

SCSEP

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM

Participant and Host Agency Handbook
Revised September 2022



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INTRODUCTION

Welcome to West Alabama Regional Commission and the Area Agency on Aging of West Alabama. We are glad to introduce you to the Senior Community Service Employment Program, also known as SCSEP.

The Senior Community Service Employment Program (SCSEP) is locally sponsored by **West Alabama Regional Commission**. Funding comes from Senior Service America, Inc. (SSAI), headquartered in Silver Spring, Maryland and the Alabama Department of Senior Services (ADSS) headquartered in Montgomery, Alabama. SSAI and ADSS administer the SCSEP on behalf of the U.S. Department of Labor.

This handbook serves as a resource for you to use and to inform you of the requirements and working conditions within the SCSEP. We hope your experience with the SCSEP is enriching and rewarding to you and the community.

The Executive Director, Project Coordinator and staff of West Alabama Regional Commission are available to answer your questions and be of assistance. Agency hours are 8:00am-5:00pm Monday -Friday.

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MISSION AND PURPOSE OF SCSEP

SCSEP serves low-income unemployed persons who are 55 years of age and older, by training them in part-time community service assignments and by assisting them with developing skills and experience to facilitate their transition to unsubsidized employment. The program is designed to provide useful part-time community service training opportunities for participants, enhance the abilities, skills and aptitudes of participants to increase their opportunities to obtain mainstream employment and foster individual economic self-sufficiency. SCSEP strives to change negative attitudes and stereotypes about older workers through demonstrated success.

ROLE OF SCSEP STAFF

The role of the SCSEP Sponsor includes outreach, recruitment activities, eligibility determination, completing assessments, processing enrollments, determining community assignments, and providing the participant, host agency and host agency supervisor with an orientation to the SCSEP program. The SCSEP staff is also responsible for monitoring host agency compliance, provision of support services, conflict mediation and/or resolution, employment counseling, assisting the participant with transitioning to unsubsidized employment, and the exit process. The host agency cannot be responsible for determining the eligibility of an applicant or participant and cannot terminate a participant

CONFIDENTIALITY

All records related to the participant's assignment shall be kept confidential in accordance with the host agency's policies and procedures regarding personnel files. By providing written and signed consent, participants may give permission to a SCSEP staff and/or the host agency

supervisor to share pertinent information with other agencies to help reach his/her employment goal(s).

BACKGROUND AND REFERENCE CHECKS

SCSEP does not verify references and does not conduct criminal background checks on participants. If the host agency deems it necessary to do so, they will assume full responsibility for any investigation including payment of any associated costs.

DISCRIMINATION PROHIBITED

West Alabama Regional Commission is an Equal Opportunity Employer and will not subject any person to discrimination in employment, services or activities on the grounds of race, color, religion, gender, national origin, political affiliations or beliefs, disability, or age, or participation in other government programs, except where age is a consideration for eligibility or where participation in other programs may affect income eligibility.

PARTICIPANT ELIGIBILITY

A. CRITERIA

Applicants who meet the following criteria shall be considered for enrollment.

- **Age** –Applicants must be at least 55 years of age; there is no upper age limit for SCSEP.
- **Income** –annual household income must be equal to or less than 125% of the federal poverty level (determined annually by the U.S. Department of Health and Human Services.) Income definitions for determining eligibility are published by the U.S. Department of Labor.
- **Residence** – At the time of enrollment the applicant must be a resident of the counties authorized to be served by West Alabama Regional Commission (Bibb, Fayette, Greene, Hale, Lamar, Pickens and Tuscaloosa Counties)
- **Must be unemployed** - At the time of application and while enrolled on SCSEP the applicant/participant must be unemployed.
- **Durational Limit** – Applicants/participants cannot have been previously on SCSEP for four years/48 months. The four years is cumulative and includes any time participants may have been on SCSEP with another provider.

B. DOCUMENTATION

Proof of the above eligibility criteria is required at the time of eligibility determination and during recertification. Examples of acceptable documentation include but are not limited to the following:

- **Age** – birth certificate, driver’s license, or passport
- **Income** (of family members in household) - social security administration benefit letters, earning statements from employers, or bank statements showing interest
- **Family Size** – income tax return for prior year, a lease, or landlord statement, or a marriage certificate, third party attestation (family size form)
- **Residence** – a utility bill, a voter registration card, or a driver’s license
- **Veteran Status** – Form DD-214, issued by the Defense Department

Participants are required to complete and sign an Employment Eligibility Verification Form (I-9) to document U.S. citizenship or permission to work in the United States.

C. RECERTIFICATION OF ELIGIBILITY REQUIRED

Income eligibility of every participant will be reviewed each year by the Project Coordinator, even if the participant is on an approved break. The recertification must be completed prior to June 30 of each year. It is the participant's responsibility to notify the Project Coordinator of any significant changes in income or family size that may affect continued eligibility. If, at any time, the Project Coordinator suspects the participant may be over income, he/she will be asked to provide information for the necessary documentation.

If a participant is determined to be over-income on the recertification date or at any other point during his/her SCSEP participation, he/she will be provided a thirty (30) day written notice of termination that includes the reason for termination and a copy of the appeal procedures. The participant can continue to work until his/her exit date. See Grievance Procedures for appeal rights. Project staff will refer participants to other employment and training services for assistance.

SCSEP ENROLLMENT AND ORIENTATION

Once an individual is determined to be eligible to participate on SCSEP, the Project Coordinator will complete orientation and gather eligibility documentation and officially enroll them as a SCSEP participant. Likewise, host agencies must complete SCSEP orientation, sign a host agency agreement, and provide required documentation prior to becoming partners with our SCSEP project. During orientation both participants and host agency supervisors must sign an orientation form to acknowledge receipt of this handbook.

ASSESSMENT AND INDIVIDUAL EMPLOYMENT PLAN

After a participant has been determined eligible to participate in SCSEP, he/she will be interviewed by the Project Coordinator to determine job interests, current skills, past work and volunteer experience. Based on this information he/she will be assigned to a community service assignment.

Within 90 days of enrollment the Project Coordinator will meet with the participant to design an Individual Employment Plan (IEP). The IEP process is very important for successful participation in SCSEP. Together the participant and Project Coordinator will establish goals such as training needed for viable unsubsidized employment and supportive services to address barriers that may get in the way of obtaining IEP goals. The Assessment and IEP are updated twice per year. The Host Agency Supervisor's participation and agreement is encouraged. The IEP is a tool to help the participant make progress with his/her goal(s). If after a suitable amount of time the participant has not made progress toward his/her goal(s) the IEP will be reviewed and a determination will be made as to whether the participant should stay in his/her current position or be rotated to another position which may be better suited to meeting the participant's goals.

ORIENTATION TO BE CONDUCTED BY THE HOST AGENCY

Before a participant begins the community service assignment, the host agency must provide an assignment-related orientation including but not limited to the host agency background and purpose; the community service(s) it provides; agency personnel policies and procedures related to work hours, time and attendance; and work performance expectations. A Safety Procedures Consultation may also be included in the orientation if it has not already been done with the participant, including: the location(s) and use of fire extinguishers and alarms; the posted designated route(s) of escape in event of a fire; the participant's role, if any, in an emergency; and a review of all other disaster action plans for the agency.

WHAT IS A HOST AGENCY?

A host agency is a community-based organization, 501(c)(3) or government entity that provides part-time training and supervision for one or more SCSEP participants. Placing individuals in community service positions provided by host agencies strengthens their ability to become self-sufficient, provides much-needed support to organizations that benefit from increased civic engagement, and strengthens the communities that are served by such organizations.

Each host agency is encouraged to develop training situations which are mutually beneficial to the participant and the host agency. Host agencies provide valuable services to their community and to the participants they train, and are encouraged to develop situations which will benefit the participant first and then the host agency. While receiving this training or updating existing skills, participants provide significant services to their local communities and their host agencies. The ultimate goal, however, is for participants to continue to learn and gain the skills they need to qualify for unsubsidized employment.

DRUG FREE WORKPLACE POLICY

Host agencies should provide participants with a safe assignment environment, free of drugs, alcohol, and medications. The unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited and thus will result in termination from the program.

West Alabama Regional Commission shall use its best efforts to ensure a safe and healthful working environment, free of substance abuse (drugs and alcohol), harassment and hazardous conditions. The West Alabama Regional Commission Drug-Free Workplace Policy is attached.

ASSIGNMENT ROTATION

The length of time at a host agency or on the program varies for each participant and is based on individual training needs. If it is necessary, rotation of position or training site may be recommended to provide continued learning and growth for the participant. The maximum time a participant may spend in the program, known as the “durational limit,” is a total of 48 months, or four years.

Changing community service assignments is intended to:

- Increase the chances of obtaining unsubsidized employment;
- Provide opportunities to increase responsibilities and learn or improve skills in new assignments;
- Prevent a host agency from using any participant to perform tasks which otherwise would be performed by regular staff members; and
- Encourage the development of new host agency training assignments.

To that end, the length of time that a participant may remain in a community service assignment is determined by the IEP. Sponsors must document in the IEP the appropriate assignment length. However the Project Coordinator may choose to move participants to a new community service assignment, either within the existing host agency or to a new host agency, when he/she has mastered existing opportunities or when it is determined that a change in assignment would be in the best interest of the participant progressing towards his/her IEP goals.

note: If a participant is exercising the Right of Return – for example, following a failed unsubsidized placement – he/she will not be allowed to return to the previously held community service assignment.

MAINTENANCE OF EFFORT

According to federal regulation 20 CFR 641.844; “Assignment of a participant funded under Title V of the OAA [Older Americans Act] to a host agency is permissible only in addition to employment that would otherwise be funded by the host agency without assistance under the OAA.” This means that participants may not perform duties or be in a position which would normally be in the host agency’s budget if funds are/were available. It also means that participants may not displace currently employed workers.

NEPOTISM PROHIBITED

Participants are not to serve at a host agency where a member of their immediate family is in a supervisory or administrative capacity involving their oversight.

WRITTEN COMMUNITY SERVICE ASSIGNMENT DESCRIPTION

A Community Service Assignment Description form is required to help the participant understand his/her work assignment so that training activities are clear among all involved. The SCSEP staff will work with the Host Agency Supervisor to develop assignment descriptions for each participant.

The assignment description form contains pertinent information on his/her assignment title, duties, training objectives, host agency, location, hours and days of services, rate of pay, supervision, skills requirement, and training offered. This form must be completed and signed by the host agency supervisor and participant on the first day of the assignment. The original form will be kept in the participant’s personnel file at the SCSEP office and the participant and host agency will receive a copy. The participant and host agency staff will adhere to the written assignment description in all aspects. Any changes in hours, duties or other factors must be approved by the Project Coordinator. The written community service assignment description will be used in revising and updating the Assessment and IEP. Participants will not be permitted, nor will be required to perform an assignment in buildings or surroundings or under conditions that are unsanitary or potentially hazardous.

If new training or new activities are added or the location of the assignment is changed, the Project Coordinator must be advised so that the Community Service Assignment Description can be revised. The Project Coordinator and the Host Agency Supervisor will assure that assigned duties are consistent with medical limitations, make any accommodations required by the *Americans with Disabilities Act*, and adhere to confidentiality requirements of the Act.

DRIVING AS PART OF THE HOST AGENCY ASSIGNMENT

Participants may not drive as part of their CSA assignment unless (a) the participant authorized to drive, has a valid driver’s license and a least the minimum comprehensive automobile liability insurance required by the state and (b) the host agency confirms with the Sponsor that their agency’s insurance will cover the participants as drivers. Additionally, the Project Sponsor must ensure that their own coverage extends to participants for non-owned or hired vehicles. If the SCSEP staff agrees that a participant’s duties should involve driving, the participant must furnish SCSEP staff with a copy of their driver’s license and automobile insurance. The host agency must extend their automobile insurance coverage to the participant driver. The requirements for federal, state, and local government agencies will be governed by applicable statutes.

INJURY ON ASSIGNMENT

In the event of injury on the community service assignment, a participant must immediately file a First Report of Injury, with a copy to the Host Agency Supervisor and the Program Coordinator. Even if a minor incident occurs, reporting protects the participant's worker's compensation rights.

West Alabama Regional Commission's Initial Treating Physician for Workers Compensation is the DCH System. When possible, participants should go to one of the following facilities for treatment for an on-the-job injury: DCH Center for Occupational Health located in the DCH Medical Tower in Tuscaloosa, DCH Regional Medical Center Emergency Department in Tuscaloosa, Northport Medical Center Emergency Department located in Northport, Fayette Medical Center Emergency Department located in Fayette, or the Pickens County Medical Center Emergency Department located in Carrollton. Upon arrival at one of these facilities, the participant should report that they are covered by West Alabama Regional Commission's Workers Compensation Plan.

TRAINING

Training for job skills is an important part of the SCSEP Program. Training and other opportunities should be offered at each Host Agency. Limited training funds are available for skills or classroom training; however project staff will work with participants to identify resources in the local area. Participants should always bring to the attention of project staff any training of which they are aware. The staff will review if it is feasible. Participants may also be paid for time spent in appropriate training, as determined by the Assessment and Individual Employment Plan, provided resources are available.

SCSEP ACTIVITIES OUTSIDE OF HOST AGENCY ASSIGNMENT

Participants are to be provided time to attend SCSEP participant meetings, training, and employment search workshops, job clubs, and job fairs, or interviews and annual recertification. These activities will be included within the 19.75 hour work week. Time away from the training site should be arranged by the participant and approved in advance.

REQUIRED PARTICIPANT AND HOST AGENCY MEETINGS

Participants and host agency supervisors/representatives are required to attend periodic meetings for the purpose of providing training and information. Meetings are held at least twice each year, but may be held more frequently. SCSEP participant meetings are mandatory paid training sessions and participants will be reimbursed at their regular rate of pay.

VOLUNTEER SERVICE PROHIBITION

According to the USDOL, the Fair Labor Standards Act (FLSA) prohibits individuals under certain circumstances from volunteering for extra hours of service with a public agency if they are employed by the same agency. Although these community assignments are training opportunities and not employment the following still applies. Section 3[e][4][A](iii) of the FLSA does not permit an individual to perform volunteer service for a public agency when such service involves the similar or identical service which the individual is assigned to perform for the same public agency.

LIMITATIONS TO POLITICAL ACTIVITIES

A participant is free to engage in political activities on his/her own time, however, the following instructions apply:

- Participants may not engage in political activities while at his/her community service assignment.
- Participants may not represent themselves as a spokesperson for the West Alabama Regional Commission SCSEP Program as part of any political activity at any time.
- If a participant is assigned to a Host Agency which is federally funded, whether at Federal, State or Local government agencies, there may be additional restrictions.

HOST AGENCY ROLES AND RESPONSIBILITIES

A host agency must:

- Be a non-partisan, non-profit or governmental organization. Organizations eligible to act as host agencies are public agencies operated by non-profit agencies or units of government with certification under Section 501(C) (3) of the U.S. Internal Revenue Code. Prior to serving as a host agency, organizations must submit their Federal Employer Identification Number (FEIN) and Section 501(C) (3) designations.
- Agree to provide adequate orientation, instruction and training for the participant's assignment and recommend suitable training to promote the unsubsidized placement of the participant.
- Provide adequate supervision and the day-to-day monitoring of the participant.
- Establish assignments that support the goals of the SCSEP as well as the participant's goals established in the IEP. The host agency also must be willing to work with the project coordinator to develop the participant's IEP and performance evaluation.
- Each host agency must sign an agreement with the SCSEP project sponsor before any participants can be assigned to the community service at the host agency. The agreement must be for one project year, or the appropriate portion thereof, and must be renewed each project year.
- Complete required paperwork promptly.
- Encourage participants to find employment off the program.
- When possible, consider participants for employment in open positions for which they qualify. Also help participants by referring them to positions they know are available in the community and by providing references.
- Provide additional support to SCSEP by promoting the program with peers and employers in the community, co-sponsoring special events, or providing in-kind or direct support to the program
- Complete a customer satisfaction survey that may be sent from the Department of Labor. If you do receive a survey, please take a moment to complete and return it in the stamped, self-addressed envelope provided.
- Attend SCSEP meetings and training sessions.
- Maintain participant records as required by the SCSEP Sponsor.
- Follow guidelines for any disciplinary actions.

SUPERVISION

The host agency supervisor is the direct supervisor for the participant's ongoing assignment, monitors the participant's day-to-day activities, and will train as well as give feedback about performance. The supervisor or a designated alternate must provide supervision coverage at the site at all times. In the event of the absence of the participant's direct supervisor, a simple written

plan for backup supervision shall exist and be provided to the SCSEP staff. A participants must know who they are to report to at all times. Any change of supervisor must be reported to the SCSEP staff. The same level of supervision and training provided to regular employees performing related tasks at the agency should also be provided to SCSEP participants. Training and supervision will prepare the participant for the transition to unsubsidized employment.

EXPECTATIONS OF HOST AGENCIES

Host agency supervisors are a key to making the participant's training a successful experience. Supervisors are encouraged to be a partner throughout the planning process. Supervisors can assist the participant in setting goals during the interview, orientation, and development of the assignment description. Be clear about expectations and ask for feedback regularly. Include participants in staff meetings and trainings; this keeps participants up to date and allows them to have a sense of belonging. Giving participants responsibilities learned through training tasks encourages them to speak up and request assistance to resolve issues. Give undivided attention to what the participant is saying. Give them time to think and collect thoughts. Most of all recognize their contributions and their value.

HOST AGENCY SAFETY AND TRAINING MONITORING

Host agencies are required to ensure that all laws governing workplace safety are followed. Host agency safety procedures must be reviewed with the participant at the beginning of the training assignment. We encourage participants to report unsafe conditions to their host agency supervisor and to the SCSEP staff who will discuss these with the host agency supervisor directly for possible corrections.

SCSEP Project Coordinators are responsible for obtaining reasonable assurance that the participants' working conditions are safe and healthful and the assignment is appropriate to the individual. Project Coordinators are to conduct one host agency safety and monitoring consultation per participant per community service assignment and thereafter on an annual basis if the participant stays in the same community service assignment.

The first host agency safety check is to be completed either at the time of initial assignment, or no later than 60 days after the start of the community service assignment

SCSEP staff will conduct periodic site visits (announced and unannounced) for monitoring host agency compliance with training and supervision as well as working and safety conditions. An attempt will be made to coordinate site visits with scheduled visits for enrollments, participant recertification, IEP reviews, or exits. The host agency supervisor should plan to be available for announced site visits.

UNSUBSIDIZED EMPLOYMENT AT A HOST AGENCY SITE

Participants may not train at the host agency and work as an unsubsidized employee at that site at the same time. Host agencies may never compensate participants for extra hours worked or increase the wage being paid with other funds. Any such payment for hours worked at the training site in excess of the allowed training hours will be considered unsubsidized employment, and the participant will immediately be exited from the program as an unsubsidized placement. This action may result in cancellation of the Host Agency Agreement.

PARTICIPANT PERFORMANCE EVALUATIONS

Host agency supervisors must conduct an evaluation of the participant's performance at least once a year. The evaluation lets the participant know how his/her performance is regarded. It identifies

areas of accomplishment, areas where improvement may be needed, and areas in which additional training or experience may improve the likelihood of unsubsidized employment. The supervisor completing the evaluation must discuss its content with the participant. The evaluation will be used in continuing the IEP. Participants will have the opportunity to sign it and receive a copy of the evaluation as well as have an opportunity to comment upon or respond to the evaluation in writing

COMMUNITY SERVICE SCHEDULES

The host agency will provide the participant and sponsor with a schedule indicating when the participant will be doing his/her training each week. The host agency and participant are encouraged to develop the most appropriate schedule to meet the needs of both parties. If changes occur, other than a short-term modification to accommodate a unique work situation or the participant's personal needs, a new work schedule will need to be submitted to the sponsor showing the revised schedule. The participant may train a maximum of 19.75 hours per week. If a participant has a special need to train fewer than 19.75 hours, for an extended period, this must be approved by the sponsor.

HOURS

Participants may work **19.75 hours per week which equals 39.50 per payroll**

Unless: there is a special payroll which is highlighted on the payroll schedule, or limited funding requires West Alabama Regional Commission to be able to only offer less than 19.75 hours per week.

Once the schedule is set, any changes must be approved in advance by the Project Coordinator. Unauthorized additional hours are not allowed. Participants who exceed their authorized hours may be subject to progressive disciplinary action.

Hours should be rounded to the nearest quarter hour.

(Example: Do not list 3 hours and 42 minutes, or 3 hours 27 minutes, etc.)

.25= 15 minutes If a participant works 3 hours and 15 minutes it would be recorded 3.25

.50= 30 minutes If a participant works 3 hours and 30 minutes it would be recorded 3.50

.75= 45 minutes If a participant works 3 hours and 45 minutes it would be recorded 3.75

TIMESHEETS /PAYROLL SCHEDULE

Timesheets will be provided for the participants by the SCSEP Sponsor. Host agency supervisors will assure that timesheets are:

- Completed on time
- Verified to be accurate
- Signed by both participant and supervisor
- Submitted at the end of the pay period to the SCSEP Sponsor

Payroll schedules will be provided to participants and host agency supervisors and can also be found under the SCSEP section of the sponsor agency website: westalabamaaging.org

SUBMITTING TIMESHEETS

ORIGINAL timesheets must be completed and received in the SCSEP office by 10:00 AM SHARP on the due date. Failure to meet this deadline will result in delay of payment until the next payroll is run. Copies, faxes and scans are NOT accepted. Please make every effort to have timesheets

submitted on time, as there will be NO EXCEPTIONS. Please ensure the timesheet is signed by both the participant and supervisor. A copy should be kept on file at the host agency.

LEAVE TIME

Certain “lost” time (such as weather closings, holidays, etc.) may be made up providing, the time can be made up in the same pay period, does not exceed 39.50 total hours for the per pay period, and is approved in advance by the Project Coordinator. Participants are required to notify the Project Coordinator and host agency supervisor in all instances when they will not be reporting to their community service training assignment as scheduled.

- **Federal Holidays** - SCSEP participants can only be paid for hours worked/spent in training. Participants may make-up hours if they are scheduled to work on a day their host agency is closed for a federal holiday.
- **Sick leave** - if sick participants may make-up hours missed in the same or subsequent pay period.
- **Inclement Weather and Disaster closings** - If the Host Agency is closed due to weather, power, or other factors, these are not paid days. With prior approval of the Project Coordinator and if the Host Agency can accommodate, a participant can make up the time in the same period or subsequent pay period.
- **Leave Without Pay** -When a participant will not be earning wages for three or more consecutive days at the host agency assignment he/she must request leave without pay to the Project Coordinator. The participant must mutually agree on the extent or time frame of leave with both the Project Coordinator and host agency supervisor. The participant must send a request to the Project Coordinator using the **authorized absence form**, which can be obtained at the SCSEP office. Breaks in participation will not be approved beyond 30 days.

In the event of an illness a doctor’s excuse should be submitted when possible. If a request for leave without pay is approved, and if it exceeds more than three working days, the Project Coordinator will put the participant on an approved break in service. **When possible the participant must submit this form and have it approved prior to taking time off.**

The leave without pay policy shall only apply to a participant on leave for medical or family health or personal reasons. The leave without pay 30 day policy does not apply to participants who have been placed on approved break between community service assignments for administrative reasons, or due to a workers compensation claim. In these instances, leave may be warranted beyond 30 days and must be approved by the SCSEP Project Coordinator. Duration of leave in these instances will be determined on a case by case basis.

Participants may NOT work overtime to build up compensation time to be recorded in prior or later pay periods. This is strictly disallowed. Furthermore, if a participant chooses or needs to be off for any extended period, another participant may be placed in the assignment. In such situations, neither the replacement nor the former participant has priority over the particular assignment involved. Both participants may continue to participate in the program.

- **Jury duty** - Participants will receive payment for jury duty consistent with the policies of West Alabama Regional Commission and with Alabama state law.
- **Alternative Assignment** – Participants may request an alternate community service assignment if the Host Agency is to be closed for an extended period of time.

PAYROLL DISTRIBUTION

WAGES

You will receive no less than the local minimum wage as the pay rate, which is specified in the community service assignment description.

DIRECT DEPOSIT

During enrollment participants must complete an authorization form for direct deposit. This form, along with a voided check for a checking account or a deposit slip for a savings account must be submitted in order for direct deposit to be set up. If at any time the account the check is deposited to changes, please let the SCSEP office know, so the appropriate paperwork can be completed.

FRINGE BENEFITS

F.I.C.A. – West Alabama Regional Commission contributes to the Social Security System for all participants in accordance with payroll tax provisions. Federal and State income taxes may also be withheld.

UNEMPLOYMENT INSURANCE – Participants will not be covered by Unemployment Compensation insurance unless required by state law.

PHYSICAL EXAMINATIONS – After enrollment in the SCSEP, participants will be offered at no cost, the opportunity to have a limited physical examination reimbursed by the program. Maximum reimbursement is \$75. If the physical examination costs less than \$75, then participants will only be reimbursed the actual cost. Project staff will assist participants in obtaining a physical examination from a local resource if needed. Once enrolled, physical examinations are offered on an annual basis. If required by applicable health laws certain community service training assignments may require participants to have a physical examination. Under these circumstances if a participant objects to taking the physical examination or sharing the results, the Project Coordinator may limit or exclude the participant from a particular community service assignment. The Project Coordinator will provide the participant a physical form to be completed by the physician.

WORKERS COMPENSATION

- Participants are protected by Workers' Compensation which covers injuries received at work. All injuries related to the community service assignment must be reported immediately to the Project Coordinator.
- If a participant becomes involved in an accident or sustains an injury while working, he/she must report the situation as required by state law.
- Workers' Compensation information is posted in the Local SCSEP Project Office.

- If a participant should have an active Workers' Compensation claim with West Alabama Regional Commission he/she will be put on an approved break in service, and cannot be terminated from SCSEP while the claim is active.
- If a participant should have an active Workers' Compensation claim during the recertification period, and while on approved break with an open workers compensation claim. He/she does not have to be recertified at that time
- When the claim is closed, the participant will return to active status and be recertified the recertification period was missed. This is because family income could have changed during the period on approved break. If found currently eligible, every reasonable accommodation will be made to find a suitable host agency assignment within the parameters of the participant's current physical status.

TRANSPORTATION REIMBURSEMENT

- 1) Participants will not be reimbursed by West Alabama Regional Commission for personal use of his/her vehicle or commuting to his/her assignment.
- 2) If authorized to use a personal vehicle for Host Agency business, participants may be reimbursed. A copy of the current auto insurance policy and current driver's license must be provided for personnel files.
- 3) Drivers of Host Agency-owned vehicles will be covered under your Host Agency's insurance policy, which will be on file with the Project office. The Host Agency should pay for a public service license if needed.

EXPECTATIONS OF PARTICIPANTS

Participants in a SCSEP Project are expected to observe certain standards of conduct and make every effort to fulfill the objectives of the program. Participants are expected to:

- 1) Register with the State Employment Services (Department of Labor or the American Job Center) and/or other appropriate employment referral services.
- 2) Actively seek and work to fulfill the goals in the Individual Employment Plan (IEP).
- 3) Perform assignment duties accurately, neatly, promptly and efficiently.
- 4) Work regular assigned hours; arrive to work on time; notify supervisor when late or out due to illness; notify the Project Coordinator and Host Agency Supervisor in advance when requesting time off.
- 5) Wear appropriate clothing and maintain good personal grooming habits on the assignment.
- 6) Work cooperatively with the Host Agency Supervisor and other staff members, as well as any other SCSEP participants assigned at the Host Agency.
- 7) Ask questions of the supervisor or Project Coordinator if unsure of what is expected.

- 8) Work cooperatively with the Project Coordinator to secure an unsubsidized job if that is agreed upon in the IEP goal.
- 9) Report injuries or unsafe working conditions immediately to the Host Agency Supervisor and Project Coordinator.

EMPLOYMENT SEARCH AND UNSUBSIDIZED JOBS

A key purpose of SCSEP is to enable participants to achieve gainful employment and personal development through community service and training. Therefore, participants are required to seek unsubsidized employment per the first Individual Employment Plan (IEP) and cooperate with the Project Coordinator's efforts. When designated in the IEP, participants will be required to visit the local American Job Center or other agencies as assigned. If there is not a local American Job Center in the area, participants will be required to make an active job search to the best of their abilities by contacting local employers (when and as determined in the IEP). If participants are unable to get a job, the Project Coordinator and participant will discuss what additional services may be needed, and determine the next steps. These steps may include developing a new training plan or determining that the SCSEP services are not suitable for the participant, leading to exit from the program.

FOUR YEAR/48 MONTH LIFETIME LIMIT ON SCSEP PARTICIPATION

The Older Americans Act, the authorizing legislation for SCSEP, requires that eligible participants may participate in SCSEP for a maximum period of 48 months or 4 years. In most cases participants rarely participate for 48 months as they leave for unsubsidized placements or other personal reasons. Each participant's time enrolled is tracked by West Alabama Regional Commission by preparing enrollment forms and documenting breaks of service entered into SPARQ.

TRANSITION ASSESSMENT AND IEP

Participants will receive notification letters that they are approaching the end of the four years/48 month time limit on SCSEP from the Project Coordinator at 12 months, 90 days, and 30 days prior to the date his/her time limit is reached.

Project Staff will begin working with participants on his/her Transition Assessment and IEP one year (12 months) prior to the participant reaching his/her individual durational limit exit date and then updated minimally at 90 days and 30 days before the exit date. The Transition Assessment and IEP are intended to help participants develop a post-SCSEP survival plan prior to termination from SCSEP.

Participants have the option to decline the Transition Assessment and IEP process. If declined, project staff must document this decision thoroughly in detailed case notes as well as on the *Transition Assessment and IEP Form*.

If project staff concludes the participant does not have sufficient financial resources, they will help identify and put in place community resources that will help to close the gap between the finances the participant has and the amount needed. The goal of such plans is to increase financial stability by giving participants the steps to take, which may include contacting various agencies and programs (with the assistance of program staff and other professionals as appropriate).

The participant's health status may be assessed when applicable, especially if it would identify a disability for which he/she would be eligible for disability benefits.

The IEP portion of the Transition Assessment and IEP should include the following as appropriate:

- Up-to-date information on transferrable skills, interests, unsubsidized placement goal, if applicable, and specific action steps, such as updating your resume, job interviewing and job search skills, additional needed training, employers to target and an outreach strategy
- Up-to-date information on supportive needs and goals along with specific action steps, such as developing a personal budget without SCSEP wages, or getting permission from the participant to contact social support systems to ensure safety net services throughout the transition;
- Up-to-date information on continuing community service goals or other plans post-exit and specific action steps, such as identifying other stipend/volunteer programs

PARTICIPANT SUPPORTIVE SERVICES

Supportive services are available to participants and may include, but are not limited to, counseling in areas such as health, nutrition, and Medicare benefits, etc. All participant supportive services are dependent upon funding and must be pre-approved by the SCSEP staff. The need for supportive services will be identified in the original Assessment and IEP if possible or the plan will be updated once the need for a specific supportive service is identified. Requests for supportive services must be made in writing or by email and must include the approximate cost of the service. Written approval (letter or fax) or an email approving the supportive service will be sent prior to the service being provided.

EXITING SCSEP

FOLLOW UPS

When a participant exits SCSEP West Alabama Regional Commission is required to conduct follow ups for 24 months. Several contacts with participants are required during this time, and if the participant is working, will include gathering information about new wages, benefits, etc. This is done to indicate to The Department of Labor the value of how the SCSEP may have benefited the participant. A release form must be signed by the participant to allow follow ups to be conducted.

VOLUNTARY EXITS

If a participant decides to voluntarily exit the SCSEP program, one week's notice should be given with the reason for exiting stated. If a participant obtains an unsubsidized job, he/she may be released the next day if that is in the best interest to secure the job. Project staff will ask the participant to submit copies of acceptable documentation to verify the reason for exiting SCSEP.

TERMINATIONS FROM SCSEP

REASONS FOR TERMINATION:

A participant may be terminated for any one of the following seven (7) reasons:

1. Termination for Cause
2. Termination for Individual Employment Plan Violation
3. Termination for Income Ineligibility

4. Termination for Violation of Leave without Pay (Project staff may call this Approved Break in Service)
5. Termination for Reaching Durational Limit
6. Termination Due to Program Ineligibility
7. Termination Due to Becoming Employed While Enrolled in SCSEP

1. ***Termination for Cause*** – The participant will be put on leave without pay for 30 calendar days and will be issued a 30 day written notice. Reasons for termination for cause may include, but are not limited to:

- Refusal to cooperate in establishing eligibility;
- Refusal and/or unwillingness to perform assigned duties without good cause;
- Three 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, eligibility or other official records;
- Insubordination, that is, intentionally refusing to carry out the direction or instructions of the host agency supervisor or sponsor staff without good cause;
- Obscene, abusive, harassing, or threatening language or behavior;
- Causing an imminent threat to health or safety;
- Theft, meaning illegally taking or withholding the property of another without permission;
- Intentional loss, damage, destruction or disclosure of unauthorized use of property, records or information;
- Workplace harassment or discrimination on the basis of sex, race, color, religion, national origin, age, marital status, or disability;
- Conviction of a felony or any criminal drug statute for a violation occurring in the workplace while on or off duty, or while on duty away from the workplace;
- Consuming, selling, purchasing, manufacturing, distributing, possessing or using any illegal or non-prescribed drug or from being under the influence of alcohol and/or other drugs while performing your host agency assignment or while carrying out objectives required by the IEP. Legally prescribed medications are excluded if they do not affect the participant's ability to perform duties or protect the safety of themselves or others;
- Being found to have unsubsidized employment while on SCSEP;
- Exceeding the sponsor leave without pay/approved break policy by failing to return to the community service by the required date without due notice or good cause;
- A pattern of consistent and conscious failure to follow the steps mutually agreed upon and outlined in the Individual Employment Plan (IEP) without good cause, including:
 - Refusing to search for a job;
 - Sabotaging a job interview, for example, if a participant tells the interviewer that he/she is not interested in the job;

- Refusal of a reasonable number (3) of job offers and/or referrals to job openings;
- Refusing to accept or transfer to a different community service assignment;
- Refusal to accept IEP-related training opportunities;
- Refusal to register and follow-up with the One-Stop Career Center related to unsubsidized employment;
- Refusing to accept or follow-through on obtaining support services that will enhance the participant's ability to participate in a community service assignment consistent with the IEP without good cause;
- Refusing to cooperate with the assessment or IEP process such as refusing to participate in the completion of the assessment, reassessment, the IEP and/or updates;
- Refusing to cooperate with other IEP-related referrals

2. ***Termination for Individual Employment Plan Violation*** – Failure to participate in the IEP process may be cause for corrective actions and, as a last resort, termination. Prior to an IEP related termination, the participant will be given a chance to correct the offending action. Written notice shall be given to the participant, citing a specific incident in which he/she did not fulfill his/her responsibility. The notice should list the specific event, cite the jointly signed agreement provision and provide a period of time for corrective action.

3. ***Termination for Income Ineligibility*** – If at any time, the project sponsor determines that a participant is no longer eligible for continued enrollment because he/she attained additional includable income during the preceding six or 12 months or because of a change in his/her family status, the participant must be terminated. Determinations of ineligibility cannot be based on anticipated changes in income or family size; they must be based on actual data. The participant has the responsibility to report increases in income and changes in family status. The participant will be allowed to continue working at the Community Service Assignment until his/her date of exit.

4. ***Termination for Violation of Leave without Pay*** – A participant may be terminated if he/she reaches the time limit established with West Alabama Regional Commission or does not comply with the approved policy as outlined in this Participant Handbook.

5. ***Termination for Reaching Durational Limit*** – The maximum eligibility period for SCSEP participation is a total of 48 months. When a participant reaches his/her durational limit, he/she must be terminated on the date when he/she reaches the four year limit. The participant will be allowed to continue working at the Community Service Assignment until his/her date of exit.

6. ***Termination Due to Program Ineligibility*** – If West Alabama Regional Commission determines that a participant is no longer eligible during the eligibility verification process, the participant must be given written notice explaining the reasons for termination and applicable procedures to appeal. If West Alabama Regional Commission discovers after the eligibility or recertification process is finished that staff incorrectly determined the participant to be ineligible through no fault of his/her own; he/she must be given written notice. The participant will be allowed to continue working at the Community Service Assignment until exited.
7. ***Termination Due to Becoming Employed While on SCSEP*** – To remain qualified for enrollment in SCSEP, the participant must be unemployed. If, at any time, West Alabama Regional Commission staff determines that a participant obtained an unsubsidized job while enrolled on SCSEP, the participant will be placed on leave without pay for 30 calendar days and will immediately be given a written notice (30 calendar days) explaining the reason for termination and the appeal procedure.

DISCIPLINE PROCEDURE GUIDELINES FOR THE HOST AGENCY

Use your best judgment: If the problem is serious, call the SCSEP staff immediately.

Host agency supervisor's steps to take in the event of behavior or performance issues:

Step 1 The host agency supervisor discusses behavior/performance issues with the participant and makes specific suggestions regarding the kinds of changes desired. The host agency supervisor informs the SCSEP staff of the situation, documents what was discussed and puts it in the host agency file. Then it is forwarded to the SCSEP staff to put in the participant's file. The SCSEP staff then addresses this situation with the participant, documents it and puts it in the participant's file.

Step 2 If the behavior/performance issues reoccur, the host agency supervisor discusses the situation with the SCSEP staff to determine how best to address the issue(s). The host agency

supervisor prepares formal documentation of issue(s) to be discussed with the participant, noting specifics such as date and time of incident(s), review of behavior/performance changes desired and realistic deadlines for the changes to occur.

Specific to Drug/Alcohol Related Procedures If a SCSEP participant appears to be impaired while on duty, the host agency supervisor shall remove him/her from the training site and inform the SCSEP staff immediately. If the participant appears to be impaired for reasons other than drugs or alcohol, the SCSEP staff may request that the participant obtain a physician's release before the participant may return to his/her assignment.

DISCIPLINARY/TERMINATION PROCEDURES BY SPONSOR AGENCY

The termination procedure will typically include the following disciplinary steps. West Alabama Regional Commission staff or Project Coordinator may skip Steps One and Two and go straight to Step Three (outlined below) and terminate a participant immediately for serious violations such as fraud, theft, destruction of property, violence, or threats to health and safety of others.

Step One: Documented Verbal Warning

West Alabama Regional Commission staff or Project Coordinator will verbally warn participant and follow up with written documentation of the warning. This documentation will be placed in the participant's personnel file.

Step Two: Written Warning

West Alabama Regional Commission staff or Project Coordinator will provide the participant with a written warning as well as discuss via telephone or in person. A copy of the written warning will be sent to the participant and placed in the participant's personnel file.

During both Steps One and Two – The participant will be informed of the corrective action needed and the time frame for which the corrective action must be taken.

Step Three: Termination

A participant may not be terminated until 30 calendar days after he/she has been provided a written notice. Written notices of termination including the reason for the action and appeal procedures must be given to the participant if the Project Staff or Coordinator expects to terminate the participant from SCSEP. Participants have the right to appeal any decision.

GRIEVANCE/COMPLAINT PROCEDURES

Written notices of termination including the reason for the action and appeal procedures must be given to the participant when the project sponsor expects to terminate. Participants have the right to appeal any termination decision. A participant may not be terminated until 30 calendar days after he/she has been provided a written notice. West Alabama Regional Commission will ensure that the grievance procedure is provided uniformly and fairly.

When a participant files a written complaint, the sponsor, host agency supervisor and the participant should promptly seek to resolve the differences in an informal conference. If the participant is not satisfied with the results, he/she has the right to appeal to a complaint resolution committee established by the Sponsor or to the Sponsor's chief executive officer. A written summary of decisions made must be provided to all involved. Further appeals may be made to the Sponsor's grantor (Senior Service America, Inc. or Alabama Department of Senior Services) or, if there is a violation of federal law, to the U.S. Department of Labor. A copy of the grievance procedure is given to new participants as part of the SCSEP orientation

▪ ***Notification of Filing of Complaint required by the Participant***

If a participant files a written complaint, this invokes the project sponsor's complaint resolution procedures. The project sponsor must notify the SSAI SCSEP National Director or Alabama State SCSEP Director, whichever applies, and provide a copy of the complaint within seven business days.

▪ ***Complaint Resolution/Grievance Procedure Steps***

The grievance procedure applies to participant's complaints over conditions which are, in whole or in part, subject to the control of the Host Agency Supervisor and/or Project Coordinator, involving policy administration, terms and conditions of enrollment.

1. Upon receipt of a written complaint, the Project Director, participant and host agency supervisor, if appropriate, should seek promptly to resolve the differences

in an informal conference.

2. A written statement outlining the result of the informal conference should be provided to all involved persons, including the participant.
3. If the participant is not satisfied with the results of the informal conference, he/she has the right to appeal to an established complaint resolution committee or to the chief executive officer of West Alabama Regional Commission as provided for in this Participant Handbook
4. West Alabama Regional Commission shall ensure the appeal is heard promptly.
5. Participants have the right to use the assistance of others at the hearing, to call witnesses and to question those involved in the complaint.
6. A written summary of the decisions made at the hearing must be provided promptly to all involved.
7. The time limit of the complaint resolution procedure for each project sponsor is 45 business days, including the time for filing the appeal to SSAI or ADSS.

Adverse Action against Participant

When the project sponsor takes an adverse action against a participant, the sponsor must notify him/her in writing of the reason or reasons for the action, and advise the participant of the complaint resolution procedures and of his/her right to appeal to SSAI's SCSEP National Director or the Alabama State SCSEP Director, whichever is applicable.

Right to Appeal to Senior Service America, Inc. (SSAI)

Persons who are dissatisfied with a decision resulting from your project sponsor's complaint resolution procedure have the right to appeal to SSAI.

1. The participant should file a written appeal to SSAI promptly, and as soon as possible, upon receiving the sponsor's decision.
2. SSAI will send a letter to the participant acknowledging receipt of the complaint and will review the results of the complaint resolution procedure. SSAI will notify West Alabama Regional Commission of receipt of the complaint. SSAI may request additional information from the participant or project sponsor. SSAI may decide to hold a hearing to gather additional information. In such cases where SSAI decides to hold a hearing, SSAI may request consent for additional time from all involved parties.
3. SSAI will affirm or amend the decision within 15 business days and provide the participant and West Alabama Regional Commission a written copy of the decision stating that the decision is final, except if the participant appeals to the U.S. Department of Labor.

Right to Appeal to Alabama Department of Senior Services (ADSS)

Persons who are dissatisfied with a decision resulting from your project sponsor's complaint resolution procedure have the right to appeal to ADSS.

1. The participant who has a complaint should verbally present it to his/her Project Coordinator within five (5) calendar days after knowledge of reasons giving rise to the complaint. The Project Coordinator shall attempt to resolve the complaint to the mutual satisfaction of both parties within five (5) calendar days after its presentation. If unsuccessful, the participant may proceed to step 2 within five (5) days of the presentation to the supervisor. If the complaint is between the participant and the Project Coordinator, the participant should bypass step one and immediately proceed to step two.
2. If a satisfactory resolution is not reached in step one, the participant may submit a written grievance to the sub-grantee Executive Director, who shall review the grievance, and render a written decision within five (5) calendar days after review.
3. If the participant does not accept the Executive Director's decision, the participant may submit a written request to the SCSEP State Director, Alabama Department of Senior Services (ADSS), to review the matter. The SCSEP State Director shall respond within fifteen (15) days of receipt of the participant's review request. The request to the SCSEP State Director must be received at ADSS within 45 days of the date of the filing of the original written grievance. The decision of ADSS is final and binding except for a complaint alleging violations of law or a complaint alleging discrimination.

Department of Labor Appeal

A complaint alleging violations of law may be appealed to the U.S. Department of Labor (DOL) as described below if the complaint is not resolved within 60 business days of the time of filing by the combined complaint resolution procedure of your project sponsor and the SSAI SCSEP National Director or Alabama State SCSEP Director (whichever is applicable). A complaint alleging violations of law is appealed to the following DOL unit:

Complaints alleging violations of the law. A complaint alleging violations of law, other than a complaint alleging discrimination, which is not resolved within 60 business days as a result of the combined complaint resolution procedure of your project sponsor and SSAI may be filed with the Chief, Division of Adult Services, Employment and Training Administration, U.S. Department of Labor, 200 Constitution Ave., N.W., Washington, D.C. 20210.

U.S. Department of Labor regulations governing SCSEP provide that, except for complaints alleging violations of the law, and for complaints alleging discrimination, the Department shall limit its review to determining whether the appeals procedures of your project sponsor and SSAI/ADSS were followed.

Complaints or Questions Regarding Nondiscrimination Requirements

1. Complaints or questions regarding nondiscrimination requirements, or complaints alleging a violation of the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 188 of the Workforce Investment Act of 1998 (WIA), or their implementing regulations **must be directed or mailed** to Civil Rights Center at the U.S. Department of Labor at: Director, Civil Rights Center, U.S. Department of Labor, Room N-4123, 200 Constitution Ave., N.W., Washington, D.C. 20210.

2. Per U.S. Department of Labor regulations governing SCSEP, staff of Senior Service America, Inc. or the Alabama Department of Senior Services must refer complaints alleging discrimination on the basis of race, color, religion, gender, sexual orientation, national origin, disability or age – except when age was used as a valid requirement for SCSEP eligibility as described in the SSAI Policy and Procedure Manual (Policy 203, Eligibility Requirements) – to the Civil Rights Center.
3. Per U.S. Department of Labor regulations governing SCSEP, staff of Senior Service America, Inc. or the Alabama Department of Senior Services are not permitted to process an allegation based on discrimination. Senior Service America, Inc. and Alabama Department of Senior Services staff should advise the participant that the complaint or question must be filed with the Civil Rights Center at the U.S. Department of Labor, as noted above.

Pending the disposition of the allegation by the Civil Rights Center, Senior Service America, Inc. or the Alabama Department of Senior Services staff will continue to assist you to resolve any program problems in the same manner as your sponsor staff would assist any other participant regardless of the discrimination allegation.