Department of Labor

Senior Community Service Employment Program (SCSEP)

Information Collection Request

Attachment A

Summary of 60-day Federal Register Notice (FRN) Comments and Responses

Executive Summary (Overview of Document)

The Department of Labor (DOL) published a 60-day Notice in the <u>Federal</u> <u>Register</u> (FRN) seeking public comments concerning proposed extension for the authority to conduct the information collection request (ICR) titled, "Senior Community Service Employment Program (SCSEP)" on March 21, 2018 (OMB ICR Reference Number 1205-0040).

This document provides a summary of the public comments received in response to the 60-day comment Notice on the SCSPE ICR and the Department's responses to those comments. The Department has organized this Summary of Comments and Responses by issues raised by the commenters, and the particular forms of the ICR documents.

Each comment contains a comment number in the first column. The actual comment received appears in the second column. The third column provides the agency's response.

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Comment Received from Senior Service America		
	ETA 8705A	
1.	In reviewing this updated form, SSAI noticed that the instructions at the top have been amended. The draft text states: *The Equitable Distribution (ED) Grantee Report, Form 8705A, is based on the number of modified positions by county as determined by the Census data and the highest applicable minimum wage, as well as the number of enrollments by county as determined by the data in the ETA data collection system. The grantee report should include all states in which the grantee operates.* We feel the instructions on the current ED form are more accurate and recommend that the Department revise their instructions as follows: The Equitable Distribution (ED) State Grantee Report, Form 8705A, is based on the number of modified authorized positions by county as determined by Census data and the highest applicable minimum wage, as well as by the number of enrollments by county captured in the ETA data collection system at the time of reporting. The grantee report should include all states in which the grantee operates.	The Department agrees with the commenter in part and has revised 8705A for clarity: The Equitable Distribution (ED) State Report, Form 8705A, is based on the number of modified positions by county (authorized positions adjusted for the applicable minimum wage in the county) as determined by the Census data, as well as the number of enrollments by county as determined by the data in the ETA data collection system at the time of the report. The State Report should include all grantees that operate in that state. While the Department recognizes the commenter's intent for the last three recommendations, the Department believes that the current language is sufficient for the State Equitable Report instruction. Thus, the Department will maintain the current instruction.
	ETA 8705B	
2.	Similar to our comments for #1 above, SSAI suggests the Department revise the instructions on this form as follows: The Equitable Distribution (ED) Grantee Report, Form 8705B is based on the	See Comment 1. The Equitable Distribution (ED) Grantee Report, Form 8705B, is based on the number of modified positions by county *(authorized positions adjusted for the applicable minimum wage in the county), a*s determined by Census data, as well as the number of enrollments by county captured in the

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	number of modified authorized positions by county as determined by Census data and the highest applicable minimum wage, as well as by the number of enrollments by county captured in the ETA data collection system at the time of reporting. The grantee report should include all states in which the grantee operates.	ETA data collection system *at the time of the report*. The Grantee Report should include all states in which the grantee operates.
	ETA 9121	
3.	Change "alternative phone extension" to mobile or cell phone number as a significant number of participants have cell phones	The new ETA-CMS is a shared platform. The Department's goal is to maintain consistency in data elements (to the extent possible) amongst ETA grant users.
4.	Adding the +4 to the zip code collection will add significant time to participant intake. Most individuals do not know their zip +4 number. This data collection element is not essential.	See Comment 3. Additionally, the +4 Zip Code is an optional field for the Senior Community Service Employment Program (SCSEP).
5.	Name of Case Manager. We're not clear on the purpose of this data element as it seems to suggest that every participant will have a case manager. This job title is not commonplace within the SCSEP network and while case management services are provided, collection of this data will cause confusion.	The Department appreciates the commenter's feedback. The Department does not mandate a specific grantee staffing pattern via the ETA-CMS system. The ETA-CMS system is designed to allow for multiple scenarios for structuring case assignments. The case manager role via the ETA-CMS is a type of user access role assigned to staff within the system. This role is not intended to be an official job title within an organization.
6.	Unemployment Compensation eligible status. Since UI programs are operated on a state by state basis, it does not seem that the Department will be able to assist with this data collection element. For intake staff, securing this documentation will add significant time to the intake process for each SCSEP participant. Additionally, unemployment insurance is not includable for income eligibility purposes so it is unclear as to why project staff would spend	The data element does not require any documentation; the grantee need only enter the status/ referrer (which corresponds to 1, 2, 3, or 0) based on the participant's self-attestation. Data collected through this element does not pertain to SCSEP eligibility determination, but rather will provide the Department information regarding whether an applicant is receiving unemployment compensation. The Department agrees with the commenter that

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	a great deal of time seeking unemployment compensation documentation.	unemployment compensation, a benefit received under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.) are excludable from SCSEP eligibility determination. The Department will use data collected under this element to continue to pursue the joint WIOA goal of providing integrated services to participants, by tracking and ensuring reemployment services are provided to claimants through the workforce system.
7.	Low income status at program entry. This data collection element seems duplicative in that all SCSEP applicants have to go through income eligibility determination. Also, choices C, D, F, and G should be eliminated to save time as SCSEP does not serve youth, only adults 55 and older.	The Department recognizes that some part of the definition is not applicable to the SCSEP population. However, because this element is shared amongst ETA programs, ETA is aligning SCSEP with this definition. The Department will make special efforts in the ETA-CMS and on the hard copy forms to reduce items that may cause duplication.
8.	The regulations currently allow a grantee to conduct either a 12 months or 6 months look back period for income eligibility for the grantee to identify the period most advantageous for the participant's eligibility. We hope the business rules for the Department's new data collection system for SCSEP will continue to provide this choice.	The business rule for these elements will not change under the new ETA-CMS data collection system.
9.	Please amend "Secondary Contact Name" to "Emergency Contact Name" to denote the importance of this information. Following Hurricane Katina, SSAI and its subgrantee serving Gulfport, MS were able to successfully locate most of the participants by contact their "emergency" contacts.	See comment 3.
10.	What is an "Applicant Certification?" What purpose does it serve? This will be a new form and process for SCSEP, so it is unclear if it is needed, or what	This data element corresponds with the signature and date on the applicant intake form. The new ETA-CMS is an automated case management system and

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	paperwork or process burden it will add to the program.	replicates the hard copy form for eligibility determination.
11.	SSAI does not see where the Department's data collection system will calculate a participant's 4-year durational limit such that SCSEP staff can check an applicant for eligibility related to this factor on the front end of their interactions with an individual. Additionally, it is not clear whether the database will follow the order of the questions on the forms as SPARQ currently does. This organization of data elements in SPARQ to the SCSEP OMB Approved Forms is a helpful and timesaving date entry feature.	SCSEP participants durational limit calculation are system generated and ETA will continue to have real-time calculations available to grantees and sub-recipients via the ETA-CMS. The Department agrees with the commenter and to the extent possible, ETA will organize the data elements in the ETA-CMS to the SCSEP hard copy forms. ETA plans to submit hard-copy forms as a non-material change to OMB following the completion of the ETA-CMS.
	ETA 9121	
12.	Add Area Agency on Aging or Aging Disability Resource Center as Code Value #3 for Support Services providers as follows to reflect SCSEP's requirement in both the Older Americans Act and regulations to collaborate with the Aging Network: 1= Grantee or sub-recipient/local project 2= Workforce Partner 3= Aging Partner 3= All (1, 2 and 3) 4= Both 1 and 2 5 = Both 1 and 3 6= Both 2 and 3 7= Other (Specify)	The Department agrees with the commenter and will revise the code value for this element to read : 1= Grantee or sub-recipient/local project 2= Workforce Partner 3= Aging Partner 4= Combination of 1, 2, and/or 3 5= Other (Specify)
13.	For the field "participant assigned to", please add aging in order that reports can be generated showing the required collaboration in statue and regulation	The Department agrees with the commenter and has revised the code value for this element to read:

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	with the Aging Network: 1 = Grantee or sub-recipient/ local project 2 = Workforce Partner 3 = Aging Partner 4 = Other host agency	1 = Grantee or sub-recipient/ local project 2 = Workforce Partner 3 = Aging Partner 4 = Other host agency
14.	For Community Service Assignment code 108 E1, we recommend the Department amend it to say "SCSEP Project Administration" to ensure data collection accuracy.	The Department agrees with the commenter and has changed "Project Administration to "SCSEP Project Administration."
15.	Explain what these data collection fields are for. It is difficult to comment without knowing their purpose. SCSEP has formal definitions of "enrollments" and "exits" in regulation: Enrollment From Enrollment To Exit From Exit To	The date filters referenced by the commenter can be used to refine search results when entering and updating records in the new ETA-CMS.
	ETA 9122	
16.	Continue efforts to allow SCSEP grantees access to UI participant data so that grantees can more accurately and efficiently reflect performance data of program exiters. While SSAI and other grantees will continue with current case management efforts until UI participant is accessible, SSAI emphasizes that UI performance data is a critical tool for SCSEP grantees, without which more closely aligning performance results with WOIA will be exceedingly difficult.	The Department recognizes that the Unemployment wage data is critical to efficiently and accurately capturing employment outcome data for program exiters. Thus, as an effort to align more closely with the employment outcome measures, the Department is including SCSEP, along with other discretionary programs, in the forthcoming Memorandum of Understanding for wage sharing. The Department agrees with the Commenter that until the UI wage data is

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	In the intervening period, allow self-attestation and/or self-reporting by SCSEP exiters to ensure that SCSEP performance can be accurately monitored by grantees in real time and in an affordable manner.	available to SCSEP grantees, supplemental data (via follow-ups) will remain the primary outlet for reporting employment outcomes. The Department plans to continue its current procedures for case management follow-up (including the use of self-attestation with proper documentation).
17.	Add Area Agency on Aging or Aging Disability Resource Center as Code Value in the drop-down for "Supportive Services provided by" to reflect SCSEP's requirement in both the Older Americans Act and regulations to collaborate with the Aging Network: 1= Grantee or sub-recipient/local project 2= Workforce Partner 3= Aging Partner 3= All (1, 2 and 3) 4 = Both 1 and 2 5 = Both 1 and 3 6= Both 2 and 3 7= Other (Specify)	See Comment 12.
18.	There does not appear to be a clear exit date from which follow-ups will be triggered. The 90 day after-exit exit for core measures appears to be a "soft exit" often for SCSEP that is not permissible by statute or regulation. Additionally, such an exit option will create several significant grant management issues for grantees including but not limited to the following. (1) Currently, when a participant exits on June 30, staff are able to resolve and enter the required data before the grant closes on September 30th. (2) Additionally, currently, fiscal reviews include a monitoring of all participants paid (active and exited) from July 1 to June 30th on both payroll and in the	The Department plans to use soft-exits in the ETA-CMS to promote active case management and consistent flow of services to participants based on Individual Employment Plans. For participants who have hard exits in accordance with Statutes or regulations, follow-up can begin immediately after the hard exits. SCSEP has always followed the Common Measures rule that a re-enrollment or return to program within 90 days of follow-up negates an exit for purposes of the performance measures and continues to do so under the new employment outcome measures. Follow-up for the SCSEP PY 2018 performance measures will continue to be determined by the actual data of exit as entered into the

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	current data collection system SPARQ to ensure that grant funds were properly spent on eligible participants. How will this person be accounted for in the data collection system? (3) How will a 90-day exit hold work in a national grantee transition year? Is the person exited or on break? Should they be transitioned?	system by the grantee.
	ETA 9123	
19.	Provide clarity on the exit exclusions not apparent on this spreadsheet. From a recent Department webinar, we learned that "family care" was no longer going to be an exit exclusion for SCSEP, yet it is still listed on this spreadsheet. The Department is risking a prime opportunity to collect and understand workforce dynamics of the largest growing segment of the labor force, people 55+. When a person has to leave a job or training position (like SCSEP) to care for a family member, that is important data to capture. Also having SCSEP performance measures be negatively impacted by an event as significant and unexpected to a participant as having their own health issue is moving to align SCSEP to WIOA without considering data important to the Department.	The Department agrees with the commenter and has updated the code values for Other Reason for Exit to read: 1 = Moved from area 2 = For cause 3 = Voluntary 4 = Non-income eligible 5 = Durational limit 6= Institutionalized 7 = Health/Medical 8 = Deceased 9 = Reserve Forces called to Active Duty 10 = Ineligible
	ETA 9120-9123 File - System Element Tab	
20.	Allow grantees that operate SCSEP via subgrants to other agencies, continue to be the main contact through which the Department communicates to subgrantees. Since SSAI is the prime recipient and responsible for all aspects of its SCSEP grant, SSAI should continue to be contacted and provide updates to the Department regarding contact information for our SCSEP subgrantees, as well as information on all those using the data collection system.	The Department's point of contact for SCSEP grants will continue to be the grantee signatory and/or point of contact.

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	ETA 9120-9123 File – Services Tab	
21.	Without clear understanding of this tab, SSAI does suggest that the Department (a) have more dialogue with grantees and provide additional comment periods; and (b) recognize that the list of "career" services on this tab, do not reflect an uniform list services SCSEP has provide to every participant. Per current SCSEP regulations, grantees must use the IEP and Assessment to identify and inform participant-centered service delivery to SCSEP participants versus provide them with a standard set of services. This tab lists services a participant could receive depending on his/her responses to their Assessment and Individual Employment Plan. The Assessment and IEP also drive the services at the Community Service Assignment, the training a participant receives, and as well as the supportive services and referrals provided.	The Department agrees with the commenter and will continue to maintain (through ETA guidance and systems) the SCSEP statute and regulations by requiring and enforcing the use of the assessment and Individual Employment Plan to determine trainings and services for SCSEP participants. The Department will aim to consult (when applicable) with grantees about the implementation of these new fields and how best to use the assessment and IEP to drive service delivery.
	ETA 9120-9123 File - Participant Job Codes Tab	
22.	Explain the reasons for the changes in the following codes: o Construction, Installation and Repair to Construction and Extraction o Food Preparation and Service to Food Preparation and Serving Related o Healthcare to Healthcare Support o Maintenance and Custodial to Building and Grounds, Cleaning and Maintenance o Production, Assembly, Light Industrial to Production o Retail, Sales and Related to Sales and Related	The Department has elected to use the 2018 Standard Occupational Classifications as defined by the Bureau of Labor Statistics to classify the types of trainings and occupations, which SCSEP participants are engaged in.
23.	Explain the reason for adding the following codes as neither seem likely Host Agency positions:	See Comment 22.

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	o Architecture and Engineering o Life, Physical, Social Science	
	ETA_9124B	
24.	SSAI was under the understanding from calls and webinars hosted by the Department that the existing Host Agency Customer Satisfaction Survey was going to be utilized. The *SCSEP Support Statement A* 20180329 document also states on pages 3 and 7, that ETA will continue to use the existing customer satisfaction surveys. However, in comparing the current Host Agency Survey form to Form 9124B, it appears there have been a few changes made to Form 9124B. SSAI's priority recommendation that the Department continue to use the current Host Agency Survey Form (ETA-9124 – Part B; Revised September 2014), or at least for the Department to remove question #9 (Would you like the participants to have been better prepared in any of these areas?). A key mission of SCSEP, reaffirmed by Congress in the 2016 Reauthorization of the Older Americans Act, is that the host agency experience provides the participants with skill building opportunities listed in this question. To ask a host agency supervisor if they would have preferred to have a better trained, more skilled SCSEP participant assigned to them initially appears to go against the program's mandate of serving those with the most barriers to employment, and will produce responses indicating poor SCSEP performance. The participant is at the host agency because they need what the host agency offers.	SCSEP received approval from OMB for revisions to all three customer satisfaction surveys in August 2015. The surveys in use since that time are the versions authorized by OMB. Any additional changes must be approved by OMB. As stated in the IFR, SCSEP will consult with grantees, customers, and stakeholders to explore possible changes to all three surveys that focus on the concept of effectiveness.
	ETA 9182A	

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25.	So that a participant does not have to complete two (2) forms, SSAI suggests the Department amend this form by including the following text in paragraphs 2 and 4 of the release form as follows: Paragraph 2: I do not grant Photographer the right to use, reuse, publish, or republish the photographic likenesses or pictures of me, or those in which I may be included, in any printed, digital, Internet, or other media for exhibition, except that, Photographer may provide the photographic likenesses or pictures of me to the Senior Community Service Employment Program of (insert grantee name) and of the United States Department of Labor for the purpose of advertising in promotion of the Senior Community Service Employment Program. Paragraph 4: I release the Senior Community Service Employment Program of (insert grantee name) and of the United States Department of Labor from any and all claims for damages or libel, slander, invasion of privacy, or any other claim arising out of the consent to take the photographic likenesses or pictures of me.	The Department agrees with the commenter and has revised paragraph two of this form to read: I do not grant Photographer the right to use, reuse, publish, or republish the photographic likenesses or pictures of me, or those in which I may be included, in any printed, digital, Internet, or other media for exhibition, except that, Photographer may provide the photographic likenesses or pictures of me to the Senior Community Service Employment Program of [INSERT GRANTEE NAME] and of the United States Department of Labor for the purpose of advertising in promotion of the Senior Community Service Employment Program. In addition, the Department agrees with the commenter and has revised paragraph four of this form to read: I release the Senior Community Service Employment Program of [INSERT GRANTEE NAME] and of the United States Department of Labor from any and all claims for damages or libel, slander, invasion of privacy, or any other claim arising out of the consent to take the photographic likenesses or pictures of me.
	ETA 9182B	
26.	Similar to Form ETA_9182A, SSAI suggests that the Department amend this form providing space for the grantee to insert their name so the participant has to only complete one form for this purpose, instead of multiple forms. The Employment and Training Administration/Division of Older Worker Programs of the United States Department of Labor and (insert grantee name) are hereby given my consent to (CHECK PROPER BOX):	The Department agrees with the commenter and has revised paragraph one of this form to read: The Employment and Training Administration/Division of Older Worker Programs of the United States Department of Labor and [INSERT GRANTEE NAME] are hereby given my consent to (CHECK PROPER BOX):

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Comment Received from National Association of States United for Aging and Disabilities		
27.	**Timeline** As you know, the ICR proposes to implement the transition from the legacy SPARQ system to ETA's WIPS and case management system by July 1, 2018. In DOL's supporting statement, the agency notes that it projects completing the transition by September 30, 2018. The comment period for the current ICR does not close until May 21, 2018. This ambitious timeline poses potential challenges for grantees on a number of different fronts, notably: • Given that the comment period for the ICR does not close until May 21, 2018, this gives DOL less than a month and a half to review and account for comments and concerns from SCSEP stakeholders. • The truncated timeline offers little room for training, technical assistance, or piloting of the new systems for SCSEP grantees. The September 30, 2018, deadline for transition would result in a rushed rollout and inadequate time for technical assistance and other important stakeholder engagement efforts. • State grantees will have inadequate time to implement changes/new systems and training sub-recipients, which may cause additional issues down the road. A rushed process benefits neither DOL or SCSEP grantees. *Recommendation:* DOL should implement the new WIPS and ETA-CMS systems no earlier than July 1, 2019. While NASUAD appreciates DOL's sentiment that SPARQ will continue to be utilized for program year 2018	The Department intends to give the SCSEP grantees adequate notice before requiring the use of the new ETA-CMS for data entry. The Department hopes that the notice will allow grantees to modify their business process, train their staff, and/or update internal systems. As development of the ETA-CMS continues in early PY 18, the Department will continue to assess a feasible timeline for implementation, and will in turn share timeline with grantees.

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	(PY2018), the current timeline is unworkable and may result in deleterious program outcomes if pushed too quickly.	
28.	**Goal and Benchmark Setting** We recognize that the IFR is implementing statutory changes; however, we remain concerned that the new measures will drastically undercount the effectiveness of the SCSEP program particularly for state grantees. During a national webinar on April 6, 2018, DOL staff provided information on a simulation of the new reporting measures using prior year data and concluded that the performance measures would result in substantially lower outcomes than the prior measures in place. Staff also noted that the outcome of these measures was extremely sensitive to the sample size, which could result in drastic variations from year-to-year for smaller grantees. Given that state agencies often administer SCSEP in rural and frontier areas, which not only reduce the sample size but are also more acutely impacted by unemployment and economic factors.

Recommendation: We strongly encourage DOL to move forward with a model that recognizes these variations and accounts for data volatility and external factors. | The Department appreciates the commenter's concerns and will track performance under the new measures during baseline period of PY 18 and PY 19. Although the Department cannot change the statutorily-required measures, it will document any changes in performance levels and ensure that an accurate story of SCSEP's effectiveness in serving its three customers is conveyed to Congress and SCSEP's stakeholders. |
| 29. | **Training and Technical Assistance** NASUAD appreciates DOL's commitment to working with SCSEP grantees on a successful rollout of the new information collection systems. That said, we have concerns that the truncated timeline, coupled with the largest overhaul of the SCSEP reporting system since the implementation of the SPARQ | To help foster a smooth transition, the Department is currently working on hosting series of technical assistance sessions for the new ETA-CMS and the new performance measures. |

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	system, will require significantly more stakeholder engagement, detailed training, and in-person technical assistance than has been accomplished – or proposed – to date. While webinars are an effective tool for reaching stakeholders, disseminating information, and taking feedback, they are not a realistic substitute for in-person, in-depth training. It is essential that the SCSEP grantees are trained as subject matter experts in the new reporting systems to ensure that they can effectively train their sub-recipients and sub-contractors. This is an area of concern that may be felt more acutely by state SCSEP grantees, as they are typically smaller and have less staff than the national grantees. *Recommendation:* DOL should consider hosting a national conference or a series of regional trainings along with a train-the trainer tool guide to execute a successful implementation of the WIPS and ETA-CMS reporting systems. Overhauling the SCSEP reporting system simultaneously with the rollout of new performance measures places substantial pressure of SCSEP grantees whose resources are already stretched to capacity, and a robust technical assistance process is critical for successful implementation.	
30.	**Applicability of WIPS and ETA-CMS Systems to SCSEP** NASUAD acknowledges that many of the proposed changes that are affecting the SCSEP program are required under the 2016 Reauthorization of the OAA, and therefore cannot be changed aside from a legislative proposal. That said, we want to reiterate that fact that SCSEP is the only Federal jobs program that specifically assists older adults to attain employment. As such, there are a number of factors that should be taken into account when attempting to	The Department will continue to maintain the integrity of SCSEP's statute and regulations in all of its guidance and systems. The Department will work effectively with grantees to implement the new ETA-CMS, the new performance measures, and the new service delivery model. ETA hopes to consult broadly with the grantees and welcomes the suggestion of creating workgroups.

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	translate SCSEP measures to the broader WIOA system. For example, as we noted in our prior comments, the case management that would be required under the proposed changes to the SCSEP reporting measures and would likely be required under this new system is extensive and inappropriate for the service delivery model. We believe that there should be other alternatives considered for the case management data system._Recommendation:_ We ask that DOL remain cognizant of the unique nature of the SCSEP program, and be mindful and deliberative in its processes moving forward to fully ensure that the new systems it is implementing work with the specific nature of the SCSEP program and the population it serves. We further recommend that DOL delay the transition of the case management system and establish a working group that includes states, national SCSEP grantees, and local providers to develop recommendations for how to establish an appropriate case management system.	
31.	We ask that DOL remain especially aware of states that submit standalone state plans, as these states are less likely to be fully integrated with their state WIOA programs, and therefore less likely to have data sharing agreements with WIOA partners.	The Department appreciates the commenter's remarks.