



Senior Community Service Employment Program

PROGRAM HANDBOOK for PARTICIPANTS



Foreword

This Program Manual provides official guidance for the administration of Operation ABLE's Senior Community Service Employment Program (SCSEP) funded by the Department of Labor through Operation ABLE (the Grantee).

The manual is based on the following legislative and regulatory mandates:

- Title V of the Older Americans Act of 1965, as amended,
- 20 CFR Part 641 Senior Community Service Employment Program; Final Rule
- Department of Labor Older Worker Bulletins, and the
- Operation ABLE's Grant Agreement with the U.S. Department of Labor.

The operational policy, procedures, and standards outlined in this manual are to be followed and enforced by all participants. This manual is effective July 1, 2023. It supersedes any other editions and update memoranda. In case of any perceived discrepancy between this manual and other materials, Operation ABLE's staff should be consulted for clarification. When legislative or policy changes require that the manual be updated, Operation ABLE will send all SCSEP participants a memorandum announcing the change(s).

This Senior Community Service Employment Program is funded by the US Department of Labor as an award totaling \$5,958,297 including a MA Executive Office of Elder Affairs sub-grant. Grants are matched with \$595,829 nonfederal support. Operation ABLE SCSEP is an equal opportunity program. Auxiliary aids and services are available upon request to individuals with disabilities and video relay calls are welcome.

Table of Contents

Table of Contents	iii
Participant Introduction	1
Section 1: SCSEP Overview	2
1.1. Eligibility Criteria	2
1.2. Goals of SCSEP:	2
1.3. SCSEP History and Today	3
1.4. SCSEP Participant Process	3
Criminal Offender Record Information (CORI)	4
Additional Terms:	7
Section 2: Participant Expectations	8
Section 3: SCSEP Policies and Regulations	8
3.1. Obligation to Search for Employment:	8
3.2. Attendance and Hours of Work	9
3.3. Compensation	10
3.4. Withholdings	10
3.5. Prohibited Additional Compensation	10
3.6. Conflict of Interest	10
3.7. Overtime	10
3.8. Holidays	10
3.9. Paid Time Off / Vacation / Sick Days	11
3.10. Leave Policy	11
3.11. Change in Contact Information	12
3.12. Computer Use	12
3.13. Confidentiality	12
3.14. Discrimination	13
3.15. Drug-Free Workplace Policy	13
3.16. Assistance to Participants	13
3.17. Eating and Drinking	13
3.18. Employment	13

3.19. Optional Physical Examination	14
3.20. Timesheets.....	14
3.21. Jury Duty / Witness.....	14
3.22. Bereavement Leave	14
3.23. Outside Work	15
3.24. Personal Appearance	15
3.25. Political Activities.....	15
3.26. Reassignment (Rotation) Policy.....	15
3.27. Religious Activities	16
3.28. Safety at the Community Service Assignment	16
3.29. Support Services.....	17
Section 4 Grievance Procedures	17
4.1. Requirements	17
4.2. Grievance Procedures	18
4.3. Procedures for Appealing.....	20
Violations of the Law and Discrimination	20
Section 5: Exiting SCSEP and Unsubsidized Employment Acquisition	21
5.1. Program Exit	21
5.2. Unsubsidized Employment Follow-Up.....	21
Section 6: 48-Month Durational Limit	22
Section 7: Termination and Resignation from SCSEP	22
7.1. Termination Policy.....	22
7.2. Termination Reasons	22
7.3. IEP-related Termination Reasons	24
7.4. Termination Procedures.....	25
7.5. SCSEP Termination Notice.....	26
7.6. Resigning from SCSEP	26
GLOSSARY	27

Participant Introduction

The SCSEP is funded by the United States Department of Labor and is administered by Operation ABLE. 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
- Other information you need to participate in this program

Your goals in entering this program should include commitments to:

- Upgrade your job skills and work experience through “on the job” experience providing community service and attending training workshops and programs.
- Seek improved employment opportunities beyond this program.
- Improve your living situation through paid training while connecting with your community and preparing for work.
- Pursue additional skill improvement through related programs and develop a comprehensive plan to do so. This plan is called the Individual Employment Plan (IEP), and we’ll help you create it.
- Find unsubsidized employment; meaning a job where you are on the employer’s payroll directly.

Section 1: SCSEP Overview

The SCSEP is a federally funded employment and training program for unemployed individuals 55 years of age or older with an income no greater than 125% of the Federal Poverty Limit (FPL). The SCSEP is funded by the U.S. Department of Labor (DOL). Operation ABLE is the grantee for the SCSEP in Massachusetts (Essex, Middlesex, Norfolk and Suffolk counties) and New Hampshire (Belknap, Carroll, Cheshire, Coos, Grafton, Hillsborough, Merrimack, Rockingham, Sullivan, and Strafford counties).

1.1 Eligibility Criteria

To be eligible for participation in the SCSEP, an individual must meet each of the following criteria for age, income, employment status, and place of residence.

- Age – Each individual must be 55 years of age or older. No upper age limit can be imposed for initial enrollment or continued enrollment.
- Income – The family income of an Applicant or Participant must not exceed 125 % of the federal poverty levels established and periodically updated in March of each year.
- Employment Status – Must be unemployed at the time of application and while enrolled in the program.
- Residence – Each individual must reside in New Hampshire or Massachusetts in the Grantee’s service area while enrolled in the program. Residence means an individual’s declared dwelling place or address. Local projects may not impose a length of residency prior to enrollment in SCSEP. Individuals who move out of the Grantee’s service area will be discharged from the program but may have the option to transfer to the local project in their new location.

1.2 Goals of SCSEP:

- Upgrade job skills for job placement
- Earn income during training
- Get involved in his/her community
- Provide the local program community with needed service
- Help the mature worker find unsubsidized employment or gain self sufficiency

1.3 SCSEP History and Today

History

During the 1960s, President Lyndon Johnson announced the War on Poverty campaign. The SCSEP, Title V of the Older Americans Act, was a product of this campaign. This program has been continually funded by Congress since then and addresses the same issues today. These issues include the understanding that many mature people continue to seek work with outdated skills and that economic changes may result in mature persons losing work or being forced into retirement before they are financially ready.

Today

SCSEP has been updated to take into account changes in the modern economy and to provide greater focus on the training aspects afforded to participants. Experience has shown that mature persons can improve their skill levels in a wide range of activities. By working closely with the SCSEP Representative to create an Individual Employment Plan (IEP), participants can focus efforts more effectively. The result is that participants can develop skills and behaviors that result in greater employability; facilitating their transition into unsubsidized employment.

Lastly, changes have been implemented to make use of additional programs and services to provide participants with more training and support. Such additional services are designed to enhance not only job attainment but also retention. Participants may find as they go through the initial assessments and development of their IEP that barriers they are facing will be identified. Participants work with their SCSEP Representative to use the IEP to detail plans specifically designed to overcome those barriers whenever possible.

1.4 SCSEP Participant Process

As a participant, it is very important that you have an understanding of the process you are undertaking as well as the terms people will be using. This section presents a simple description of some of the steps and terms that you need to know.

1) Application, Acceptance, and Enrollment in the SCSEP

This step makes sure you are eligible for the SCSEP and that the program has space available for you. Enrollment into this subsidized training program is based solely on SCSEP eligibility criteria and priorities, as set by the U. S. Department of Labor, and the applicant's qualifications for each given position. No person shall, on the grounds of race, creed, color, disability, national

origin, gender, sexual orientation, political affiliation, religious beliefs, or participation in other government programs be subjected to discrimination under this program or any activity sponsored by Operation ABLE

Much of the information you complete in this step will be reviewed annually to ensure you still meet income eligibility requirements. Funding from year to year is not guaranteed and participation may be terminated based on funding levels.

2) Other Enrollment Considerations

Participants must be capable of performing the tasks outlined in the Host Agency's Assignment Description and considered employable in non-subsidized employment at some point in the future.

Every participant must also agree to actively cooperate in a job search unless otherwise deemed to be focused on a path of self-sufficiency.

Criminal Offender Record Information (CORI)

Operation A.B.L.E and many Host Agencies may perform a CORI and/or other background check on potential SCSEP participants before they are cleared to begin a Community Service Assignment.

3) Orientation

This step consists of several smaller segments that may be conducted over time. You will generally receive an orientation during which much of the information in this handbook is reviewed and a number of policies explained. Additionally, several important forms will be discussed and given out during your orientation session. These forms may include your acceptance and understanding of the requirements of this program, time sheets, and other logistical forms. Staff members have a checklist to ensure your application, acceptance, and orientation is fully completed.

4) Assessment of Skills and Interests

This is one of the most important efforts you will undertake in this program. These assessments are designed to provide the foundation from which your IEP is created. Additionally, these assessments are used to identify other resources and training that you need to be successful in meeting your goals and the goals of this program. It is important that you be thoughtful in completion of this effort and ask all the questions you might have.

5) Individual Employment Plan (IEP)

The IEP is the most important document you will create in this program. You will create this plan in conjunction with SCSEP staff members. The IEP serves as your personal roadmap to success and is designed to specifically assist you in meeting your goals and those of this program. You should refer to your IEP often throughout your participation to ensure you are “on course.”

IMPORTANT: The IEP is an agreement similar to a contract. You are agreeing to participate in training and other activities, as well as setting goals for yourself. Your goals may stretch your current abilities, and that is very important and appropriate. Additionally, you should make sure your goals are SMART by working with your SCSEP Representative. SMART goals are:

S: Specific; **M:** Measurable; **A:** Attainable; **R:** Realistic; and **T:** Timely.

You and your SCSEP Representative may have to modify or improve your IEP as you complete different tasks or assignments or if your situation dramatically changes. Changes are not made to lower goals to your performance level but to take into account that situations beyond your control can change, and those changes may require re-assessment. Sometimes, practical program reasons may require changes to your IEP (for example, a Host Agency becomes unavailable). Only your SCSEP Representative has the authority to make changes. You should work with your SCSEP Representative to bring any issues to his/her attention as soon as possible. It is very important you meet the goals you set forth in your IEP. Failure to meet the responsibilities you agreed to in your IEP can have serious consequences including termination from the program. The sooner problems or changes are addressed, the better your chances are for being successful in this program.

6) Training: Community Service Assignment and Skills Training

Community Service Assignment (Host Agency)

The Community Service Assignment (CSA) is the primary method by which SCSEP Participants receive training. CSAs are provided through a host agency (non-profit organizations or governmental entities). The CSA is designed to provide SCSEP Participants with needed skills training, as defined in your IEP. It may be appropriate to rotate your Community Service Assignment (internally or externally) to ensure that you continue to learn new skills to improve your job-readiness potential. An individual assignment a host agency is generally no longer than 18 months.

Skills Training

Skills training is the generic term for all training activities outside of the Community Service Assignment training effort. Skills training consists of both instructor-led group sessions and individual efforts. For example, your IEP may require vocational or computer training that requires attendance in a classroom environment where you may have workbooks, exercises, and reading assignments. Other skills training may require self-guided efforts such as reading books or attending sessions at a Career Center (MassHIRE or NH Works).

7) Job Search Agreement

To continue participation in the SCSEP, you hold the responsibility to continually seek unsubsidized employment. In coordination with your SCSEP Representative, you will develop a plan for Job Searching while participating with the SCSEP. This plan may include (but is not limited to) direct employer contact, attending job fairs, attending job counselling, attending classroom training, or conducting industry research. This activity will be tracked on Individual Performance Report forms (IPRs) and needs to be submitted to your Program Assistant at least once a month.

8) Recertification

Participant's income is recertified annually. You will be contacted by your SCSEP Representative and an in-person appointment will be made. The income documents required for recertification are the same as those collected when you initially apply to the program. Participants found ineligible because of income are given written notice of termination and terminated thirty (30) days after the notice. It is recommended that the terminated Participant work closely with the SCSEP Representative, the local Career Center, and Temporary Placement Agencies in their search for employment.

9) Unsubsidized Job Placement

This step refers to the participant's effort obtaining an unsubsidized job. This job may be with the Host Agency or another organization (profit or not-for-profit). Job placement is the goal of this program and should provide participants with increased income, benefits and personal satisfaction.

10) Follow-up

Helping the participant retain the job that he/she worked so hard to obtain is an important part of SCSEP. SCSEP staff members will contact you for up to 13 months to see how you are doing in your job. Additional resources may be made available to you (on a need and availability basis) to help you overcome problems that may threaten your continued employment.

Additional Terms:

SCSEP Representatives: Regional Managers, Area Program Managers/Coordinators and Program Assistants

These important people facilitate the administration of SCSEP and work to ensure compliance with program regulations. You will have at least one staff member with whom you are in regular contact, and you will know who that is. In some cases, program participants serve in these roles and have received additional training to fulfill this role.

Host Agency Supervisor

The Host Agency Supervisor plays an important role in preparing you for employment. The kind of training provided by supervisors helps you find work in the labor force and prepares you for interaction with your future manager. Host Agency supervisor expectations are documented and reviewed with you at your initial assignment.

Community Service Assignment

The SCSEP staff work together with the Host Agency to develop the Training Assignment Description for each position. Participants spend roughly 20 hours per week involved in SCSEP activities. These hours include training time at the assigned site and other required program activities, as stated in the IEP and other agreements (if used). A Training Assignment Description may be updated or the participant reassigned by SCSEP staff as needed to meet participant and program goals.

Orientation at the Host Agency

Orientation is required to be completed within 30 days of your assignment to a Host Agency. The orientation includes your site supervisor and will be conducted at the training location.

Monitoring / Reassessment

Your SCSEP Representative will check in with you at least once every six months, most likely in a site visit to your Community Service Assignment. The goal of these meetings is to evaluate the effectiveness of the assignment as well as evaluate your progress.

Section 2: Participant Expectations

The following list is intended to give insight, guidance, and understanding behind the services provided by the SCSEP:

You can expect to:

- Be treated as a co-worker at a Community Service Assignment, NOT as free help.
- Have a suitable work-training assignment that considers your life experience, career direction, and skills.
- Know about the Host Agency, its policies, people, and programs as well as what is expected of you.
- Have a Training Assignment Description that accurately reflects the tasks and responsibilities of the training assignment.
- Participate in updating the job description periodically to accommodate changes in tasks and/or added responsibilities.
- Obtain timely and effective skills training.
- Obtain additional training to support your ability to take on greater responsibilities at the Host Agency.
- Have a safe, orderly, and designated place at the Community Service Assignment that is conducive to performance and learning.
- Have patient, respectful, and thoughtful guidance from your supervisor.
- Have diverse learning experiences that can lead to increased capability in finding unsubsidized employment. This goal may require assignment to more than one Host Agency and will be documented in your IEP.

Section 3: SCSEP Policies and Regulations

3.1. Obligation to Search for Employment:

Participants are encouraged to find employment, and the initial IEP specifies the agreed-upon steps to be taken in this pursuit. Failure to meet the obligation to seek and find employment may

result in the participant's termination from SCSEP. In certain circumstances, however, a participant may also be deemed fit to pursue a path geared toward Self Sufficiency. These situations are less common and may be followed only in coordination with the SCSEP Regional Manager's approval.

The following activities are required:

1. Attendance at meetings and trainings as required and agreed upon with your SCSEP Representative.
2. Possible rotational assignments (Host Agencies).
3. Registration and participation in appropriate activities at a Career Center.
4. Completing and submitting job-search logs if requested by SCSEP Representative.

Additionally, some training may be required that is self-taught and/or self-paced through a computer lab, a Career Center, or through group meetings and/or books. In all cases, the training must be documented in the IEP and must be agreed to with the SCSEP Representative.

The IEP must be kept current as the SCSEP process document of record. If training cannot be accomplished due to factors such as funding, the IEP should reflect that or the goal should be removed or re-established using an available class/method.

3.2. Attendance and Hours of Work

Regular attendance is essential to the operation of the Community Service Assignment. If you are unable to attend or arrive at your scheduled time, you must call your site supervisor. **SCSEP Participants are responsible for notifying their site supervisor and their SCSEP**

Representative if they are going to be late or absent. Good attendance and punctuality are important factors in any aspect of employment and will have an impact on future evaluations.

Excellent reviews are important for a reference when seeking unsubsidized employment.

Any Participant absent from duty for three consecutive assignment days without proper notification and authorization shall be considered to have resigned from the assignment, and this behavior may result in termination from the SCSEP program. Re-occurring tardiness or absences may result in removal from the SCSEP program.

The average workweek for participants is roughly 20 hours, although there may be some exceptions to this. This time allotment does not include the lunch or break period. Participants are considered to be enrolled in a part-time training program, and if a lunch period is taken, the length of the unpaid lunch period should be based upon the Host Agency's personnel policies.

3.3. Compensation

The SCSEP is a training program and an hourly stipend is paid to participants for generally 20 hours of work per week and is fixed at the higher of the state or federal minimum wage.

3.4. Withholdings

Social Security, Federal and State taxes are withheld, if required, and W-2 forms will be issued at the appropriate time.

3.5. Prohibited Additional Compensation

No rewards, gifts, or other forms of additional compensation shall be received from any source for a SCSEP Participant's performance of his/her duties. SCSEP Participants are prohibited from accepting additional work hours (with or without pay) or any other form of bonus. Award certificates or similar items of non-material value are allowed.

3.6. Conflict of Interest

Federal regulations forbid a person who works in a decision-making capacity (whether compensated or not) to supervise immediate family members through the SCSEP. This also applies to positions of an administrative capacity, staff position, or community service position funded under the SCSEP.

3.7. Overtime

SCSEP Participants are not eligible for overtime compensation and **cannot work over 8 hours in any 24-hour period**. CSAs are not allowed to provide any form of additional compensation to SCSEP Participants. Unless written permissions is obtained, SCSEP Participants will not exceed 20 hours of paid training per week. Limits on how many hours participants are permitted to work per week are dictated by available funding guidelines.

3.8. Holidays

SCSEP Participants will receive holiday pay if the holiday falls on a day on which they are regularly scheduled to work. Holiday pay hours must not exceed the hours that the SCSEP Participant would normally work. For example, if the SCSEP Participant works five days a week at four hours a day to achieve their 20 hours per week, the SCSEP Participant will receive four hours of holiday pay only.

Federal holidays include:

New Year's Day
Birthday of Martin Luther King, Jr.
Washington's Birthday
Memorial Day
Juneteenth
Independence Day
Labor Day
Columbus/Indigenous People's Day
Veterans Day
Thanksgiving Day
Christmas Day

3.9. Paid Time Off / Vacation / Sick Days

There is no vacation, paid time off, or sick leave for the SCSEP Participants. Missed time may be made up during the same two-week pay period without loss of hours/compensation. In addition, there are no “snow days.” If a CSA is closed and it is not on an approved Federal holiday, SCSEP Participants may make up that day during the same pay period if permitted by the Host Agency/CSA Supervisor.

3.10. Leave Policy

If a SCSEP Participant requires more than three days away from the CSA, a Leave of Absence may be granted. A Time-Off Request form must be submitted to their regional SCSEP Office for approval by the Regional Manager. Participants must notify their CSA Site Supervisor as soon as possible.

There are two types of leaves of absence available to the SCSEP Participants: Voluntary and Medical. LOA's, whether medical or voluntary, may be granted for up to 30 calendar days (cumulatively) per program year (July 1-June 30). Extensions for medical leaves of absence may be granted at the discretion of the Regional Manager.

The Participant's Community Service Assignment slot will be held open until their approved break ends. SCSEP Staff will obtain appropriate return-to-work documentation prior to the Participant's return to the Community Service Assignment if the break is due to medical reasons. The documentation is to be part of the Participant's permanent file and noted in the case notes that it was received.

In the event of a national emergency like the COVID-19 health crisis Operation ABLE reserves the right to place SCSEP participants on a temporary paid leave status. For the COVID-19 emergency this decision was based on DOL guidance provided to SCSEP grantees on 3/12/20.

3.11. Change in Contact Information

Each Participant is responsible for notifying their SCSEP Representative if there are changes in the following areas:

- Address
- Phone number
- Income
- Household size
- Emergency Contact information
- Site Supervisor
- Work Schedule

3.12. Computer Use

Computers at the Host Agency should be used for training purposes including research and Host Agency assignments. Computers should not be used for personal use or entertainment. Host Agency policies must be followed. Participants should also keep in mind that computer resources are owned by the Host Agency and can be searched at any time. When in doubt, consult your supervisor.

3.13. Confidentiality

Confidentiality of Host Agency information, procedures, staff, and clients is required. Confidentiality policies of the Host Agency will be explained and followed; however, sound judgment is also required. A breach in confidentiality could be grounds for removal from SCSEP.

3.14. Discrimination

Host Agency discrimination based on sex, religion, age, race, color, and national origin, veteran or military discharge status, disability or sexual orientation or marital status, as governed by all applicable State and Federal laws, is prohibited. Additionally, sexual harassment is prohibited. Participants must report discrimination or harassment to SCSEP staff representatives.

3.15. Drug-Free Workplace Policy

Operation ABLE absolutely prohibits the use, consumption or sale, purchase, transfer, or possession of any illegal or non-prescription drug by any enrollee during working hours, while representing SCSEP, while on the premises of or at Host Agencies, or while engaged in SCSEP activities.

In addition, participants are strictly prohibited from being under the influence of alcohol during working hours, while representing SCSEP, while on the premises of or at his/her Host Agencies, or while engaged in SCSEP activities.

Evidence of such behavior is grounds for immediate termination from the SCSEP.

3.16. Assistance to Participants

SCSEP staff will work with Participants who suffer from drug or alcohol abuse or other personal/emotional problems, in receiving the necessary assistance.

Any Participant seeking such assistance is encouraged to meet with his/her SCSEP Representative to discuss the situation before problems begin to surface in the workplace.

Any disclosures made by any participant will be treated as confidential, unless there is the risk of harm to persons or property. The Participant's decision to seek assistance will not be used as the basis for disciplinary action or used against the SCSEP Participant in any disciplinary proceedings.

3.17. Eating and Drinking

The policies of the SCSEP agency as well as the Host Agency must be followed. In general, do not eat or drink in computer labs or around expensive equipment. If you have any doubts, ask your supervisor.

3.18. Employment

SCSEP Participants are not employees of SCSEP, the SCSEP Grantee, the Department of Labor, or the Host Agency. This handbook, associated procedures, forms, or other documentation do not

constitute a work contract or a guarantee to obtain work. SCSEP Participants who exit the program are not entitled to unemployment compensation.

3.19. Optional Physical Examination

All SCSEP Participants are offered the opportunity to get reimbursed, up to a set dollar amount, for a physical examination annually, after enrollment. However, most participants are already eligible for a free annual physical and there would be nothing to reimburse. **A physical is a fringe benefit and is not a requirement.** Participants may refuse the physical examination. In such cases, the refusal must be documented through a signed waiver. It is in the Participant's best interest to obtain an annual physical.

3.20. Timesheets

Timesheets must be signed by both the Participant and the Host Agency Supervisor. It is the responsibility of the Participant to submit the timesheet to the Host Agency Supervisor at a previously identified time/date for each pay period as noted on the Payroll Schedule.

3.21. Jury Duty / Witness

Leave for jury duty shall be provided in accordance with State jury system and local laws.

Massachusetts Participants shall receive regular pay for service for the first three days as a juror.

The State will compensate the Participant from the fourth day on.

New Hampshire Participants will be compensated by the State directly for each day they serve and will receive mileage allowance and reimbursement for tolls and parking.

A copy of the juror selection notification must be provided to the SCSEP Representative prior to the first day of jury service as well as proof that the participant attended as required.

Participants who are scheduled to serve as witnesses can make up the time.

3.22. Bereavement Leave

Participants shall be granted a leave of absence with pay for a maximum of four days upon evidence satisfactory to Grantee of the death of a spouse, child, step-child, parent, step-parent, brother, sister, grandparent, grandchild, spouse's parent, a person for whom the participant is the legal guardian, a person for whom the participant is primarily responsible for making funeral arrangements, or a person living in the Participant's household. This leave may be used, at the option of the participant, within thirty (30) calendar days from said death. In extraordinary

circumstances, at the discretion of the Regional Manager, bereavement leave may be used after thirty (30) calendar days from the date of death.

Upon evidence satisfactory to the Regional Manager, a participant shall be granted one (1) day of leave without loss of pay to attend the funeral of the brother, sister, grandparent or grandchild of the participant's spouse.

3.23. Outside Work

SCSEP Participants must be unemployed at the time of enrollment and may not obtain outside work while participating in the SCSEP. If SCSEP Participant becomes employed, either full time or part time, while enrolled, they must exit the SCSEP. The no-employment rule does not apply to casual, non-recurring labor for which a Participant may be compensated (occasionally shoveling a neighbor's driveway or baby-sitting for a friend's family). Participation in the Foster Grandparent Program, the Senior Companion Program, the Senior Demonstration Programs, and the Retired Senior Volunteer Program are not considered employment.

3.24. Personal Appearance

SCSEP Participants are expected to adhere to dress code norms established at their CSA.

Dressing appropriately and exercising excellent hygiene improves how SCSEP Participants may be perceived and results in a better training environment.

3.25. Political Activities

Projects that are funded by the SCSEP may not involve political activities. SCSEP Participants and SCSEP Staff are not permitted to engage in partisan or non-partisan political activities during hours for which they are paid with SCSEP funds. In addition, SCSEP Participants and Staff are not permitted to engage in partisan political activities representing themselves as a spokesperson of the SCSEP. Any manner of employment or out-stationed positions in the office of Congress, a state or local legislator, or on any staff of a legislative committee are also prohibited.

3.26. Reassignment (Rotation) Policy

Periodically the SCSEP Participant may be required to rotate to another CSA, due to any one of or a combination of factors, which include, but are not limited to:

- Fulfillment of IEP goals, the establishment of new goals, or modification of existing goals.

- Changes to the CSA location that require modification or elimination of training opportunities. This may happen when the CSA Description or the agreement between the SCSEP and the CSA is modified or terminated.
- Changes in funding of the SCSEP or non-profit status of the CSA Site.
- General performance of the SCSEP Participant and/or extended length in a particular training assignment.
- Re-evaluation of the SCSEP Participant's skills and aptitudes that indicates a change in training assignment.

3.27. Religious Activities

SCSEP Participants and staff are not permitted to engage in any religious activities during hours for which they are paid with SCSEP funds. In addition, SCSEP Staff and Participants are prohibited from representing themselves as a spokesperson for the SCSEP while participating in religious activities.

The decision to observe religious holidays is solely that of the SCSEP Participant and Staff.

Please discuss any intentions with the CSA Supervisor and the appropriate SCSEP

Representative. If one chooses to take time-off for religious reasons there are two options available, either make up the time missed in order to be paid, or take the time off unpaid.

3.28. Safety at the Community Service Assignment

The SCSEP holds safety as a critical program element. The safety and welfare of the SCSEP Participants is paramount. SCSEP Participants and CSA Supervisors are expected to exercise reasonable judgment in preventing accidents. The following requirements should be followed:

- Adhere to the CSA Description for assigned tasks and responsibilities.
- Follow every precaution and safety rule at the CSA.
- IMMEDIATELY seek first aid and support for any and all injuries, however minor they may seem, and then report the accident to both the CSA Supervisor and the appropriate SCSEP Representative. **Any accident no matter how minor should be reported to a SCSEP representative using the Accident Report Form within 24 hours of the incident.**
- Report unsafe conditions, equipment, or practice at the CSA.
- Do NOT use any kind of power tools that pose the risk of bodily injury or harm.
- Read safety precautions provided by the SCSEP and the CSA.

- Use all personal protective equipment required for the task being performed as well as protective/appropriate clothing.
- Participants should not operate any vehicle on behalf of their CSA while on assignment time.
- Use of ladders and other climbing tools while on assignment are also prohibited.
- Exercise good judgment in inclement weather to decide whether it is prudent to travel to the CSA. The fact that the CSA may be open or nearby should never be the determining factor.

3.29. Support Services

Operation ABLE will provide support services to national and state grant Senior Community Services Employment Program (SCSEP) participants to assist them in achieving success in the program. These funds can only be accessed once during the SCSEP participant's duration period and there is a maximum of \$150.00 allowable. These services can include but are not limited to; child/adult care, transportation, car repair, clothing/uniforms, tools, licensing fees, drug/alcohol services, IT needs, and additional training. All requests will be handled on a case by case basis with the provision that there is sufficient funding available at the time of the request. In order to apply for these funds, SCSEP staff must identify the specific needs of a participant, complete a Support Service Request Form, which will include cost, vendor, and justification for services needed, and then await the approval of the appropriate SCSEP Regional Manager. After this initial approval, the request with appropriate receipt/payment documentation will be forwarded to the SCSEP Director for final approval. Staff will make every effort to process support service payments prior to the delivery services. Unless there are compelling circumstances, all payments will be made directly to the vendor.

Section 4 Grievance Procedures

4.1. Requirements

SCSEP Representatives are required to give all SCSEP participants a written copy of Operation ABLE's SCSEP Grievance Procedures during the initial enrollment, along with a verbal explanation of the policy. This procedure must be applied fairly, consistently and uniformly. All

grievances and rendered decisions must be kept on file. In notifying the complainant of a final decision, the Grantee must advise the complainant of their right to further appeal.

Note: This policy does not cover allegations of discrimination, which should be directed to the Office of Civil Rights, U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210. The complainant should file a written complaint within ninety (90) days in the case of an alleged act of discrimination.

4.2. Grievance Procedures

Operation ABLE is committed to a safe training environment. Any SCSEP participant who believes that he/she has encountered differential, irregular, or illegal action at a Host Agency must be directed to take specific actions and follow these steps:

Step 1. File the written complaint – The complainant must first file a written complaint with the SCSEP Representative within thirty (30) days after the alleged act occurred.

- 1) The grievance should clearly explain the circumstances around the incident and the incident itself.
- 2) The grievance should be detailed, include date, time, location, and names of people directly involved in or witnessing the incident.

Step 2. Informal Hearing - After receiving a written grievance, the SCSEP Regional Manager, shall make every effort possible to settle the problem, following these steps:

- SCSEP Representative must document the receipt of the written grievance.
- SCSEP Representative must conduct an interview with the parties concerned. During the interview the following information must be gathered and documented in writing:
 - Date of the incident or incidents and parties involved.
 - Description of the problem: action, decision or condition giving rise to the incident as seen by the complainant.
 - Other pertinent information that might be necessary to resolve the grievance.
- SCSEP Regional Manager shall render a written decision based on the information gathered during the above-mentioned interviews within five (5) business days from the date the initial interview was held. Such written decision shall include an account of all follow-up steps taken by the SCSEP Regional Manager to resolve the matter, and a list of advice or recommended solution(s) given to the parties involved regarding the merits of the complaint and how to remedy the situation.

- Inform the complainant that if he/she is not satisfied with the decision, he/she has the right to appeal it.
- If grievance can be resolved, the SCSEP Regional Manager shall document the resolution in writing and submit copies of the documentation to the parties involved. The parties must sign and date the agreement.
- If the complainant accepts this decision, the procedure is complete.
- If the complainant does not accept this decision, and files an appeal, then the grievance is brought up to the next level of review, which is described below, until it reaches the final steps in the process.

Step 3. Second hearing - If the first informal hearing does not resolve the issue, a second process shall be followed:

- All interested and involved parties shall present the grievance to Operation ABLE in writing.
- Copies of all written grievance statements shall be made available to both sides.
- The SCSEP Representative shall form an ad hoc Complaint Resolution Committee with 3 members. This Committee will be comprised of the Operation ABLE Chief Program Officer, Chief Financial Officer, and the SCSEP Director.
- Both parties shall be informed within five (5) business days in writing when the committee will meet for the purpose of hearing the complaint, and the exact time and place of the hearing. At the hearing before the Complaint Resolution Committee, the complainant shall have the opportunity to present witnesses in his/her behalf, if appropriate, and shall have the opportunity to ask questions of the person or persons whose actions are alleged to have caused the complaint.
- The Complaint Resolution Committee shall consider the facts and make the decision within five (5) days after the day of the hearing. The decision shall be made by a majority vote based on information in the file, written statements, and the testimony given at hearings. The decision shall be submitted in writing to the parties involved within five (5) business days after a decision is made.
- Minutes shall be made of each hearing. The minutes, along with the written statements and other documentation presented at the hearing, shall be maintained in Operation ABLE's files for at least three (3) years after the final disposition of the grievance. If the complaint has not been resolved through the combined processes outlined above,

Operation ABLE shall inform the complainant of the process and procedure for appeal to Operation ABLE's legal department at 174 Portland St., 5th Floor, Boston, MA 02114.

4.3. Procedures for Appealing

- An appeal may be filed within five (5) working days after a written decision is sent. The appeal should be sent to the Operation ABLE legal department, 174 Portland St., 5th floor, Boston, MA 02114. The subject of the appeal can either be an alleged wrong decision (substance) or an inadequate compliance with hearing procedures (process).
- Operation ABLE will prepare a report summarizing the complaint, the informal and formal investigation, and the disposition of the complaint and/or the written decision of the Complaint Resolution Committee.
- Operation ABLE's legal department shall review the results of the complaint resolution procedure of the Grantee. General Counsel, or his/her designee, may seek or obtain additional information and shall affirm or amend the decision in writing within 15 business days. The decision of Operation ABLE's General Counsel is final. If the complainant alleges a violation of federal law (other than civil rights law) not resolved within 60 days, they should follow the procedure listed below:

Violations of the Law and Discrimination

- Complainants alleging violations of the law, other than those alleging discrimination, which are not resolved within 60 days as a result of the complaint resolution procedures of the SCSEP Grantee, Operation ABLE, may file an appeal with: Division of Older Worker Programs, Employment and Training Administration; U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210. If the complaint alleges discrimination, it should be directed to the Office of Civil Rights, U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210.
- Once complete, Operation ABLE maintains the complaint and decision in the files.
- If, in the course of the complaint resolution process, a participant is placed on approved break for administrative reasons or removed from the payroll pending the results of the Complaint Resolution Committee or subsequent appeals process, and such determination is made in the participant's favor, the participant may extend their services to make up for lost hours during the appeal process and shall be restored to an active status.

- **Harassment:** Harassment will not be tolerated and is defined and controlled by the policies of the SCSEP agency and the Host Agency.

Section 5: Exiting SCSEP and Unsubsidized Employment Acquisition

5.1. Program Exit

Operation ABLE works diligently to help job-ready participants find jobs in the private and public sectors.

If you obtain an unsubsidized position, you must notify your SCSEP Representative and the Host Agency Supervisor about it immediately. An exit form will be given to you and a number of follow up services will be provided after you leave the program.

5.2. Unsubsidized Employment Follow-Up

Follow-up services are required to ensure the success of the placement and to maintain the planned employment retention rates for the program. A member of Operation ABLE staff must contact the former participant and his/her employer **two quarters after job placement, and again four quarters after job placement.** It is also recommended that staff follow the same follow schedule for program participants who were not exited to a job in the event that they may have secured a job after their program exit. Regular follow-up can identify problems and give staff an opportunity to initiate actions to deal with them before a former participant is terminated or leaves a job.

Follow-up contacts may be made by telephone, mail, or e-mail. During the follow-up contact, the SCSEP Area Program Manager will:

- **Determine** if both the former participant and the employer are satisfied with the placement;
- **Collect** information required by the Department of Labor and SCSEP.
- **Identify** any current or potential problems that could result in a termination of the former participant; and
- **Offer** job counseling or referrals to community agencies, when appropriate, to resolve any issues.

Section 6: 48-Month Durational Limit

Participants enrolled in the SCSEP have a 48-month durational time limit to participate in the program and secure an unsubsidized job placement. The SCSEP Representative tracks and reports on the 48-month durational time limit for all participants. Operation ABLE will monitor the reports and will not approve any extensions over and above the 48-month limit.

This program participation durational limit is a requirement of the federally funded SCSEP grant and it is designed to assist the maximum number of individuals to participate in this subsidized training program and achieve their goal of securing unsubsidized employment.

You will be given a written notice of your termination date one (1) year before your exit date, six (6) months before your exit date, and 30 days before your exit date. Please note that your Host Agency will be made aware as well.

Section 7: Termination and Resignation from SCSEP

7.1. Termination Policy

SCSEP Representatives are required to give all SCSEP participants a written copy of the SCSEP termination policy during initial enrollment, along with a verbal explanation of the policy. This policy must be applied fairly and consistently in terminating SCSEP enrollment for all participants. Participants cannot be terminated due to age, as there is no upper age limit for participation in SCSEP. Participants should only be terminated when it is clear that a program violation has occurred (see 12.2) and a record of the issue or incident is properly recorded in the participant's file.

All participants must receive a written SCSEP Termination Notice 30 days prior to the date of termination. All participants should be informed of their right to appeal any termination. The SCSEP Termination Notice must inform participants that the termination is subject to Operation ABLE's Termination Policy and Procedures, and a copy of the Complaint Resolution Committee and Grievance Procedures must be attached to the Grantee's Termination Notice.

7.2. Termination Reasons

Listed below are reasons for termination and standard termination procedures for SCSEP participants:

Termination Due to Provision of False Information.

If, at any time, Operation ABLE determines that an individual was incorrectly declared eligible as a result of false information knowingly given by the participant, Operation ABLE must give the participant immediate written notice with an explanation and must terminate the participant 30 days after receipt of the notice. The participant will be removed immediately from the host agency and placed on leave without pay during the 30-day notice period.

Termination Due to Incorrect Initial Eligibility Determination.

If, at any time, Operation ABLE determines that it incorrectly determined a participant to be eligible for the program through no fault of the participant, Operation ABLE will give the participant immediate written notice explaining the reason(s) for termination and will terminate the participant's enrollment 30 days after it has provided the participant with written notice. The participant will be allowed to continue the host agency assignment with pay during the 30-day notice period.

Termination Due to Income Ineligibility Determined at Recertification.

If, at any time, Operation ABLE finds a participant to be no longer eligible for enrollment, Operation ABLE will give the participant written notice explaining the reason(s) for termination and will terminate the participant 30 days after it has provided the participant with written notice. The participant will be allowed to continue the host agency assignment with pay during the 30-day notice period.

Termination Due to Achieving 48-Month Individual Durational Limit.

A participant will be terminated when he or she meets the 48-month maximum participation duration date. Operation ABLE must send a notification of termination letter one (1) year, six (6) months, and 30 days before the 48-month maximum participation date. The participant will be able to continue participating in the program until the date of exit.

Termination Due to Becoming Employed During Enrollment.

To qualify for enrollment in the SCSEP a participant must be unemployed. All participants are informed that they may not be employed while participating in the program and that they must notify Operation ABLE immediately upon becoming employed. A participant who is discovered to be employed while enrolled, without having notified Operation ABLE of the employment, will have their enrollment terminated immediately from the program. If this occurs, the

participant will be placed on Leave without pay immediately. Operation ABLE must send a 30-day letter of termination to the participant.

Termination for Cause

There are several reasons to terminate a participant “for-cause.” When warranted, a participant may be terminated for certain behaviors and/or conduct. The following are specific reasons; however, other similar reasons that demonstrate willful misconduct or an intentional disregard of program rules may cause involuntary termination. Examples of permitted reasons for termination include:

- Falsification of official records, such as timesheets
- Intentional disclosure of confidential or private information obtained from the host agency, or Grantee.
- Theft
- Physical violence or intentional destruction of property
- Obscene, abusive, harassing, or threatening language or behavior
- Sexual harassment of colleagues or others
- Causing an imminent threat to health or safety
- Non-compliance with drug and alcohol free policy, which prohibits participants while performing their host agency assignment or while carrying out objectives required by the IEP
- Frequent tardiness or absences exceeding three (3) times during a 30-day period without good cause
- Failure to regularly attend or properly justify absence from the group training meetings or individual monitoring meetings conducted by the SCSEP provider.

7.3. IEP-related Termination Reasons

If a participant fails, without good cause, to cooperate fully with Operation ABLE to accomplish the goals of his or her IEP strategy, an IEP-related termination “for-cause” may be in order. All IEP related violations should be considered on a case-by-case basis. Examples of lack of compliance with the IEP without good cause include refusal to:

- Accept training opportunities outlined in the IEP
- Accept a new community service assignment to enhance skill development in support of IEP goals

- Accept supportive services that will enhance his/her ability to participate in a Community Service Assignment consistent with the IEP
- Participant services offered such as job search, skill training, or resume writing

The IEP-related termination option should be used as a last resort. Before considering termination proceedings, the Grantee should make every effort to find out why a participant is not cooperating to meet their employment and training goals. A participant must be given a chance to correct the offending action.

Written notice shall be given to the participant, citing a specific incident in which the participant did not fulfill his or her IEP responsibility. The notice should list the specific event, cite the jointly signed IEP agreement, and provide a period of 30 days to take corrective action.

7.4. Termination Procedures

Step one: Documented Verbal Warning.

Operation ABLE verbally warns the participant and documents the verbal warning in the participant file.

Step two: Written Warning. Operation ABLE will complete a written warning and send it to the participant with the correction plan described below.

Step two: Corrective Action.

Operation ABLE will complete and send to the participant a 30-day Corrective Action Plan. The Corrective Action Plan must be discussed in person and signed by Operation ABLE and the participant. To follow up on the Corrective Action Plan, Operation ABLE will issue and request a weekly progress report from the participant.

Step four: Termination. If a participant fails to satisfactorily comply with the 30-day Corrective Action Plan, Operation ABLE will provide a SCSEP Termination Notice to the participant informing him or her of the reason(s) for termination and the effective date, which must be a minimum of 30 days after the issuance of the notice. Operation ABLE will inform the participant of his or her last day at the Host Agency, or inform the participant that he or she is

being placed on a 30-day unpaid leave of absence until the exit date. During this time SCSEP staff is available to assist the participant in job search activities.

7.5. SCSEP Termination Notice

A SCSEP Termination Notice is completed for each participant whose enrollment is ended. It must state the participant's right of appeal and a copy of the Complaint Resolution Committee and Grievance Procedures must be included with the SCSEP Termination Notice. The signature of Operation ABLE's Program Director or designee is required on each termination notice. A copy of the SCSEP Termination Notice shall be a part of the participant's record.

Operation ABLE must be fully informed of all involuntary terminations for-cause.

7.6. Resigning from SCSEP

If a Participant decides to leave the program for any reason, a two-week notice shall be given, and a written letter of resignation with an explanation must be submitted to the SCSEP Representative and copied to the Host Agency Supervisor. A copy of the Participant's resignation letter must be kept in the Participant's file.

GLOSSARY

<i>Authorized position level</i>	The number of SCSEP enrollment opportunities established by Department of Labor and Operation ABLE, Inc. for a program year for each project.
<i>Community Service Assignment</i>	A part-time, temporary employment paid with grant funds in projects at Host Agencies through which eligible individuals are engaged in community service and receive work experience and job skills that can lead to unsubsidized employment.
<i>Disability</i>	A physical or mental impairment that results in substantial functional limitations in one or more major life activities. The individual must have a record of such impairment.
<i>DOL</i>	United States Department of Labor.
<i>Eligible individual</i>	Anyone who is at least 55 years old, unemployed, and who is a member of a family with an income that is not more than 125 % of the family income levels, as established and periodically updated by the U.S. Department of Health and Human Services.
<i>Area Program Manager</i>	Primary staff assigned to help participants in their training, job search and match to potential employers.
<i>Operation ABLE, Inc.</i>	Grantee, 174 Portland St., 5 th Floor, Boston, MA 02114
<i>Grantee</i>	An entity receiving financial assistance directly from the Department of Labor to carry out SCSEP activities. Operation ABLE, Inc. is a federal Grantee.
<i>Host Agency</i>	A public agency or a private non-profit organization (501(c)(3) of the Internal Revenue Code of 1986) that provides work site training duties and responsibilities, and supervision for a SCSEP participant.
<i>Individual Employment Plan (IEP)</i>	The SCSEP participant's training and employment plan. The IEP is jointly developed and agreed to by project staff, the participant and the host site. The IEP documents an employment goal, achievement objectives, and an appropriate sequence of services for the participant as determined by the comprehensive assessment.
<i>Low Employment Prospects</i>	Refers to individuals who are unlikely to find a job without the help of SCSEP or another employment and training program.
<i>Low income</i>	A family income of no more than 125 percent of the poverty level established and periodically updated by the U.S. Department of Health and Human Services.

<i>OAA</i>	Older Americans Act of 1965, as amended (42 U.S.C. 3001 et seq.).
<i>Participant / Enrollee</i>	An individual who is eligible for SCSEP, receives program services, and is paid a training stipend for engaging in community service assignments under a project.
<i>Program Assistant / SCSEP Representative</i>	SCSEP staff assigned to establish and maintain activities to assist participants throughout their experience in the SCSEP.
<i>Program Year</i>	The one-year period covered by the Grantee agreement, usually beginning on July 1 and ending on June 30.
<i>Project</i>	A Grantee that provides SCSEP services under a legal agreement i.e. Operation ABLE, Inc.
<i>Reassessment</i>	An evaluation that measures the progress a participant has made toward learning new skills, reaching personal development goals, and meeting his or her employment and training objectives under the Individual Employment Plan (IEP).
<i>Residence</i>	An applicant's or participant's declared dwelling place or address. Projects cannot require a length of residency for applicants prior to enrollment.
<i>SCSEP</i>	Senior Community Service Employment Program as authorized under Title V of the Older Americans Act.