SUBSTITUTE TEACHER
2024-2025 HANDBOOK

Unified School District No. 445,
Montgomery Co.
Coffeyville

615 Ellis Street
Coffeyville, KS 67337

620-252-6400
www.cvilleschools.com



Dr. Craig Correll
Superintendent of Schools

Unified School District No. 445, Montgomery Co. does not discriminate on the basis of sex, race, color, national origin, handicap, or age in admission or access to, or treatment or employment, in its programs or activities. USD 445 Coffeyville is an equal opportunity employer.

Coffeyville USD 445 School Information

Dr. Jerry Hamm Early Learning Center..... .620-251-1147
202 Walnut, Coffeyville, KS 67337
Principal.....Amanda Cavaness
Asst. Director.....Meaghan Ward
Lead Secretary .....Jenifer Hannigan
Secretary .....Crystal Brown

Community Elementary School..... .620-252-6430
102 South Cline, Coffeyville, KS 67337
Principal.....Angela Krause
Asst. Principal.....David Lovelace (grades 5-6)
Asst. Principal.....Tara Thompson (grades 3-4)
Asst. Principal.....Julie Stukesbary (grades K-2)
Lead Secretary .....Shanna Ehmke
Secretary .....Haylie Ehmke
Secretary .....Stacy Hayden
Secretary .....Angela King

Roosevelt Middle School..... 620-252-6420
1000 W. 8th, Coffeyville, KS 67337
Principal.....Julie Dunham
Asst. Principal.....Edward Rutherford
Lead Secretary .....Rosemary Sortore
Secretary .....Dottie Decker

Field Kindley Memorial High School..... 620-252-6410
1110 W. 8th, Coffeyville, KS 67337
Principal.....Travis Stalford
Asst. Principal.....Kelsa King
Asst. Principal.....Wade Welch (Athletic/Activities Director)
Lead Secretary .....Kimberley Jones
Book Keeper .....Jennelle Speer
Athletic Secretary.....Shanna Brown
Attendance Secretary ....Emmett Starnes

Substitute Coordinator, Julee Johnson..... 620-252-6430
Payroll Clerk, Corrissa Walker..... 620-252-6400
Dep. Superintendent/Business Manager, Michael Speer..... 620-252-6400

Board of Education Office
615 Ellis, Coffeyville KS 67337
Phone: 620-252-6400
www.cvilleschools.com

BOE Approved, August 19, 2024

Notice of Nondiscrimination

Applicants for admission and employment, students, parents, employees, sources of referral of applicants for admission and employment, and all unions or professional organizations holding negotiated agreements or professional agreements with the school district are hereby notified that this district does not discriminate on the basis of race, religion, color, national origin, sex, age, or disability in admission or access to, or treatment or employment in, its programs and activities. Any person having inquiries concerning the USD 445 School District's compliance with the regulations implementing Title IX, Americans with Disability Act or Section 504 is directed to contact the Superintendent of Schools, who has been designated by the Board of Education to coordinate the district's efforts to comply with the regulations implementing these laws. You may also contact the Section 504 Coordinator at the Kansas State Board of Education by calling 785-296-2424.

Preamble

The USD 445 Board of Education, administration, teachers, and other employees of the district recognize and declare that it is their mutual aim to provide a quality education to all district pupils. All those above recognize and agree that they have the shared responsibility to:

- Respect each pupil's dignity and worth
- Respect each pupil's right to learn in a safe, supportive environment
- Uphold the standards of the teaching and administrative professions
- Promote quality teaching based on recent pedagogical research
- Assume responsibility for student learning, along with students and parents

In addition, each employee shall demonstrate professional behavior that supports team effort and enhances team behavior, performance and productivity.

Purpose

The Substitute Teacher Handbook is intended to serve as a guide and reference for all classified employees. The Substitute Teacher Handbook should not be regarded as constituting a contractual arrangement with USD 445 Coffeyville, and, does not alter the "at-will" relationship between employer and employee. This handbook supersedes any previous handbook or unwritten policies, and except where restricted by law, USD 445 reserves the right to change the policies described herein. While the handbook provides important information relative to aspects of your substitute teacher position with USD 445, it cannot be used as the basis for all decisions. You are encouraged to consult your supervisors with specific questions you do not find addressed in this handbook. This handbook is subject to updates and changes throughout the fiscal year.

Verification of Employment and Employment Eligibility

The Immigration and Naturalization law of 1986 requires employers to verify, within three business days of hiring, that all employees hired after Nov. 6, 1986, are citizens or aliens authorized to work in the U.S.A. Both employer and employee are required to fill in information to complete an I-9 Form. The human resources department shall verify all inquiries of employment verification. USD 445 shall request that each inquiry be received in writing on the requestor's letterhead, either by fax or mail. USD 445 Coffeyville shall provide the Social Security Administration (SSA) and if necessary, the Department of Homeland Security (DHS), with information from each new employee's Form I-9 to confirm work authorization. USD 445 utilizes the Government's eVerify procedure to confirm work authorization. If the Government cannot confirm that you are authorized to work, USD 445 Coffeyville is required to give

you written instructions and an opportunity to contact DHS and/or the SSA before taking adverse action against you, including terminating your employment.

Background Check

Employment of all classified staff is subject to a background check. Should the background check show any convictions, probations, or diversion agreements, consideration will be made as to the duration and seriousness of the conviction. In questionable cases, the HR/Payroll Department will consult with the superintendent of schools when considering whether or not to employ the applicant in question. Under no circumstances will an applicant be employed if charges of child molestation or other sexual crimes are reported on the background check.

Safety Statement

USD 445, Coffeyville, Kansas, promotes an aggressive safety and health program for all employees and students. The district will monitor all working conditions, practices, products, and personnel to ensure the safest environment for all concerned. The district will provide safety training in job procedures, materials, and other related matters. Employees are required to follow all general safety procedures and practices in the course of their duties. In the event of an accident or safety problem, employees are to immediately report to the building principal or supervisor.

Sexual Harassment Statement

It is the policy of USD 445 to maintain an employment and educational atmosphere free of any pressures on employees and students relating to sexual harassment. Consistent with applicable federal and state laws, USD 445 endorses the objective that employees and students be free of situations where sexual considerations form the basis for business or educational decisions. Sexual harassment may be described as unwelcome sexual advances, requests for sexual favors, and other unwelcome physical, visual, or verbal behavior of a sexual nature. Sexual harassment is to be reported to your immediate supervisor, unless your immediate supervisor is involved. In that case, sexual harassment is to be reported to their superior.

Bullying by Staff

Board Policy GAAE: The board of education prohibits bullying in any form, including electronic means, on or while using school property, in a school vehicle or at a school-sponsored activity or event. The administration shall propose, and the board shall review and approve a plan to address bullying on school property, in a school vehicle or at a school-sponsored event. The plan shall include provisions for the training and education of staff members. Staff members who bully others in violation of this policy may be subject to disciplinary action, up to and including suspension pending a hearing and/or termination. If appropriate, staff members who violate the bullying prohibition shall be reported to local law enforcement.

Employee Classifications

The Employee Handbook is intended to address the policies and needs of all employees, except where indicated by specifically mentioning “licensed staff employees” or “classified staff employees” or “special services staff employees”. The Negotiated Agreement and contracts for employees supersedes similar items addressed in this Employee Handbook.

Licensed Staff Education:

Teachers: Staff who holds a Kansas teaching license and are covered by the USD 445 Teachers' Negotiated Agreement and the Licensed Employee Handbook. These employees are issued a contract.

Administrators: Staff who holds an administrator license and are assigned administrative duties. Administrators are not covered under the Negotiated Agreement and are included in Special Services. These employees are issued a contract.

Counselors: Staff who holds a Kansas Counseling license and are assigned counseling duties. Counselors are not covered under the Negotiated Agreement and are included in Special Services. These employees are issued a contract.

Substitute Teachers: Individual day contracted staff who hold a Kansas substitute teacher license and are covered under the Substitute Teacher Handbook. These employees are employed on an individual day basis as teacher absences occur with no expectation of continued employment.

Director Employees:

Staff, other than educationally licensed staff, who perform supervisory or other duties related to their field. These positions are Director of Human Resources, Director of Child Nutrition Services, Director of Maintenance, Director of the After-School Program, and the School Resource Specialists. These employees are issued an agreement.

Support Staff Employees:

Staff, other than educationally licensed staff, who perform duties related to their field. These positions include student support specialists, teaching assignments of non-fully licensed staff (PK-12). These employees are issued an agreement.

Classified Staff Employees:

Staff, other than licensed education staff, who are employed by the district and paid on an hourly basis.

Grant Employees:

Various employees hired under specific grant requirements. These employees often have special provisions for their employment due to grant requirements, such as set wages, vacation, hours worked or starting and ending times and are included in the Support Staff grouping. Example of these employees would include employees in the Parents as Teachers, Indian Education and Migrant Program. These employees may be listed under the "Classified Staff" designation depending on the grant requirements.

Benefit Eligibility:

Full-time Employees: Eligible for district benefits. For USD 445 benefit purposes, a full-time employee is one who is scheduled to work six or more hours per day, for nine or more months per year and whose recommendation for employment is approved by the Board of Education. For KPERS purposes, a full-time employee is one who is scheduled to work 630 hours, or more per year.

Part-time Employees: Not eligible for district benefits. Employees who work in permanent jobs, but who work less than six hours per day for any length of time in a fiscal year and whose recommendation for employment is approved by the Board of Education. These employees although are not eligible for district benefits, may be eligible for KPERS if the employee is scheduled to work 630 hours or more per year. Substitute Teachers are considered individual day contracted workers and not part-time employees.

Substitute Teacher and Temporary Employees: Not eligible for district benefits. Employees who are hired on a temporary basis, either for a specific job, or a specified length of time, employed either full-time or part-time.

Grandfather Clause: Those employees who were employed prior to July 1, 2016 and who worked five hours or more per day for nine or more months per year will continue to be eligible for district benefits.

Employment Procedures

The Board of Education shall, as a condition of entering or continuing employment, require each employee who is in regular contact with pupils, to submit a certification of health, stating the employee is free from TB infection, signed by a licensed physician or the Montgomery County Health Department on a prescribed form. Upon employment, the following information shall be provided to the Payroll Clerk at the Central Office:

Application	Copy of Social Security Card	Copy of Driver's License
Health Physical/TB Test	Withholding Tax Form (W-4/K-4)	Loyalty Oath
Form I-9	Direct Deposit	KSDE Substitute License

Payroll Consideration and Amounts

If a substitute subs for less than a full day, the sub will be paid at half-day increments.
The current pay schedule is as follows:

Pay Scale	Per Day
Substitute Teacher for a full day	$120
After 20 consecutive days for the same teacher	$130
After 90 consecutive days in same assignment, subs will be placed on teacher base salary, with no benefits, if they have full licensure for their current assignment.	

Pay periods are as follows:

For the month of:	**Payday:**
August	September 13, 2024
September	October 15, 2024
October	November 15, 2024
November	December 13, 2024
December	January 15, 2025
January	February 14, 2025
February	March 14, 2025
March	April 15, 2025
April	May 15, 2025
May	June 13, 2025

If you substitute teach for a Special Education class, you will be paid through Tri-County Special Education Co-Op. There will be additional paperwork for you to fill out and their pay periods are different. Tri-County's pay periods are on or before the 25th of the month. For per day amounts, to sub in Tri-County classrooms, please contact Tri-County.
If you have further questions, please call either the Central Office (620-252-6400) or Tri-County (620-331-6303).

Kansas State Department of Education Teacher Certification

Landon State Office Building, 900 SW Jackson Street - Topeka KS 66612-1182
Phone: 785-296-2288 Web: www.ksde.org

Kansas Fingerprint Information

Fingerprint Process: **All applicants for initial Kansas certification and applicants whose certificate has been expired for one year or more** will be required to submit fingerprint cards for a criminal history record check. Follow procedures outlined in the Fingerprint Card Instructions below. You must use the Kansas preformatted card (FBI, FD258). Only one card is required.

Fingerprint Card Instructions

1. Enter your name (including aliases,) complete mailing address, social security number, citizenship, date of birth, and personal information (sex, race, etc.). The spaces for OCA, FBI, and MNU numbers may be left blank if you do not have one of those numbers. Cards with missing or incomplete information will be rejected. DO NOT SIGN AND DATE THE CARD YET – this will be done in front of the law enforcement officer. Cards with incomplete information will be rejected.

2. Take the cards to a qualified law enforcement agency and have them take your fingerprints. Some law enforcement agencies may charge a fee to take your prints.

3. Have at least one form of picture identification for the law enforcement agency.

4. Place adequate postage on the envelope provided and give it to the law enforcement agency to use in submitting your fingerprints.

5. Sign and date the card in front of the officer taking your prints.

6. Request the law enforcement agency performing the fingerprinting process to staple the fingerprint cards together and mail them along with your background check fee (check or money order made payable to KSDE) to the Kansas State Department of Education in the addressed envelope provided with the application packet. Do NOT send cash. Do NOT combine the background fee and the application fee together. Submit two separate checks.

7. Cards submitted without the background check fee will not be processed. Bent or folded cards will not be accepted and a new set of fingerprint cards will be mailed to you for prints to be taken again.

8. A background check clearance is valid for one year. Applications for certification submitted one year after the background check clearance is received will require a new set of fingerprints for a new clearance.

KSDE Substituting Limitations (K.A.R. 91-31-19)			
Classification	**Max Days Same Assignment**	**Max Days/Sem.**	**Max Total/Year**
Current teaching certificate-- endorsed in position held *(3/5 Year Certificate)*	Year	Semester	Year
Current teaching certificate-- for any level or any endorsement *(3/5 Year Certificate)*	125 Days	Semester	Year
Standard Substitute Certificate[#]- Current/expired certificate or Recommendation from college have completed approved educational program *(5 year Certificate)*	90 Days	Semester	Year
Emergency Substitute Certificate[#]- - BA/BS level degree in any field *(1 Year Certificate)*	30 Days*	Semester	Year
Emergency Substitute Certificate-- completed 60 college hours *(1 Year Certificate)*	15 Days*	60 Days	120 Days

*If a local school board can demonstrate, in writing, an insufficient supply of substitute teachers, the board may appeal to the commissioner of education for authority to allow individuals holding an emergency substitute teaching certificate to continue to teach for an additional length of time not exceeding a total of 93 days in a school year.

If the state board of education has declared a time of emergency, any person holding a five-year substitute teaching certificate or an emergency substitute teaching certificate with a baccalaureate degree may teach for the duration of the time of emergency in a position made vacant by reason of the emergency.

Emergency Substitute License Requirements:

Minimum requirement: 60 semester credit hours from a regionally accredited college or university. Semester credit hours and/or degrees must be earned through a college or university accredited by one of the following regional accrediting associations:

- New England Association of Schools and Colleges
- Middle States Association of Colleges and Schools
- The Higher Learning Commission (HLC)
- Northwest Association of Schools and Colleges
- Southern Association of Colleges and Schools
- Western Association of Schools and Colleges Senior Colleges and Schools Commission on Colleges

- Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges
- Association for Biblical Higher Education

CEU's and/or Clock Hours are NOT equivalent to semester credit hours.

You will need to fill out a Form 8 for your first emergency substitute license and also when you are renewing your emergency substitute license.
Your first emergency substitute license will be valid for the school year in which you apply through June 30th.Each renewal of an emergency substitute teaching license will be valid for two school years. You can apply to renew an emergency substitute license in February of the year it expires.

Standard Substitute License Requirements:

- Must hold a degree and have completed a teacher preparation program in order to qualify.
- All applicants for an initial Kansas license must submit one fingerprint card for the purpose of a KBI and FBI background clearance report.
- If you are applying for an initial Substitute License, have completed a KANSAS teacher preparation program, and have never held a standard teaching license in Kansas, submit FORM 1 online.
- To apply for an Initial Kansas Substitute License and you have completed a teacher preparation program outside of Kansas, or a Renewal of a Kansas Substitute Certificate, complete Form 5 online.

Ready to Apply

Steps for completing an online application:

- Access the *Kansas Licensure Application System website.
- Click on the register button to display the KSDE User Registration Form.
- Follow the steps to complete the registration process.
- Log in with the username and password you created to see the KSDE Web Applications link.
- Click on "2.KLAS-Use only for Forms 2, 3a, 8 or 20" menu option to access the application form you need.
- Fill in the form and submit.
- You can monitor the progress of your application using the Educator License Lookup.

What the Substitute Can Expect From the District/School

The District will:

- Post teacher absences on the Absence Management attendance/absence program.
- Substitutes may "choose" the absence they wish to fill from within the program.
- Absences not filled automatically by the Absence Manager system will result in the Substitute Coordinator making personal phone calls in an effort to fill the position.
- Make available a kiosk to clock in/out when the substitute day starts/is complete.

The School Office will:

- Provide you with the School Substitute Handbook
- Support you in appropriate discipline or other problems
- Acquaint you with the classroom and location of lesson plan book, teacher's guides, etc.
- Bring to your attention any special situations
- Express appreciation for your cooperation and services

The Regular Teacher will have accessible:

- A list of pupil names and/or seating chart
- Daily and weekly schedule
- Complete and detailed lesson plans
- Fire and Tornado drill directions, which are posted in each classroom
- Name of student you can rely upon for assistance
- Name of teacher who will provide assistance
- Elementary Only:
  - List of pupils by bus number
  - A list of students with special needs (emotional, physical or medical)
  - A list showing special schedules of students in class (Reading, Math, Speech, etc.)

What the District Expects of the Substitute

1. Report to the school main office at least 15 minutes before school begins to sign all necessary forms and clock in. All Substitute Teachers will be required to sign into the district time-clock system, Time and Attendance (formerly Veritime), when they arrive at the school. A kiosk will be available in the main office.

Early Learning Center	Elementary	Middle School	High School
8:00 am – 3:00 pm	8:05 am - 3:20 pm	8:10 am – 3:10 pm	8:10 am - 3:10 pm

2. Teach and follow the lesson plans as well as you can.
3. Assume the duties of the regular teacher that may include:
   - Maintaining lunch and attendance records
   - Grading papers (unless otherwise directed)
   - Bus duty
   - Playground supervision (except noon duty)
   - Fire drill and tornado drill supervision
   - Care of plants, materials, etc.
   - Leave the room in good order, closing all windows
   - Other responsibilities listed on school substitute guide
4. Notify the principal or office of any problems or accidents that might occur.
5. Send all student medication to the office.

6. School Board Policy JDA states, "corporal punishment shall not be permitted in the school district". It is a generally accepted policy that employees do not touch students to discipline them except to protect themselves or students.
7. Never leave a class unattended. Use the classroom phone to communicate with the office.
8. Keep the room pleasant and conducive to learning.
   - Maintain good discipline and positive relationships with students.
   - Be positive and kind to students.
   - Treat all students equally, respecting their needs as students.
9. Be professional and ethical in communications and conversations to parents, students, district staff and the general public.

The Substitute Coordinator may assign substitute teachers by the request of a teacher or administrator. In most cases, the assignment will be at the discretion of the Substitute Coordinator. Should there be a question of substitute assignments, either on the part of a substitute teacher, teacher, or administrator, the Substitute Coordinator will consult with the Director of Human Resources to make a decision on assignments based on the district's strategic plan and what is in the best interest of the students

Evaluation of Substitute Teacher by Regular Teacher
Coffeyville USD 445

(INFORMATION MAY ALSO BE SUBMITTED IN AESOP)

Substitute: _____ Dates: From _____ To _____

Substituted for: _____

CLASSROOM TEACHER:

Please comment below on the performance of your substitute and return this form to the office today.

1. Lesson plans were followed as directed. _____ Yes _____ No
2. Procedures for correcting papers were followed. _____ Yes _____ No
3. Adequate information was left for me by substitute regarding day's work. _____ Yes _____ No
4. Classroom, desk, books, papers, etc. were left in order. _____ Yes _____ No
5. Overall appraisal of substitute: On a 5-point appraisal scale (#1 excellent to #5 poor), please circle the number that best describes the substitute's performance.

   1 2 3 4 5

6. Remarks: _____

   _____

   _____

   _____

7. If you have any concerns about having this teacher assigned to this school again, please discuss with the building principal.

NOTE: This form is available for inspection by substitute on request. Conferences may be arranged with the principal if desired.

Regular Teacher: _____

Date: _____ School: _____

Substitute Teacher's Experience Report
Coffeyville USD 445

(TURN IN COMPLETED REPORT TO OFFICE AT END OF THE DAY INFORMATION MAY ALSO BE SUBMITTED IN AESOP)

I substituted for _____ on _____
(Regular Teacher)

1. I was welcomed and assisted by the office staff. _____ Yes _____ No
2. The substitute teacher information provided contained the teacher's daily schedule, including any duties. _____ Yes _____ No
3. The attendance directions were adequate. _____ Yes _____ No
4. The lunch count directions were adequate. _____ Yes _____ No
5. The classroom rules were posted. _____ Yes _____ No
6. The seating charts were up-to-date, and responsible students were labeled on the chart for each class. _____ Yes _____ No
7. Lesson plans were up-to-date and contained sufficient specific and detailed information for me to perform satisfactorily. _____ Yes _____ No
8. Teacher's editions of necessary textbooks were available. _____ Yes _____ No
9. How would you rate the classroom behavior of the students?
   Excellent ____
   Good ____
   Fair ____
   Poor ____
10. I had a satisfying day(s) at _____.
    (Name of School)
    _____ Yes _____ No

COMMENTS:

_____

_____

_____

_____ _____
Substitute Teacher's Name Date

Substitute Teacher Job Description

Primary Purpose
The Substitute Teacher creates a positive learning environment to facilitate the personal, social, and intellectual development of students in the absence of the regular teacher. In order to respond to the individual needs and abilities of students, the Substitute Teacher must work closely with other staff and the administration of USD 445.

Qualifications Profile
- Current Kansas State Teaching License or Emergency Substitute License on file in the central office, or a Bachelor's degree from an accredited college/university preferred, or a high school diploma to qualify for the Emergency License.
- TB Skin Test/Physical completed and on file
- Ability to pass a background check
- Valid driver's license or state issued ID

Essential Job Functions
- Monitor students in the school building and inform administration immediately of any condition which jeopardizes the health, safety, or orderly delivery of educational services.
- Implement effective lessons in the absence of the regular Instructor.
- Follow lesson plans made by the regular Instructor.
- Motivate students through effective communication and evaluative feedback.
- Demonstrate awareness of the needs of students and provide for individual differences.
- Set high expectations for student achievement and behavior.
- Establish and maintain a positive climate for learning through appropriate classroom management.
- See that district policies are observed during all activities.
- Obtain advance approval of the regular Instructor and Principal for all activities.
- Adhere to all district health and safety policies, including all precautions of the Bloodborne Pathogens Exposure Control Plan.
- Other duties as assigned by the Principal, or other Administrative Staff.

Knowledge, Skills and Abilities
- Facilitate the personal, social, and intellectual development of students.
- Maintain a positive learning environment and respond to the individual needs of students.
- Ensure that all activities conform to district guidelines.
- Communicate effectively with all members of the school district and community.
- Work effectively with community organizations.
- React to change productively and handle other tasks as assigned.
- Support the value of an education.
- Support the philosophy and vision of USD 445 Coffeyville.

Physical Requirement/Mental Demands/Environmental Conditions
- Requires the ability to maintain emotional control while under stress and in stressful situations.
- Requires the ability to frequently stand for prolonged periods of time.

- Requires the ability to walk frequently.
- Requires the ability to use standard office equipment including computer and peripherals and other instructional equipment for prolonged periods of time.
- Requires the ability to frequently use repetitive hand motions, including frequent keyboarding and mouse use.
- Requires the ability to occasionally kneel/squat, bend/stoop, push/pull, twist, or reach.
- Requires the ability to occasionally lift and carry items 50 lbs.
- Requires the ability to work and concentrate in noisy and crowded environments.
- Requires the ability to work with frequent interruptions.
- Requires the ability to occasionally work outside with exposure to extreme hot and cold temperatures.
- Requires timeliness and regular attendance and/or physical presence at the job.
- Works in standard office and school building environments.

Equipment

Uses standard school equipment such as personal computers, printer, copy and fax machines, and telephone.

Travel Requirements

Possible travel to another school building in the district to fill teacher vacancies.

FLSA Status: Exempt

Direct Supervisor: Building Principal

Disclaimer

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this position. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

The information contained in this job description is for compliance with the American with Disabilities Act (A.D.A.) and is not an exhaustive list of the duties performed for this position. Additional duties are performed by the individuals currently holding this position and additional duties may be assigned.

Coffeyville Unified School District No. 445 does not discriminate on the basis of sex, race, color, national origin, handicap, or age in admission or access to, or treatment or employment, in its programs or activities.