

**JUSTIFICATION for
Non-material Change to
Senior Community Service Employment Program Performance Measurement System
OMB Control No. 1205-0040**

The Employment and Training Administration (ETA) is submitting a non-material change request to make revisions to ETA Form 9121 and ETA Form 9122 under OMB control number 1205-0040. The information collection is necessary to comply with statutory and regulatory requirements of the Older Americans Act - 2006. The revised forms address the data collection requirements for the supportive services and participants staff program elements which allows SCSEP to comply with the statutory and regulatory requirement.

Community Service Assignment Form – ETA-9121

- A new field 16 has been added to capture whether the participant has been assigned to a host agency that is either a grantee or sub-recipient/local project or a workforce partner. This field is required to ensure that participants assigned to either type of entity are receiving training, services, wages, and benefits in accordance with the law and SCSEP policy.
- The existing fields 16 and 16a and have been combined into a new 16a and are now only required in the small minority of cases where the participant has been assigned to a host agency that is either a grantee or sub-recipient/local project or a workforce (new field 16 above). ETA is thus limiting the data collection and reducing the burden hours for grantees by collecting information on wages and hours only where essential.
- New fields 20a.1, 20a.2, and 20a.3 are added to capture information on the provision of supportive services to participants as required by OAA-2006 and the SCSEP regulations. The Department must be able to track the provision of supportive services because they are necessary to help SCSEP participants, who have multiple barriers to employment and are the hardest to serve, be successful in their community service assignments. In addition, grantees may also request a waiver of the requirement to spend 75% of their grant funds on participant wages and fringe benefits in order to reprogram up to 10% of those funds on additional participant training and supportive services. Currently, the Department has no data on the provision of supportive services and is unable to monitor grantee compliance with the law or to reliably evaluate grantee requests for the waiver.

We believe that grantees are not providing supportive services to all participants during the community service assignment so the number of responses for these new fields will be fewer than for the form as a whole.

Unsubsidized Employment Form – ETA-9122

- New fields 21a, 21b, and 21c are added to capture information on the provision of supportive services to participants as required by OAA-2006 and the SCSEP regulations. The Department must be able to track the provision of supportive services because they are necessary to help SCSEP participants, who have multiple barriers to employment and are the hardest to serve, be successful in their unsubsidized employment during the first 12 months after exit from the program. Currently, the Department has no data on the provision of supportive services and is unable to monitor grantee compliance with the law.

We believe that grantees are not providing supportive services to most participants in unsubsidized employment and that the number of responses to these fields will be far fewer than for the form as a whole.

The SCSEP is a program authorized by Title V of OAA-2006 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, 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. The data collection efforts require leveraging information so that no information is duplicated.