



CDC has developed a new policy titled “**Continued Service Agreements for Training**”

1. **Reason for Issuance:** This policy establishes common requirements, procedures, and responsibilities for the administration of Continued Service Agreements (CSA) for training at CDC¹.
2. **Summary of Policy:** CDC supports both individual and organizational development of human resources by providing career development opportunities for employees through a variety of training events. To protect CDC’s substantial investment of resources in employee training and development, employees will be required to sign a CSA prior to participating in training under certain conditions.
Specifically the policy:
 - Requires a CDC CSA for training supported by CDC that exceeds 160 duty hours or \$10,000 in cost
 - Requires a service obligation to CDC from 6-18 months depending on training cost and duration
 - Provides criteria for successful completion of training
 - Provides procedures for recovery of CDC training funds under certain circumstances
3. **Related Issuances:** [Long-Term Education Policy](#)
4. **Responsible Organization:** Office of the Chief Operating Officer, Human Capital Management Office, Training and Career Development Branch
5. **Material Superseded:** None
6. **Recertification:** This document is scheduled for recertification on or before the last working day of June 2016.
7. **Points of Contact:** Thomas Jones, Senior Policy Analyst, Operational Policy Management Team, 404 498-1516. For subject matter questions, please contact Reginald Hunter, OCOO/HCMO, 770-488-1833.
8. To go directly to the policy, enter the following URL into the location line of your browser:
<http://aops-mas-iis.cdc.gov/Policy/Doc/policy563.pdf>

/s/ Allison Tanner
Acting Deputy Chief Operating Officer

¹ References to CDC also apply to the Agency for Toxic Substances and Disease Registry (ATSDR).

CONTINUED SERVICE AGREEMENTS FOR TRAINING

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EXHIBIT	A.	<u>Authorization, Agreement and Certification of Training, Standard Form 182</u>

1. PURPOSE AND SCOPE

This policy establishes requirements, procedures, and responsibilities for the administration of Continued Service Agreements (CSA) for training at the Centers for Disease Control and Prevention.

The policy applies to current CDC civil service employees who are covered for training under Title 5. Service obligation requirements for members of the Public Health Service Commissioned Corps (CC) are specified in the Commissioned Corps personnel manual, Subchapter CC25.2, "Career Development."

This policy does not cover the service obligation associated with the Long-Term Education Program which is included under the Long-Term Education policy.

2. BACKGROUND

CDC supports both individual and organizational development of human resources by providing career development opportunities for employees through a variety of training events, courses, and programs. To protect CDC's substantial investment of resources in employee training and development and to ensure the agency's return on investment, in some instances the employee will be required to sign a CSA prior to participating in the training in order to ensure that newly acquired skills or knowledge are used to benefit CDC for a specified period of time following the training.

The authority for this requirement is found in Chapter 41 of Title 5, United States Code (U.S. Code). This statute provides agencies the discretion to enforce the continuance of service by employees who have been selected for training.

3. POLICY

A. Policy Overview

Training supported by CDC that exceeds 160 duty hours or \$10,000 in cost requires a CDC CSA. A CDC CSA is a written agreement requiring employees to remain in service to CDC at completion of a training, event, offering, or program, for a period of time as determined by the length of the training period or its associated cost to the agency.

Time in training for CSAs is computed in accordance with the guidelines specified in 5 U.S. Code Section 4108 and 5CFR 410.310. Successful completion is determined either by the employee receiving a passing grade (where a grading system is applied) or by the employee's attendance of at least 85 percent of the training when attendance is the only method of determining completion. Measures associated with failure to achieve successful completion are discussed in Section 3G, Repayment of Training Expenses; and Section 3H, Waivers of this document.

A typical CSA scenario and guidelines is as follows:

- Determination is made by cost and/or duration of the training that a CSA is required
- Applicants must complete and submit related documentation, with required authorizations, prior to the start of training
- Through the CSA, the employee commits to work for CDC for a pre-established length of time in exchange for CDC-supported training or education
- The service obligation begins when the training is completed
- Should the employee fail to comply with the CSA completion requirements, repayment and/or other measures take effect and are applied in accordance with specific factors and circumstances

B. Continued Service Requirements

The following chart shows the service obligation required for training of various costs and duration.

Cost of training is under \$10,000 and under 160 duty hours	Cost of training is \$10,000 to \$20,000 or 160 duty hours to 240 duty hours	Cost of training is \$20,001 to \$30,000 or 241 duty hours to 360 duty hours	Cost of training is over \$30,000 or 360 duty hours
No CSA required	Service obligation required: 6 months	Service obligation required: 12 months	Service obligation required: 18 months

C. Application Process

CDC civil service employees who apply for training that requires a CSA will follow the established application procedures of their Center/Institute/Office (CIO) for vendor-sponsored or CDC-sponsored training having a cost. A training order must be processed for approval through the appropriate CDC or Vendor Sponsored Training System.

Standard Form (SF) 182, Authorization, Agreement and Certification of Training (see Exhibit A), is the official document used to approve training and authorize payment for training costs. This is the electronic version of the former HHS-350 document and is the only proper vehicle for the training nomination and authorization process. Specific instructions for completing each section and field of the SF-182 are provided with the form.

In order to access the Vendor Sponsored Training System (VSTS) to input an SF-182, users must have an account established. To request access, the user should contact their Administrative Officer or VSTS Lead User for their CIO. Access is an overnight process. The SF-182 includes a CSA form to be completed if required.

D. Review and Approval Process

As with all vendor-sponsored training or CDC-sponsored training with a cost, approval for the employee to attend training must be obtained and fully documented on the SF-182 electronically through VSTS before training begins and before payment is made to the academic institution or vendor.

CIO officials who have been delegated the authority to approve vendor-sponsored training must evaluate each instance of training that exceeds 160 duty hours to justify the substantial investment of resources in training employees.

E. Recordkeeping Requirements

CIOs must maintain signed copies of all CSAs, in accordance with the CDC Records Schedule, and implement tracking processes to ensure that training subject to a CSA is completed as scheduled and that all periods of service obligation are fulfilled. At the completion of the required service, the CIO should send the employee a notification that the service obligation has been fulfilled.

F. Training Program Changes or Modifications

The employee must obtain approval from their authorized CIO official of any proposed change or modification in the approved training program, e.g., course and schedule changes, withdrawals or incompleteness, and increased costs.

G. Repayment of Training Expenses

If the employee fails to satisfactorily complete the approved training and/or voluntarily leaves CDC before completing the service obligation as defined in the CSA, the employee must repay CDC all or part of the costs of the training (excluding salary). CDC may recoup registration fees, course fees, tuition, matriculation fees, library and laboratory fees; purchase or rental of books fees, materials and supplies; funds for travel, per diem, moving of household goods and personal effects; and any special expenses and miscellaneous other costs paid in connection with the training.

Repayment calculations will not include salary and are normally prorated as a percentage of the remaining service obligation period. Any amounts which may be due CDC as a result of failure on the employee's part to meet the terms of this agreement

may be withheld from monies owed to the employee by the government, or may be recovered by other methods provided by law.

H. Waivers

Under Title 5, U.S. Code, Chapter 41, if an employee voluntarily separates from CDC to enter the service of another federal agency or resigns while under the obligation period before completing the period of service, the employee will give CDC written notice of at least 10 workdays prior to separation, during which time a determination concerning the requirement for reimbursement to CDC will be made. If the employee fails to give this advance notice, and does not receive written notice of waiver of payment or transfer of obligation to the gaining agency and resigns, the employee agrees to repay the amount of additional expenses incurred by the government for this training. Recovery of expenses is initiated unless a waiver documenting the reasons and justification is initiated by the employee.

The CDC Chief Operating Officer may waive employee obligations to CDC, in whole or in part, based on the justification provided by the employee. Approval of the waiver must be fully documented and based on full consideration of equity, good conscience, and the public interest.

A waiver may be granted if the employee:

- 1) Has completed at least 75 percent of the required period of service
- 2) Resigned because of personal illness or serious illness of an immediate family member
- 3) Is unable to make the required payment because of severe financial hardship

If the waiver granting authority within CDC determines that the employee would not use the training in the new position at the gaining agency, the employee is notified before their transfer of the intent to recover expenses. The employee may respond to the findings before such action is taken. Recovery of expenses is prorated against the remaining portion of the employee's obligated service commitment. CDC employees can process grievances on decisions not to grant waivers through the CDC grievance system. Bargaining unit employees who are covered by a collective bargaining agreement can resolve disagreements through negotiated procedures.

4. RESPONSIBILITIES

A. CDC Chief Operating Officer

The CDC Chief Operating Officer retains the authority to:

- 1) Approve an employee's request for reconsideration of training amounts to be recovered
- 2) Approve an employee's appeal to waive right to recover training costs

B. Centers, Institutes, and Offices

CIO Officials will ensure equitable treatment of all employees; apply sound fiscal management principles in paying for training expenses; and authorize and approve attendance and procurement of vendor-sponsored training. They will also:

- 1) Establish internal procedures to select employees for training in accordance with merit principles and will adhere to the established policy
- 2) Allocate funds for training expenses
- 3) Ensure employees sign a CSA as required before they begin training
- 4) Ensure employees satisfactorily complete training (as evidenced by a passing grade or completion of at least 85% of the training when attendance is the only available measure)
- 5) Maintain records of leave used by the employee to fully document service obligations of the CSA
- 6) Determine the employee's service obligation and provide written notification to the employee upon completion of the obligation.
- 7) Maintain a copy of the employee's service obligation
- 8) Maintain records of training for a reasonable period of time, but no less than the expiration of the service obligation period. This includes keeping copies of the SF-182 and CSA, and notifying the Office of Human Resources, Atlanta Field Office (OHRAFO) data systems to prevent separation from CDC without recouping payment due the agency
- 9) Notify OHRAFO when employee fails to fulfill CSA
- 10) Make recommendations to the CDC Chief Operating Officer on employee's request for Reconsideration of Recovery Amounts and/or Appeal to Waive Right to Recover Training Costs
- 11) Conduct training record reviews and notify Financial Management Office (FMO), when appropriate, so recovery of funds can be arranged

C. Human Capital Management Office, Training and Career Development Branch

- 1) Provides overall administration and implementation of the CDC Employee Training Program and ensures compliance with statutory requirements
- 2) Informs the CIOs of training policies related to CSAs
- 3) Advises/consults on the development and enforcement of CSAs
- 4) Provides periodic updates for this policy as required

D. Human Capital Management Office, Human Capital Planning Branch (HCPB)

Advise on and coordinate requirements for Commissioned Corps training covered by HHS Commissioned Corps policy

E. Office of Human Resources, Atlanta Field Office (OHRAFO)

Process personnel actions for separations from CDC, only when notified by the appropriate CIO, that the employee's CSA has been completed, recovery has been waived, or FMO has been notified to recoup costs of training

F. Financial Management Office (FMO)

- 1) Ensure training costs are recovered from employee's pay when applicable
- 2) Advise employees of payroll deductions to recover training costs when applicable

G. Employees

Employees who apply for training covered by this policy will:

- 1) Complete a CSA as a prerequisite to training
- 2) Ensure training has been approved and authorized prior to attending training
- 3) Obtain required approval to modify courses and/or change terms of training
- 4) Fulfill the commitment to the terms of the CSA
- 5) Initiate requests, as applicable, for Reconsideration of Recovery Amounts and/or Appeal to Waive Right to Recover Training Cost

5. REFERENCES

- **STANDARD FORM 182 (SF-182)**, Authorization, Agreement and Certification of Training; Includes Continued Service Agreement, http://www.opm.gov/forms/pdf_fill/sf182.pdf
- Title 5, Code of Federal Regulations, Part 410, Training; Part 335, Intergovernmental Regulations; and Part 531, Pay Under the General Schedule
- Title 5, United States Code, Chapter 41, Training; Section 4108, Employee agreements; service after training, Continued Service Agreements
- U.S. Office of Personnel Management (OPM) Training Policy Handbook, Continued Service Agreements

6. ACRONYMS AND DEFINITIONS

A. ACRONYMS

For the purpose of this policy, the following acronyms apply.

ATSDR – Agency for Toxic Substances and Disease Registry

CDC – Centers for Disease Control and Prevention

CDC/IS – CDC/Information Systems (training orders system in mainframe)

CIO – Center/Institute/Office

CSA – Continued Service Agreement

FMO – Financial Management Office

FTE – Full Time Equivalent (job/position)

HHS – Department of Health and Human Services

OHRAFO – Office of Human Resources, Atlanta Field Office

OPM – Office of Personnel Management

SF-182 – Standard Form 182

HCPB – Human Capital Planning Branch

U.S. Code – United States Code

B. DEFINITIONS

For the purpose of this policy, the following definitions apply:

Continued Service Agreement – is defined as a written agreement requiring an employee to remain in service to CDC for a specified, pre-established length of time, in exchange for CDC-supported training or education. By entering into the agreement, the employee commits to fulfilling the service obligation that begins when the associated training period is completed. Terms and conditions for failure to adhere to the agreement are clearly specified.

Training Identified as Requiring a CSA – Any training that is equal to or exceeds: 160 duty hours per course/program/event or, \$10,000 in training dollars for which CDC provides payment

Training/education is defined as a class(es), course(s), program(s) or training event(s) that is vendor-sponsored, or a combination of CDC and vendor-sponsored training.

CDC-sponsored training is defined as training paid for with CDC funds scheduled by and held specifically for CDC employees.

Vendor-sponsored training is defined as training offered outside of CDC that is open for public registration, sponsored by organizations – companies, educational institutions, professional associations or other sources – in which the standard features and costs of training are established in catalogs or other non-CDC printed materials.