

## Part 6: Participant Records, Recertification, Exit Procedure and Termination

---

### **600 Personnel / Participant Records**

- A. Personnel / Participant Record Required
- B. Required Documents to Include in Personnel / Participant Record
- C. Security for Sensitive Information
- D. Retention and Destruction of SCSEP Records
- E. Notification Procedure for Participant Data Breach

### **601 Recertification of Eligibility**

- A. Annual Recertification of Eligibility Required
- B. Termination of Income-Ineligible Participant
- C. Host Agency Prohibited from Recertifying Eligibility

### **602 Exit Procedure**

- A. SCSEP Exit Form / SCSEP Unsubsidized Employment Form
- B. Participant Signature Requirements for the *SCSEP Exit Form* and the *SCSEP Unsubsidized Employment Form*
- C. Participants and Host Agencies Prohibited from Exiting Participants
- D. Source Documentation Requirements for the *SCSEP Exit Form*
- E. Transfer of Participants to another SCSEP Provider

### **603 Termination**

- A. Termination Policies Must Be Reviewed at Enrollment
- B. Disciplinary/Termination Process
- C. Types of Terminations
- D. Termination for Cause
- E. Termination for Individual Employment Plan (IEP) Violation
- F. Termination for Violation of Sponsor's Leave Without Pay/Leave of Absence Policy
- G. Termination for Income Ineligibility
- H. Termination for Reaching Individual Durational Limit
- I. Termination Due to Program Ineligibility
- J. Termination Due to Becoming Employed While Enrolled in SCSEP
- K. Documentation for Termination

## 600 Personnel / Participant Records

### A. Personnel / Participant Record Required

SSAI project sponsors must keep permanent records for each participant. The personnel records must be kept current and remain confidential. SSAI recommends that all participant records, with the exception of the *Participant's I-9 Form* (the *Employment Eligibility Verification Form*) and any medical records are kept in one location. The I-9 Form and medical records must be kept separate from other personnel records [for more information, see section 203-C *Employment Eligibility Verification Form (I-9)* required] and other sensitive information (see 600c). This may include some Most-In-Need documents gathered at enrollment.

The file containing the *SCSEP Participant Form* must indicate the location of all other documents. Personnel records are to be kept in a secure place accessible only by authorized persons. No sponsor volunteers may have access to participant personnel records. The *SCSEP Participant Form* is available in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

Each participant has the right to review any and all documents that constitute his or her personnel record.

### B. Required Documents to Include in Personnel / Participant Record

Each participant's personnel record must consist of at least the following documents, which are available in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>, *Participant Form* and copies of all eligibility verification documents for initial enrollment, re-enrollment and recertification:

- Completed income worksheets that correspond to each participant's initial enrollment, re-enrollment and recertification;
- Completed copy of the *Record of Offer of Physical Examination to Participant Form*;
- Completed copy of *Record of Participant Orientation Form*, including an acknowledgment of receipt of participant policies and procedures/handbook and Privacy Act of 1974 statement;
- Completed Initial Assessment, Re-Assessment and Individual Employment Plan;
- Signed copy of the W-4, Employee's Withholding Allowance Certificate;
- Signed copy of the written community service assignment description;
- Record of date and duration of each host agency assignment using the *SCSEP Community Service Assignment Form* (if applicable);
- Completed copy of the *Release of Employer Information Form* to facilitate obtaining follow-up information;
- Completed *Employment Eligibility Verification Form (I-9)*, which must be filed separately from all other personnel/participants records; and
- Completed case management notes.

The following items, if applicable, also must be included in each participant's personnel record:

- Record of valid driver's license and auto liability insurance if the participant is, or will be, required to drive in connection with the community service assignment, or if the participant is reimbursed for driving to participant meetings or other training activities;
- *Statement of Desired Hours of Community Service as Participant Form*;
- Any SSAI-approved waivers to the four-year cap on lifetime participation; applicable waivers, such as durational limit on assignment or release of employer information;
- Any SSAI-approved waivers to the four-year cap on lifetime participation; applicable waivers, such as durational limit on assignment or release of employer information;
- Performance evaluations (see following paragraph); and
- Completed *SCSEP Exit Form*.

SSAI does not require sponsors to conduct performance evaluations of participants, but does require sponsors to obey local laws and its own and host agencies' policies. If a subgrantee conducts a performance evaluation for a particular position, it may not use that evaluation to determine program eligibility and must conduct it for all applicants to that position. Such evaluations, if done, must be maintained in a secure and confidential manner.

### **C. Security for Sensitive Information**

SCSEP program sponsors must certify that participant records are securely stored and access to them is limited to appropriate staff to safeguard personally identifying information. For example, medical and disability-related records must be securely stored separate from all other participant information and access to them must be limited to authorized staff for only authorized purposes.

Access to medical documentation that a participant is entitled to status as a family of one, priority of service, or waiver of the durational limit should be limited to staff who need to document the basis for such decisions.

Similarly, case notes about a participant's criminal background should be treated the same way as medical records. They should be maintained in a separate secured file to which access is strictly limited.

Staff making assignments to a host agency should not have access to a participant's disability status unless the participant has requested an accommodation for the process of assignment or the host agency has an affirmative action or similar plan intended to benefit people with disabilities and the participant has informed staff that he or she is interested in such programs.

Host agencies may not be informed that a participant has a disability except in the following circumstances:

- The applicant has made an independent decision to disclose the disability;
- The applicant has directed the sub-grantee staff to make the disclosure on behalf of the applicant;  
or
- The request was initiated by the participant and not by the sub-grantee staff.

**D. Retention and Destruction of SCSEP Records**

Program and fiscal records must be maintained for three years after **the program year in which the participant received his/her final follow-up activity** or completed audit (whichever is longer), according to the Older Americans Act, U.S. Department of Labor (DOL) regulations and SSAI's Sponsor Agreement. The Sponsor Agreement further requires sponsors to:

- Maintain any records and accounts, including property, personnel and financial records, which SSAI, DOL or any authorized representative deems necessary;
- Retain program and financial records for three years after **the participants receive their final follow-up activity**; grant closeout or three years from a completed audit, whichever is longer; and
- Make sponsor records relating to the SCSEP program available for examination on request by SSAI and/or the DOL.

**E. Notification Procedure for Participant Data Breach**

If documentary material or computer equipment containing personally identifiable information (PII) for current or former participants is lost or stolen from your possession, custody or control – referred to as a “data breach” – the procedure outlined below must be followed.

PII refers to any information about an individual maintained by a project sponsor, including any information that can be used to distinguish or trace a participant's identity, such as their name, Social Security Number, date and place of birth, mother's maiden name, biometric records, etc., and any other personal information that is linked or could be linked to a participant.

The procedure includes the following steps:

1. Immediately notify the National SCSEP Director, that the project has experienced a data breach of participants' PII and that you have determined that a reasonable risk exists for the potential misuse of the information.
2. The Project Director shall immediately assess the information compromised; risks posed; and, how affected participants should be notified. The Project Director will coordinate the response with SSAI staff. Maintain up-to-date contact information on all participants, former and current.
3. If appropriate, establish a call center to interact with participants.
4. Consider offering appropriate credit-monitoring assistance to affected participants.
5. Familiarize project personnel on the project's privacy and security procedures and how they should recognize, report and respond to a data breach.

# 601 Recertification of Eligibility

## A. Annual Recertification of Eligibility Required

The U.S. Department of Labor and SSAI require project directors to conduct an eligibility review at least once every 12 months with each participant. SSAI will set the schedule for recertification eligibility review at the beginning of each program year. Using the SSAI Recertification Webtool – available on the partners' page of SSAI's website at <http://seniorserviceamerica.org> – the project director must conduct the eligibility review to ensure a participant continues to meet the income limits for participation in SCSEP. (For more information, see section 204 Computing Income for Eligibility.)

Participants are required to notify the project sponsor at any time of any changes in income or family size that may affect eligibility, including during the review. Also, if at any time the project staff suspects that the participant is exceeding the income limits, they may ask him or her to provide necessary documentation of income or family size.

Income and family size are the only enrollment criteria that need to be reviewed during recertification. Project sponsors must retain copies of the documents used to review and verify income and family size.

Copies of the Recertification Webtool used to conduct the eligibility recertification and signed by the participant must be kept in the participant's file. Project sponsors also should keep copies of all supporting documentation used to recertify a participant.

## B. Termination of Income-Ineligible Participant

A participant who is determined at the time of recertification to be income ineligible must be informed in writing that he or she will be terminated, the reason for the termination and the procedures to appeal the determination. (For more information, see section 603-E Termination for Income Ineligibility.)

Sponsors may not terminate a participant until at least 30 days after the participant receives the written notice. A sample termination letter can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

The timing of a termination for income ineligibility should be determined based on the participant's circumstances. For example, if the reason for income ineligibility is that a participant's new spouse adds \$1,000 per month to the family income, the sponsor must determine how long it will take before the extra \$1,000 per month makes the participant over-income for a family of two. If there were no further changes when that date arrived, the 30-day termination notice should be sent. If circumstances had changed in the interim, you would do a new recertification calculation.

## C. Host Agency Prohibited from Recertifying Eligibility

Unless the host agency is also the project sponsor, host agency representatives cannot be responsible for conducting eligibility recertification.

## 602 Exit Procedure

### **A. SCSEP Exit Form / SCSEP Unsubsidized Employment Form**

The *SCSEP Exit Form* is used to document most terminations or exits from SCSEP. (For more information, see section 603 Termination.)

The *SCSEP Unsubsidized Employment Form* is used to document unsubsidized placements. Both of these forms can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

Project directors must complete either the *SCSEP Exit Form* or the *SCSEP Unsubsidized Employment Form* and keep them in participants' files and ensure that data on these forms is entered in SPARQ within five (5) calendars **days of the exit**.

### **B. Participant Signature Requirements for the SCSEP Exit Form and the SCSEP Unsubsidized Employment Form**

Participants are not required to sign the *SCSEP Exit Form* or the *SCSEP Unsubsidized Employment Form*. Project sponsors must complete a detailed case note that includes the participant's date of exit (see 500-H for case note example). In addition, project sponsors must have on file signed Releases from participants to collect information from employers.

The *Release Form* can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

### **C. Participants and Host Agencies Prohibited from Exiting Participants**

Participants and host agencies, except when the project sponsor is the host agency, cannot terminate a participant or sign a *SCSEP Exit Form*. However, a participant may gather the necessary information for the preparation of another participant's *SCSEP Exit Form*.

### **D. Source Documentation Requirements for the SCSEP Exit Form**

SSAI has developed the following forms to assist projects in meeting the data validation requirements related to participant exits as set forth by the U.S. Department of Labor.

- *SCSEP Case Management Note Form* – to validate Exit Date (#8 on the *SCSEP Exit Form*) and type of exit (#9 on *Exit Form*)
- *SCSEP 3<sup>rd</sup> Party Attestation Form* for Excluded Exits for Health, Medical, Family or Institutionalization

Completed copies of these forms, or other appropriate data validation source documentation must be kept in the participant's file when applicable (see SSAI Data Validation List). These forms, including the SSAI Data Validation List, can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

**E. Transfer of Participants to another SCSEP Provider**

SSAI does not permit transfers of participants to other SSAI subgrantees or other SCSEP providers **without prior approval from the SSAI National SCSEP Director.**

In instances where transfers are approved, SSAI Headquarter staff will initiate the required paperwork and secure the necessary approvals from DOL.

## 603 Termination

### A. Termination Policies Must Be Reviewed at Enrollment

Every participant must receive a written copy of the sponsor's Participant Handbook at the time of initial enrollment (see section 805-A Written Personnel Policies and Complaint Resolution Procedures Required). The Participant Handbook must include all the policies for termination, and those policies must be verbally reviewed with each participant during orientation. No participant will be terminated solely on the basis of their age as there is no upper age limit on SCSEP participation.

Participants must sign a form acknowledging they have received the handbook and this form must be placed in each participant's file. Before initiating a termination, project directors should review their own policies and contact the SCSEP Help Desk and speak with a Program Officer if there are any questions.

Participants may only be terminated for the termination reasons (C-J) below, and all termination policies will be applied fairly and consistently. Sponsors will seek to avoid termination whenever possible and will use progressive discipline and corrective action, as described below, except in cases of serious violations, such as fraud, theft, violence, or threats to health or safety.

For further information regarding exit procedures see, section 602, Exit Procedure.

### B. Disciplinary/Termination Process

Normally, the termination process will include the following steps.

#### *Step One: Documented Verbal Warning*

Sponsor staff will verbally warn the participant, complete a detailed documentation of the warning for the file, and include this documentation in the participant's file.

#### *Step Two: Written Warning*

Sponsor staff will draft a written warning letter to the participant and discuss the written warning with the participant in person or via the telephone. The written warning letter will be sent to the participant and a copy will be put in the participant's file.

During both Steps One and Two, project staff must inform the participant of the corrective action and time period in which the corrective action must be taken.

#### *Step Three: Termination*

Written notices of termination must be given to participants who project sponsors are terminating. Participants have the right to appeal any termination decision. In no case may a participant be terminated before 30 calendar days after project staff provide him/her with their written notice.

SSAI sponsors can skip Steps One and Two and move directly to "Step Three – Termination" for serious violations such as fraud, theft, destruction of property, violence, or threats to health or safety.



### **C. Types of Terminations**

SCSEP participants may be terminated only for any one of the following seven (7) types of termination:

1. Termination for Cause
2. Termination for Individual Employment Plan Violation
3. Termination for Violation of the Sponsor's Leave of Absence Policy
4. Termination for Income Eligibility
5. Termination for Reaching Durational Limit
6. Termination Due to Program Ineligibility
7. Termination Due to Becoming Employed While on SCSEP

### **D. Termination for Cause**

Project directors must follow the proper procedures and policies governing terminations.

Project sponsors must give participants terminated for cause written notice. The termination letter must explain the reasons for termination, state the participant is on leave without pay for 30 calendar days before the exit date, and appeal procedures, including deadlines and the name of the individual to whom the appeal should be made. Participants have the right to appeal any termination decision (for example, the appropriate timeframes and names of the individuals to whom to appeal). For more information, see section 805 Personnel Policies and Complaint Resolution Procedures. A sample termination letter can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>. Participants may not be terminated until 30 calendar days after project staff have provided the participant with the written notice (during which time they are on leave without pay and project directors must note this in SPARQ). The project sponsor may, but does not have to, refer participants terminated for cause to other sources of assistance or to the American Job Center/One-Stop delivery system.

Reasons for terminations for cause include the following:

- Refusal to cooperate in establishing eligibility;
- Refusal and/or unwillingness to perform assigned duties without good cause;
- Three or more unauthorized absences from the host agency/training site without good cause or proper notice or a pattern of unexcused tardiness;
- Falsification of timesheets, eligibility or other official records (for more information, see section 202-G);
- Insubordination, that is, intentionally refusing to carry out the direction or instructions of a host agency supervisor or sponsor/subgrantee staff without good cause;
- Obscene, abusive, harassing, or threatening language or behavior;
- Causing an imminent threat to health or safety;
- Theft, meaning illegally taking or withholding the property of another without permission;

- Intentional loss, damage, destruction or disclosure of unauthorized use of property, records or information;
- Workplace harassment or discrimination on the basis of sex, race, color, religion, national origin, age, marital status, or disability;
- Conviction of a felony or any criminal drug statute for a violation occurring in the workplace while on or off duty, or while on duty away from the workplace;
- Consuming, selling, purchasing, manufacturing, distributing, possessing or using any illegal or non-prescribed drug or from being under the influence of alcohol and/or other drugs while performing his/her host agency assignment or while carrying out objectives required by the IEP. Legally prescribed medications are excluded if they do not affect the participant's ability to perform his or her duties or protect the safety of the participant or others;
- Being found to have unsubsidized employment while on SCSEP;
- Exceeding the SSAI accepted leave without pay policy by failing to return from leave by the required date without due notice or good cause (for more information see section 700-F Leave Without Pay/Leave of Absence);
- A pattern of consistent and conscious failure to follow the steps mutually agreed upon and outlined in the IEP without good cause, including:
  - Refusing to search for a job;
  - Sabotaging a job interview, for example, a participant tells the interviewer that he or she is not interested in the job or tells the interviewer that he or she is not qualified;
  - Refusal of a reasonable number (3) of job offers and/or referrals to job openings;
  - Refusing to accept or transfer to a different community service assignment;
  - Refusal to accept IEP-related training opportunities;
  - Refusal to register and follow-up with the American Job Center/One-Stop related to unsubsidized employment;
  - Refusing to accept or follow-through on obtaining support services that will enhance the participant's ability to participate in a community service assignment consistent with the IEP without good cause;
  - Refusing to cooperate with the assessment or IEP process such as refusing to participate in the completion of the assessment, reassessment, the IEP and/or updates; and
  - Refusing to cooperate with other IEP-related referrals.

Behaviors that may lead to any termination for cause must be documented thoroughly and included in the participant's records (see section 603-B Disciplinary/Termination Process).

**E. Termination for Individual Employment Plan (IEP) Violation**

The IEP serves to reflect the goals of the participant while on SCSEP and it is created in collaboration the participant and the host agency supervisor. An initial IEP must contain an appropriate employment goal but subsequent IEPs need not have an employment goal if one is not feasible for the participant. In those cases, the IEP should reflect other appropriate goals for self-sufficiency, including supportive services to address barriers, additional training and/or transition to other programs or services (for more information see section 301-D).

As noted in section 603-D above, repeated refusal by the participant to perform specific actions as agreed to in the IEP, such as attending a job interview or accepting an alternative community service assignment or attending GED class, may result in termination for cause. Participants may be terminated for refusal to accept a reasonable number (3) of job offers or referrals to unsubsidized employment appropriately related to their Individual Employment Plan (IEP), if the participants have no extenuating circumstances that would prevent them from moving to such employment.

Before issuing a termination notice, project sponsors must give the participant a verbal warning that also is documented, and subsequent written notices. The notices must cite a specific incident in which the participant did not fulfill an IEP responsibility, the provision violated in the jointly signed agreement, and inform the participant of the corrective action and time period in which the corrective action must be taken.

If the participant does not take appropriate corrective action by the stipulated deadline, project sponsors must give the participant a written termination notice that includes the reasons for IEP termination (stated in their personnel policies and procedures and their participant orientation sessions). The termination letter must also explain that the participant is on leave without pay for 30 calendar days before the exit date and appeal procedures, including deadlines and the name of the individual to whom the appeal should be made. Participants have the right to appeal any termination decision. For more information, see section 805 Personnel Policies and Complaint Resolution Procedures. The project sponsor may, but does not have to, refer them to other sources of assistance or to the American Job Center delivery system. A sample termination letter can be found in this manual's Appendix II and at SSAI's website at <http://seniorserviceamerica.org> by clicking on the Partner/Subgrantee Sign In link to access the partners page.

Such participants may not be terminated until 30 calendar days after project staff have provided them with the written termination notice during which time they are on leave without pay and project directors must note this in SPARQ.

**F. Termination for Violation of Sponsor's Leave Without Pay/Leave of Absence Policy**

Participants may be terminated if they reach the time limit of a project sponsor's Leave of Absence policy or if the participant does not comply with the SSAI approved policy as outlined in their Participant Handbook (for more information, see section 700-F Leave Without Pay/Leave of Absence). Before terminating a participant for reaching the time limit of a Leave Without Pay/Leave of Absence policy or for non-compliance with the policy, project directors should review their own policies and discuss the possible termination with a Program Officer on the SCSEP Operations Team.

Project sponsors must include their approved policies for Leave Without Pay/Leave of Absence in their Participant Handbooks (for more information, see section 700-F Leave Without Pay/Leave of Absence). Every participant must receive a copy of the sponsor's handbook and/or personnel policies and participants' files must contain a form they sign attesting that they have received it and received a verbal review of it.

Project staff should not begin the disciplinary or termination process until after the time limit of a Leave Without Pay/Leave of Absence policy has been reached, or a violation of the policy has occurred. Participants may not be terminated for a violation of the project sponsor's Leave of Absence policy until 30 calendar days after project staff have provided the participants with the written notice (during which time they are on leave without pay and project directors must note this in SPARQ).

The project sponsor may, but does not have to, refer them to other sources of assistance or to the American Job Center delivery system. A sample termination letter can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

### **G. Termination for Income Ineligibility**

If, at any time, a project sponsor determines that a participant no longer is eligible for continued enrollment because he or she has attained additional includable income during the preceding six or 12 months or because of a change in family status, the participant must be terminated (for more information, see section 204-D Method of Computing Income). Project sponsors must inform participants who are income ineligible of the reason for termination and provide the participant with a 30-calendar-day written notice. The participant is allowed to continue working at their Community Service Assignment until exited.

Such participants may not be terminated until 30 calendar days after project staff have provided the participants with written notice. The written termination letter must explain the reasons for termination, appeal procedures, including deadlines and the name of the individual to whom the appeal should be made. Participants have the right to appeal any termination decision. For more information, see section 805 Personnel Policies and Complaint Resolution Procedures. The project sponsor must refer them to other sources of assistance or to the American Job Center delivery system.

For information on determining date of ineligibility due to income, see section 601-B Termination of Income Ineligible Participant. *The SCSEP Participant Form* and *SCSEP Exit Form* documenting the participant's ineligibility must be completed and submitted to SSAI. Project sponsors also should maintain copies of those forms in their records.

Determinations of ineligibility cannot be based on anticipated changes in income or family size; they must be based on actual data. As a best practice, during orientation, project sponsors should inform participants of their responsibility to report increases in income and changes in family status.

The *SCSEP Participant Form*, *SCSEP Exit Form* and a sample termination letter can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

### **H. Termination for Reaching Individual Durational Limit**

The maximum eligibility period for SCSEP participation for people enrolled on or after July 1, 2007, is a total of four years or 48 months. (For more information, see section 203-D Durational Limit on Individual's Program Participation.)

SSAI requires sponsors to develop a Transition Assessment and Individual Employment Plan (IEP) for the participant with a goal of self-sufficiency after termination from SCSEP. (For more information, see section 301-F Assessments Needed for Transition Assessment and IEP and section 301-G Transition Assessment and IEP.)

Participants who reach their individual durational limit must be terminated **on the date** when they reach their four-year limit. Written notices of termination including the reason for the action and appeal procedures must be given to participants who the project sponsor expects to terminate 30 calendar days prior to their four year durational limit date/exit date. Participants have the right to appeal any decision.

A sample termination letter can be found in this manual's Appendix II and on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

### **I. Termination Due to Program Ineligibility**

If a program sponsor determines a participant is ineligible (or no longer eligible) during the eligibility verification process, it must give written notice explaining the reasons for termination and applicable procedures to appeal. Such people must be referred to other sources of assistance, including the American Job Center/One-Stop delivery system.

If a sponsor discovers after the eligibility or recertification process is finished that staff incorrectly determined a person to be eligible through no fault of the person, the sponsor must give immediate written 30 calendar day notice explaining the reasons for termination and applicable procedures to appeal as well as referrals to other sources of assistance, including the American Job Center/One-Stop delivery system. Participants are allowed to continue working at their Community Service Assignment until exited (see 603-E Termination for Income Eligibility).

The types of reasons that may come to light after the eligibility process has been finished, which could make a participant ineligible are, for example, new and more accurate information about age, or income.

Participants may not be terminated until 30 days after project staff have provided the participants with written notice. The termination letter must explain the reasons for termination and the appeal procedures. A sample termination letter can be found in this manual's Appendix II and at SSAI's website at <http://seniorserviceamerica.org> by clicking on the Partner/Subgrantee Sign In link to access the partners page.

### **J. Termination Due to Becoming Employed While Enrolled in SCSEP**

To qualify for enrollment in SCSEP, a participant has to be unemployed. If, at any time, subgrantee staff determines that a participant entered unsubsidized employment while enrolled on SCSEP, the participant will be placed on leave without pay and will be given an immediate written 30 day calendar notice explaining the reasons for termination and applicable procedures to appeal.

Such participants may not be terminated until 30 calendar days after project staff have provided them with the written termination notice, during which time they are on leave without pay and project directors must enter this data in SPARQ.

The termination letter must explain the reasons for termination, state the participant is on leave without pay for 30 calendar days before the exit date, and appeal procedures, including deadlines and the name of the individual to whom the appeal should be made. Participants have the right to appeal any termination decision. For more information, see section 805 Personnel Policies and Complaint Resolution Procedures. A sample termination letter can be found in this manual's Appendix II and at SSAI's website at <http://seniorserviceamerica.org> by clicking on the Partner/Subgrantee Sign In link to access the partners page.

**K. Documentation for Termination**

All termination reasons should be reported on the *SCSEP Exit Form* (for more information, see section 602 Exit Procedure). The *SCSEP Exit Form* is available on the partners' page of SSAI's website at <http://seniorserviceamerica.org>.

Project sponsors must retain in the participant's file copies of all termination-related documentation including, but not limited to, termination letters, corrective action correspondence, detailed case notes from project staff, detailed information from the host agency supervisor, and copies of the Orientation Checklist that affirm the participant received and reviewed the Participant Handbook, including its termination and grievance policies.