



Center for  
Employment Training

BRIGHTON CENTER

Real Training. Life Changing.



# 2017 Trainee Catalog 2018



BRIGHTON CENTER  
A COMMUNITY OF SUPPORT

# **CET Trainee Catalog**

## **Table of Contents**

General Information .....	5
Brighton Center’s Mission .....	5
CET’s Purpose Statement.....	5
Philosophy .....	5
Agency and Program History .....	6
Program Design .....	6
CET’s Fourteen Precepts.....	7
Industrial Advisory Board .....	8
Technical Advisory Committees .....	8
Unit Team .....	9
Advising.....	9
Trainee Demographics.....	9
Non-Discrimination Policy .....	9
Services to Trainees with Disabilities.....	10
Accreditation and Licensing.....	11
White House Recognition .....	11
Getting Started.....	12
Our Location .....	12
How to Apply .....	12
Admissions Process.....	12
Admissions Responsibilities of Trainees.....	13
Prior Offenders .....	13
Readmission After Withdraw.....	13
Orientation .....	13
Personal Career Strategy (PCS).....	14
Transfers between Programs.....	14
Evaluation of Prior Training .....	14
Additional Information.....	14

Parking .....	14
Center for Employment Training Staff.....	14
Courses of Study .....	15
Restrooms.....	15
Lunch and Scheduled Breaks .....	15
CET Telephone .....	15
Non-Smoking Facility .....	15
Voter Registration.....	15
Holiday Drive.....	16
Trainee Ambassadors .....	16
Financial Aid.....	17
Financial Aid Programs .....	17
Financial Aid Eligibility .....	17
How to Apply for Aid .....	18
Financial Aid Payments.....	18
Financial Aid Award Notification .....	18
Method and Frequency of FA Disbursements.....	18
Additional Information .....	19
Verification Policy.....	19
Selection of Applications to be Verified .....	19
Verification Time Frame .....	19
Document Collection Procedures.....	19
FAFSA Adjustments (Professional Judgment).....	21
Interim Disbursements .....	21
Referral of Fraud Cases.....	21
Federal Supplemental Educational Opportunity Grant (FSEOG) .....	22
Determining Eligibility.....	22
Awarding FSEOG .....	22
Federal Work Study .....	23
Tuition Policy .....	23
Estimated Cost of Attendance .....	24
Textbook Pricing and Information .....	24

Textbook Availability .....	24
Covered Certifications .....	24
Cancellation Rights .....	24
Return to Title IV (R2T4) Policy .....	24
Refund Policy .....	25
Withdrawal .....	26
Return to Title IV Procedures .....	26
FSEOG .....	27
Leave of Absence .....	27
File Security.....	28
Insurance .....	28
Trainee Services .....	29
Supportive Services .....	29
Financial Opportunity Center .....	29
Adult Education .....	29
GED Instruction.....	29
Graduation Ceremony .....	29
Transcripts and Certificate.....	30
Trainee Expectations.....	31
Trainee Rights .....	31
Attendance .....	31
Punctuality .....	32
In-Service Days and Holidays.....	32
Trainee Evaluation.....	32
Satisfactory Academic Progress.....	33
Trainee Conduct .....	35
Quality of Work.....	35
Dress and Grooming .....	35
Cell Phone Usage .....	36
Drug and Alcohol Prevention.....	36
Copyright Infringement .....	37
Disciplinary Action.....	38

Disciplinary Action .....	39
Personal Items .....	39
Safety and Wellness.....	40
Safety Practices.....	40
Notice of the Annual Campus Security Report .....	40
Inclement Weather.....	40
Emergency Action Plan.....	41
Employment Services.....	42
Career Coaching.....	42
Externship .....	42
Career Placement Assistance.....	42
Alumni Services.....	43
Gainful Employment .....	43
Administrative Policies and Procedures .....	44
Brighton Center’s Grievance Policy and Procedure.....	44
Americans with Disabilities Act (ADA) Policy Statement and Complaint Procedure.....	45
Sexual Harassment Policy .....	46
Confidentiality Statement.....	47
Security of Information.....	47
Family Education Rights and Privacy Act (FERPA).....	47
Solicitations.....	49
Governance and Administration .....	49
Brighton Center’s Board of Directors .....	49
Management System.....	49
Legal Status.....	49
Important Notice .....	49
Appendix A: Officials and Faculty List .....	50
Appendix B: Course Descriptions.....	51

## **General Information**

This Trainee Catalog is your guide to the learning opportunities, supportive services, and rights and responsibilities you will experience as a new trainee at the Center for Employment Training.

### **Brighton Center's Mission**

The Center for Employment Training (CET) is a program within the Workforce Development Department of Brighton Center, Inc. Brighton Center is the most comprehensive community based social service agency in Northern Kentucky, and is committed to helping community members achieve self-sufficiency. Brighton Center's mission statement is as follows:

The mission of Brighton Center, Inc. is to create opportunities for individuals and families to reach self-sufficiency through family support services, education, employment, and leadership. We will achieve this mission by creating an environment that rewards excellence and innovation, encourages mutual respect, and maximizes resources.

### **CET's Purpose Statement**

CET's purpose is to create educational and employment opportunities for our trainees so that they achieve a higher level of self-sufficiency. In an atmosphere of mutual respect and partnership, we assist individuals with overcoming their barriers and reaching their goals and objectives.

We achieve this by providing a professional environment that addresses the need for support services, skill training, and career development.

### **Philosophy**

The Center for Employment Training is designed to serve anyone who wants real training with life changing results. Consequently, CET does not have entry requirements unlike most colleges, universities, or other training institutions. Each trainee is treated as an individual with unique aspirations, needs and abilities. Training is short-term and intensive—the goal is to get trainees a job as quickly as they are qualified.

Trainees can expect openness from our staff. Throughout their training, trainees will receive guidance, counseling and support. Trainees will receive periodic progress reviews to let them know how they are doing, and can receive assistance with resources to assist with personal and family issues. CET hosts a caring staff who understands the trainees' needs and who will work hard to help them succeed.

## **Agency and Program History**

In the 1960's, Reverend Bill Neuroth, assistant pastor at Corpus Christi Church, saw the need for an agency to meet the needs of the economically disadvantaged people who moved into the Newport, KY area. In 1966, Reverend Neuroth responded to that need by founding Brighton Street Center. In 1968, Robert Brewster began as a volunteer at the Center and became its director in 1969. In August, 1971, Brighton Street Center acquired new quarters, away from Brighton Street, changing its name to Brighton Center, Inc.

Brighton Center is a private, non-profit, community based organization. Over the last 50 years we have offered employment-training programs to youth and adults. In an effort to continually improve, Brighton Center conducted research and spoke with staff, area employers and community residents. This search for information led us to the Center for Employment Training (CET), a nationally recognized employment-training program based in San Jose, California.

The original Center for Employment Training, in San Jose, California, offers trainees a comprehensive skill training and human development program. It provides trainees with a variety of services including instruction in English and Math, basic skills improvement, the opportunity to get a GED, resource advising and other support services. The goal is to graduate trainees with marketable skills and a permanent, unsubsidized job that leads to their economic self-sufficiency. In May 1996, Brighton Center was awarded replication assistance by the Department of Labor to start the Center for Employment Training in Northern Kentucky. Brighton Center's CET program opened on April 14, 1997, and in February 2001, CET received accreditation by the Council on Occupational Education.

## **Program Design**

CET offers a competency-based employment training program which emphasizes skills most needed in the workplace. A trainee moves through the curriculum at his or her own pace, moving on to a new concept when ready. Over sixty percent of training is hands-on, using equipment similar to that used in the workplace.

CET promotes good work habits through simulation of a business environment. We require consistent attendance, and trainees sign in and out to simulate workplace attendance procedures. Tardiness and absenteeism are addressed as they occur, in recognition of the importance of punctuality and good attendance on the job.

CET's skill divisions prepare trainees for occupations that are in demand in the local labor market. The training has been designed in close cooperation with local employers to ensure that CET graduates will be in demand in the workforce. Because job conditions change quickly, CET continually checks job requirements and updates curricula and

classroom equipment to meet industry needs. Although class size varies due to CET's open-entry/open-exit design, CET maintains a trainee-to-instructor ratio of twenty-to-one.

Upon entry into the CET program, each applicant starts an orientation period during which time the applicant can investigate each skill area to determine the best fit. The applicant can change his or her skill area of interest during the orientation period. He or she will be officially enrolled into the skill area of choice once the orientation period has been successfully completed.

### **CET's Fourteen Precepts**

CET's fundamental purpose is to provide effective training to individuals facing many barriers to employment. The program is comprehensive, individualized and generally adaptable to each person's needs. The CET model is based upon the following 14 Precepts:

**1. Training is open entry and open exit.**

CET offers rolling admissions; trainees can start once they have completed eligibility and financial aid appointments. New starts begin each week or as seats become available.

**2. Training is tutorial and highly individualized.**

The instructor/trainee ratio is approximately twenty-to-one. Trainees find their own pace through the curriculum, and advanced trainees tutor newly enrolled trainees.

**3. Training emphasizes and promotes the development of good work habits.**

CET's Career Development curriculum emphasizes proper work habits and practices. Each skill division stresses the requirements of their specific industry.

**4. Training and counseling are based upon the realities of industry.**

CET partners with a wide section of businesses and hosts an Industrial Advisory Board to ensure classroom practices mirror the practices of the workplace.

**5. Instructors are the primary counselors for trainees.**

Instructors serve as "supervisors" in the employment simulation of each skill division. Trainees learn that the instructors are advocates to help them address barriers to employment.

**6. No testing is required as a condition for entering training.**

Trainees do not need a high school diploma or GED for enrollment, though federal student aid requires completion of secondary education.. Adult Education instruction is available onsite.

**7. Trainees remain in training until they start work.**

Trainees utilize the Career Services room to launch their career search and network with employers, and "graduate" upon obtaining employment.



**8. Trainees who are absent from training are contacted by phone or through home visitation.**

CET expects consistent attendance and good communication from trainees. Tardiness and absences are addressed as they occur by the Skill Instructors.

**9. Reality counseling by staff confronts trainees with alternative solutions, but leaves the final decision up to them.**

Natural consequences are discussed, and critical thinking is encouraged.

**10. Training at CET is hands-on, job related and remedial training is integrated into skill training.**

Hands-on training occurs a minimum of 60% of the time. Basic skills instruction is integrated into skill training.

**11. Trainees are assured help in finding a decent and meaningful job.**

The Career Coach prepares trainees in soft skills, resume preparation, and interviewing skills through the Career Development curriculum.

**12. Training offered in a particular skill division expands and contracts with the job market for the skill.**

The curriculum in the skill areas is fluid and changes to meet the demands of the industry.

**13. Small administrative units coupled with small training teams of instructors enable all decisions relative to a particular trainee to be made at the working level.**

Unit Teams meet weekly to discuss trainee progress or barriers and set specific plans in motion to address any concerns.

**14. Home visitation (Alumni follow up) is intensified after job placement to help the trainees retain stable employment.**

Follow-ups occur monthly for 12 months to assist the trainees with any problems at work and to provide additional assistance to find new employment as needed.

### **Industrial Advisory Board**

The Industrial Advisory Board (IAB) is a volunteer board composed of a broad spectrum of business and industry in support of Brighton Center's Center for Employment Training (CET). The IAB is an advisory board, and does not participate in the internal management of CET. The IAB instead influences CET through direct contributions and through the IAB's influence within the private sector and with elected officials on behalf of CET's fundraising and program development efforts.

### **Technical Advisory Committees**

Each skill division hosts a Technical Advisory Committee (TAC) comprised of employees of companies who hold the jobs that our graduates want to obtain. TAC

members offer hands-on experience and knowledge of the field and current conditions in industry. The TAC provides guidance on current employment trends, and helps to determine demand for skill divisions. The TAC reviews skill division curriculum content to insure our training remains current, that training equipment is adequate, and that our trainees graduate ready to meet industry standards.

### **Unit Team**

At the core of CET's training design is the Instructional Unit Team. The Unit Team consists of the Skill Instructor, Success Coach, Career Coach, Admissions Specialist and administration. Unit Teams may also include others who have day-to-day contact with the trainee. The Unit Team meets on a weekly basis to monitor the progress of trainees; to identify barriers, suggest resources, and determine staff actions to assist trainees with reaching their goals.

### **Advising**

Skill Instructors serve as primary advisors to trainees. CET offers work supports, financial and career coaching to each trainee. Other Brighton Center staff are available to help trainees gain access to supportive services that can help alleviate potential barriers to employment.

### **Trainee Demographics**

CET offers a multicultural learning experience. A diverse population of trainees is represented at CET which reflects CET's commitment to helping those most in need. Trainees range in age from late teens to the seventies, with most in their twenties to forties. Some trainees work part-time while attending training and many are single parents. Some trainees face multiple barriers to employment and receive assistance in connecting with support services through Brighton Center.

A demographic snapshot of the 229 individuals served in 2016 shows:

Gender: 192 female, 37 male

Race: 153 white, 64 black, 7 multi-racial, 3 Asian

### **Non-Discrimination Policy**

The Center for Employment Training does not discriminate on the basis of race, color, religion, gender, sexual orientation, age, ethnic or national origin, or disability, as defined by ADA and EEOC, in the training program or activities it conducts. Grievances concerning discrimination must follow the Grievance Procedure.

CET offers a multicultural learning experience. A diverse population of trainees is represented at CET. Trainees range in age from late teens to the seventies. Some trainees work part-time while attending CET, many are single parents, and many have multiple barriers to employment.

## **Services to Trainees with Disabilities**

Brighton Center's Center for Employment Training (CET) provides reasonable accommodations to those with documented disabilities, provided an undue hardship is not created for Brighton Center.

An undue hardship refers to any accommodation that would be unduly costly, expensive, substantial, disruptive, or that would fundamentally alter the nature of the business or program.

A reasonable accommodation is the provision of an auxiliary aid, or modification of the course or program, that will allow access to the educational program, material, activity or degree.

Examples include:

- Making existing facilities readily accessible to and usable by persons with disabilities.
- Acquisition or modification of equipment or devices.
- Appropriate adjustments or modification of exams or policies.
- Provision of alternative print formats.

### **Eligibility**

A trainee with a disability is eligible to receive reasonable accommodation of the documented disability is a physical or mental impairment that substantially limits a major life activity.

Trainees requesting services or accommodations must complete the following steps:

1. Meet with the Admissions Specialist.
2. Provide documentation of medical, psychological or other appropriate diagnostic evaluations to document the nature and extent of the disability.

### **Documentation**

Examples requiring documentation include:

- Physical disability: medical report stating the extent of the injury, illness, or condition.
- Blind, visual impairment: medical report stating the restricted vision fields.
- Deaf/hearing impairment: audiological evaluations indicating the extent of hearing loss.
- Learning disability: psycho-educational evaluations conducted within the past 3 years and administered by qualified professionals.

### **Accreditation and Licensing**

The Center for Employment Training is accredited by the Commission of the Council on Occupational Education, a national accrediting body recognized by the United States Department of Education.

CET is also licensed by the Kentucky Council on Post-Secondary Education.

Trainees may review materials regarding accreditation and licensure by contacting the Financial Aid Officer or Coordinator.

### **White House Recognition**

In 2014, the Center for Employment Training was nationally recognized at the White House as one of thirty job training programs that “work”. CET was applauded for excellence in service bundling and for providing real training that is life changing to trainees for almost 20 years. CET has placed over 1000 trainees in employment over our twenty years!

# Getting Started

## Our Location

The Center for Employment Training prepares individuals for employment in the local job market. CET strives to simulate a work environment by offering training under real workplace conditions and with equipment used by local employers.

CET is located at 601 Washington Ave., Suite 140, Newport, Kentucky, 41071. The facility is on TANK bus route 11, and is accessible to those with mobility challenges. The facility follows accepted postsecondary school accessibility guidelines.

## How to Apply

CET's doors are open to anyone eighteen or older, who wants to pursue a career in one of the skills we offer. CET welcomes prospective trainees whose maturity, motivation and abilities suggest they can successfully complete a chosen program of study.

Instruction is ongoing, allowing trainees to begin classes every week. CET's instructional programs are hands-on, individualized, and self-paced. Courses do not require previous academic experience, and many find success through CET's instructional model who have not been successful in traditional school settings. Training is 30 hours per week from 9:00 AM to 3:30 PM, Monday through Friday.

Interested persons may sign up for an information session at CET during business hours, weekdays from 8:30 AM - 5:00 PM, or by calling (859) 491-8303 x2200. Trainees are generally given a start date depending on how quickly eligibility and financial aid requirements are completed. Trainees may be eligible for financial aid offered through 3<sup>rd</sup> party sources, which may expedite the enrollment process.

Individuals who pay their tuition out-of-pocket are admitted immediately and do not have to meet any financial aid criteria. Applicants who wish to fund their training partially through a Pell grant must complete the Free Application for Student Financial Aid (FAFSA) and have obtained a high school diploma or GED, or take and pass an Ability-to-Benefit test. Foreign secondary school diplomas which are recognized as equivalent to a U.S. high school diploma will also be accepted. Other specific requirements may apply depending on the source of financial aid, and will be discussed in the financial aid interview.

## Admissions Process

The admission process has two phases, (1) an Information Session, and (2) an admissions and financial aid eligibility appointment. Applicants first attend a general Information

Session and tour our facility. After the Information Session, the applicant schedules an admissions and financial aid eligibility interview. The applicant will receive a start date only once eligibility and financial aid are completed.

### **Admissions Responsibilities of Trainees**

A trainee seeking admission to CET has the following responsibilities:

- Read and retain the Trainee Catalog and paperwork pertaining to admissions and financial aid;
- Ask questions for clarification on admissions or financial aid procedures, we want you to understand the process;
- Complete all necessary applications and financial aid forms with accurate, up-to-date information;
- Provide necessary documentation and verification for admissions and financial aid in a timely manner, and prior to receiving a start date;
- Inform CET of any change of name, address, telephone number, or status that may affect training or Financial Aid eligibility within five business days of the change.

### **Prior Offenders**

Trainees who have a felony related to child endangerment, violence, or drugs on their record will not be permitted into training for training in healthcare due to the stringent standards for obtaining employment in the medical field. Other felonies must be expunged to qualify for Medical Assistant training.

### **Readmission After Withdraw**

Trainees who have previously withdrawn from enrollment at CET may be eligible for readmission. CET is under no obligation to readmit any trainee, regardless of withdrawal circumstances. Since CET provides debt-free education to qualified applicants, each person who enrolls but does not graduate depletes the limited resources we have to serve others. Trainees are encouraged to be certain they are ready to commit to CET for the entire program length before attempting readmission.

Trainees who withdraw and restart within 180 days of the date of withdraw may be eligible to restart within the same Title IV period of enrollment and resume training where they left off. Trainees who withdraw and restart after 180 days of the date of withdraw are not eligible to restart within the same Title IV period of enrollment and must complete all the skill competencies.

### **Orientation**

Orientation occurs during the first two weeks in the program. Orientation is an opportunity for CET to welcome new trainees and allow an opportunity to explore the skill division. During Orientation, the new trainee is a full participant in the classroom and will attend meetings with Skill Instructors and other staff to explore the curriculum. Individual meetings will help determine skill training needs and assess barriers to

success. Consistent attendance is required during Orientation, and failure to attend may result in cancellation of enrollment.

### **Personal Career Strategy (PCS)**

The Personal Career Strategy (PCS) is a goal setting and service planning document that trainees start discussing during Orientation. The Career Coaches will introduce new trainees to the PCS process, and trainees are encouraged to start thinking about long term career goals, and what steps are needed to achieve that goal. The PCS is an essential part of the CET experience—staff use the document regularly in Unit Team and in one-on-one meetings with trainees. Since the PCS goals are set by the trainee, staff members serve as a resource to help the trainee achieve those goals.

### **Transfers between Programs**

During Orientation, trainees are encouraged to explore CET’s skill divisions to determine the skill that best fits their interests and abilities. After the Orientation is completed, trainees may not transfer from one program to another. Exceptions may be made under special circumstances, but only with approval of CET administration.

### **Evaluation of Prior Training**

CET does not accept transfer credits from other postsecondary institutions. Trainees with previous educational or professional experience are encouraged to work at an increased pace to complete skill competencies more quickly. Trainees who demonstrate mastery of skill competencies are encouraged to assist other trainees as mentors in the classroom.

## **Additional Information**

---

### **Parking**

Free parking is provided in the large fenced parking lot across 6<sup>th</sup> Street. Please only park in CET-reserved or non-reserved spots. Watertown Square tenants may tow cars parked in spots reserved for other businesses, and the towing fee is expensive. Please extend the same courtesy to other local businesses by not parking in their private lots. On-street parking is available, but make sure you are aware of the street cleaning seasonal parking restrictions. You will get a parking citation if you park on the side of a street scheduled for street cleaning. The church parking lot across Washington Ave. is for staff parking only.

### **Center for Employment Training Staff**

CET’s ultimate success comes from placing individuals in high demand occupations; therefore, CET Skill Instructors must be highly skilled in their trades. CET requires Skill Instructors to have a Bachelor’s degree and/or training in a related field with a minimum of three years of experience in the skill area. CET Skill Instructors must have thorough knowledge of modern technological principles in the skill taught and the ability to plan,

implement, and evaluate an individualized skill training division course. Success Coaches and Career Coaches are required to have a Bachelor's degree in a related field and/or experience working with individuals as well as experience with workforce development activities. The Admissions Specialist must have a Bachelor's degree in a related field and/or experience working with CET's service population.

### **Courses of Study**

Each course has specific learning objectives and competencies. Scheduled course hours are based on an average time to complete all skill competencies. Some trainees will complete their skill in more time and some in less. Course Descriptions are available on the [bccet.edu](http://bccet.edu) website and during classroom orientation.

### **Restrooms**

Restrooms are located in the public areas of the building, and are locked for safety. We are the primary patrons of the restroom, and care should be taken that we keep our restrooms clean. Restroom keys are signed out from classrooms and must be signed back in after use.

### **Lunch and Scheduled Breaks**

The instructors schedule lunch and breaks. Lunch is scheduled for thirty (30) minutes. Morning and afternoon breaks are fifteen (15) minutes each. Trainees must be back at their workstations by the end of break times or they will be considered absent.

### **CET Telephone**

A phone for trainee use is located in the trainee break room on the wall. Trainees are asked to use the phone only when necessary and to limit calls to under a few minutes. All office phones are for CET staff use only. Cell phone calls and text messaging is not permitted in the skill division—volume on phones should be turned off.

### **Non-Smoking Facility**

The Watertower Square is a non-smoking facility and hosts state offices. The state office smoking ban prohibits smoking in state buildings or on the sidewalks around state buildings. Smoking is only permitted outside in designated areas, and smokers should keep at least 50 feet away from entrance doors. Trainees should ask a staff person if unsure about where to smoke. Please make sure to put extinguished cigarettes in appropriate containers—littering is not acceptable at CET.

### **Voter Registration**

CET makes good faith efforts to distribute voter registration forms to students. Forms are obtained and given out at least 120 days prior to close of voter registration for each election cycle. Voter registration forms are available in the Financial Aid Office.



**Holiday Drive**

Brighton Center organizes a Holiday Drive for our customers each year in December. Trainees may sign up for gifts for their children from the Holiday Drive, but they must have been enrolled in CET or another Brighton Center program for at least thirty days. Staff can provide seasonal details about Holiday Drive enrollment as December draws near.

**Trainee Ambassadors**

High performing trainees may consider applying to become a Trainee Ambassador. Ambassadors assist CET staff with information sessions, public relations and job fairs, and help to plan events and outings for CET. Becoming a Trainee Ambassador is an opportunity to develop leadership and presentation skills, and is a great addition to a resume!

# **Financial Aid**

## **Financial Aid Programs**

The cost of training for CET trainees is paid through a variety of sources. CET contracts with local and state agencies, and receives funding from private foundations to provide job training and placement. Because Brighton Center's CET is an accredited institution, it is able to offer Financial Aid under Title IV of the Higher Education Act (HEA) as an additional funding source to qualified trainees.

All applicants are evaluated during the admissions process to determine eligibility for Financial Aid. CET's Financial Aid Officer is available to help trainees assess their needs, identify sources of aid, and complete required forms.

The Federal Pell Grant and the Federal Student Educational Opportunity Grant programs provide grants to assist trainees in paying for post-secondary education. Grants do not have to be repaid. The amount of a grant is based on individual need. Any eligible trainee may apply for Financial Aid at any time during training but the FAFSA (Free Application for Federal Student Aid) must be received prior to graduation. Federal SEOG funds are limited and are awarded only to trainees with "exceptional need". Trainees with exceptional need are those who have an expected family contribution of zero (based on an analysis from the FAFSA), who are otherwise eligible for the Federal Pell Grant program during the current award year, and are not receiving Federal Student Aid from other agencies.

## **Financial Aid Eligibility**

Eligibility for financial aid at CET is based on need. Financial need is defined as the difference between a trainee's cost of attendance at CET and the trainee or trainee's family's calculated ability to pay these expenses. In addition to be eligible for Financial Aid a trainee must:

- Be admitted as a regular trainee.
- Be enrolled or accepted for enrollment in an eligible program on at least a half time basis.
- Be a citizen or an eligible non-citizen.
- Not owe money on a federal student loan or have made arrangements to repay it.
- Notify the school if you are in default on a federal student loan.
- Be making satisfactory progress (as defined by CET's policy).
- Be registered for Selective Service (if male born on or after January 1, 1960).
- Have a High School Diploma or a GED to be eligible for federal student aid.
- Agree to use any federal student aid received solely for educational purposes.

## **How to Apply for Aid**

Applicants should contact CET's Financial Aid office for the necessary forms and guidance during the admissions process. An applicant will need to sign up for an FSA ID at [fsaid.ed.gov](http://fsaid.ed.gov) then complete a Free Application for Federal Student Aid (FAFSA). Information is available and applications can be completed via the internet at <http://www.fafsa.ed.gov>. This form is used to determine eligibility and amount of award for each type of Federal Student Aid. The form is available on the web and can be completed with the Financial Aid Officer during the financial aid interview. Documentation to substantiate information provided on the FAFSA is required. There is no charge to file for financial aid.

## **Financial Aid Payments**

In order to receive payment of Federal Financial Aid funds, a trainee must be making *satisfactory academic progress*, must be in compliance with the attendance policy, and must be in the proper payment period for disbursement.

Trainee financial aid disbursements are made no later than fourteen (14) days after the funds are received from the United States Department of Education. Financial Aid disbursements are credited directly to the trainee's cost of attendance at CET.

## **Financial Aid Award Notification**

CET will notify each trainee in writing of the amount of the funds that he or she (and his or her parents if applicable) can expect to receive for each Federal Student Aid program, including Federal Work Study, and how and when the funds will be dispersed. This will be done through an *Enrollment Agreement* which is signed by each enrolling trainee. The *Enrollment Agreement* explains all financial aid awarded through Title IV (including how and when funds are dispersed) or through third-party funders, and explains the financial liability enrolled students will incur by attending the Center for Employment Training.

The Financial Aid Officer administers the *Enrollment Agreement*, and is available during normal business hours for any questions regarding financial aid. The *Enrollment Agreement* is completed at the end of Orientation by the Financial Aid Officer and before any financial aid is awarded or disbursed. A copy of this Agreement will be placed in the Financial Aid file for each trainee. Trainees that are selected for Federal Work Study will receive written notification from the Financial Aid Officer prior to their first day of work study. A copy of this notification will also be placed in trainee's Financial Aid file.

## **Method and Frequency of FA Disbursements**

Trainee financial aid disbursements are made no later than fourteen (14) days after the funds are received from the United States Department of Education. Financial Student Aid disbursements are first credited directly to the trainee's cost of attendance at CET.

Any remaining FSA funds will be disbursed to the trainee after tuition and fees are paid in full.

### **Additional Information**

Further information on Federal Student Aid Programs can be found online at [www.studentaid.gov](http://www.studentaid.gov).

Applicants for Federal Student Aid are required to disclose their social security numbers. Social Security Numbers are used to verify identities, to process the awarding of funds, and to trace individuals who have borrowed funds from federal, state, or private sources.

## **Verification Policy**

---

Verification is the process of confirming the accuracy of trainee reported data on financial aid applications. Only a portion of the trainee population is selected for verification.

### **Selection of Applications to be Verified**

If the Central Processing System (CPS) selects a FAFSA application for verification, the FAO will verify the elements required by the Verification Tracking Group to which the application has been assigned (V1-V6). In addition to verifying these required items for CPS-selected trainees, CET can choose to verify any other application items, requiring reasonable documentation, in accordance with consistently applied institutional policies. CET will decide which trainees must provide documentation for any additional data elements and what constitutes acceptable documentation.

### **Verification Time Frame**

The FAO will inform applicants of documentation required to complete verification and the time frame in which the documents must be submitted. Delays in submitting verification documentation may affect the availability of financial aid. Verification must be complete before the FAO may exercise professional judgment to adjust any values that are used to calculate EFC. If a trainee submits documentation which appears fraudulent, the FAO will notify the CET Coordinator for further action.

### **Document Collection Procedures**

Documents for verification are date stamped and kept in the financial aid file. Verification is complete when all required documents are received, any conflicting information is corrected on the FAFSA, and the FAO is satisfied that the verified accurate information has been reported to CPS.

Documentation submitted for verification must be legible, appropriate, and have the trainee's social security number for identification purposes. If the trainee submits a document which is not legible (i.e., a copy of a tax return in which the income numbers are not identifiable), appropriate (a tax return is requested and the trainee submits a W-2), or identifiable (trainee submits a copy of a stepparent's tax return without claiming the trainee as a dependent or last name matching), the documents will be returned and additional documentation will be required.

### ***Verification Processing Time***

Financial aid funds are awarded on a first-come, first-serve basis. Federal Student Aid is not available to the trainee until verification is complete. Therefore, trainees who fail to submit verification documents cannot be awarded Federal Student Aid.

### ***Notification of Verification to Applicants***

Trainees are notified by the FAO that their FAFSA has been selected for verification. Trainees also are notified on their Student Aid Report (SAR) that they have been selected for verification. Trainees are notified by the FAO once verification is complete and Federal Student Aid is available.

### ***Verification of Data Elements***

CET systematically verifies the data elements flagged by CPS for verification (V1-V6). The FAO may request for additional information if further investigation is needed to resolve a discrepancy. The Verification Worksheet must include all required signatures.

#### **Adjusted Gross Income**

Adjusted Gross Income is verified by comparing a copy of the trainee, spouse, or parent income tax return transcripts. Discrepancies outside of tolerance levels must be corrected before further processing.

#### **U.S. Income Tax Paid**

U.S. Income Tax paid is verified by comparing a copy of the trainees, spouse, or parent income tax return transcripts. Discrepancies outside of tolerance levels must be corrected before further processing.

#### **Household Size**

Household size is verified by comparing the Verification Worksheet to federal data. Discrepancies must be corrected before further processing.

#### **Number in Postsecondary Institutions**

Number of family members enrolled at least halftime in postsecondary institutions is verified by comparing the Verification Worksheet to federal data. Discrepancies must be corrected before further processing.

### ***Tolerances of Discrepancies***

When verifying a trainee's record, there are two instances when a discrepancy in information will not need to be corrected.

1. When the absolute value of the discrepancies does not exceed \$400.
2. When the EFC is 0 and a recalculation determines the EFC would remain 0.

### ***Correction Procedures***

The trainee will meet with the FAO and provide documentation or written statements for verification of corrections. FAFSA corrections can be completed by the FAO or by the trainee with an active FSA ID. The FAO can assist trainees with accessing FAFSA to make corrections or to obtain a valid FSA ID.

### ***Overpayments***

FAO policies and procedures are designed to eliminate the possibility of an overpayment from any fund. If however, an overpayment does occur, the trainee is placed on hold until the overpayments can be corrected. Because private third party funders pay educational costs, if a balance exists, it is unlikely that direct overpayment to a trainee will occur.

### **FAFSA Adjustments (Professional Judgment)**

There are very limited circumstances whereby the FAO may make adjustments to the data elements on the FAFSA or to override a trainee's dependency status. The formula that calculates the EFC cannot be changed. However on a case by case basis, dictated by special circumstance, adjustments to data impacting the family income or assets can be made and applied to the standard formula, possibly yielding a new EFC figure. The FAO may require additional documentation to approve data or dependency changes.

### **Interim Disbursements**

CET does not allow interim disbursements. Trainees must complete the verification process before Federal Student Aid is originated or disbursed. Exceptions must include extenuating circumstances, be documented in the trainee's folder, and be monitored by the FAO and approved by the Coordinator.

### **Referral of Fraud Cases**

If any school employee suspects that a trainee, employee, or other individual has misreported information or altered documentation to fraudulently obtain FSA funds, CET will report suspicions and provide evidence to the Office of Inspector General (OIG). The OIG hotline is 1-800-MIS-USED.

## **Federal Supplemental Educational Opportunity Grant (FSEOG)**

---

The FSEOG is a Campus Based financial aid assistance program for trainees who demonstrate exceptional financial need. The FSEOG program is federally funded for the purpose of helping the financially needy trainees meet the cost of postsecondary education. This program is administered by CET; however, FSEOG funds are awarded only to Pell Grant recipients and are awarded to Pell recipients with the lowest EFC's first.

### **Determining Eligibility**

In order to determine eligibility for any federal financial aid program, trainees must file a Free Application for Federal Student Aid (FAFSA) and have the results sent to CET. The FAO will accept results through electronic transmission with the Central Processing System (CPS). Trainee eligibility is determined only through the CPS of the Department of Education using the Federal Methodology need analysis formula. The FAO must have an official EFC before eligibility for any fund may be determined. FSEOG grants are awarded only to trainees who qualify for a Pell Grant and with the lowest EFC's.

Trainees will receive written notification of the amount of their FSEOG eligibility as well as how funds are to be disbursed.

### **Awarding FSEOG**

#### ***Matching Award Requirement***

CET matches the federal allocation of FSEOG funds by 25%. As CET is open enrollment/open exit, FSEOG funds will be made available equitably throughout the year by month in consideration of multiple start dates.

#### ***Overawarding***

In the event of an overaward, the trainee's account is placed on hold until such time that the overpayment is rectified.

#### ***Recordkeeping***

Financial aid records are maintained in trainee folders. Trainee records include the ISIR, demonstrating need and FSEOG eligibility through a zero EFC. The Coordinator, the FAO, and the Accounting Office are responsible for account management and appropriate record security for all FSA transactions.

#### ***Trainee Eligibility***

FSEOG funds are awarded only to first-time undergraduates who are Pell eligible who have a demonstrated financial need, normally represented through a zero EFC.

### ***Selection Process***

Federal Student Educational Opportunity Grant (FSEOG) funds are available each month in a limited capacity to CET trainees who demonstrate significant need with a zero expected family contribution (EFC).

### ***Amount of Award***

The FAO self-imposes a maximum award of \$1,000 to ensure that the greatest number of trainees have an opportunity to receive FSEOG funds. In no instance will FSEOG funds when combined with Pell funds and third party funds exceed educational expenses.

### ***Disbursement***

FSEOG funds are disbursed only after an official EFC from the Department of Education has been received. Offered aid must be accepted by the trainee via the Enrollment Agreement.

To determine the amount of each disbursement, CET will divide the total FSEOG by the number of payment periods the trainee will attend, which at CET is 2 payment periods.

### **Federal Work Study**

Federal Work Study (FWS) is a Campus Based program available to trainees on a limited basis. Generally, trainees who are eligible for FSA, are able to perform essential functions of work study positions and are in satisfactory academic progress are eligible for short-term employment through FWS funded positions. Due to the limited amount of FWS funding available, trainees are not awarded FWS funded positions as part of an initial financial aid package.

### **Tuition Policy**

---

CET's tuition schedule is based on the clock hours required on average to complete all curriculum competencies. The tuition amount remains constant, even if an individual trainee requires more or less time to complete the program. CET tuition is due at enrollment unless other arrangements are made; any tuition not covered by the total secured funds is the responsibility of the trainee.

When tuition is paid in whole or in part by a 3<sup>rd</sup> party funder, CET will negotiate the terms of payment of tuition with those entities.

With private pay individuals, tuition is due at enrollment unless other arrangements have been made. CET does not charge a withdrawal fee or a registration fee, and textbooks may be available to borrow, as long as they may remain at CET. Trainees will want to purchase their own textbook and may be required to purchase other equipment depending



on the training skill division. Refunds are based on the CET refund policy described below.

### **Estimated Cost of Attendance**

Tuition	\$8,350.00
Books and supplies <i>estimate</i>	\$400.00
Room and Board <i>estimate</i>	\$7,000.00
Transportation costs <i>estimate</i>	\$720.00

### **Textbook Pricing and Information**

Textbook titles, ISBN numbers, and pricing information is available in the Consumer Publications handout for trainees who would like to purchase their own textbook.

### **Textbook Availability**

CET makes textbooks available to trainees within seven days after official enrollment. After completing Orientation, trainees will have full access to required textbooks for their skill division, either by purchase or with a loaner textbook.

### **Covered Certifications**

CET will cover the cost of some certifications for trainees who have successfully completed the required competencies in their skill. Covered certifications vary by skill division; contact your Skill Instructor or Success Coach for more information.

### **Cancellation Rights**

A trainee has the right to cancel his or her enrollment until midnight of the tenth training day after the first day he or she attends training. A training day is defined as a day on which a trainee is scheduled to attend training. Notice of cancellation must be in writing and must be delivered by hand or U.S. Postal Service to the Center for Employment Training.

### **Return to Title IV (R2T4) Policy**

---

CET is committed to ensuring compliance with all required regulations for Return to Title IV, HEA programs. When a trainee receiving a Title IV grant withdraws from CET during a payment period in which he or she began attendance, CET will determine the amount of the Title IV grant that the trainee has earned as of the trainee's withdrawal date (last day of attendance per CET's attendance records) and return Title IV funds as appropriate to regulations. Trainees are provided a written copy of all policies through the Trainee Catalogue prior to enrollment as well as availability through Consumer Information.

## Refund Policy

Trainees have the right to withdraw from a course of instruction at any time by providing a dated written notice of withdrawal to CET's Financial Aid Office. Trainees who withdraw from training after the ten day cancellation period may be eligible for a refund of financial aid, though if the trainee did not pay tuition out-of-pocket, the refunded financial aid will be returned to the Department of Education as calculated by the R2T4 refund worksheet. Any remaining tuition that must be refunded after Title IV funds have been returned will be returned to the third-party funders.

The *Enrollment Agreement* is signed by each trainee enrolling and is kept by the FAO. The *Enrollment Agreement* explains all financial aid awarded through Title IV (including how and when funds are dispersed) or through third-party funders, and explains the financial liability enrolled students will incur by attending the Center for Employment Training. The Financial Aid Officer administers the *Enrollment Agreement*, and is available during normal business hours for any questions regarding financial aid. The *Enrollment Agreement* is completed at the end of Orientation by the Financial Aid Officer and before any financial aid is awarded or disbursed. A copy of this Agreement will be placed in the Financial Aid file for each trainee. Trainees that are selected for Federal Work Study will receive written notification from the Financial Aid Officer prior to their first day of work study. A copy of this notification will also be placed in trainee's Financial Aid file.

The withdrawing trainee is obligated to pay for educational services rendered. If a financial aid recipient withdraws before earning sufficient Title IV or other funds to cover incurred training costs, the trainee will be responsible for the unpaid portion of incurred training costs.

1. No charges will be incurred within the first ten days of enrollment, within which cancellation rights can be executed.
2. After the 10<sup>th</sup> day of classes and during the first 10% of the period of financial obligation, CET shall refund at least 90% of the tuition;
3. After the first 10% of the period of financial obligation and until the end of the first 25% of the period of obligation, CET shall refund at least 50% of the tuition;
4. After the first 25% of the period of financial obligation and until the end of the first 50% of the period of obligation, CET shall refund at least 25% of the tuition; and,
5. After 50% of the period of financial obligation, CET may retain all of the tuition.

The period of financial obligation includes all scheduled hours from the trainee's start date. Only unearned aid remaining after Return to Title IV calculations will be eligible for return to third-party funders.

### ***Refund Examples***

Refund examples are provided to trainees to assist them with understanding how Title IV refunds and CET refunds work. Please see attached copies of the Refund Examples.

- Student A has completed over 60% of the scheduled clock hours for the course.
- Student B has not completed 60% of the scheduled clock hours for the course.

### **Withdrawal**

A trainee may voluntarily withdraw from CET at any time by providing a dated written notice of withdrawal to CET's Financial Aid Office. CET reserves the right to withdraw a trainee if the trainee does not comply with CET's rules and policies. The trainee will be notified of such a decision at his or her last address of record. The withdrawing trainee is obligated to pay for educational services rendered. If a financial aid recipient withdraws before earning sufficient Title IV or other funds to cover incurred training costs, the trainee will be responsible for the unpaid portion of incurred training costs.

### **Return to Title IV Procedures**

#### ***Withdraw Date***

The official withdraw date is the last date of attendance as determined by CET's attendance records, since CET is considered an institution required to take attendance. This date is used for all trainees who cease attendance, including those who take an unapproved LOA, and those who officially withdraw. CET allows **14 calendar days** to make a determination of a trainee's intent to withdraw if written notice is not received by school personnel.

CET is not required to administratively withdraw a trainee who has been absent for 14 days (or less if applicable). However, after 14 days, CET will have determined whether the trainee intends to return to classes or to withdraw. If the trainee is eventually determined to be a withdrawal, the end of the 14-day period begins the timeframe for completing a Return of Title IV Funds calculation.

#### ***Method of Calculating Return to Title IV Funds***

The Financial Aid Office will complete a Department of Education approved "Treatment of Title IV Funds when a Student Withdraws from a Clock Hour Program" worksheet to calculate how much Title IV aid has been earned by the withdrawing trainee. This calculation occurs for all withdrawn financial aid recipients (anyone who does not complete the program), even if the withdrawal date occurs after the 60% point in the payment period or period of enrollment.

Since CET is a clock hour program, the trainee will earn 100% of the Title IV grant if he or she completes 60% of the clock hours scheduled to be completed for the payment period or period of enrollment.

There are no institutional charges at CET for supplies, books, or equipment, so there are not institutional charges reflected the Return to Title IV Funds Calculation.

### ***Return to Title IV Timeframes***

Within **30 days** of the date of determination of withdraw, the “Treatment of Title IV Funds when a Student Withdraws from a Clock Hour Program” worksheet will be completed.

Within **45 days** of the date of determination of withdraw, CET will return all unearned funds to Title IV.

### ***Order of Return to Title IV***

CET will return all unearned Title IV aid in the required order-of-return, meaning Pell funding will be refunded first, then FSEOG funds, then FWS funds if applicable.

CET will disburse directly to a trainee any amount of a post-withdrawal disbursement of grant funds that is not credited to the trainee’s account. CET will make the disbursement as soon as possible, but no later than 45 days after the date of CET’s determination that the trainee withdrew.

### ***Post-Withdraw Disbursements***

Grant funds from a post-withdrawal disbursement can be credited to a trainee’s account up to the amount of outstanding allowable charges. CET must disburse grant funds no later than 45 days after the date of determination that the trainee withdrew. No post-withdrawal disbursement may be made to the account or estate of a student who has died.

### ***Trainee Responsibility for Returning Unearned Aid***

All Pell and FSEOG grant funds are disbursed directly to trainee accounts to pay tuition costs. Trainees do not receive grant funds for educational expenses, so there is no time that a trainee would need to directly return unearned aid to Title IV.

## **FSEOG**

All FSEOG funds are included in the calculation to Return to Title IV. The nonfederal share of FSEOG program funds are excluded because CET meets its FSEOG matching share by the aggregate method.

## **Leave of Absence**

A trainee may be granted an official Leave of Absence (LOA) by CET. A LOA will allow the trainee to suspend scheduled course hours for the duration of the leave. This will allow the absences during that time to not count against scheduled course hours to meet Satisfactory Academic Progress (SAP) requirements.

A request for LOA must be submitted to the Skill Instructor **prior to the first day of the leave** and be approved by the CET administration. The LOA request must give the

reason for the leave, be dated, and be signed by the requesting trainee. For unforeseen circumstances preventing the trainee from completing a written request prior to the LOA, CET may still grant the LOA request in the trainee's absence. The LOA request must be signed by the trainee upon return, and documented in the trainee's file. The date of the approved LOA would be the first date the trainee was absent.

LOA may be granted if CET has a reasonable expectation that the trainee will return from the leave. An extension to a LOA beyond the original date may be granted, if CET receives appropriate documentation prior to the end of the LOA period. If necessary, a trainee may have multiple leaves of absence; however, under no circumstances may a trainee exceed 180 days cumulative LOA time in a 12-month period. The number of days in a LOA 12-month period is counted beginning with the first day of the first LOA.

Because training is self-paced, returning trainees resume work where they left off prior to the LOA. If a trainee does not return to CET at (or before) the end of their LOA, CET will consider the trainee as having withdrawn from the program as of their last day of attendance. The LOA will not involve any additional charges to the trainee by CET.

### **File Security**

All trainee files must remain secure at all times in double locked areas (locked file cabinet in a room that may also be locked). Hard copy files containing financial aid information will be safeguarded at all times.

### **Insurance**

Trainees are responsible for their own medical costs during their attendance at CET. Although CET carries limited liability accident insurance for externships, each trainee should have his or her own medical coverage for unforeseen health problems or accidents.



# **Trainee Services**

## **Supportive Services**

For individuals who qualify, supportive services may be available through Brighton Center. Among these are childcare, housing assistance, transportation assistance, food distribution, clothing and other emergency assistance. Supportive services and emergency assistance are provided subject to the availability of funds. CET also maintains “linkage agreements” with many service organizations and agencies in the community. As necessary, we will refer eligible trainees to the most appropriate resources, either within Brighton Center, or to external organizations.

## **Financial Opportunity Center**

Brighton Center has been named a Financial Opportunity Center by the United Way of Greater Cincinnati and LISC. Trainees often have issues that are not easily solved, and require a multi-faceted approach. Brighton Center provides family and work supports, financial education, and homeownership counseling in addition to the workforce development services provided at CET. This holistic approach of services allows trainees at CET to access supportive services before and after their enrollment at CET, and helps CET graduates to have more support in becoming self-sufficient.

## **Adult Education**

In order to make it possible for trainees to obtain the necessary job skills, CET integrates basic education in reading and mathematics as well as vocational English instruction for those who have had less formal education or who have limited English-speaking proficiency. Vocational English and basic education skills are integrated into skill training and are taught in the context of the specific occupational skill in which the trainee is enrolled.

## **GED Instruction**

Trainees without a GED will be permitted to enroll in CET, but they will not be eligible for federal student aid, and they must obtain their GED before program completion. GED instructors from the Newport Adult Learning Center are available on-site. CET trainees in need of their GED generally will attend GED classes in four-week GED sessions prior to beginning coursework in their skill division.

## **Graduation Ceremony**

To be eligible to participate in CET’s Graduation Ceremony, trainees must complete all competencies in a skill division. Trainees who enroll in CET without a GED must also complete their GED to be eligible to participate in the graduation ceremony. Graduation is held twice each year if the graduating class is exceptionally large. Trainees who complete their training will be invited back to participate in the next ceremony.

The true mark of success for a CET graduate is to complete all course competencies and to obtain employment.

### **Transcripts and Certificate**

The *transcript* is an official copy of a trainee's educational record. Transcripts are only available for successful program completers since CET is a clock hour program, partial completion is not reflected on the transcript.

The *certificate* is a document that certifies that a trainee is a successfully completed all competencies in a skill division.

Both documents are given to a trainee after both successfully completing the curriculum and obtaining employment. After graduation, if a trainee needs additional copies of their transcript, or needs a sealed copy sent to another educational institution, contact the Admissions Specialist, at (859) 491-8303 x2201.



## Trainee Expectations

Trainee expectations at CET are based on the standards practiced in the workplace, and are modeled after the requirements an employer would have for an employee.

### Trainee Rights

A trainee enrolled at the Center for Employment Training has the right to expect:

- A clean, safe, supportive environment;
- Instruction from skilled professionals who have experience working in the occupation being taught and who have familiarity with the expectations of the workforce;
- All information, on-site materials, and equipment needed to complete the training program made available through CET;
- Assistance with developing soft skills to overcome barriers that may interfere with successful completion of training and with obtaining employment;
- Expedient and fair handling of complaints as outlined in the Grievance policy;
- A Brighton Center training program which does not engage in erroneous or deceptive practices;
- Confidentiality of personal information.

### Attendance

---

CET requires trainees to attend class in their skill division each weekday from 9:00 AM to 3:30 PM. Trainees should schedule medical, legal, and benefits-related appointments at times outside of scheduled classroom hours. **Communication is essential.** Permission for absence from training should be requested in advance.

Steady attendance is essential for successful progression and completion of training, and is the most frequent reason people are fired by their employers. To have an absence excused, timely communication and proper documentation is required (doctor's notes, etc.) If the trainee has not communicated by the day of their absence, they will be considered a no-call, no-show, and will not have the absence excused. Trainees are permitted a maximum of 12 absent hours per month to meet the 50% SAP hour and week requirements and keep your financial aid disbursements current.

Trainees sign in to class each day, and attendance is recorded in each trainee's file. Because instruction is individualized and self-paced, absent trainees are expected to continue where they left off before the absence. You miss a day, you miss a lot!

The following attendance expectations apply:

1. Trainees must sign in each day and record the number of clock hours you are present.



2. A trainee who anticipates being absent or tardy should receive permission in advance from the instructor or, if there is an emergency situation beyond the trainee's control, the trainee must telephone the instructor by 9:00 AM.
3. Chronic absenteeism or tardiness may result in short-term attendance goals as a condition of remaining in training.
4. A trainee who anticipates a medical absence of more than two days should request a written *Leave of Absence* form from their instructor.
5. A trainee who has been absent ten days without contact with their instructor will be withdrawn from the program unless the trainee has received an approved *Leave of Absence*.
6. Attendance is critical to complete the necessary clock hours required for Satisfactory Academic Progress (see Satisfactory Academic Progress section).

### **Punctuality**

Training starts at 9:00 AM every day. If a trainee is running late, they must call their Skill Instructor by the start of class. Determination of whether tardiness is excused depends on when and how the trainee communicated with the instructor and the circumstances. Excessive tardiness or absenteeism, whether excused or unexcused, is grounds for disciplinary action.

### **In-Service Days and Holidays**

CET may be closed to trainees for up to six days per year for staff in-services. In addition, Brighton Center will be closed on the following observed holidays:

New Year's Day	Good Friday	Labor Day
Martin Luther King Day	Memorial Day	Thanksgiving
Presidents' Day	Fourth of July	Day After Thanksgiving

Holidays and in-service time are not counted toward course completion hours. CET will be closed to trainees for the last two weeks of December for the winter holidays.

### **Trainee Evaluation**

---

To measure progress, trainees are formally evaluated upon completion of each competency. Competence is demonstrated through written, oral, or performance demonstration, with at least a minimum passing score. Because completion of training is based on an individual's mastery of material and skills, CET's training is, by definition, individualized and self-paced.

A special emphasis is placed on continual evaluation since a trainee is not considered to have successfully completed the program until he or she demonstrates sufficient competence to function adequately on the job. To measure progress, trainees are formally

evaluated upon completion of each competency. Competence is demonstrated through written, oral, or performance demonstration, with at least a minimum passing score (generally 70% or “pass” on a pass/fail measure). Because completion of training is based on an individual’s mastery of material and skills, CET’s training is, by definition, individualized and self-paced.

At CET time is the variable; achievement is the constant. Instructors meet regularly with their trainees to review accomplishments and to plan learning strategies. Work habits, attitudes, and personal or family issues are also assessed and discussed with trainees as necessary and appropriate.

### **Satisfactory Academic Progress**

Federal regulations require that CET must establish a reasonable satisfactory academic progress (SAP) policy for determining whether an otherwise eligible trainee is making satisfactory academic progress in his or her educational program and may receive assistance under the Title IV, Higher Education Act (HEA) programs. CET’s policy applies to all trainees, whether they are receiving assistance under Title IV HEA programs or not, and provides criteria for how academic progress is evaluated.

It is important that all trainees progress in their training at a rate that will allow them to finish training within the time allowed for graduation. SAP meetings between the trainee and Skill Instructor will assess (1) attendance against scheduled clock hours and week benchmarks, and (2) academic progress towards completion of competencies. SAP meetings will occur at 25% intervals throughout the program (roughly each 6-8 weeks). Each trainee will receive a formal Title IV HEA review of Satisfactory Academic Progress (SAP) at 50% of scheduled clock hours and weeks (the end of the Title IV, HEA program’s first payment period).

CET uses both quantitative and qualitative standards to measure SAP:

***Quantitative Standard:*** All trainees must progress at a pace of progress through their skill division to ensure that he or she completes within the maximum allowable timeframe for the program. The maximum timeframe that trainees must finish their training cannot exceed 150% of the published length of the course clock hours and number of weeks for each skill division.

At 50% scheduled clock hours, the cumulative number of clock hours successfully completed divided by the cumulative number of clock hours attempted must be a minimum of 67%.

***Qualitative Standard:*** CET does not provide traditional grade point averages (through we estimate GPA's for RMA exam purposes) to trainees, and in order to ensure a qualitative measure (a comparable assessment measured against a norm) is set. Each skill division has 10 course competencies that must be achieved in order to successfully complete the program. At 50% scheduled clock hours, each trainee must have a minimum of 30% of competencies complete to ensure that they are on pace of progress to successfully complete within the maximum timeframe.

CET offers only clock hour educational programs, as a result course incompletes are not-applicable. If a trainee withdraws and restarts training within 180 days of withdraw, they may resume their progress in the curriculum. If a trainee withdraws and restarts training after more than 180 days, they must restart the program from the beginning. Credit hours from another institution that are accepted toward a trainee's skill division must count as both hours attempted and completed.

During individual meetings between trainees and their Skill Instructor, a trainee's progress will be monitored and discussed, and they will be kept informed of their attendance against clock hours and weeks attended as well as their percentage of competencies achieved. At the 50% interval individual meeting, each trainee will receive written notice of the SAP and how that evaluation impacts their eligibility for Title IV funds, if applicable. If a trainee fails to achieve SAP, the trainee and the Skill Instructor will collaborate on a Corrective Action Plan structured to return the trainee to SAP.

### ***Financial Aid Warning***

If the trainee does not meet both standards of SAP at the 50% interval, which is the end of the first Title IV, HEA program payment period, he or she will be placed on Academic Warning, and must attain SAP by the 100% interval of scheduled clock hours. Financial Aid Warning is a status assigned to a trainee who fails to make SAP as CET as an institution evaluates academic progress at the end of each payment period. Financial Aid Warning status is assigned without an appeal or other action by the trainee. A student on Financial Aid Warning may continue to receive assistance under the Title IV, HEA programs for one payment period despite a determination that the trainee is not making SAP.

### ***Re-establishing Financial Aid Eligibility***

In order for a trainee to re-establish their Financial Aid Eligibility, they must return to SAP by taking action that brings him or her into compliance with CET's satisfactory academic progress standards by the 100% interval of scheduled clock hours. Trainees will be notified in writing that they have returned to SAP and that they have re-established Financial Aid Eligibility. Trainees that interrupt their attendance in a program will always return to the skill division at the same SAP status as they were prior to leaving the program.

## **Trainee Conduct**

---

Trainees are expected to conduct themselves as if they were on the job. CET must be a safe place for all trainees, and any exception is treated with zero-tolerance. The following principles of conduct are to be followed at all times:

- Perform to your personal best
- Maintain honesty and integrity
- Follow established policies and procedures
- Adhere to the dress code
- Follow all safety practices
- Maintain satisfactory progress
- Respect the rights of others
- Behave courteously to others
- Respect the property of others
- Remain in authorized areas of the facility
- Smoke only in designated areas outside the facility

### **Quality of Work**

Staff at CET expect trainees to give their best effort. Trainees are expected to maintain satisfactory progress in attendance and in completing skill competencies. Trainees are encouraged to ask for help from instructors and keep focused on the goal of completing the program. Cheating or plagiarism is grounds for withdrawal from training.

### **Dress and Grooming**

CET requires trainees to dress for the career they want while attending. Safety, neatness, cleanliness, and good taste are important considerations in how trainees should dress and be groomed both for training and for the workplace. Trainees may be sent home or disciplined for not adhering to proper dress and grooming requirements.

Dress and grooming that is not appropriate for the workplace or for training includes:

- Tight, skin-revealing, or undergarment-revealing (i.e., shorts, leggings, tights, belly shirts, etc.)
- tank tops, halter tops, spaghetti straps
- brightly dyed hair colors
- denim jeans, cut-off jeans, or excessively worn clothing
- pajamas (tops, bottoms, or slippers) or sweatpants
- any headwear, unless approved by your instructor (hats, bandannas)
- clothing with logos or statements that may be controversial or offensive
- For MA and CMT, no open-toed shoes
- For MA, all tattoos covered

Trainees will not be permitted to attend class if their clothing and grooming is not appropriate for the skill division. Ultimately it is up to the discretion of the instructors in each skill area to determine if a trainee's attire is appropriate for training.

### **Cell Phone Usage**

Trainees must turn the volume off on their cell phones in the skill division. No cell phone use (voice or text) in the classroom is permitted except in case of instructor-approved emergency. Use of cell phones during class time may result in disciplinary action.

### **Drug and Alcohol Prevention**

CET is committed to providing a drug and alcohol prevention program that follows all regulatory guidelines. This is an important component of CET's career development and success skills. CET instructors spend time covering the effects of drugs, alcohol, and other substances on the individual, the family and the community.

Trainees are expected to conduct themselves against defined principles of conduct at all times. This includes a zero tolerance policy concerning substance abuse. Abuse of any drug, which includes alcohol, prescription drugs, or illegal substances while attending CET is strictly prohibited, and will subject any violator of this policy to disciplinary action, including withdrawal from the program. Any violation of this policy, while on CET property, constitutes grounds for immediate expulsion. By signing this policy, trainees agree to drug testing at the request and expense of CET at any time. Refusal of said testing demand will result in disciplinary actions, including expulsion. This policy has been adopted in order to protect the trainees attending CET, as well as to comply with accepted practices in the workplace. Most employers demand such tests of their potential employees, as well as random screens for their current workforce.

CET will annually distribute to all staff and trainees a drug and alcohol prevention program that includes the following:

- Standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by trainees and employees on our property or as part of any of our activities;
- A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol;
- A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
- A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
- A clear statement that CET imposes disciplinary actions or sanctions on trainees and employees (consistent with local, State, and Federal law) for violations of standards

of conduct required by regulation. These disciplinary actions are outlined in the Trainee Catalog for trainees and Brighton Center's policy and procedure manual for employees. These disciplinary actions are up to and including official withdrawal from CET for trainees to separation of employment for employees, and referral for legal prosecution. A disciplinary sanction or action may include the completion of an appropriate rehabilitation program.

To ensure compliance with Department of Education regulations and the Drug Free Schools and Campus Act, CET will conduct a biennial review to determine our program's effectiveness and implement changes to the program if they are needed; and ensure that the disciplinary sanctions are consistently enforced.

The Plan and Annual Review can be requested through the Financial Aid Office, and is available on the website at [www.brightoncenter.org/bccet](http://www.brightoncenter.org/bccet).

### **Copyright Infringement**

Copyright infringement is the act of exercising, without permission or legal authority, one or more of the exclusive rights granted to the copyright owner under section 106 of the Copyright Act (Title 17 of the US Code). These rights include the right to reproduce or distribute a copyrighted work. In the file-sharing context, downloading or uploading substantial parts of a copyrighted work without authority constitutes an infringement.

CET trainees found to be exercising copyright infringement will face disciplinary action up to and including withdrawal.

Penalties for copyright infringement include civil and criminal penalties. In general, anyone found liable for copyright infringement may be ordered to pay either actual damages or "statutory" damages affixed at not less than \$750 and not more than \$30,000 per work infringed. A court can, in its discretion, also assess costs and attorneys' fees. For details, see Title 17, US Code, Sections 54,505.

Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to \$250,000 per offense. For more information contact the CET Coordinator.

## Disciplinary Action

---

The following are types of conduct are unacceptable:

- Excessive absenteeism or tardiness;
- Lack of academic progress;
- Cheating of any kind;
- Unauthorized use of supplies or equipment;
- Clocking in or out for other trainees;
- Reporting to CET intoxicated or under the influence of non-prescription drugs;
- Using obscene, abusive or threatening language;
- Theft, including unauthorized borrowing of property;
- Creating a disturbance or in any way disrupting or interfering with the training of others;
- Willful destruction of the building, property of Brighton Center or the property of others;
- Insubordination, disobedience, or disrespect toward a staff member;
- Refusal of employment offers;
- Violating non-discrimination or sexual harassment policy;
- Use, sale, or possession of alcohol, narcotics, or controlled substances at CET, on any other Brighton Center property, or while representing CET.

When necessary, and at the discretion of the Coordinator, trainees may be suspended for up to two weeks or withdrawn from training for incidents involving drugs, alcohol, weapons, or other behavior creating a danger to others. Disrespecting or threatening behavior towards another trainee or staff member may also be a basis for suspension or withdrawal. CET will not hesitate to involve emergency responders when necessary.

The following are behaviors considered unacceptable and are grounds for **immediate withdrawal** from the program:

- Possession of a weapon while on the CET premises or any other Brighton Center property.
- Fighting or physically touching another trainee or staff person in a threatening or inappropriate manner.

## **Disciplinary Action**

You may be placed in Disciplinary Action due to continued disregard for CET policy, lack of training progress, attendance issues, or inappropriate behavior. Consequences generally follow three steps, but may be advanced depending on the severity of the infraction:

1. Warning: verbal notification of an infraction, noted in case notes.
2. Suspension: a temporary ban from attending CET or being on school grounds.
3. Withdrawal: separation from the program. Permission to restart the program is at the discretion of CET administration and Skill Instructors.

For more information, see “Withdrawal”, under the Return to Title IV Policy.

## **Personal Items**

CET will attempt to keep abandoned belongings for two weeks from the last date of attendance. CET assumes no responsibility for personal items left on-site at any time.



## Safety and Wellness

### Safety Practices

Trainees must obey all safety rules. Proper clothing and safety gear must be worn or used as required. Trainees are not permitted to operate equipment without training and adequate supervision. Trainees are expected to immediately report all accidents.

### Notice of the Annual Campus Security Report

In 1990, Congress passed a law called the Student-Right-To-Know Act that established the right of students, their parents and employees to know about crimes committed on campuses and about campus security policies and procedures. In compliance with this law, the *Jeanne Clery Disclosure of Campus Security* policy and *Campus Crime Statistics Act*, the Center for Employment Training presents information related to campus security and safety.

All currently enrolled trainees, prospective trainees, CET employees and prospective employees are entitled to request a copy of the CET Annual Campus Security Report. The report contains crime statistics about certain specified crimes/incidents that have been reported to the local police department over the past three years and which have occurred either on CET property or on public property adjacent to the campus.

The report also contains policies and practices pertaining to campus safety, crime prevention and reporting, alcohol and drug abuse prevention and assistance programs.

Requests for the report should be made to the Admissions Specialist, (859) 491-8303 x2201. The report is also available on our website at [www.brightoncenter.org/bccet](http://www.brightoncenter.org/bccet).

### Inclement Weather

Brighton Center will be closed for all non-emergency services, including CET, in the event of a Level 3 snow emergency. If **Newport Independent Schools** are closed, then CET will be open, but not required for trainees. If you cannot attend CET due to inclement weather in other cases, you must communicate with your success coach prior to the start of class that day. CET will post school closing/delay information on the four major news networks in the Greater Cincinnati area.

## **Emergency Action Plan**

---

### **In Case of Emergencies**

In all cases of emergency, remain calm. Notify your instructor or closest CET staff member immediately. Allow the staff person to assess the situation and call 911 if necessary. Follow the protocol listed below for specific emergency situations.

### **In Case of Fire**

Remain calm in all cases of fire; notify your instructor or the closest CET staff person.

Go to the nearest exit. The escape route assignments are posted at each of the skill area doors, as well as the doors of common areas. All fire doors will be closed upon exit. Instructors will provide verbal instructions to trainees during exit. All are required to exit in an orderly fashion. The instructors will inform trainees of pre-established meeting locations outside the building.

Once outside, trainees and staff will meet in the parking lot across the street from CET, at the corner of Washington and Sixth streets. The instructors will take attendance of trainees in their skill area.

### **In Case of Tornado**

Remain calm and return to your skill area immediately. Follow the verbal instructions given by your instructors. Find a place under your desk/table/etc. and place arms over your head. If you have a jacket, place it over your head as well. Instructors may move trainees to the lowest part of the building for safety.

### **In Case of Accident or Illness**

Remain calm. In all cases of accident, notify your instructor or closest CET staff member immediately. The staff person will assess the situation and determine if a 911 call is necessary for further medical attention.

The instructor will provide verbal instructions for those involved in the incident. In addition, they will notify the emergency contact person listed in the trainee's file.

When a trainee feels ill, she/he should notify the instructor immediately. The instructor will decide if the trainee needs to be dismissed. In cases of severe/sudden illnesses, the emergency contact person will be notified and arrangements will be made to transport the trainee to a doctor.

## **Employment Services**

### **Career Coaching**

Work habits, attitudes, behavior patterns, and communication skills are as important as technical knowledge for success in the workplace. In order to prepare trainees for the demands of the workforce, CET trainees receive instruction in career coaching. The career coaching curriculum teaches the success skills that help trainees achieve their goals in their professional and personal lives. Personal development topics such as self-awareness, personal finance, and interpersonal skills are stressed for their importance to achieving self-sufficiency.

Career coaching also covers the technical aspects of job searching and interviewing skills, mock interviews, on-the-job training, perception in the workplace, and applied writing and verbal skills. Trainees will graduate from CET ready to work and knowledgeable of workplace dynamics and culture.

### **Externship**

Externship opportunities are a good way to gain on-the-job experience after completion of the skill competencies, but before obtaining employment. The Skill Instructors and the Career Coaches have developed relationships with employers who will accept CET externs, and interested trainees are selected by the employers according to the quality of work they have demonstrated in their skill. Externship is used to evaluate a trainee's performance, punctuality, appearance, attendance, and attitude while receiving on-the-job training and to determine if additional employment coaching is needed.

The Medical Assisting field requires a 160 or 200 hour externship to obtain employment as a Medical Assistant, so all MA trainees must complete an externship to successfully complete training. Microsoft Office Technology has externship opportunities available to high-performing trainees interested in gaining additional experience.

### **Career Placement Assistance**

CET prepares trainees for employment from the start of training, with technical career search skills, an Personal Career Strategy, and specialized career coaching.

The Career Coach works with trainees and local industry to identify available jobs as trainees move towards completing the final competencies in their skill division. CET actively helps individuals to find training-related employment, and then follows-up on trainees who graduate into a job. Career Coaches also continue to offer placement assistance to past graduates who are looking for new employment. In addition to the program's career coaching resources, CET prepares trainees to identify employment opportunities and to compete in the job market on their own.

## **Alumni Services**

The true mark of success for CET is employment retention—not just seeing that our graduates find employment, but knowing that they keep that job and grow with it. To this end, CET will continue to maintain contact with graduates and their employers beyond the time trainees are placed on a job to provide support to keep trainees informed about CET updates and events. We maintain contact with our employed graduates for at least a year to provide support and encouragement.

## **Gainful Employment**

CET offers information on Gainful Employment (GE) to all prospective trainees at the initial information session and posts the information on the CET website. GE data is updated each July to reflect information from the previous fiscal year on completion rates, placement rates, and overall retention.



# **Administrative Policies and Procedures**

## **Brighton Center's Grievance Policy and Procedure**

It is the right of every individual and family served by Brighton Center, Inc. to be treated fairly and with respect. Brighton Center's services should be provided in a timely manner. While the Center strives to maintain a high quality of service, it is inevitable that there will be instances when individuals and families served are dissatisfied with our services. On these occasions it is important that individuals and families served have a process through which they can air their grievances. These grievance procedures will be provided to every individual and family served at the time of application for services.

### **Procedure:**

1. When an individual or family served has a grievance, it is initially the responsibility of the program employee involved to attempt to understand and resolve the grievance. It shall be the responsibility of the employee to inform the individual or family served of the grievance procedure and assist them in contacting the appropriate supervisor.
2. The individual or family served who files a grievance will be free from retaliation or barriers to services.
3. The supervisor will gather relevant information and will attempt to understand and resolve the grievance.
4. Should the individual or family served not be satisfied, the grievance shall be considered by the Department Director, who shall attempt to resolve the grievance.

At this stage the Director will complete the agency *Individuals and Families Served Grievance Form*. This Form will be copied to the aggrieved and included in the aggrieved individual or family's case record. The Form includes the resolution or outcome of the grievance and serves as timely written notification of the resolution. This Form will also be forwarded to the Risk Management Team as part of the agency's CQI Review.

5. If the Department Director cannot resolve the grievance, it shall be considered by the Vice President as appropriate, and if necessary by the President & CEO.
6. The Board of Directors of Brighton Center, Inc. shall be the final resource should the President & CEO be unable to resolve the grievance. The President of the

Board shall appoint a committee of Board Members to review the grievance and recommend a resolution to the Board. Every effort should be made to ensure that at all levels of the grievance process reviews will be completed in a fair, thorough, and timely manner.

In cases where a grievance is not resolved within the organization using the steps outlined above, the customer can present the grievance to the **Commission of the Council on Occupational Education, 7840 Roswell Rd., Building 300, Suite 325, Atlanta, Georgia, 30350. The telephone number is (800) 917-2081.**

In cases where a grievance is not resolved within the organization using the steps outlined above for a client receiving assistance through the Cabinet for Health and Family Services, the client can contact either

1. **Kentucky State Office of the Ombudsman**, 275 E. Main St., 1E-B, Frankfort, Kentucky, 40621, (800) 372-2973, or
2. **Office of Civil Rights and Inclusiveness**, Corporation for National Service, 1201 New York Ave. NW, Washington, DC, 20525, (800) 833-3722, (202) 565-3465 fax, [eo@cns.gov](mailto:eo@cns.gov).

#### **Americans with Disabilities Act (ADA) Policy Statement and Complaint Procedure**

Brighton Center, Inc. has adopted an internal complaint procedure providing for prompt and equitable resolution to complaints alleging any action prohibited by the US Department of Justice regulations implementing Title III of the American with Disabilities Act. Title III states, in part, that “no otherwise qualified individual with a disability shall, solely by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination” in programs or activities sponsored by an agency.

Complaints should be addressed to the Coordinator of ADA compliance efforts:

Human Resources Director  
Brighton Center, Inc.  
P.O. Box 325  
Newport, KY 41072  
Phone (859) 491-8303, ext. 2431

#### Complaints

1. A complaint should be filed in writing or verbally, containing the name and address of the person filing it, and briefly describe the alleged violation of the regulations.

2. A complaint should be filed within 180 days after the complainant becomes aware of the alleged violation. (Processing of allegations of discrimination, which occurred before this complaint procedure was in place, will be considered on a case-by-case basis.)
3. An investigation, as may be appropriate, shall follow a filing of complaint. The investigation shall be conducted by the ADA Coordinator. These rules contemplate informal but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a complaint.
4. A written determination as to the validity of the complaint and a description of the resolution, if any, shall be issued by the ADA Coordinator and a copy forwarded to the complainant no later than ten (10) days after its filing.
5. The ADA Coordinator shall maintain the files and records of Brighton Center/Brighton Properties relating to the complaints filed.
6. The complainant can request a reconsideration of the case in instances where he or she is dissatisfied with the resolution. The request for reconsideration should be made within ten (10) days to the President/CEO, or in the absence of the President/CEO, the Executive Vice President.
7. The right of a person to a prompt and equitable resolution of the complaint filed hereunder shall be impaired by the person's pursuit of other remedies such as the filing of an ADA complaint with the responsible federal department or agency. Use of this complaint procedure is not a prerequisite to the pursuit of other remedies.
8. These rules should be construed to protect the substantive rights of the interested persons to meet appropriate due process standards, and to assure that Brighton Center complies with the ADA and implementing regulations.

### **Sexual Harassment Policy**

Sexual harassment is strictly prohibited. Sexual harassment is defined as any unwelcome or offensive sexual advances or requests for sexual favors or any conduct that affects the atmosphere of CET.

Any trainee who feels he/she has been subjected to or has observed sexual harassment is urged to report the incident immediately. All reports will be held in confidence until investigations are complete and appropriate action can be taken.

Trainees engaging in acts of sexual harassment will be subject to disciplinary action up to and including separation from the program. All complaints dealing with sexual harassment must follow the Grievance Procedure outlined above.

### **Confidentiality Statement**

The administration and staff of CET and Brighton Center will respect all trainees' right to confidentiality. All information is treated in a confidential manner and will only be shared when necessary to assist the trainee in accomplishing the program goals. The trainee will be asked to sign a release of information form allowing communication for purposes relating to successful completion of the curriculum and obtaining employment.

### **Security of Information**

CET does not release information regarding a trainee without the trainee's written consent. Trainees are allowed to review their education records to verify accuracy. CET maintains customer records for a minimum of three years, and maintains all transcripts for program graduates.

Inquiries should be addressed to the **Center for Employment Training, 601 Washington Ave., Suite 140, Newport, Kentucky, 41071, (859) 491-8303 x2200.**

## **Family Education Rights and Privacy Act (FERPA)**

---

### NOTIFICATION TO TRAINEES OF THEIR RIGHTS UNDER THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT

The Family Educational Rights and Privacy Act (FERPA) affords trainees certain rights with respect to their education records. These rights include:

1. The right to inspect and review the student's education record within 45 days of the day the Trainee Facility receives a request for access.

Trainees should submit to the Coordinator, Director, or their designee, written requests that identify the record(s) they wish to inspect. The official will make arrangements for access and notify the trainee of the time and place where the records may be inspected. If the records are not maintained by the official to whom the request was submitted, that official shall advise the trainee of the correct official to whom the request should be addressed.

2. The right to request the amendment of the trainee's education record that the trainee believes is inaccurate.



Trainees may ask the Training Facility to amend a record that they believe is inaccurate. They should write the official responsible for the record, clearly identify the part of the record they want changed, and specify why it is inaccurate.

If the Training Facility decides not to amend the record as requested by the trainee, the Training Facility will notify the trainee of the decision and advise the trainee of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the trainee when notified of the right to a hearing.

3. The right to consent to disclosures of personally identifiable information contained in the trainee's education records, except to the extent that FERPA authorizes disclosure without consent.

One exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A school official is a person employed by the Training Facility in an administrative, supervisory, academic or research, or support staff position (including health staff) a person, company, or agency with whom the school has contracted to provide services that the Training Facility, itself, would otherwise have to provide (such as an attorney, auditor, collection agent, security service or other service provider); a person serving on the Board of Directors; or a trainee serving on an official committee, such as a student council, disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

Upon request, the Trainee Facility discloses education records without consent to officials of another school in which a trainee seeks or intends to enroll.

4. The right to file a complaint with the U.S. Department of Education concerning alleged failures by the Center for Employment Training to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202-8520  
1 (800) USA-LEARN

<http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

The Center for Employment Training procedures for implementation of FERPA and for exercising a student's FERPA rights are outlined in this online Compliance Manual for the Act.

The Center for Employment will provide grades and access to trainee education records to parents who certify that the trainees are financially dependent, as defined in Section 152 of the 1986 Internal Revenue Code.

### **Solicitations**

No solicitations of any kind are allowed unless specific written authorization is given by the Department Director. This includes fundraisers for trainees' children or churches.

## **Governance and Administration**

---

### **Brighton Center's Board of Directors**

Brighton Center's Board of Directors is comprised of volunteer community members committed to the agency mission. The Board of Directors hires the President/Chief Executive Officer, sets policy, provides community leadership, and participates in fundraising activities. Most board members reside in the Northern Kentucky/Greater Cincinnati area. A listing of members of the Board of Directors is available on [brightoncenter.org](http://brightoncenter.org)

### **Management System**

Brighton Center's CET utilizes a four-tiered management system. CET is operated under the supervision of a Program Coordinator. The Program Coordinator reports to the Department Director. The Department Director reports to the Vice President who, in turn, reports to the President and Chief Executive Officer. The Program Coordinator and Director's offices are on-site. Brighton Center's administrative offices are located at 8<sup>th</sup> and Central Ave. in Newport, Kentucky.

### **Legal Status**

Brighton Center, Inc. is a private, non-profit organization. Brighton Center maintains a 501 (c) 3 tax-exempt status.

### **Important Notice**

This catalog of programs and policies is provided as an important source of information for anyone interested in the Center for Employment Training (CET). CET reserves the right to make necessary changes or corrections to any of the information within the catalog. This catalog should not be construed as a contract between the trainee and CET.



**Northern Kentucky  
Scholar House**

**Early Childhood  
Education**

**Financial  
Services**

**Family  
Center**



**BRIGHTON CENTER**  
A COMMUNITY OF SUPPORT

**Community &  
Youth Services**

**Brighton  
Recovery Center**

**Workforce  
Development**

**CENTER FOR EMPLOYMENT TRAINING**

601 Washington Ave. Suite 140, Newport, KY 41071

(859) 491-8303 ext. 2201 | [www.bccet.edu](http://www.bccet.edu)

[admissions@brightoncenter.com](mailto:admissions@brightoncenter.com)

