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## **Financial Aid**

## **Financial Aid Programs**

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

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

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

## **Financial Aid Eligibility**

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

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

#### How to Apply for Aid

Applicants should contact CET's Financial Aid office for the necessary forms and guidance during the admissions process. An applicant will need to complete a Free Application for Federal Student Aid (FAFSA); information is available and applications can be completed via the internet at <u>http://www.fafsa.ed.gov</u>. This form is used to determine eligibility and amount of award for each type of Federal Student Aid. The form is available from the Financial Aid office, and normally is completed 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 trainees 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 Dispersements

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 is paid in full.

### **Additional Information**

Further information on Federal Student Aid Programs can be found in the booklet, "The Student Guide", which is available to Federal Student Aid applicants at the time of application. Additional copies of the booklet and the application are available in the Financial Aid Office.

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

The following individuals will have their information verified by CET's Financial Aid Office (FAO):

<u>Applicants selected on the ISIR for verification</u> – If CET has reason to believe that any information on the application used to calculate the EFC is discrepant or inaccurate (or if any supporting documentation is discrepant or inaccurate), CET will require the applicant to provide adequate documentation to resolve the conflict.

<u>Applicants not selected for verification</u> – CET will resolve conflicting information regardless of whether or not the applicant was selected for verification. The Financial Aid Office will review all tax returns provided to the school even if they were not requested. All C Codes (changes to EFC) on the ISIR will be reviewed and resolved by the FAO.

The FAO is required to resolve any discrepancies discovered in a trainee's file. Because need analysis information is only collected from the DOE, and additional information is typically not requested from trainees who are not selected for verification, conflicting information is systematically rare.

Beginning with the 2012-13 award year, if the Central Processing System (CPS) selects an application for verification, the FAO will verify the elements listed below. In addition to verifying these required items for CPS-selected trainees, CET can choose to verify any other application items, requiring any 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.

- Household size
- Number enrolled in college
- Food stamps
- Child Support paid
- Income information for tax filers:
  - Adjusted Gross Income (AGI)
  - U.S. Income Tax paid
  - Untaxed IRA distributions
  - Untaxed pensions
  - Education Credits
  - IRA Deductions
  - Tax exempt interest
- Income information for non tax filers:
  - Income earned from work

## **Verification Time Frame**

The FAO will inform applicants of required paperwork to complete the financial aid application. If the FAO has received DOE information identifying the trainee as being selected for verification, a request for the appropriate verification documents (i.e., verification form, and trainee and parent tax transcripts) is made as well as the time frame for submission of this information.

If a trainee submits documentation, which appears fraudulent, the FAO will notify the CET Coordinator.

## **Document Collection Procedures**

Required documentation items are identified and the receipt date is maintained in the trainees financial aid file. When documents arrive, the FAO will enter a receipt date on the document. When all required documents are received, the trainee is considered complete and ready to be packaged. The financial aid files are secured by the FAO for verification and packaging.

Documentation submitted to the FAO 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 training submits a W-2), or identifiable (trainee submits a copy of the step-parents tax return and the last name does not match the trainee's and there is no trainee social security number) the documents will be returned and a request for additional documentation is requested.

#### **Processing Time Period**

Trainees are notified that the majority of financial aid funds are awarded on a firstcome, first-serve basis and that until the missing items are submitted to the FAO, additional processing of their file is not possible.

#### Failure to Comply

Trainees who fail to submit verification documents never become complete; therefore, aid is not awarded for these trainees.

#### Submission After Deadline

Trainees who submit verification documents very late after the time they were requested will be awarded aid on an availability basis.

#### Notification of Verification to Applicants

Trainees are notified that they are selected for verification on the Student Aid Report (SAR).

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

CET systematically verifies only those data elements required by the federal government. However, the FAO is free to ask for additional information if further investigation is needed to resolve a discrepancy. All required signatures will be present on the Verification Worksheet. Verification must be complete before professional judgment is excised to adjust any values that are used to calculate EFC.

#### 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.

### Exclusions

Although regulations allow situations when verification of household size is not required, the FAO does not have a systematic way to track these exclusions. Therefore, all trainees selected for verification must submit a response to the household size question on the Verification Worksheet.

## 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.

### Exclusions

Although regulations allow situations when verification of number at the Institution is not required (See Chapter 2, page 19 of the DOE Verification Guide), the FAO does not have a systematic way to track these exclusions. Therefore, all trainees selected for verification must submit a response to the household size question on the Verification Worksheet.

## Institutional Discretionary Items

The FAO verifies those applicants identified by the Department of Education (DOE). The FAO may select a trainee for verification if there is a discrepancy or a condition, which is unusual and warrants investigation. If a trainee submits verification documentation (i.e., tax return), the FAO must verify the information on the document against the information in the trainee's file.

#### Tolerances

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.

#### **Notification to Trainees**

Trainees are notified of the results of verification by the FAO.

#### **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 PIN. The FAO can assist trainees with accessing FAFSA to make corrections or to obtain a duplicate PIN.

### **Overpayments**

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

#### **Updating Requirements and Procedures**

There are three situations whereby the FAO may update trainees' information. When trainees notify the FAO of an allowable update, the FAO may recalculate the trainee's EFC and the new figure may be used to award financial aid. Updates may occur for

- 1. Dependency status (may not be changed due to marital status).
- 2. Family size.
- 3. Number of family members enrolled in a postsecondary institution.

#### **Interim Disbursements**

Because CET is liable for disbursements made prior to verification, CET does not allow interim disbursements. Trainees must complete the verification process before aid is awarded 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 the FAO suspects that a student, employee, or other individual has misreported information or altered documentation to fraudulently obtain federal funds, CET will report suspicions and provide evidence to the Office of Inspector General (OIG). The OIG hotline is 1-800-MIS-USED.

## Federal Supplemental Educational Opportunity Grant (FSEOG)

The FSEOG is a 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 must be made available equitably throughout the year by month in consideration of multiple start dates.

#### **Overawarding**

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

## Recordkeeping

Financial aid records are maintained in trainee folders. Trainee records include the demonstration of need and FSEOG eligibility. The Coordinator, the FAO, and the Accounting Office are responsible for account management and appropriate record security for all trainee aid transactions.

#### **Trainee Eligibility**

FSEOG funds are awarded only to first-time undergraduates who are Pell eligible. Trainee eligibility is determined only through the Central Processing System of the Department of Education using the Federal Methodology need analysis formula.

#### 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 a portion of the FSEOG allocation. In no instance will the FSEOG funds when combined with Pell funds and third party funds exceed educational expenses.

#### 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).

#### **Disbursement**

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

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

### **Federal Work Study**

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

## **Tuition Policy & Fees**

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  $3^{rd}$  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**

2013-2014 Tuition	\$8350.00
Room and Board estimate	\$3,400.00
Transportation costs <i>estimate</i>	\$700.00

### **Textbook Pricing and Information**

Books are made available to trainees. If a trainee decides to purchase a textbook that CET provides, the expected costs are listed below:

#### **Microsoft Office Technology**

*Microsoft Office 2010, Illustrated: Introductory with SAM 2010 ISBN-13: 978-1-133-53026-8,* **\$154.92** 

*Microsoft Office 2010, Illustrated: Second Course ISBN-13: 978-0-538-74813-1,* **\$123.49** 

### **Medical Assisting**

Saunders Book of Medical Assisting, 2<sup>nd</sup> Ed., Diane M. Kleiger ISBN-10: 0-7216-9572-8 Medical Terminology: A Short Course, Davi-Ellen Chabner, 5<sup>th</sup> ed. ISBN-13: 978-1-4160-5518-1, Bundle price: \$122.98

<u>Construction and Manufacturing Technologies</u> NCCER Core Curriculum, ISBN-10: 0-7216-9572-8, **\$100.00** 

## **Textbook Availability**

CET provides makes textbooks available to trainees within seven days after official enrollment. After completing their Orientation period, trainees will have full access to required textbooks for their skill division.

## **Cancellation Rights**

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

## **Return to Title IV Policy**

CET is committed to ensuring compliance with all required regulations for Return to Title IV, HEA programs. When a trainee receiving a Title IV grant withdrawals 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 Return to Title IV 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 enrolling trainee for the Financial Aid Office.

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 trainees 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-day orientation period, 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 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 postwithdrawal disbursement may be made to the account or estate of a student who has died.

### Trainee Responsibility for Returning Unearned Aid

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

### **FSEOG**

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

### Leave of Absence

A trainee may be granted an official Leave of Absence (LOA) for medical issues. A request for LOA must give the reason for the leave, be dated, and be signed by the requesting trainee. A request for LOA must be submitted to the Skill Instructor prior to the first day of the leave and be approved by the Department Director. If an unforeseen circumstance prevents the trainee from providing a prior written request, CET may grant the trainee's request for a leave of absence. This decision must be documented in the trainee's file and the written request from the trainee must be secured as soon as possible. For example, a trainee is injured in a car accident and needs a few weeks to recover before returning to CET, the trainee would not have been able to request the LOA in advance. This will be documented in the trainee's file and signed upon the trainee's return to CET. The date of the approved LOA would be the date the trainee was unable to attend CET because of the accident.

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 medical documentation prior to the <u>end</u> 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 is counted beginning with the first day of the trainee's LOA in a 12-month period.

Because training is self-paced, returning trainees resume work where they left off prior to the LOA. A trainee who does not return to CET at or before the end of their LOA, CET will treat the trainee as withdrawn as of their last day of attendance. The LOA will not involve any additional charges to the trainee by CET.

#### **Readmission After Withdraw**

Trainees who have previously attended CET and withdrawn, either during Orientation or after having officially enrolled, may be readmitted. CET is under no obligation to readmit any trainee, regardless of withdrawal circumstances.

Trainees who withdraw and restart within 180 days of the date of withdraw will 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.

#### **File Security**

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

#### Insurance

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

## **Student Eligibility**

## How to Apply

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

Instruction is ongoing, allowing trainees to begin classes every week. CET's instructional programs are hands-on, individualized, and self-paced. Courses do not require previous academic experience, and many find success through CET's instructional model that have not been successful in traditional school settings. Training is offered 34 hours per week from 8:30 AM to 4:00 PM, Monday through Friday. One day per week, skill divisions will release trainees at 3:00 PM.

Interested persons may sign up for an information session at CET during business hours, weekdays from 8:30 AM - 5:00 PM, or by calling (859) 491-8303 x2200. Trainees are generally given a start date according to how quickly eligibility and financial aid

requirements are completed. Trainees may be eligible for financial aid offered through  $3^{rd}$  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. Other specific requirements may apply depending on the source of financial aid, and will be discussed in the financial aid interview.

## **Non-Discrimination Policy**

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

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

#### **Admissions Process**

The admission process has three phases, (1) an Information Session, (2) an admissions eligibility appointment, and (3) a financial aid eligibility interview. Applicants first attend a general Information Session and tour our facility. After the Information Session, the applicant schedules an admissions eligibility appointment and a financial aid eligibility interview. The applicant will receive an enrollment start date only once eligibility and financial aid are completed.

Upon enrollment, each applicant completions a period, lasting 10 days, during which he or she may cancel enrollment. The period is also an opportunity for the applicant to investigate each skill to determine which best fits him or her. During this time, the trainee is a full participant in training. The trainee meets formally with skill instructors who have an opportunity to determine the trainee's remediation needs. Perfect attendance is especially encouraged during this time.

#### **Admissions Responsibilities**

A trainee seeking admission to CET has the following responsibilities:

• Read and retain the Trainee Catalog and paperwork pertaining to admissions and financial aid;

- Request, if needed, further information or 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 and in a timely manner, and prior to receiving a start date;
- Inform CET of any change of name, address, telephone number, or status that may affect training or Financial Aid eligibility within five business days of the change.

#### **Prior Offenders**

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

#### Readmission

Trainees who have previously attended CET and withdrawn, either during Orientation or after having officially enrolled, may be readmitted. Readmission is a carefully considered process, and not everyone will be approved for readmission. CET is under no obligation to readmit any trainee, regardless of withdrawal circumstances.

Since CET provides a debt-free education to qualified applicants, each person who withdraws from the program depletes the limited resources we have to serve trainees. Trainees are encouraged to be certain they are ready to commit to CET for the entire program length before attempting readmission.

Trainees who withdraw after official enrollment will not be considered for readmission until the following financial aid award year without Department Director approval. To inquire about readmission, contact the Admissions Specialist, (859) 491-8303 x2201.

#### Orientation

Orientation occurs over a ten-day period, during which time you may cancel enrollment without incurring any financial obligation. Orientation is an opportunity for the applicant to investigate the skill division, and to determine if CET is a good fit for their training needs. During this time, the trainee is a full participant in training, and will attend meetings with Skill Instructors and other staff to explore CET's curriculum. Individual meetings will help determine skill training needs and barriers to success. The end of Orientation is marked by the trainee signing the Enrollment Agreement, which outlines the path to success through CET.

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

## **Enrollment Agreement**

The Enrollment Agreement outlines the requirements and conditions for attending training at CET. The Agreement is

- 1. A financial agreement to repay tuition in the event of withdrawal,
- 2. an agreement of intention to follow through with training and employment, and
- 3. an agreement to communicate with instructors and staff, both during training and when missing training is inevitable.

Once the Agreement is signed, the trainee is officially enrolled in their skill division at CET.

## **Transfers between Programs**

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

## **Trainee Evaluation**

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

A special emphasis is placed on continual evaluation since a trainee is not considered to have successfully completed the program until he or she demonstrates sufficient competence to function adequately on the job. To measure progress, trainees are formally evaluated upon completion of each competency. Competence is demonstrated through written, oral, or performance demonstration, with at least a minimum passing score (generally 70% or "pass" on a pass/fail measure). Because completion of training is based on an individual's mastery of material and skills, CET's training is, by definition, individualized and self-paced.

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

#### **Satisfactory Academic Progress**

Federal regulations require that CET must establish a reasonable satisfactory academic progress 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 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. During individual meetings between the trainee and Skill Instructor, attendance against clock hours and weeks, and progress on skill division competencies are monitored and discussed at 25% intervals. Each trainee will receive formal review of Satisfactory Academic Progress (SAP) at 50% of scheduled clock hours and weeks (the end of the Title IV, HEA programs first payment period).

CET uses 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 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 (GPAs) to trainees, and in order to ensure a qualitative measure (a comparable assessment measured against a norm) is set. Each skill division has 10 course competencies that must be achieved in order to successfully complete the program. At 50% scheduled clock hours, each trainee must have a minimum of 30% of competencies complete to ensure that they are on pace of progress to successfully complete within the maximum timeframe.

CET offers only clock hour educational programs, as a result course incompletes are notapplicable. 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 monitored and discussed, and they will be kept informed of their attendance against clock hours and weeks attended as well as their percentage of competencies achieved. At the 50% interval individual meeting, each trainee will receive written notice of the SAP and how that evaluation impacts their eligibility for Title IV funds, if applicable. If a trainee fails to achieve SAP, the trainee and the Skill Instructor will collaborate on a Corrective Action Plan structured to return the trainee to SAP.

#### Financial Aid Warning

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

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

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

## COURSE DESCRIPTION MICROSOFT OFFICE TECHNOLOGY

## Trainees will learn to perform the following employment-related competencies:

		Weeks	Hours
1.	<u>Computer Basic Concepts</u> – Learn basic hardware and software applications, memory, storage devices, and practice basic file management.	2	68
2.	<u>Basic Skills</u> – Review math areas needed determined by the results of initial testing. Math areas tested on include whole numbers, decimals, fractions, integers & percents. In English, review of topics through classroom/individual instruction. Topics include sentence structure, paragraph development, grammar, spelling, formatting business correspondence, etc.	4	122
3.	<u>Microsoft Office Word</u> – Learn and practice basic through advanced word processing functions and apply skills to hands-on simulation projects as well as attain increased speed and accuracy performing keyboarding.	4	136
4.	<u>Microsoft Office Excel</u> – Learn and practice basic through advanced spreadsheet commands and functions and apply skills to hands-on work simulation projects.	4	136
5.	<u>Microsoft Office Access</u> – Learn and practice basic through intermediate database commands and functions and apply skills to hands-on work simulation projects, learn to create tables, queries, forms and reports.	2	68
6.	<u>Microsoft Office Outlook</u> – Exercise professional email usage, attachments, appointments, tasks, notes and journals, understanding web browsers, designing and navigating web pages.	2	48
7.	<u>Microsoft Office PowerPoint/Publisher</u> – Learn and practice basic through advanced visual presentation, apply skills to hands-on work simulation projects, design professional brochures and publications.	3	136
8.	<u>Discovering Computers</u> – Understand key terms and concepts of the computer and apply relevant uses of Microsoft Office Applications to create documents, spreadsheets, databases, and presentations of visual interest.	3	102
9.	<u>Customer Service</u> – Learn and prepare systems of filing and perform various office management and administrative assisting skills. Learn and practice amicable approaches to customer service.	3	102
10.	<u>Career and Success Coaching</u> – Discuss employment needs, goals, and expectations; complete job applications, write resumes and cover letters; respond to newspaper ads by letter and/or telephone; practice effective interviewing techniques in mock interviews. Achieve skills in problem solving, time management and personal quality of life skills.	3	102
	Total Course Weeks/Hours:	30	1020

## COURSE DESCRIPTION MEDICAL ASSISTING

## Trainees will learn to perform the following employment-related competencies:

1.	Introduction to Allied Health Care – Learn components of allied health care field, legal and ethical standards required for certification.	Weeks 2	Hours 40
2.	<u>Communication and Interpersonal Skills</u> – Learn the language and terminology of medical assisting, learn to communicate effectively in a multi-cultural environment, compile a patient's medical chart, record a medical history and write progress notes.	1	30
3.	<u>Receptionist and Clerical Skills</u> – Acquire knowledge and experience in maintaining medical office filing systems, developing proper telephone skills, processing incoming and outgoing mail, insurance forms, billing and collection, etc.	3	100
4.	<u>Anatomy and Physiology / Procedures for Common Disorders</u> – Acquire knowledge and experience with taking vital signs, patient positioning, and physical examinations. 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.	8	260
5.	<u>Medical Terminology</u> – Learn the language of medicine and healthcare. Understand the origin and the parts used to build medical words. Learn uses in patient care, medical history, diagnostic testing, treatment, billing and coding, and the charting process.	2	50
6.	<u>Essential Skills and Knowledge</u> – Learn about Principles of Universal Precautions, perform aseptic functions; perform patient positioning, dispose of hazardous wastes properly, perform safety and emergency procedures, etc.	6	200
7.	<u>Pharmacology and Medication Administration</u> – Learn about apothecary weights and measures; administer drugs properly, etc.	4	130
8.	<u>Handling Emergencies</u> – Acquire knowledge and experience in applying CPR and first aid in various medical emergencies.	1	30
9.	<u>Career and Success Coaching</u> – Discuss employment needs, goals, and expectations; complete job applications, write resumes and cover letters; respond to newspaper ads by letter and/or telephone; practice effective interviewing techniques in mock interviews. Achieve skills in problem solving, time management and personal quality of life skills.	2	70
10.	<u>Supervised Externship</u> – Supervised work in an approved hospital, clinic, or similar environment. Externship is required for employment as a medical assistant.	4	160
	Total Course Weeks/Hours:	33	1070

## COURSE DESCRIPTION CONSTRUCTION & MANUFACTURING TECHNOLOGIES

## Trainees will learn to perform the following employment-related competencies:

1.	<u>Introduction to the Trades</u> – Acquire knowledge and experience about the different trades. Learn safety in the trades and best practices for electrical, plumbing, HVAC, manufacturing, and carpentry. Understand how different trades interact with one another and why proper scheduling is important on a job site. Occupational Safety and Health Act (O.S.H.A.) 10-hour safety certificate training.	Weeks 2	Hours 70
2.	<u>Workplace Basic Skills</u> – Review all mathematics with emphasis on construction math and measurements. Receive instructions in computer literacy, internet usage, emails and other computer skills relating to business. Attend skill classes that address issues such as work ethic, communication, and attitude to better prepare for joining the workforce.	1	40
3.	<u>Framing</u> – Learn residential floor, wall, and roof framing methods, and commercial metal framing; principals of layout and the history of framing; codes and their applications; power tools; rise and run principles to calculate stair building dimensions.	3	100
4.	<u>Surface Work</u> – Learn drywall hanging, taping, mudding, patching, caulking and painting; review principles of working with concrete.	2	80
5.	<u>Finish Carpentry</u> – Learn shop tool usage and woodworking skills; principles and practices of finish carpentry; proper techniques of mitering, coping and general joinery; cabinet assembly; theory of form and function; proper sanding, staining and finishing.	4	120
6.	<u>Construction Management</u> – Learn blueprint reading and drafting; construction management for the job site; estimating and bidding; new products in the market place and their application.	2	60
7.	<u>Plumbing</u> – Learn how plumbing runs through a house as a system. We will put piping together by soldering, flaring, threading, and gluing. Toilet and faucet installation and repair will also be covered.	2	60
8.	<u>Electricity</u> – Learn the properties of electricity. Electrical components and how they work; electrical schematic reading; electrical safety; electrical tool use including an electrical multimeter. Build electrical circuits and learn troubleshooting methods.	4	120
9.	<u>H.V.A.C.</u> – Learn the theory of heating and air conditioning. Identify all components necessary to all H.V.A.C. systems and learn their functions We will draw and study a basic H.V.A.C. schematic. We will use schematics to troubleshoot H.V.A.C. systems. Trainees will also be given the opportunity to earn their E.P.A. certifications for refrigerant recovery in this competency.	3	105
10.	<u>Career and Success Coaching</u> – Discuss employment needs, goals, and expectations; complete job applications, write resumes and cover letters; respond to newspaper ads by letter and/or telephone; practice effective interviewing techniques in mock interviews. Achieve skills in problem solving, time management and personal quality of life skills.	4	145
	Total Course Weeks/Hours:	27	900

### Facilities

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

CET is located at 601 Washington Ave., Suite 140, Newport, Kentucky, 41071. The facility is easily accessible by public transportation, and is handicapped accessible. The facility follows accepted postsecondary school guidelines.

### List of Faculty and Instructional Personnel

### Administration

Hall Sommer, Melissa	WD Department Director
Sirbu, Brandon	CET Coordinator
Peters, Amanda	CET Manager
Rawe, Ron	Financial Aid Officer
Kennedy, Vickie	Admissions Specialist

### **Construction and Manufacturing Technologies**

Kitts, Randy	CMT Skill Instructor
McAuley Suhr, Nancy	MOT/CMT Career Coach
TBD	CMT Success Coach

#### **Medical Assisting**

Duffy, Lee Ann	MA Skill Instructor
Ahlers, Jami	MA Career Coach
Greene, Jonika	MA Success Coach

#### **Microsoft Office Technology**

Schuning, Peggy	MOT Skill Instructor
McAuley Suhr, Nancy	MOT/CMT Career Coach
TBD	CMT Success Coach

#### **Articulation Agreements**

For trainees who have completed their skill division and would like to continue their field of study, CET has arranged articulation agreements with area colleges. If you have interest in continuing your education beyond CET, please inquire about the opportunities we have available. Generally, these articulation agreements will allow your credits to transfer to the new institution, allowing you to take fewer classes and accrue less cost in pursuit of your educational goals. For the current award year, CET has an articulation agreement with Cincinnati State for the CMT skill division. More information on our articulation agreement is available through the Admissions Specialist.

### **Accreditation & Licensure**

The Center for Employment Training is accredited by the <u>Commission of the Council on</u> <u>Occupational Education (COE)</u>. COE was originally founded in 1971 as a regional accrediting agency of the Southern Association of Colleges and Schools and in 1995 the Council became a national accrediting body recognized by the United States Department of Education. [http://www.council.org/]

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

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

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

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

#### **Procedure:**

- 1. When an individual or family served has a grievance, it is initially the responsibility of the program employee involved to attempt to understand and resolve the grievance. It shall be the responsibility of the employee to inform the individual or family served of the grievance procedure and assist them in contacting the appropriate supervisor.
- 2. The individual or family served who files a grievance will be free from retaliation or barriers to services.
- 3. The supervisor will gather relevant information and will attempt to understand and resolve the grievance.

4. Should the individual or family served not be satisfied, the grievance shall be considered by the Department Director, who shall attempt to resolve the grievance.

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

- 5. If the Department Director cannot resolve the grievance, it shall be considered by the Vice President as appropriate, and if necessary by the President & CEO.
- 6. The Board of Directors of Brighton Center, Inc. shall be the final resource should the President & CEO be unable to resolve the grievance. The President of the Board shall appoint a committee of Board Members to review the grievance and recommend a resolution to the Board. Every effort should be made to ensure that at all levels of the grievance process reviews will be completed in a fair, thorough, and timely manner.

In cases where a grievance is not resolved within the organization using the steps outlined above, the client can present his/her 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.

Every effort should be made to ensure that, at all levels, client grievances are reviewed in a fair, thorough and timely manner.

## 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.

The following has been designed to coordinate ADA compliance efforts. Complaints should be addressed to:

Human Resources Director Brighton Center, Inc. P O Box 325 Newport, KY 41072 Phone (859) 491-8303, ext. 2430

Complaints

- 1. A complaint should be filed in writing or verbally, containing the name and address of the person filing it, and briefly describe the alleged violation of the regulations.
- 2. A complaint should be filed within 180 days after the complainant becomes aware of the alleged violation. (processing of allegations of discrimination, which occurred before this complaint procedure was in place, will be considered on a case-by-case basis.)
- 3. An investigation, as may be appropriate, shall follow a filing of complaint. The investigation shall be conducted by the ADA Coordinator. These rules contemplate informal but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a complaint.
- 4. A written determination as to the validity of the complaint and a description of the resolution, if any, shall be issued by the ADA Coordinator and a copy forwarded to the complainant no later than ten (10) days after its filing.
- 5. The ADA Coordinator shall maintain the files and records of Brighton Center/Brighton Properties relating to the complaints filed.
- 6. The complainant can request a reconsideration of the case in instances where he or she is dissatisfied with the resolution. The request for reconsideration should be made within ten (10) days to the Executive Director, or in the absence of the Executive Director, the Chief Operating Officer.
- 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.

### **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.

#### **Voter Registration**

CET makes good faith efforts to distribute voter registration forms to trainees. 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.

#### **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.

## Family Education Rights and Privacy Act (FERPA)

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

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

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

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

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

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

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

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

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

committee, such as a student council, disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

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

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

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

Family Policy Compliance Office U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202-8520 1 (800) USA-LEARN http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html

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

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

## **Drug and Alcohol Prevention**

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

Trainees are expected to conduct themselves against defined principles of conduct at all times. This includes a zero tolerance policy concerning substance abuse. Abuse of any drug, which includes alcohol, prescription drugs, or illegal substances while attending CET is strictly prohibited, and will subject any violator of this policy to disciplinary action, including withdrawal from the program. Any violation of this policy, while on CET property, constitutes grounds for immediate expulsion. By signing this policy,

trainees agree to drug testing at the request and expense of CET at any time. Refusal of said testing demand will result in disciplinary actions, including expulsion. This policy has been adopted in order to protect the trainees attending CET, as well as to comply with accepted practices in the workplace. Most employers demand such tests of their potential employees, as well as random screens for their current workforce.

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

- Standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by trainees and employees on our property or as part of any of our activities;
- A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol;
- A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
- A description of any drug or alcohol counseling, treatment, or rehabilitation or reentry programs that are available to employees or trainees; 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.