



# Trainee Catalog | 2022-2023

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## **General Information**

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

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

Center for Employment Training (CET) is a program within the Workforce Development Department of Brighton Center, Inc. Brighton Center is a comprehensive community based social service agency in Northern Kentucky that 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**

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 assist trainees with obtaining a career as quickly as they are qualified.

CET hosts a caring staff who understand trainees' needs and who work hard to help them succeed. Trainees can expect openness from CET 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.

## **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 Commission of 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 for individuals that prepares them for careers in high-demand industries. The program is comprehensive, individualized, and generally adaptable to each person's needs, including removal of workforce barriers. 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 conduct their career searches in partnership with their Career Coach and other CET staff. Trainees only “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 CET staff.
- 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 and job-related. Basic Skills education is integrated into skill training.**  
Hands-on training occurs a minimum of 60% of the time. Success Skills, Adult Education, and Career Development are integrated into skill training.
- 11. Trainees are assured help in finding a high quality and meaningful job with a livable wage, benefits, and opportunities for career advancement.**  
The Career Coach assists trainees with developing their professional skills, as well as resume and interview preparation and other job-search-readiness 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 each skill division 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 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 their 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 the 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 ensure our training remains current, that training equipment is adequate, and that trainees' skills and knowledge 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, as well as support staff 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. The Unit Team identifies barriers to program completion and job attainment, suggests resources, and determines staff actions to assist trainees with reaching their goals.

### **Advising**

Skill Instructors serve as primary advisors to trainees. CET offers assistance with accessing work supports (such as food assistance, childcare, housing, etc.), as well as 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 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 199 individuals served in the 2020-2021 Fiscal Year shows:

Gender: 187 female, 12 male

Race: 114 White, 65 Black/African American, 13 Multi-Racial, 4 Hispanic/Latino, 2 Asian, 1 Other

## **Non-Discrimination Policy**

Center for Employment Training does not discriminate on the basis of gender, race, color, religion, sexual orientation, national origin, age (40 or older), familial status, HIV/AIDS, pregnancy, military service, gender identity, marital status, disability, or any other protected class accordance with any applicable federal, state or local law. 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 if 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 Outreach and Recruitment 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



Brighton Center – Center for Employment Training is accredited by the Commission of the Council on Occupational Education.

CET is licensed by the Kentucky Commission on Proprietary Education.

Trainees may review materials regarding accreditation and licensure by contacting the CET 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 1,100 trainees in employment over our twenty years!

## Center for Employment Training Staff

### Administrative & Support Staff

Talia Frye

Vice President, CET Chief Administrator

(859) 491-8303 ext. 2416 | [tfrye@brightoncenter.com](mailto:tfrye@brightoncenter.com)

Credentials: Bachelor of Arts, Speech Communication, Master of Public Administration – Northern Kentucky University

Ellen Bates

Workforce Development Director

(859) 491-8303 ext. 2203 | [ebates@brightoncenter.com](mailto:ebates@brightoncenter.com)

Credentials: Bachelor of Social Work – Xavier University

Lauren Allhands

CET Coordinator

(859) 491-8303 ext. 2204 | [lallhands@brightoncenter.com](mailto:lallhands@brightoncenter.com)

Credentials: Bachelor of Arts, Social Science – Southern New Hampshire University

Gabrielle Fletcher

CET Manager

(859) 491-8303 ext. 2222 | [gletcher@brightoncenter.com](mailto:gletcher@brightoncenter.com)

Credentials: General Equivalency Diploma

TBD

Financial Aid Officer – *Please contact CET Coordinator for all financial aid inquiries until position is filled*

Kiara Johnson

Outreach & Recruitment Specialist

(859) 491-8303 ext. 2201 | [kjohnson@brightoncenter.com](mailto:kjohnson@brightoncenter.com)

Credentials: Master of Public Administration – University of Cincinnati; Bachelor of Arts, Political Science University of Cincinnati; Associate of Arts, Liberal Arts – University of Cincinnati

## **Instructional & Coaching Faculty**

### ***Skill Instructors***

#### ***Health Technology Administration (HTA)***

Tasha Johnson

Skill Instructor

(859) 491-8303 ext. 2211 | tljohnson@brightoncenter.com

Credentials: Associate of Science, Business Management, specialization in Health – Davenport University; Certificate, Health Technology Administration – Center for Employment Training; Certified Electronic Health Record Specialist (CEHRS) – National Healthcareer Association; Certified Billing and Coding Specialist – National Healthcareer Association

#### ***Human Resources & Payroll Specialist (HRPS)***

Debbie Puckett

Skill Instructor

(859) 491-8303 ext. 2210 | dpuckett@brightoncenter.com

Credentials: Master of Education, Human Resources Development – Xavier University; Bachelor of Science, Organizational Leadership – Xavier University; Associate of Science, International Trade – Cincinnati State

#### ***Medical Assisting (MA)***

Tammy Liles

Skill Instructor

(859) 491-8303 ext. 2213 | tliles@brightoncenter.com

Credentials: Certificate, Medical Assisting – Center for Employment Training; Registered Medical Assistant (RMA) – American Medical Technologists; Certified Pharmacy Technician (CPhT) – Pharmacy Technician Certification Board

### ***Coaches***

Sarah Bryant

Career Coach

(859) 491-8303 ext. 2227 | sbryant@brightoncenter.com

Credentials: Associate of Arts and Sciences – Gateway Community and Technical College

Matricia Fagin

Success Coach (Medical Assisting)

(859) 491-8303 ext. 2216 | mfagin@brightoncenter.com

Credentials: Bachelor of Arts, Organizational Leadership – Northern Kentucky University

Isaac Frederickson

Financial Wellness Coach

(859) 491-8303 ext. 2217 | ifrederickson@brightoncenter.com

Credentials: Certified HUD Housing Counselor – U.S. Department of Housing & Urban Development; Bachelor of Arts, Communication – University of Cincinnati

Elizabeth (Lizzie) Specht

Success Coach (Health Technology Administration, HR & Payroll Specialist)

(859) 491-8303 ext. 2212 | especht@brightoncenter.com

Credentials: Certificate, Microsoft Office Technologies – Center for Employment Training; Certificate, Microsoft Office Specialist in Excel – Microsoft

# Getting Started

## How to Find Us

CET is located at 601 Washington Ave., Suite 140, Newport, Kentucky, 41071. The facility is on TANK bus route 12 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 sixteen 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 methods are hands-on, individualized, and self-paced. The training does not require previous academic experience, and many find success through CET's non-traditional, instructional model. CET is a clock-hour program and trainees attend scheduled hours to meet program requirements.

Interested persons may sign up for an information session at CET during business hours, weekdays from 8:30 AM - 5:00 PM, by calling (859) 491-8303 x 2201, emailing [admissions@brightoncenter.com](mailto:admissions@brightoncenter.com), or on our website, [www.bccet.edu](http://www.bccet.edu). Trainees are given a start date depending on how quickly eligibility and financial aid requirements are completed. Trainees may be eligible for financial aid offered through 3rd 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 Open House 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. Applicants also have the opportunity to meet with onsite Success Coaches who can assist future trainees with getting prepared to start training at CET.

### **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.
- 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.

### **Background Requirements**

Individuals who have a felony related to child endangerment or violence will not be permitted to enroll in the Health Technology Administration or Medical Assisting skill divisions due to the stringent standards for obtaining employment in the medical field. CET will work with individuals with other background concerns to assess the feasibility of employment in chosen industry of training and will provide support in assisting with expungement for qualifying charges.

### **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 of training. Orientation is an opportunity for CET to welcome new trainees and allow them the 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. Failure to attend may result in cancellation of enrollment.

### **Personal Career Strategy**

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 the agency database, 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 Skill Divisions**

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. Watertower 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 staff must possess industry knowledge, skills, and experience that support high-quality job-training instruction, supportive services, and program administration. Specifically, Skill Instructors are required to possess a high school diploma or equivalency, in addition to having completed a training or degree program in their area of instruction, hold professional, up-to-date certification in the field of instruction, and possess at least one year of field experience. Coaches, supportive services, and program administration staff possess post-secondary credentials and/or demonstrated experience and expertise appropriate to their areas of responsibility.

### **Restrooms**

Restrooms are 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 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 beneficial addition to a resume.

## **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 [www.bccet.edu](http://www.bccet.edu) and will be provided during classroom orientation.

## **Skill Divisions**

Center for Employment Training (CET) 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 offers three skill divisions: Health Technology Administration (HTA), Human Resources & Payroll Specialist (HRPS), and Medical Assisting (MA).

### **Distance Education**

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60% of CET's curriculum is hands-on by providing a contextualized training environment. Certain competencies must be completed and demonstrated in-person. Because of this, all skill divisions and training schedules require some in-person participation. Distance Education is utilized to provide trainees the opportunity to progress and attend from the convenience of their homes during certain components of the curriculum. Skill Instructors are responsible for assigning individualized in-person and Distance Education attendance schedules, and trainees may request changes to their individualized schedule based on need. All attendance schedules are at the discretion of the Skill Instructor and/or CET Administration, are subject to change, and may be significantly modified during events such as public health emergencies.

The Medical Assisting skill division supports up to 784 of the total 1,070 scheduled clock hours as Distance Education. A minimum of 286 clock hours must be performed in-person and represents aspects of the curriculum that require hands-on practice and demonstration of skill, such as Clinical Procedure Demonstration, Success Skills, and Clinical Externship.

The Health Technology Administration skill division can support up to 946 of the total 1,000 scheduled clock hours as Distance Education. A minimum of 54 clock hours must be performed in-person.

At this time, the Human Resources & Payroll Specialist skill division is offered only in-person and does not allow Distance Education participation.

CET faculty and/or CET Administration reserve the right to create, modify, increase, or decrease, trainees' individual in-person attendance to Distance Education schedule ratios based on learning needs, academic performance, etc. The hour totals listed above are threshold requirements that align with accreditation standards and should not be construed as permission to perform fewer in-person clock hours than assigned by CET faculty.

## **Training Schedule**

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All skill divisions operate year-round, apart from a short winter break at the end of the calendar year.

### **Health Technology Administration**

Health Technology Administration (HTA) is 1000 clock hours in length. It is in-session Monday-Friday from 8:30am-3:30pm, which includes a half hour lunch break. This equals 6.5 daily scheduled clock hours, which totals 32.5 hours of scheduled clock hour time per week. Trainees with good attendance and satisfactory pace can expect to complete this training in approximately 31 weeks.

### **Human Resources & Payroll Specialist**

Human Resources & Payroll Specialist (HRPS) is 900 clock hours in length. It is in-session Monday-Friday from 8:30am-3:30pm, which includes a half hour lunch break. This equals 6.5 daily scheduled clock hours, which totals 32.5 hours of scheduled clock hour time per week. Trainees with good attendance and satisfactory pace can expect to complete this training in approximately 28 weeks.

### **Medical Assisting**

Medical Assisting (MA) is 1070 clock hours in length, including a 160-hour clinical externship. MA has two schedule options:

#### ***Daytime Primary Schedule***

The Daytime MA schedule is in-session Monday-Friday from 8:30am-3:30pm, which includes a half hour lunch break. This equals 6.5 daily scheduled clock hours, which totals 32.5 hours of scheduled clock hour time per week. Trainees with good attendance and satisfactory pace can expect to complete this training in approximately 34 weeks.

#### ***Evening/Weekend Primary Schedule***

The Evening/Weekend MA schedule is in-session Tuesday-Saturday. Tuesday-Friday, trainees participate via Distance Education from 4:00pm-8:30pm, and in-person at CET on Saturday from 9:00am-5:30pm (including a half hour lunch break). This equals 26 hours of scheduled clock hour time per week. Trainees with good attendance and satisfactory pace can expect to complete this training in approximately 41 weeks.

## Course Descriptions

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Please see pages 19-22.

## Health Technology Administration

	<u>Weeks</u>	<u>Hours</u>
1 <b><u>Adult Education and Digital Literacy Fundamentals</u></b> – Acquire knowledge and experience with computer literacy, business math, and language skills through independent work, group projects, and class presentations.	4	120
2 <b><u>Healthcare Legislation</u></b> – Learn about HIPAA, general medical facility safety, OSHA, customer service and the patient experience, and identifying and reporting abuse. Learn about the impact common healthcare laws have on the industry and different stakeholders. Demonstrate understanding through a focused project on healthcare legislation.	1	30
3 <b><u>Medical Office Administration</u></b> - Explore administrative health careers, beginning with an examination of the profession, health care industry, and daily responsibilities. Learn front office, billing, medical insurance, and compliance procedures through Sim Chart activities. Understand Human Resources management, business operations, and administrative competencies through medical office management activities.	3	90
4 <b><u>Electronic Medical Records</u></b> – Learn Health Information Management and practice workplace-specific skills with electronic medical records. Complete case study- based assignments and develop proficiency with charting and documentation best practices.	3	90
5 <b><u>Medical Terminology</u></b> – Learn the language of medicine and healthcare. Understand the origin and the parts used to build medical words. Learn word usage in patient care, medical history, diagnostic testing, treatment, billing and coding, and the charting process.	3	90
6 <b><u>Anatomy and Physiology</u></b> – Learn about the human body systems and basic physiology. Develop a practical understanding of medical diagnoses and diagnostic procedures as a foundation to understanding the translation of the condition of the patient to ICD-10 code(s).	3	90
7 <b><u>Diagnosis Codes</u></b> – Learn the diagnostic codes used to accurately translate the medical condition of a patient. Learn ICD-10 codes and the role these codes have in the billing process. Practice workplace simulation activities and prepare for the Certified Professional Coder (CPC) certification.	5	160
8 <b><u>Procedure Codes</u></b> – Learn the CPT codes used to standardize healthcare procedures and treatments. Practice workplace simulation activities and prepare for the Certified Professional Coder (CPC) certification.	6	180
9 <b><u>Success Skills</u></b> – Learn self-presentation, communication, relationship building, and employment skills through daily practice in a simulated workplace environment using hands-on, integrated instruction methods such as web-based applications, project-based education, group exercises, role playing scenarios and other materials as deemed necessary and relevant through industry standards.	3	90
10 <b><u>Career Coaching and Development</u></b> – Learn how to complete an employment portfolio focusing on the following items: job applications, resumes, references, cover and thank you letters. Develop a Personalized Career Strategy identifying future goals. Practice effective interviewing techniques in mock interviews.	2	60
<b>Total Course Weeks/Hours:</b>	<b>33</b>	<b>1000</b>

## Human Resources & Payroll Specialist

	<u>Weeks</u>	<u>Hours</u>
<p><b>1 <u>Adult Education and Digital Literacy Fundamentals</u></b> – Acquire knowledge and experience with computer literacy, business math, and language skills through independent work, group projects, and class presentations.</p>	2	60
<p><b>2 <u>Introduction to HR Operations</u></b> - Learn components of Human Resource and Payroll operations. Explore and research organizational strategies and their connection to mission, vision, values, business goals, and objectives. Compare and contrast organizational culture across various industries, to deepen knowledge of traditions and unwritten procedures. Demonstrate applied learning concepts through presentations, group discussions, and workshops.</p>	2	60
<p><b>3 <u>Microsoft Office Applications</u></b> - Learn, study, and practice basic word processing, spreadsheet commands, and functions. Develop and exercise visual formatting presentation skills. Design professional presentations, brochures, and publications. Daily use of professional email, attachments, appointments, tasks, notes, and journals. Understand web browsers, designing and navigating web pages. Utilize MOS applications to support job-related functions, through hands-on work simulation activities and projects.</p>	3	90
<p><b>4 <u>Compensation and Benefits</u></b> - Research applicable laws and regulations to compensation and benefits such as monetary and non-monetary entitlement, wage, and hour, and privacy (COBRA, ERISA, FLSA, USERRA, HIPAA, PPACA, tax treatment). Define total rewards statements, healthcare plans, flexible benefits, retirement plans, and wellness programs. Communicate and present compensation and benefits programs.</p>	4	140
<p><b>5 <u>Employee Relations, Development, and Retention</u></b> - Learn and develop internal customer service skills, triage employee questions, answering or refer appropriately as the first level of support. Strengthen communication skills and deepen understanding of job quality and practices that support a healthy work environment. Facilitate applicant pre-screening of interview candidates, manage applicant databases, post job listings, and manage company social media and job boards. Coordinate activities to support employee programs and incentives.</p>	1	40
<p><b>6 <u>HR Law &amp; Regulations</u></b> - Learn, practice, and demonstrate knowledge of legal and regulatory environments, drawing connections between business functions, policies, and reporting requirements. Practice the implementation of confidentiality and privacy rules that apply to employee records, company data, business functions, policies, and procedures. Apply laws and regulations related to health, safety, security, and privacy (OSHA, HIPAA, Act, ADA, and Sarbanes- Oakley Act) through demonstrated skills and workplace simulated environment.</p>	3	90
<p><b>7 <u>Payroll &amp; Accounting</u></b> - Develop an understanding of pay structures and programs such as variable, merit, bonus, incentives, non-cash compensations, pay scales/ grades. Learn to navigate payroll processes - pay schedules, leave, and time-off allowances. Exercise critical thinking to resolve routine employee compensation and benefits issues. Use practical, hands-on curriculum integrated through a number of resources such as web-based applications, project-based education, group exercises, role-playing scenarios, and other materials as deemed necessary and relevant through industry standards.</p>	4	130

8	<b><u>Record Keeping &amp; Data Entry (software)</u></b> - Learn the value of technology for collecting, storing, reviewing, and analyzing information. Access, collect, and provide information and data to support HR-related decisions. Maintain employee data and confidentiality. File management, processing forms, notices, announcements, new hire processes and forms, salary forms, performance, and termination paperwork. Prepare HR-related documents for reports, presentations, and organizational charts.	3	110
9	<b><u>Success Skills</u></b> – Learn self-presentation, communication, relationship building, and employment skills through daily practice in a simulated workplace environment. Uses practical, hands-on curriculum integrated through a number of resources such as web-based applications, project-based education, group exercises, role playing scenarios and other materials as deemed necessary and relevant through industry standards.	3	90
10	<b><u>Career Coaching and Development</u></b> –Learn how to complete an employment portfolio focusing on the following items: job applications, resumes, references and cover and thank you letters). Mock interviews. Develop a Personalized Career Strategy, identifying future goals; develop employment portfolio, with resume and cover letter; respond to web-based employment ads; practice effective interviewing techniques in mock interviews. Learn problem solving, time management and other success skills through daily practice in a simulated workplace environment.	3	90
<b>Total Course Weeks/Hours:</b>		<b>28</b>	<b>900</b>

## Medical Assisting

	<u>Weeks</u>	<u>Hours</u>
1 <b><u>Adult Education and Digital Literacy Fundamentals</u></b> – Acquire knowledge and experience with computer literacy, business math, and language skills through independent work, group projects, and class presentations.	2	60
2 <b><u>Introduction to Medical Assisting</u></b> – Learn components of the medical field, legal and ethical standards required for certification.	2	60
3 <b><u>Electronic Medical Records</u></b> – Explore electronic medical records systems via a learning system that provides trainees with a realistic, hand-on experience for mastery of the modern medical office - from front office (administrative) skills to clinical skills to practice management skills (billing, coding, and insurance).	3	90
4 <b><u>Medical Terminology</u></b> – Learn the Language of Medicine and Healthcare. Understand the origin and the parts used to build medical words. Learn its use in patient care, medical history, diagnostic testing, treatment, billing and coding, and the charting process.	3	90
5 <b><u>Fundamentals of Clinical Medical Assisting</u></b> - Learn about infection control, doing patient assessments, patient education, nutrition and health promotion, vital signs, and assisting with the primary physical examination.	1	40
6 <b><u>Anatomy and Physiology</u></b> – Learn about the human body systems including hands-on skills pertaining to each system. Practice diagnostic procedures utilizing appropriate equipment required for diagnosing disorders within the body systems.	5	150
7 <b><u>Pharmacology and Medication Administration</u></b> – Learn about apothecary weights and measures; learn principles of proper drug administration.	4	120
8 <b><u>Clinical Procedure Evaluations</u></b> – Learn, practice and master clinical procedures including handling emergencies (CPR certification), vital signs and physical examinations, as well as, principles of universal precautions including aseptic functions, patient positioning and proper disposal of hazardous wastes.	4	120
9 <b><u>Success Skills</u></b> – Learn self-presentation, communication, relationship building, and employment skills through daily practice in a simulated workplace environment. Uses practical, hands-on curriculum integrated through a number of resources such as web-based applications, project-based education, group exercises, role playing scenarios and other materials as deemed necessary and relevant through industry standards.	3	90
10 <b><u>Career Coaching and Development</u></b> – Learn how to complete an employment portfolio focusing on the following items: job applications, resumes, references, cover and thank you letters. Develop a Personalized Career Strategy identifying future goals. Practice effective interviewing techniques in mock interviews.	3	90
<b>Total Course Weeks/Hours:</b>	<b>30</b>	<b>910</b>
<b><u>Supervised Externship</u></b> – Supervised work in an approved hospital, clinic, or similar environment.	4	160
	<b>34</b>	<b>1070</b>

# Financial Aid

## Financial Aid Programs

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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 can 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

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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**

FA 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)**

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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 over-award, 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**

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Federal Work Study (FWS) is a Campus Based program available to trainees on a limited basis. Generally, trainees who are eligible for FSA, can 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**

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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**

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Tuition	\$9,185.00
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**

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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**

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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**

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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 be 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**

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All trainee files must remain secure at all times in locked cabinets. Hard copy files containing financial aid information will be safeguarded at all times.

## **Insurance**

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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**

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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/High School Equivalency Instruction**

Trainees without a GED will be permitted to enroll in CET, but they will not be eligible for federal student aid without meeting Title IV Ability-to-Benefit criteria, and they must obtain their GED before program completion. GED instructors from the Campbell County Skills U 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. For trainees participating in the Evening/Weekend Medical Assisting training schedule, CET will leverage its partnership with CCSU to ensure that GED programming is accessible.

## **Graduation Ceremony**

To be eligible to participate in CET's Graduation Ceremony, trainees must complete 100% of all competencies in a skill division and obtain employment. Trainees who enroll in CET without a GED must also complete their GED to be eligible to participate in the graduation ceremony. A formal graduation ceremony is held annually. If the number of graduates is exceptionally large, a second ceremony may be added. Trainees who complete their training and obtain employment 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**

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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 CET Coordinator at (859) 491-8303 ext. 2204.

## Veterans' Education Benefits

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Brighton Center's Center for Employment Training is approved by the Kentucky State Approving Agency for Veterans Education (SAA) to offer VA Educational Benefits (GI Bill®) to eligible individuals enrolled in approved programs.

Veterans' education benefits can be accessed by applying on-line at [www.vets.gov/education/apply](http://www.vets.gov/education/apply). Trainees must complete one of the following forms based on their circumstances.

Trainees who have never accessed VA education benefits should use these forms:

- Form 22-1990 Application for VA Education Benefits
- Form 22-5490 Application for Survivors' and Dependents' Educational Assistance

Trainee who have used VA educational benefits before should use these forms:

- Form 22-1995 Request for Change of Program or Place of Training
- Form 22-5495 Request for Change of Program or Place of Training Survivors' and Dependents' Education Assistance

After receiving a Certificate of Eligibility from the VA, a trainee can ask CET to certify enrollment by submitting a request to the CET VA Certifying Official. Please go to the Financial Aid Officer's office to submit the request.

For general or detailed information about VA education benefits, call (888) 442-4551. For questions about how to access your VA benefits, please call (859) 491-8303 ext. 2204.

*\*GI Bill is a registered trademark of the U.S. Department of Veterans Affairs (VA)\**

# 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

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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

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Enrollment at CET requires 1) the ability to attend – both in-person and Distance Education – during the scheduled training hours, and 2) a means of reliable communication that is active and accessible during training hours. At the minimum, a telephone and/or way to communicate via SMS message or email, is necessary to complete the required check-ins when participating via Distance Education. CET offers resources and coaching to assist prospective trainees with preparing to start training.

CET requires trainees to attend and participate for all scheduled weekly hours (see Training Schedule for specific schedules). 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 can only miss 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 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 before their scheduled start time.
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 & Communication**

If a trainee is running late, they must communicate with their Success Coach by the start of class. Excessive tardiness or absenteeism, whether excused or unexcused, is grounds for disciplinary action.

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

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

New Year’s Day	Memorial Day	Labor Day
Martin Luther King Day	Juneteenth	Thanksgiving
Good Friday (Half 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 a short winter break at the end of December.

### **Trainee Evaluation**

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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.

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.

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 GPAs 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 34% 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 Coaching 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 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**

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**

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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
- Loungewear (tops, bottoms, or slippers) or sweatpants
- Headwear (ball caps, bandanas), unless approved by your instructor
- Clothing with logos or statements that may be controversial or offensive
- For MA, no open-toed shoes
- For MA, all tattoos covered

Trainees may 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.

### **Diversity, Equity, and Inclusion**

Brighton Center and CET are committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. We embrace and encourage our trainees' and employees' differences in age, sex, color, disability, ethnicity, creed, family or marital status, gender identity or expression, language, national origin, physical and mental ability, race, religion, sexual orientation, socio-economic status, veteran status, political belief, and other characteristics that make our trainees and employees unique.

All trainees and employees are expected to exhibit conduct that reflects inclusion during work and training, at work/training functions on or off the work site, and at all other company-sponsored and participative events. Any trainee found to have exhibited any inappropriate comments or behaviors against others may be subject to disciplinary action, including withdrawal. Any Brighton Center employee found to have exhibited any inappropriate comments or behaviors against others may be subject to disciplinary action, including termination, per Brighton Center policy 4B-17 (a copy of this policy may be requested at any time by contacting the CET Coordinator).

Trainees who believe they have been subjected to any kind of discrimination that conflicts with this Diversity, Equity, and Inclusion policy should report the incident following the Grievance Policy and Procedure.

### **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 in accordance with 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 Coordinator's office.

## **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**

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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
- Using racially and/or culturally-insensitive gestures or 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 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 Procedure**

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 campus 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**

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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 CET Coordinator at (859) 491-8303 x2202. The report is also available on our website at [www.bccet.edu](http://www.bccet.edu).

## 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 training will be cancelled; however, the facility will remain open. 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 our social media outlets, including Facebook and Instagram.

# Emergency Action Plan

In emergency situations, a “cool head” is a secure and stabilizing influence on the entire group. Panic is the worst possible response to an emergency. The importance of this plan cannot be overstressed; each staff member is trusted to know these procedures for use in emergencies.

## Fire Procedures

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In the event of evidence of fire, and/or the sounding of the building alarm system, all trainees, guests, and employees (henceforth referred to as “individuals”) are to evacuate the facility immediately. It is the responsibility of the individual who discovers the fire to call 911 and give the operator the facility address, 601 Washington Avenue, Suite 140, Newport, KY 41071. Always provide the street address of the facility so that emergency responders are not dispatched to another Brighton Center, Inc. building.

1. All individuals will exit the building in a calm and orderly fashion and will convene on the sidewalk across the street at the corner of 6th Street and Washington Avenue (by the Watertower Square parking lot).
2. While evacuating, close, but do not lock interior CET doors. Skill division staff will bring the skill division sign-in sheets along when leaving the building for the purposes of taking attendance at the meeting point.
3. Once individuals exit the building, no one may go back inside until the all clear is given by emergency first responders.
4. Skill Instructors/Success Coaches will take attendance of all trainees who are signed in that day from the sign-in sheet.
5. Report attendance results to the CET Coordinator and/or Workforce Development Director, who will be standing at the corner of 6th and Washington. If the CET Coordinator and Workforce Development Director are not present for the emergency, the CET Manager will perform this duty in their absence.
6. The CET Coordinator will report any unaccounted-for individuals (who may still be in the building) to the emergency first responders.
7. Individuals should not the facility until cleared by the emergency first responders.

## Medical Emergency Procedure

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It is the responsibility of the individual who discovers the medical emergency to call 911 and give the operator the facility address, 601 Washington Avenue, Suite 140, Newport, KY 41071.

Always provide the street address of the facility so that first responders are not dispatched to another Brighton Center, Inc. building.

Major rescue and medical duties outside the scope of basic first aid should be left to Emergency Medical Technicians (EMT) or Paramedics, who should be notified immediately by calling 911. Unless trained to provide first aid, do not attempt to render any first aid before emergency assistance arrives. Please note that the Medical Assisting Skill Instructor is qualified to administer basic first aid and should be called upon to assist until emergency responders arrive on scene.

Procedure:

1. Upon the discovery of a medical emergency, call 911.
2. Notify the CET Manager, CET Coordinator, or Workforce Development Director immediately.
3. Do not move the injured or ill person. Try to make them comfortable, if possible, and reassure them that medical attention is on the way.
3. Retrieve the first aid kit and/or AED. The AED machine is located in the Trainee Breakroom, and training is provided through CPR classes. The machine initiates verbal and pictorial use instructions once turned on. First Aid kits are located in the following locations:
  - Front desk drawer in lobby
  - Staff Breakroom file cabinet
  - Health Technology Administration skill division
  - Human Resources & Payroll Specialist skill division
  - Medical Assisting skill division
4. Universal precautions to Bloodborne Pathogens should be implemented according to agency policy while administering basic first aid. Use personal protective equipment (gloves and eye protection) when being exposed to bodily fluids (i.e. blood, vomit)
5. Once the injured/ill individual's immediate needs have been taken care of, remain nearby to assist medical services with any pertinent information about the incident.
6. After the emergency responders take control of the situation, report the incident to the CET Coordinator and/or Workforce Development Director and complete an Incident Report.

## **Public Health Emergency Procedure**

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It is the goal of Brighton Center, Inc. during a period of an infectious disease outbreak or pandemic to maintain essential functions and services and provide a safe and healthy work environment for employees and the public. Brighton Center, Inc. is committed to establishing

methods for monitoring practices and safety protocols, implementing measures to minimize exposure in the workplace and sustaining operational functions while the agency is opening services to resume normal operations.

Procedure:

During times of disease outbreak, including but not limited to local, State or national emergency and/or disaster, regular monitoring of Centers for Disease Control and Northern Kentucky Health Department data will be undertaken by the Workforce Development Director and/or Brighton Center, Inc. executive leadership. Through use of the Emergency Protocol Procedure (see below), the Workforce Development Director and/or executive leadership will determine and communicate necessary changes to Brighton Center – CET scope of services, staffing, work arrangements, safety protocols, etc.

Brighton Center, Inc. will continue to monitor and communicate safety measures in compliance with Federal, State, and local laws and guidance. Brighton Center, Inc. will adjust the Healthy at Work Protocol according to communications from these entities.

## **Severe Weather Procedures**

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### **Tornado**

When weather conditions appear threatening, employees shall turn on either television or radio to ensure prompt notification of tornado or severe storm watches and warnings issued by the National Weather Service. A tornado *watch* means conditions are favorable for a tornado to develop. A tornado *warning* means an actual tornado has been sighted in the area.

1. During a tornado watch, employees should alert all other employees in the building of the weather status. Any outdoor activities will be postponed until the watch has been cancelled by the National Weather Service.
2. During a tornado warning, all trainees, guests, and employees shall proceed to the safe area (see below) and position themselves so as to protect their eyes and head by assuming a curled (fetal) position with head and face covered by arms as much as possible.

The designated safe areas within CET are:

- Medical Assisting skill division
- Conference Room
- Hallway between Medical Assisting and the Conference Room

If time does not permit entry into the safe area, all individuals should stay together and go immediately to the safest area available. Areas that may afford the most protection include:

- Spaces below ground level
- Spaces farthest from exterior doors and windows
- Structures that do not have wide, free span roofs

## **Winter Weather**

Brighton Center, Inc. will be closed for all non-emergency services, including Center for Employment Training, in the event of a Level 3 Snow Emergency issued by the county in which the facility is located. Outside of a Level 3 Snow Emergency, training will be cancelled when the Newport Independent School District declares a snow day; however, staff will report to work and the facility shall remain open. The CET Coordinator is responsible for posting closing/delay information on CET social media outlets, including Facebook and Instagram.

## **Flood**

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1. Evacuate immediately, if told to evacuate by first responders or emergency radio broadcast alert. Never drive around barricades. Emergency responders use them to safely direct traffic out of flooded areas.
2. If trapped by flood waters, evacuate to the 4th floor of the Watertower Square building. Only get on the roof if necessary. Do not attempt to leave the facility or drive away.
3. Once on the highest floor in the building, call 911 and give the operator the facility address, 601 Washington Avenue, Suite 140, Newport, KY 41071. Always provide the street address of the facility so that first responders are not dispatched to another Brighton Center, Inc. building.
4. If driving or outside, do not walk, swim or drive through flood waters. Stay off bridges over fast-moving water. Fast-moving water can wash bridges away without warning. If driving, stay inside your car if it is trapped in rapidly moving water. Get on the roof if water is rising inside the car.
5. Listen to EAS, NOAA Weather Radio or local alerting systems for current emergency information and instructions regarding flooding.

## **Earthquake Procedure**

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An earthquake is a sudden, rapid shaking of the earth caused by the breaking and shifting of rock beneath the earth's surface. Earthquakes strike suddenly, without warning, and they can occur at any time of the year, day or night. In the event of an earthquake, complete the following:

1. Pick safe places in each room of the building. A safe place should be under a piece of furniture or against an interior wall away from windows, bookcases, or tall furniture that can fall on you. Stay away from windows to avoid being injured by shattered glass.

2. Sit on the floor, protect your head, and hold to available fixtures, desks, or tables. If you do not have sturdy furniture to hold on to, sit in the floor next to an interior wall and cover your head and neck with your arms. Stay indoors until the shaking stops and you are sure it is safe to exit.
3. If you are outside when the shaking begins, find a clear spot and drop to the ground. Stay there until the shaking stops (sway from buildings, power lines, trees, and streetlights).
4. If you are in a vehicle, pull over to a clear location and stop. Avoid bridges, overpasses, and power lines if possible. Stay inside the vehicle with seatbelts fastened until the shaking stops. Then, drive carefully, avoiding bridges and ramps that may have been damaged. If a power line falls on your vehicle, do not get out. Wait for assistance.
5. Be aware that fire alarm systems frequently go off in buildings during an earthquake, even if there is no fire.
6. After an earthquake, the disaster may continue. Expect and prepare for aftershocks. Each time you feel an aftershock, repeat steps 1-4. Stay indoors until the shaking stops and you are sure it is safe to exit.
7. When the shaking stops, check yourself and other individuals for injuries and get/perform first aid if necessary. Call 911 immediately to report medical emergencies, if applicable.
8. Fire is the most common hazard after an earthquake. Extinguish any small fires and evacuate utilizing the Fire Procedure as much as is possible.
9. If not in immediate danger, look quickly in and around the building for hazards. Evacuate the facility, if unsafe and call 911 to report significant structural damage, fire, gas leaks, etc. Be aware of hazards such as broken furniture, glass, downed power lines, and broken gas lines. Wear gloves to protect from broken objects. Do not enter damaged areas. Open closets and cabinets carefully as contents may have shifted.
10. Listen to emergency radio broadcasts for updated emergency information and instructions.

## **Bomb Threat Procedures**

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In the event of a bomb threat, all trainees, guests, and employees (henceforth referred to as “individuals”) are to evacuate the facility immediately. The individual who received the bomb threat will immediately notify the CET Coordinator, Workforce Development Director, and or CET Manager, whose responsibility it is to immediately give the order to evacuate and to call 911 and give the operator the facility address, 601 Washington Avenue, Suite 140, Newport, KY 41071. Always provide the street address of the facility so that first responders are not dispatched to another Brighton Center, Inc. building.

1. All individuals will exit the building in a calm and orderly fashion and will convene on the sidewalk across the street at the corner of 6<sup>th</sup> Street and Washington Avenue (by the Watertower Square parking lot).
2. While evacuating, close, leave interior CET doors propped open, if possible. Skill division staff will bring the skill division sign-in sheets along when leaving the building for the purposes of taking attendance at the meeting point.
3. Once individuals exit the building, no one may go back inside until the all clear is given by emergency first responders.
4. Skill Instructors/Success Coaches will take attendance of all trainees who are signed in that day from the sign-in sheet.
5. Report attendance results to the CET Coordinator and/or Workforce Development Director, who will be standing at the corner of 6<sup>th</sup> and Washington. If the CET Coordinator and Workforce Development Director are not present for the emergency, the CET Manager will perform this duty in their absence.
6. The CET Coordinator will report any unaccounted-for individuals (who may still be in the building) to the emergency first responders.
7. Individuals should not the facility until cleared by the emergency first responders.

## **Workplace Violence Procedures**

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### **Workplace Violence**

A violent situation is when an individual is creating a threatening situation. This could involve threatening speech, a weapon, or a condition that seems to be escalating beyond one's control.

#### **Preventative Measures:**

CET has one entrance unlocked during business hours. All other entrances are locked from the outside. Staff monitor the main entrance at all times. All non-agency visitors must sign in at the front desk upon entry. Any visitor that attempts entry without signing in will not be permitted entry. CET has several exits throughout the facility. Employees and trainees are instructed on evacuation routes.

#### **Procedures for employees responding to a violent situation:**

1. Try to defuse the situation. Respond to the individual quietly and calmly.
2. Try to seek additional information from the perpetrator and offer possible resolutions.

3. Offer an apology. This is good customer service and may calm the violent individual.
4. Never touch the violent individual. The action could be interpreted as threatening.
5. Signal for assistance. Call a colleague, preferably a supervisor, and say, “hold my calls.” Upon receiving this notification, staff will immediately respond to the situation and prepare to call 911, if necessary.
6. If the situation escalates, make an excuse to leave and evacuate the facility, if necessary.

Procedures for communicating among staff regarding violent situations:

1. Be aware of when colleagues are meeting with individuals.
2. Communicate with colleagues about upcoming meetings with individuals that have a violent history or if there are related concerns.
3. Never schedule a meeting with an individual that has a violent history in isolation.
4. If you discover a violent situation, alert colleagues that there is an emergency. This allows them to assist with the situation, notify the authorities, as well as help others to move to a safe area.
5. If a situation escalates, contact the authorities.

### **Hostage Situations**

In the event of a hostage situation, remain calm and cooperate with the perpetrator. If possible, call 911 and alert other employees. Employees made aware of a hostage situation should immediately call 911 and initiate evacuating individuals from the facility using the following procedure:

1. All individuals will exit the building in a calm and orderly fashion and will convene on the sidewalk across the street at the corner of 6th Street and Washington Avenue (by the Watertown Square parking lot).
2. While evacuating, close, leave interior CET doors propped open, if possible. Skill division staff will bring the skill division sign-in sheets along when leaving the building for the purposes of taking attendance at the meeting point.
3. Once individuals exit the building, no one may go back inside until the all clear is given by emergency first responders.
4. Skill Instructors/Success Coaches will take attendance of all trainees who are signed in that day from the sign-in sheet.

5. Report attendance results to the CET Coordinator and/or Workforce Development Director, who will be standing at the corner of 6th and Washington. If the CET Coordinator and Workforce Development Director are not present for the emergency, the CET Manager will perform this duty in their absence.
6. The CET Coordinator will report any unaccounted-for individuals (who may still be in the building) to the emergency first responders.
7. Individuals should not the facility until cleared by the emergency first responders.

### **Active Shooter/Person with Weapon Procedures**

According to the Department of Homeland Security (DHS), an “Active shooter/Person with Weapon is an individual actively engaging in killing or attempting to kill people in a confined and populated area.” Typically, the immediate deployment of law enforcement is the response action taken to stop the shooting and mitigate harm to victims. Because active shooter situations are often over within 10-15 minutes – before law enforcement arrives on the scene – individuals must be prepared both mentally and physically to deal with the situation. Active shooter violence tends to be highly random and sporadic and is usually motivated by either a personal grievance (workplace violence) or the result of a mental illness.

The ALICE procedure focuses on maximizing survivability in an active shooter situation by being proactive and provides additional options beyond traditional lockdown. In the event of an active shooter/person with a weapon within the facility, the ALICE procedure should be use.

**A – Alert:** The sooner you understand that you are in danger, the sooner you can save yourself. A speedy response is critical. Seconds count. Alert is overcoming denial, recognizing the signs of danger and receiving notifications about the danger from others. Alerts should be accepted, taken seriously, and should help you make survival decisions based on your circumstances.

**L – Lockdown:** Barricade the room. Prepare to counter or evacuate, if needed.

If evacuation is not a safe option, barricade entry points into your room in an effort to create a semi-secure starting point.

**I – Inform:** Communicate the assailant’s location and direction in real time. The purpose of inform is to continue to communicate information in as real time as possible, if it is safe to do so. Armed intruder situations are unpredictable and evolve quickly, which means that ongoing, real time information is key to making effective survival decisions. Information should always be clear, direct and in plain language, not using codes. If the shooter is known to be in an isolated section of a building, occupants in other areas can safely evacuate while those in direct danger can perform enhanced lockdown and prepare to counter.

C – Counter: Create distractions by way of noise, movement, and distance. The intent is to reduce the shooter’s ability to shoot accurately. Counter is not fighting.

ALICE training does not believe that actively confronting a violent intruder is the best method for ensuring the safety of those involved. Counter is a strategy of last resort. Counter focuses on actions that create noise, movement, distance and distraction with the intent of reducing the shooter’s ability to shoot accurately. Creating a dynamic environment decreases the shooter’s chance of hitting a target and can provide the precious seconds needed in order to evacuate.

E – Evacuate: When safe to do so, remove yourself from the danger zone. Police and emergency personnel will enter the building to assist with evacuation and administer first aid to injured individuals.

Procedures for employees in an Active Shooter/Person with Weapon situation:

1. In the event of an Active Shooter/Person with a Weapon onsite communication to all persons in the building will take place through blowing the air horn located in the Safety Bag in each room. 911 should be called immediately via landline if close by or cell phone to alert first responders. All individuals must run from the air horn, not towards.
2. Employees will proceed to secure their areas. Assertively and firmly direct trainees and guests to shut and lock the skill division doors and barricade entrances by moving furniture, equipment, or any objects that may make it more difficult for the assailant to enter the room.
3. Locate the Safety Bag in each area, utilize the doorstep and rope to secure door and administer First Aid if needed. Each office and skill area will have a small fire extinguisher and safety bag (gloves, bandages, rope, duct tape, doorstops, tape, and gauze) to assist with lock down, counter, and first aid administration.
4. If safe, use cell phone to communicate information via text message or discreet phone call regarding the intruder with police and colleagues within the building to ensure all are aware of the situation.
5. Employees must keep all individuals quiet and remain in place until police and first responders reach them. At that time, police take responsibility for the situation and all are required to adhere to their direction.

## **Emergency Protocol Procedure**

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Brighton Center, Inc. may activate an emergency protocol in the event of a local, state or national emergency and/or disaster. The protocol will be in place to maintain operations and provide flexibility in the workforce.

Procedure:

Upon Emergency Protocol activation, the Workforce Development Director and/or Executive Leadership will determine temporary changes to the scope of services (for example program procedures, postponements, etc.) and model for staffing (including work assignments, daily scheduling, alternate work arrangements, telecommute requirements, use of paid time off, and/or other related needs) to assure continuity of program services and administrative operation. Status of changes made during Emergency Protocol will be reviewed regularly and communicated appropriately.

## **Emergency Maintenance Procedure**

In the event of a maintenance emergency, the individual discovering the problem should contact the CET Coordinator or Workforce Development Director immediately. The Coordinator (or Director) will contact Hemmer Management Group, the owners and facility management company of Watertower Square. Hemmer Management Group is responsible for facility upkeep and will assume responsibility in the event of a maintenance emergency.

## **Emergency Temporary Workplace Procedure**

### ***Emergency Worksite***

If a worksite is closed, the Workforce Development Director will consult with Brighton Center, Inc. executive leadership to determine a temporary Emergency Worksite at another Brighton Properties facility. Maintaining safety while attempting to provide uninterrupted service delivery will be the goal.

### ***Computer Data Recovery***

A full backup of Brighton Center, Inc. servers is completed regularly. It is important to save documents on the network so they are backed up. Individual computer hard drives are not backed up.

### ***Emergency Phone, Internet, and Fax Use***

The Emergency Worksite will provide telephone, internet, and fax use, as needed, to provide uninterrupted service delivery.

## **Emergency Communications Procedures**

### ***Emergency Communications***

The Workforce Development Director will contact the executive leadership of Brighton Center, Inc. to coordinate communication to employees, individuals and families served, and the media. The President and CEO of Brighton Center, Inc. is responsible for notifying applicable members of the Brighton Center, Inc. Board of Directors of the emergency.

### ***Media Communication Procedures***

Refer all media inquiries in an emergency to the Workforce Development Director. Media handling procedures are provided in the Brighton Center Policies and Procedures Manual for further clarification.

## **Reporting and Investigating Accidents**

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In case of accidents or incidents, Brighton Center – CET trains all employees on incident reporting procedures. Staff members document details and involved parties of an accident or incident on the Incident Report Form. The form is reviewed by the CET Coordinator and Workforce Development Director, and incident reports are reviewed in Risk Management Committee, a meeting of Brighton Center, Inc. upper management to assess risk, liability, and safety issues that may need attention. The CET Coordinator follows up on incident reports to debrief staff and trainees as needed.

# 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 at least 160 hour externship to obtain employment as a Medical Assistant, so all MA trainees must complete an externship to successfully complete training. Health Technology Administration have externship opportunities available to high-performing trainees interested in gaining additional experience.

## Career Attainment Assistance

CET prepares trainees for employment from the start of training, with technical career search skills, a 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 career attainment 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 attain a career 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

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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. The website is [www.council.org](http://www.council.org).**

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

#### **Procedure:**

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.

### **Filing a Complaint with the Kentucky Commission on Proprietary Education**

To file a complaint with the Kentucky Commission on Proprietary Education, a complaint shall be in writing and shall be filed on Form PE-24, Form to File a Complaint, accompanied, if applicable, by Form PE-25, Authorization for Release of Student Records. The form may be mailed to the following address: Kentucky Commission on Proprietary Education, 500 Mero Street, 4<sup>th</sup> Floor, Frankfort, Kentucky 40601. The forms can be found on the website at [www.kcpe.ky.gov](http://www.kcpe.ky.gov).

### **Existence of the Kentucky Student Protection Fund**

Pursuant to KRS 165A.450 All licensed schools, resident and nonresident, shall be required to contribute to a student protection fund. The fund shall be used to reimburse eligible Kentucky students, to pay off debts, including refunds to students enrolled or on leave of absence by not being enrolled for one (1) academic year or less from the school at the time of the closing, incurred due to the closing of a school, discontinuance of a program, loss of license, or loss of accreditation by a school or program.

## **Process for Filing a Claim Against the Kentucky Student Protection Fund**

To file a claim against the Kentucky Student Protection Fund, each person filing must submit a signed and completed Form for Claims Against the Student Protection Fund (Form PE-38) and provide the requested information to the following address: Kentucky Commission on Proprietary Education, 500 Mero Street, 4<sup>th</sup> Floor, Frankfort, Kentucky 40601. The form can be found on the website at [www.kcpe.ky.gov](http://www.kcpe.ky.gov).

## **Sexual Harassment Policy**

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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**

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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.

### **Personal Data and Confidentiality**

Brighton Center and CET protects the confidentiality of information about individuals and families served and complies with all applicable legal requirements. Confidential information and records includes, but is not limited to, information entered into the Agency database (BrightonForce), information about an individual's or family's participation in a program or service, social history, medical history, psychological history, employment history, treatment, financial information, or future placement.

All trainees must complete the Release of Information form upon enrollment. CET Staff are required to uphold all Brighton Center policies and procedures relating to confidentiality and the protection of personal data (copies of these policies may be requested at any time by contacting the CET Coordinator).

## **Security of Information**

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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 seven 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.

## **Request for Information**

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Trainees may request hard copies of all CET institutional plans by contacting the CET Coordinator.

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

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### 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**

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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 741 Central Avenue, Newport, KY 41071.

## **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.



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