on a 30-day unpaid leave of absence during the 30-day notice period prior to termination.

2. Ineligibility at recertification - If VANTAGE Aging determines through the recertification process that a Job Seeker is no longer eligible for SCSEP, VANTAGE Aging will immediately give the Job Seeker a 30-day written notice explaining the reason(s) for the termination and will terminate the Job Seeker 30 days after it has provided the Job Seeker with the written notice. The Job Seeker will be permitted to continue training at the Training Site during the 30-day notice period prior to termination.
3. VANTAGE Aging incorrectly determined a Job Seeker to be eligible through no fault of the Job Seeker - If at any time VANTAGE Aging determines that a Job Seeker was incorrectly declared eligible through no fault of the Job Seeker, VANTAGE Aging will immediately give the Job Seeker a 30-day written notice explaining the reason(s) for the termination and will terminate the Job Seeker 30 days after it has provided the Job Seeker with the written notice. The Job Seeker will be permitted to continue training at the Training Site during the 30-day notice period prior to termination.
4. Job Seeker reaches individual durational limit and no extensions are available - A Job Seeker will be terminated when he or she meets the 48-month Individual Durational Limit. VANTAGE Aging will give the Job Seeker a written notice 30 days before the 48-month maximum participation date explaining the reason(s) for termination and will terminate the Job Seeker 30 days after it has provided the Job Seeker with the written notice. The Job Seeker will be permitted to continue training at the Training Site during the 30-day notice period prior to termination.
5. Job Seeker is found to be employed while enrolled in SCSEP - If at any time a Job Seeker is found to be employed while enrolled in SCSEP without notifying VANTAGE Aging of the employment, VANTAGE Aging will immediately give the Job Seeker written notice explaining the reason(s) for termination and will terminate the Job Seeker 30 days after it has provided the Job Seeker with written notice. The Job Seeker will be immediately removed from the training site and placed on leave of absence without pay during the 30-day notice period.
6. For cause as approved by the Department of Labor – Job Seekers may be terminated for willful misconduct, including intentional violations of reasonable program rules and directives, or for failure to comply with the terms of their Individual Employment Plan without good cause. Examples of the kinds of behavior that warrant termination include:

- a. Refusal to attend mandatory meetings such as quarterly meetings, IEP updates, and other scheduled meetings with agency staff, Training Site employees, or other training providers;
- b. Refusal to complete and properly document on the Job Search Log the designated number of employer contacts every pay period as described in the Job Seeker's IEP;
- c. Refusal to participate in the IEP process and/or refusal to adhere to the action plan as outlined in the IEP without good cause;
- d. Refusal to accept supportive services that will enhance the Job Seeker's community service assignment and employability consistent with the IEP without good cause;
- e. Refusal to accept three job offers or referrals for employment consistent with the Job Seeker's IEP without good cause or extenuating circumstances and/or sabotaging an interview, for example by stating that he/she will not take the job, telling the interviewer that he/she does not want to find a job, or that he/she is unqualified for employment;
- f. Refusal to cooperate in establishing eligibility during recertification;
- g. Intentional falsification of hours on a time sheet, the documentation on the job search log, or other official records;
- h. Refusal to accept a different Work-Training Assignment without good cause;
- i. The unlawful manufacture, distribution, dispensing, possession or use of controlled substances while on assignment at any Training Site or training site assigned by VANTAGE Aging or being under the influence of alcohol and or drugs, while performing the Training Site assignment or while carrying out objectives required by the IEP. Legally prescribed medications are excluded if they do not affect the Job Seeker's ability to perform his or her duties or the safety of the Job Seeker or others;
- j. Violation of state laws affecting workforce safety such as smoking bans in public buildings or prohibition on carrying concealed weapons into designated public facilities;
- k. Insubordination – intentional refusal to carry out the direct instruction of a training site employee or VANTAGE Aging staff provided there were no extenuating circumstances;
- l. Refusal to maintain confidentiality or to comply with the work-training site's policies;
- m. Theft, abuse, damage, or willful disregard for work-training site property, equipment, or supplies; intentionally taking or withholding the property of another without permission;
- n. Intentional disregard of safety practices;

- o. Being absent more than three times during a 30-day period without notifying the Training Site or a pattern of unexcused absences or tardiness without good cause or extenuating circumstances;
- p. Rude, obscene, or abusive behavior or language and/or abruptly walking off work-training assignment;
- q. Unwillingness to perform the assigned duties without good cause or extenuating circumstances;
- r. Conviction of a felony or any criminal drug statute for a violation occurring in the workplace while on or off duty, or while away from the workplace.

Disciplinary /Termination Process

VANTAGE Aging has a three-step progressive disciplinary process for involuntary terminations “for cause” of SCSEP Job Seekers.

Step one – Documented Verbal Warning. The Regional Director will discuss the problem with the Job Seeker and make specific suggestions about the kind of behavior or performance that is expected.

Step two – Written Warning. If the Job Seeker for a second time displays behaviors or conduct outlined in the reasons for “for cause” terminations or refuses to comply with the IEP requirements, the Regional Director will meet with the Job Seeker to discuss the situation and a written warning will be given to the Job Seeker. The Job Seeker is free to make any written comments on the warning as part of the permanent record. Both the Regional Director and the Job Seeker sign the written warning acknowledging the presentation and receipt of the document. The Job Seeker will receive a copy of the warning and the original will be placed in the Job Seeker’s file. The written warning will state the problem as well as the expected outcomes.

Step three – 30-day Termination Notice - If additional problems continue, as outlined in the “for cause” section of our termination policy, the Job Seeker will receive a 30-day termination notice informing him or her of the reason(s) for the termination. The Job Seeker will also receive a copy of our grievance procedure including information that he or she has the right to appeal the decision. The Job Seeker will be immediately removed from the training site and placed on a 30-day unpaid leave of absence during the 30-day notice period prior to termination.

Termination/Exit (Work-Training Site)

Job Seekers are expected to give the customary two-week advance notice when exiting from their work-training site assignment position. Exiting from the position without advance agreement with your Regional Director, or in accordance with your IEP may result in your exit for cause from the SCSEP Program.

If you experience problems at your work-training site, report them immediately to your Regional Director. He or she will investigate the problem and work at rectifying the situation, or a transfer may be necessary. The Job Seeker may be put on “Administrative Leave” while a suitable work-training site is identified or developed that will meet the goals and plan in his/her IEP.

A Work-Training Site has the right to refuse to allow the Job Seeker to continue the Work-Training Assignment at the Training Site without notice. In this case, the Regional Director will need to investigate the situation, request a written statement from the Training Site employee describing what transpired to bring him/her to this decision, and may put the Job Seeker on “Administrative Leave” until a suitable work-training site is identified or developed that will meet the goals and plan in the IEP. If Job Seeker Conduct has been a problem, the Job Seeker may be exited for cause.

Time Sheets / Time Reporting

Each Job Seeker is responsible for filling out a time sheet on a daily basis. Both the Job Seeker and the Designated Trainer (or Alternate signer) designated on the Training Site Authorized Signature Form, ONLY, may sign the time sheet to verify that the hours reported are the correct hours actually on the assignment during that particular pay period. Time sheets will not be accepted without the signature of an authorized trainer at the training site and his/her tally of direct supervision hours [not to exceed 20% of the hours reported]. This is required for the In-Kind Match for the Grant.

Time sheets must be received in the Payroll Office no later than 5 pm the Monday following the end of a pay period to ensure timely processing. Should the Designated trainer or Alternate Signer at the Training Site change, the Regional Director must be notified before a time sheet is submitted, and the new Designated Trainer’s or Alternate Signer’s signature and income information (on both the Authorized Signature Form and the Supervision Report) must be submitted to VANTAGE, so that the time sheet can be processed. Time sheets without Authorized Signatures will not be processed.

Neither the Job Seeker nor any training site employee may sign for other people. Signatures followed by initials of another person will not be accepted. Time sheets may not be signed and submitted prior to the hours on the time sheet having been worked; such time sheets will be paid up to the submitted date and time, ONLY. Days/hours not paid because they were not yet worked will have to be re-submitted on a new timesheet after the days/hours have been worked in order to be paid.

REMEMBER: *Time sheets are legal documents:*

1. Submitting time sheets that report hours that were not actually worked constitutes falsification of a legal document (or fraud).
2. Submitting time sheets with more hours recorded than have been approved by the SPONSOR, is prohibited.

3. A Job Seeker may not sign a work site representative's name to a time sheet.
4. If a Job Seeker returns to the work-training assignment *prior* to submitting the requested "return-to-work notice" OR *before the designated date* written on the "return-to-work notice" from the doctor, the Job Seeker is considered to be at the work-training assignment *without permission*. In this case, the Job Seeker and the Training Site will be informed that the Job Seeker must leave his/her work-training assignment immediately, and may not return to the work-training assignment until the "return-to-work notice" has been received by the local Regional Director, or the return date has arrived.

In each case, the Regional Director is required to present a Warning Letter Form (clearly explaining the infraction) to the Job Seeker, who must sign the document in order to remain in the program. In addition, the Regional Director will discuss the problem with the Training Site, by phone or in person, to avoid future such incidents. Any future infractions will result in the immediate Exit of the Job Seeker and the issuance of a formal warning letter and/or the voiding of the Training Site Agreement.

To contact the Payroll Department:

By fax: 1.330.535.2253 By e-mail: Payroll@vantageaging.org

Training Site Closure

When a Work-Training Site is closed on a day that the SCSEP Job Seeker would normally train, the Job Seeker may, with the Training Site's approval:

- Adjust the training schedule to make up the hours (in the same two-week pay period);
- Make arrangements with the local Regional Director for alternate training that day.

Training Site Hours

The immediate Designated trainer at the Work-Training Site along with the Regional Director and the Job Seeker, will arrange the work-training schedule. The normal workweek will generally consist of a 5-day, 20-hour week, except for nominal adjustments to ensure equivalent hours per two-week period. However, SCSEP Job Seekers and work-training sites should consult with the Regional Director to ensure the work-training schedule aligns with the Job Seeker's goals, skills, and abilities as described in the IEP. State and Local rules regarding breaks must be followed, and break times may not be considered "paid training time."

Unpaid Leave of Absence (LOA) Policy – Medical Reasons

Job Seekers may take an unpaid medical leave of absence from their Work-Training Site with the approval of the local Regional Director and adequate notice to both the

Regional Director and the Training Site. Time spent on an unpaid leave of absence is excluded when calculating a Job Seeker's lifetime limit of 48 months. Job Seekers should request a leave of absence at least 5 days prior to the proposed leave date. In the case of an emergency, a leave should be requested as soon as possible.

An unpaid leave of absence may be granted for up to 30 days for medical reasons. A Job Seeker is expected to return to his/her training assignment after the approved leave ends. If a Job Seeker is medically unable to return to the Work-Training Assignment by the end date, he/she must provide documentation from his/her medical provider with an anticipated date of return. If the medical leave must extend beyond 30 days, the Job Seeker must notify the Regional Director and request additional leave which cannot exceed a total of 90 calendar days. Failure to contact the Regional Director and request additional leave will result in exit from SCSEP.

When the Job Seeker is released by his/her physician to return, he/she must present a written "Return to Work Release" notice signed by the physician stating the specific date the Job Seeker is permitted to return to SCSEP and to the training assignment. Any limitations must be documented in the medical release. The medical release must be given to the Regional Director prior to returning to the training site. There is no guarantee that a Job Seeker will be returned to the same work-training assignment especially for a leave of absence that exceeds 30 days.

Job Seekers whose medical leave extends beyond 90 days will be exited from the program for medical reasons and he/she will be considered for re-enrollment, but re-enrollment is not guaranteed. Job Seekers cannot take more than one unpaid leave during any one 12-month look back period of 90 days or more.

No Leave of Absence will be processed if a Job Seeker is within 90 days of their durational limit.

Unpaid Leave of Absence (LOA) Policy – Personal Reasons

Job Seekers may take an unpaid leave of absence from their Work-Training Site with the approval of the local Regional Director and Work-Training Site. An unpaid leave of absence may be granted for up to 30 days for personal leave of absence for death in the family, family care, relocation, or legal matters. There is no unpaid leave of absence granted for vacation time. Individuals who are unable to return from a personal leave after 30 days, will be exited from the Senior Community Service Employment Program. Job Seekers cannot take more than 60 cumulative days of unpaid non-medical leave during any one 12-month look back period. If a Job Seeker does not return after the end of their leave of absence, or they exceed 60 cumulative days of unpaid non-medical leave in a 12-month look back period, they will be exited from the program.

No Leave of Absence will be processed if a Job Seeker is within 90 days of their durational limit.

Withholding

By law there are certain deductions that must be taken from the Job Seeker's pay, such as: State, City Income, and Social Security Taxes. Other deductions are voluntary or are legally required by court order like garnishment of wages.

Should a Job Seeker need any additional information concerning a pay check or earnings statement, contact the Payroll Coordinator at 330-762-8666 or 1-800-554-5335, ext. 192.

Workers' Compensation

VANTAGE Aging pays for Workers' Compensation coverage for all Job Seekers. The extent to which a Job Seeker's claim is covered, or *if* a claim is covered, is determined by the Ohio Bureau of Workers' Compensation. VANTAGE Aging has selected *Matrix* as its Managed Care Organization. *Matrix* handles the medical management of our Workers' Compensation claims. Regardless of the location of the Job Seeker, any work-training assignment related accident *must* be reported as soon as possible to the Training Site and the Regional Director. In addition to this an incident report must also be completed regardless of whether medical treatment is sought or required. Failure to comply with this policy may result in your claim being delayed.

Work-Training Assignments and Responsibilities

Each Job Seeker will be oriented by both the Regional Director and the Training Site as described in the Work Training Assignment Description, after which the Job Seeker will sign the Work-Training Assignment Description, acknowledging understanding and acceptance of the work-training assignment.

A Job Seeker will not be asked to perform any duties that he/she is not capable of performing or do not appear on the work-training assignment or in the IEP. SCSEP staff will assist job seekers with disabilities and training sites in identifying effective and reasonable accommodations, if needed, which will help participants perform the responsibilities of their training assignment. If the Job Seeker does not perform the duties as assigned to the best of his/her ability, he/she will be subject to disciplinary action, including a warning letter and/or exit from the program.

If an offense is serious, a Job Seeker may immediately be asked not to return to the Training Site by either the Training Site or the Regional Director, and may be exited from SCSEP. The local Regional Director will investigate all questions or incidents involving disciplinary action.

Glossary of Terms

The following terms are important for you to know and understand in this program. Refer to them as frequently as necessary and ask questions if in doubt.

PROJECT SPONSOR: The Social Service/Human Service Agency that contracts with the U. S. Department of Labor/Employment and Training Administration, and the Indiana Department of Workforce Development to operate a Title V, SCSEP program. *In this case the Project Sponsor is VANTAGE Aging*

REGIONAL DIRECTOR: The local representative of VANTAGE Aging who administers the SCSEP Program, including, but not limited to: recruiting Job Seekers and Training Sites; determining eligibility; enrolling and assigning Job Seekers to Training Sites; developing appropriate Work-Training Assignment Descriptions taking into consideration the needs and abilities of both the Training Site and the Job Seeker; providing customer service to Job Seekers, Training Sites, and Employers; monitoring, handling problems, generating warning letters, assuring program compliance; providing Quarterly Meeting training, unsubsidized placements, and exits.

JOB SEEKERS: The men and women enrolled in any Title V, SCSEP Training Program.

TRAINING SITE: The 501(c)(3) Non-Profit or Government Agency where Job Seekers will be assigned for a minimum of 20 hours per week. This Agency does not employ (or pay) the Job Seeker, but has agreed to be a work-training site with VANTAGE Aging's Senior Community Service Employment Program (SCSEP).

DESIGNATED TRAINER: The person at the Training Site who monitors the Job Seeker's day-to-day activity. This person is the main trainer for the Job Seeker's on-going work-training assignment and will train, as well as give feedback about performance, including completing periodic evaluations. The Designated Trainer or a designated alternate person must provide supervision coverage at the work-training assignment site at all times. The Designated Trainer reports any accomplishments and problems to the Regional Director and assists in developing training adjustments to meet the goals of the IEP.

TITLE V OF OLDER AMERICANS ACT: Community Service Employment for Older Americans (SCSEP) enacted to foster and promote useful part-time opportunities in community service activities for unemployed low-income persons who are 55 years or older and who have poor employment prospects in order to foster individual economic self-sufficiency and to increase the number of persons who may enjoy the benefits of unsubsidized employment.

WIOA: The Department of Labor program that funds Job Seeking Skills Training to help low-income individuals find Unsubsidized Employment, such as VANTAGE Aging's Job Club Workshops and One-Stops.

