

**THE SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
(SCSEP): OMB 1205-0040
Supporting Statements, Part A**

JUSTIFICATION

Introduction: This information collection revision request contains program performance reports for the Senior Community Service Employment Program (SCSEP). The current request is for approval of modified forms necessitated by the senior Community Service Employment Program Final Rule, Additional Indicator on Volunteer Work.

The SCSEP, authorized by title V of the OAA, is the only federally sponsored employment and training program targeted specifically to low-income older individuals who want to enter or re-enter the workforce. Participants must be unemployed, 55 years of age or older, and have incomes no more than 125 percent of the federal poverty level. The program offers participants training at community service assignments in public and non-profit agencies. The dual goals of the program are to promote useful opportunities in community service activities and to also move SCSEP participants into unsubsidized employment, where appropriate, so that they can achieve economic self-sufficiency. The Older Americans Act Amendments of 2006, Pub. L. No. 109-365 (2006 OAA), amended the statute authorizing the SCSEP and necessitated changes to the SCSEP regulations in 20 CFR Part 641. A final rule promulgating such changes was published on September 1, 2010. The statute requires the Department to issue definitions of any indicator of performance through regulation.

Program-specific measures to monitor the performance of each SCSEP grantee were first codified in the 2000 Amendments to the OAA. The 2006 OAA Amendments expanded these performance measures. The Department then refined the 2006 statutory measures in its regulations published June 29, 2007 (SCSEP IFR) and September 1, 2010 (SCSEP FR), and codified at 20 CFR Part 641 Subpart G. As established in these regulations, there are six core indicators of performance: (1) hours (in the aggregate) of community service employment; (2) entry into unsubsidized employment; (3) retention in unsubsidized employment for six months; (4) earnings; (5) the number of eligible individuals served; and (6) the number of most-in-need individuals served (the number of participating individuals described in 20 CFR 641.700(b)). Additional indicators of performance include: (1) retention in unsubsidized employment for 1 year; and (2) satisfaction of the participants, employers, and their host agencies with their experiences and the services provided.

The Final Rule provided that the only additional indicators are the two statutorily required measures: (1) retention in unsubsidized employment for 1 year; and (2) the satisfaction of participants, employers and their host agencies with their experiences and the services provided. Although in the SCSEP Final Rule ETA did not add any additional measures beyond those required by statute, ETA now believes that the benefits of adopting an additional measure of volunteer work outweigh the minor additional burden of collecting the data for the measure. The Proposed Rule added an *additional* indicator to measure the number of exiting participants who enter volunteer work. The new measure recognizes that SCSEP promotes volunteer work, which benefits both the community and the participants who perform the work. ETA believes the new measure will provide balance to the employment focus of the existing performance measures, an area of concern to some persons commenting on the Final Rule, and will provide positive outcomes for participants who may not be employed but who still build on the skills they obtained in SCSEP to provide a benefit to their community.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and or regulation mandating or authorizing the collection of information.

<i>FORM</i>	<i>LEGISLATIVE CITATIONS OAA-2006</i>	<i>REGULATORY CITATIONS</i>
Participant, Community Service Assignment, Exit, Unsubsidized Employment	Sections 502(a)(1), 502(b)(1)(C), 502(e), 503(f), (g)	641.879(a) 641.700
Quarterly Financial Report (ETA-9130)	503(f)(3)	641.879(b)
SCSEP Equitable Distribution Report	Sections 507(a), (b), Section 508	641.325(a), 641.360, 641.879(c)
Application for Federal Assistance & Budget Information Sheet (SF-424)	Section 502(b)(1), Section 503 (f)(2)	641.410(a), (b)
Customer Satisfaction Surveys	Sections 513, 514, 502(e), 503(f), (g)	641.710

The SCSEP is funded for approximately \$759 million for PY 2010 and will provide over 78,000 positions in which nearly 120,000 low-income persons aged 55 or older will be placed in community service employment. At Program Year (PY) 2008 placement rates, this should allow as many as 20,000 people to be exited from the program with the ultimate goal of unsubsidized placement in PY 2010.

To ensure that the Senior Community Service Employment Program is properly administered, and to implement the additional measure of volunteerism, it has become necessary to further modify the existing data collection forms and adjust the overall data collection burden. The legal authority for the collection of additional information may be found at sections 503, 508, 513, and 515 of the OAA-2006.

2. Indicate how, and by whom, and for what purpose the information is to be used. Except for a new collection indicate the actual use the agency has made of the information received from the current collection.
 - The Department has used the Quarterly Progress Report (ETA 5140) for 30 years to record information about SCSEP program participants and to measure grantees' progress toward agency goals and objectives. The Department uses the information to manage the program and to report program results to the public and the Congress. OAA-2006 created revised reporting requirements. These requirements continue the collection of information that can be used to measure performance against program goals and to implement corrective actions should performance prove inadequate. Corrective actions for state grantees under the OAA-2006 may include a reallocation of the grantee's funding to another entity. National grantees may be barred from participation in the next SCSEP competition if they fail to meet their aggregate goals for three successive years. There is

no longer a burden associated with the ETA-5140 because grantees are no longer required to submit the QPR. SPARQ generates the ETA-5140 from participant records maintained and submitted by the grantees. Thus, the burden associated with the data entry forms is all that is required for QPR generation. Reference to Form ETA 5140 in a PRA context is now made only for historical purposes.

- Section 503 of OAA-2006 provides for a single State Plan that outlines a 4-year strategy for the statewide provision of community service employment and other authorized activities for eligible individuals, which requires the Governor to solicit public involvement in the development of the Plan. ETA Form 8705 (see below) is used to determine the location of the SCSEP-eligible population and compares it with the actual location of program positions. The differences between the proportional share and the actual share form the basis for much of the State Plan activity. Among the agencies involved in preparing the State Plan are Workforce Investment Act (WIA) agencies, Area Agencies on Aging, community service agencies, and the SCSEP national grantees operating in that state. The purpose of the State Plan is to ensure that States address the employment situations and skills of the eligible population.
- The Equitable Distribution Report (ETA 8705) has been used by the program for over 20 years. It remains a requirement under section 508 of OAA-2006, which calls for state grantees, in conjunction with national grantees operating in the state, to submit a report that details an equitable allocation of SCSEP resources within the state based on county-by-county data showing the number of SCSEP-eligible persons in the population from the most recent U.S. Census. The Equitable Distribution Report remains unchanged from previously submitted versions.
- The 2006 amendments to Title V of the Older Americans Act (OAA-2006, Pub. L.109-365) require that customer satisfaction surveys be conducted for all three customer groups: participants, host agencies, and employers. The Employment and Training Administration (ETA) is using the American Customer Satisfaction Index (ACSI) to meet the customer satisfaction measurement needs of several ETA programs including the Senior Community Service Employment Program (SCSEP). SCSEP has been conducting these surveys nationwide since 2004. The survey approach allows the program flexibility and, at the same time, captures common customer satisfaction information that can be aggregated and compared among national and state grantee. The measure is created with a small set of core questions that form a customer satisfaction index. The index is created by combining scores from three specific questions that address different dimensions of customers' experience. Additional questions that do not affect the assessment of grantee performance are included to allow grantees to effectively manage the program. (See Part B of the Supporting Statement for a discussion of customer satisfaction survey methodology.)

3. Describe the collection of information involving the use of automated, electronic, mechanical, or other technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

- The Department requires grantees to submit data electronically in order to reduce costs and improve the quality. To accommodate the collection of information on the revised performance measures and the common measures, the Department in 2003 provided grantees with a software program – the Data Collection System (DCS) – that allowed them to collect participant data through their existing systems. In some cases this was the first electronic database used by grantees. One immediate effect of the implementation of the DCS was the elimination of the need for grantees to produce Quarterly Progress Reports.

These are now automatically generated by the DCS software. The final step in the evolution of SCSEP performance reporting is the Internet-based SCSEP Performance and Results QPR (SPARQ) system, which was launched during Program Year 2004. ETA is confident that, as the system is refined, the overall reporting burden for grantees will continue to be reduced.

- The ETA 8705 (Equitable Distribution Report) is submitted electronically by the states as an Excel-compatible spreadsheet.
- In conjunction with the Department's e-grants initiative, ETA is developing systems that will allow an increasing number of grant applicants to apply on-line for grants and grant renewals.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use the purposes described in Item 2 above.

The SCSEP is a discrete program authorized by title V of OAA to promote part-time community service employment and to foster individual economic self-sufficiency, thereby increasing the numbers of participants who obtain unsubsidized employment. The information collected includes participant personal characteristics, community service and employment records, statistics such as dates documenting progress through the program, and post-program follow-up information. Moreover, many of the performance measures that are required by this program are not collected by any other program and are uniquely defined.

5. If the collection of the information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize the burden.

Although small entities (generally non-profits) are active partners in the provision of community services and act as host agencies to program participants, these entities are usually not actively engaged in the reporting process. Thus, they are not likely to be aware of the revised reporting requirements. The exception is that some small private employers and host agencies may be chosen to receive customer satisfaction surveys. Response to these surveys is, however, voluntary.

6. Describe the consequence to the Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

- The OAA-2006 changed SCSEP by not only revising the performance measures but also requiring the Department to implement corrective action if grantees performance falls below specified negotiated levels. By requiring performance data, the interests of the grantees are protected, because these reports permit them to monitor their program progress. Moreover, Quarterly Progress Reports allow the Department to monitor grantee progress toward goals and provide timely assistance to the grantees if needed.
- If the collection of information under the Administration's common performance measures initiative is conducted less frequently, it would be contrary to the definitions provided for the measures and inconsistent with the actions of other Federal agencies and other programs within the Department.

- The Equitable Distribution Report is required annually by the OAA-2006. Failure to collect this information would be contrary to the legislation.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- more often than quarterly
- requiring a written response to an information collection in fewer than 30 days
- requiring more than an original and a copy
- requiring record retention longer than 3 years
- in connection with a statistical survey that is not designed to produce results which can be generalized to the universe of the study
- utilizing statistical data that has not been approved by OMB
- a pledge of confidentiality
- revealing a proprietary trade secret

This collection of information complies with 5 CFR 1320.5.

8. Consultation Efforts

The Department published a SCSEP NPRM on an Additional Indicator for Volunteer Work on November 23, 2010. We received 113 comments on the NPRM from State and local governmental entities; non-profit organizations that host or help to place participants; academic professionals in the field of gerontology and several private citizens. To review the public comments about this rulemaking go to <http://www.regulations.gov/#!docketDetail;dct=FR%252BPR%252BN%252BO%252BSR%252BPS;rpp=10;po=0;D=ETA-2010-0005> . Overall, comments on the NPRM were extremely supportive, stating that the NPRM clearly supports Congressional intent as reflected in the statement of purpose and the dual goals of SCSEP.

The main reason cited by most commenters for supporting the additional indicator was the large and rapidly growing body of research about the important benefits of volunteer work for the elderly and the positive impact their volunteer work has on the larger community. Specifically, several commenters, including a director of a multi-year research project on older adult civic engagement, cited a report from the Corporation for National and Community Service, "...'The Health Benefits of Volunteering: A Review of Recent Research,' [which] documents that those who volunteer have lower mortality rates, greater functional ability, and lower rates of depression later in life than those who do not volunteer." Commenters also noted that volunteerism is more likely to occur where people are invited to volunteer, or where volunteer options are presented to them; according to the comments, "... [R]esearch consistently shows that older volunteers in particular benefit greatly from improved physical well-being, enhanced self-esteem, and a greater sense of personal accomplishment." This assertion is supported by the research cited above.

Some commenters were concerned about the burden on grantees and/or sub-grantees to collect information about former participants' volunteer activities post-SCSEP. This indicator is an additional indicator, not a core indicator, and thus has no goal-setting, no data validation, and no negative repercussions attached to it for the sponsors involved. The value of this additional indicator lies in the information

that sponsors can obtain during intake, at exit, and through brief and non-burdensome follow-up efforts with participants after their SCSEP service. While the Department understands that sponsors may not be able to reach participants after exit from the program, we find that the data obtained through low burden follow-up efforts will provide valuable information to justify the minimal increase in burden.

There were three negative comments on this proposed additional indicator. These commenters voiced strong opposition to the additional indicator, suggesting that the focus of the SCSEP should be on the unsubsidized employment goal alone, rather than a shared emphasis with community service. These commenters also were concerned that volunteerism would discourage employers from hiring participants when they could continue to volunteer. However, the purpose of this regulation is not to create an either/or situation, where we are encouraging volunteer work over employment or vice versa. Rather, the point is to ask grantees and/or sub-grantees to make a good faith effort to account for any participants who choose to volunteer post-SCSEP entry, regardless of whether they also have found unsubsidized employment. DOL expects that the information culled from this additional indicator will confirm not just the overall impact on the individual participants that improve their lives through volunteering after entering SCSEP, but also the positive impact the SCSEP has on local communities through the increase in volunteerism by current and former SCSEP participants.

Finally, a few other commenters were concerned about whether “a measure of volunteerism as a program outcome may be misinterpreted by policy makers” because other “successful programs administered by the Corporation for National and Community Service are being operated at a considerably lower unit cost.” Essentially, these commenters are concerned that the SCSEP budget will suffer because, in their view, the reason for existing support from lawmakers is based entirely on SCSEP’s “outstanding record of placing the hardest to serve older workers in employment and providing paid community service opportunities to those enrolled.” The Department understands this concern and agrees that an important connection exists between SCSEP’s outstanding record of placement and its continued funding by Congress. However, the OAA laid out dual goals for the SCSEP: unsubsidized employment and community service, as discussed above. It is appropriate to consider the success of the program in achieving both of these goals. Consequently, the Department believes that the volunteerism indicator will help to show the value of the community service aspect of SCSEP.

The Department acknowledged in the Final Rule that unsubsidized employment is not a suitable or appropriate outcome for every SCSEP participant, and that while our participants are low-income and in need of financial support, being employed may not be an appropriate or achievable outcome for every individual participant. Rather, because community service is an equally important goal of the SCSEP as envisioned by Congress in the OAA, the Department is following Congress’ lead by collecting information about how participation in SCSEP community service leads to continued service to the community after participants exit from SCSEP. DOL finds this information valuable not only with respect to those individuals for whom unsubsidized employment post-SCSEP is not an appropriate or achievable outcome, but also for those who do obtain unsubsidized employment. We are not

collecting information only with respect to those who volunteer after exit without having a job; rather, we are collecting information regardless of whether the participant also has found unsubsidized employment.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration to grantees.

SCSEP grantees are forbidden from providing any remuneration other than the normal wages for community service work in non-profit host agencies.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Your answers will be kept confidential to the extent available under existing statutory authorities except when confidentiality is waived. ETA's PROTECH department has been an active participant in the development and approval of data security measures – especially as they apply to the Internet-based data collection system (SPARQ).

A key concern is for the protection of participant social security numbers. Grantees must collect the social security number in order to properly pay participants for their community service work in host agencies. When participant files are sent to DOL for aggregation, the transmittal is always protected by secure encryption. When participant files are retrieved within the SPARQ system, only the last four digits of the social security number are displayed. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on individuals.

In addition to the above, a Privacy Act Statement is provided to grantees for distribution to all program participants. Participants receive this information when they meet with a case worker or intake counselor. When the programs are monitored, implementation of this item is included in the review.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, and the explanation to be given to persons from whom the information is requested, and any steps taken to obtain their consent.

Questions of a sensitive nature include self-identification of a disability. Applicants are informed that EO information – gender, ethnicity, race, and disability – is voluntary and that the refusal to provide it will have no effect on any decision to provide services to them. The collection of this information is similar to other programs (such as WIA) and complies with the requirements of the Americans with Disabilities Act.

12. Provide estimates of the hour burden of the collection of information.

The increase in burden hours for the SCSEP program is an overall result of the fact that Congress has recently provided significant funding increases to the program. That means grantees are reporting data on more participants than in the past, thus increasing the total number of responses. The increase is mitigated by the fact that the response data for the SPARQ and Customer Satisfaction Forms has been adjusted downward based on PY 2008 usage statistics.

Senior Community Service Employment Program 2010 Burden Hour Estimates

Cite Reference	Total Respondents	Frequency	Total Responses	Average Time per Response	Burden Hours
Participant Data Form – ETA-9120	74	Ongoing	120,000	12 mins.	24,000
Community Service Assignment Form – ETA-9121	74	Ongoing	143,000	6 mins.	14,300
Unsubsidized Employment Form – ETA-9122	74	Ongoing	18,000	6 mins.	1800
Exit Form – ETA-9123	74	Ongoing	60,000	6 mins.	7,000
Equitable Distribution Report Form – ETA-8705	51	Annually	51	10 hours	510
Participant Customer Satisfaction – ETA-9124A	17,500	Annually	17,500	10 mins.	2917
Host Agency Customer Satisfaction – ETA-9124B	11,900	Annually	11,900	10 mins.	1,983
Employer Customer Satisfaction – ETA-9124C	3,800	Annually	3,800	10 mins.	633
Four-Year State Plan	28	Annually	28	7.25 hours	203
TOTAL	////	////	374,279	////	53,346

Note 1: Each of the above forms (with the exception of the ETA-8705 and Four-Year State Plan) is disaggregated in ROCIS because each is associated with two categories of affected publics. Therefore, each of the burden hour totals for these forms in the table above has two separate sub-totals in the ROCIS submission.

Note 2: The total estimated number of respondents is calculated based on 74 state and national grantees for most reports; a combined 33,200 customer satisfaction survey respondents; and 50 states and one territory for the equitable distribution reports.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation, maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, disclosing or providing the information. Include descriptions of methods used to estimate cost factors including system and technology acquisition expected useful life of the equipment. Capital and start-up cost include preparation for collecting information: such as purchasing equipment and record storage.

- If cost estimates are expected to vary widely, agencies should present ranges and explain the reasons for the variance. The cost of purchasing or contracting out the information collection services should be a part of this cost burden estimate. In developing cost burden estimates the 60-day pre OMB submission public comment process and use existing economic and regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchase of equipment or services or portions thereof unless they are for the specific purpose of the collection of the additional information.

The SPARQ application does not require any software more advanced than Windows 98. The SPARQ application does not require any specific operating system. The application is designed to run on any computer with broadband Internet access and Internet Explorer, Mozilla Firefox, Sahara, or other browsers. All grantees and sub-grantees currently have the equipment necessary to operate the application. Grantees need not incur any additional ongoing costs; although there may be some minor costs (covered by grant funds) associated with training grantee staff to use the system. The data collection application is provided free to all grantees (and sub-grantees) that wish to use it. Grantees that wish to modify their existing automated systems to report the required data rather than use the SCSEP application incur the cost of modification. Because all grantees could use the SCSEP application cost free, the Department does not consider the cost of modifying existing automated systems to be a cost burden resulting from the SCSEP system.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and other expenses that would not have been incurred without this collection effort. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Costs to the Federal Government of the SPARQ System

Report	Federal Review Hours*	Average Hourly Wage	Number of Reviews	Total**
QPR Report (ETA-5140, now reflected by SPARQ data entry forms (ETA 9120, 9121, 9122, and 9123))	3	\$40.66	370	\$45,133
State Senior Employment Coordination Plan Including ED Report	5	\$40.66	54	\$10,978
Equitable Distribution Report (ETA-8705)	2	\$40.66	54	\$4,391
Grant Application	8	\$40.66	74	\$24,071

424, 424A				
TOTAL:	18	////	552	\$84,573

*The estimates above are based on past experience in reviewing the reports but also include judgments on the time needed to analyze the performance results and review new requirements. They are based entirely on estimated staff time needed to review the reports. The average hourly cost for Federal staff members who review reports is based on the OPM Washington DC Locality Pay Schedule, 2010; Federal employee (GS-12, Step 5).

**In addition to the above ongoing costs, the ETA expects to incur contractor costs of \$2.9 million in 2010 for data specification, maintaining and testing the SPARQ software, and providing training and technical support to grantees using the system. These costs have been fully funded through the use of SCSEP set-aside funds.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

The overall burden has increased slightly to 53,346 hours due to added burden for the Exit Form – ETA-9123 and calculation adjustments.

The federal cost burden increased to \$84,573 due in part to federal wage updates and because of the added program participants. In addition, note that ROCIS now also reflects \$2,900,000 in annual contractor costs (not included in ROCIS in the previous submission), for a total of \$2,984,573.

16. For the collection of information results that will be published, outline plans for the tabulation, and publication. Address any complex analytic techniques that will be used.

In general, information from the Quarterly Progress Report (ETA 5140) has not been published by the Department – although it has sometimes been published by others and shared with the grantees. The Department will publish on its Web site the performance results of each grantee. SCSEP has also been selected as one of three ETA programs to have its data made available on a government-wide Web site in response to OMB’s Open Government Directive, which has the goals of publishing government information on-line, improving the quality of government information, creating and institutionalizing a culture of open government, and creating an enabling policy framework for open government. At this time, the focus is on populating the data.gov Web site.

The State Plan is publicly presented for comment by individual states in accordance with each state’s comment process. Such processes may include publication in local newspapers or on the state’s Web site.

The QPR uses no complex calculations. Results are generally tabulated as sums, averages, or percentage rates.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be appropriate.

ETA displays the OMB control number and the expiration date on all approved forms.

**18. Explain each exception to the certification statement identified in Item 19
“Certification for Paperwork Reduction Act Submission” of OMB 83-I.**

N/A