EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210

CLASSIFICATION
SCSEP
CORRESPONDENCE SYMBOL
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DATE
May 6, 2021

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 20-20

- TO: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM GRANTEES
- FROM: SUZAN G. LEVINE Principal Deputy Assistant Secretary
- SUBJECT: Program Year (PY) 2021 Planning Instructions and Allotments for Senior Community Service Employment Program (SCSEP) State, Territorial, and National Grantees
- 1. <u>Purpose</u>. To provide SCSEP grantees with PY 2021 allotments and grant application instructions, and dissemination of annual Federal poverty guidelines used in SCSEP eligibility determinations.
- 2. <u>Action Requested</u>. To apply for PY 2021 grant funds, SCSEP grantees must follow the instructions in this TEGL and submit all documents to <u>https://www.grants.gov</u> with a copy to their respective Federal Project Office, as well as the SCSEP program office at <u>grants.scsepdocs@dol.gov</u>, by May 24, 2021. SCSEP grantees should also note the Employment and Training Administration's (ETA) plan for disseminating poverty and low-income guidelines in future years.

3. Summary and Background.

- a. Summary –ETA releases grant planning guidance each program year to advise SCSEP grantees of the number of authorized positions and associated allotments for the program year and ETA's requirements for obligating funding to grantees. This TEGL provides SCSEP state, territorial, and national grantees with the PY 2021 SCSEP allotments and instructions for PY 2021 grant submissions.
- b. Background SCSEP funds are allocated by a formula provided in Section 506 of the Older Americans Act of 1965 (OAA), as amended, 42 USC §3056d, and operate on a PY basis, from July 1 through the following June 30. The Consolidated Appropriations Act of 2021, Pub. L. 116-260, (from this point forward, referred to as "the Act") Division H, Title I, secs. 106(b) and 107, allows the Secretary of Labor (Secretary) to set aside up to 0.5 percent of each discretionary appropriation for activities related to program integrity and 0.75 percent of most operating funds for evaluations. In PY 2021, after reducing the appropriation by \$1,123,000 for set-asides authorized by the Act, \$403,877,000 is

RESCISSIONS	EXPIRATION DATE
TEGL 22-19 and TEGL 22-19, Change 1	Continuing

available for SCSEP program activities. Any funds not used for these reserve activities will be distributed by formula to state, territorial, and national grantees.

SCSEP funds are allocated to and administered through grants to all state governors, Puerto Rico, the District of Columbia, and four territories, as well as competitively awarded to national non-profit agencies for services across the country. The national non-profit organizations compete for the awards every four years (subject to annual appropriations), with an optional one-year extension. ETA renews SCSEP state and territorial grant awards on an annual basis and SCSEP national grants on an annual basis during non-competitive years, which includes PY 2021 (as PY 2020 was a national competition award year). Each year, ETA requires grantees to submit a grant application that includes an SF-424, an SF-424A, the geographic areas to be served, a detailed budget narrative, a program narrative, signed programmatic assurances, and any optional special requests.

Each year in January, the U.S. Department of Health and Human Services (HHS) publishes the poverty and low-income guidelines based on the last calendar year's increase in prices as measured by the Consumer Price Index. These numbers, multiplied by 125 percent, are the basis of "low income" for eligibility determinations as defined at Section 518(a)(3)(A) of the OAA Amendments of 2006, 42 USC §3056p(a)(3)(A).

- 4. <u>Program Details Annual Grant Guidance</u>. This section provides detailed submission instructions for state and territory formula grantees, as well as current national grantees.
 - **a. Program Allotments (Attachment I).** Attachment I details the funding amounts and authorized positions for each grantee in PY 2021.
 - **b.** Grant Application Requirements. Grantees must submit a complete grant package to receive PY 2021 funds. ETA will not obligate funds to any grantee until it has provided all of the information outlined in this guidance. Additionally, grantees must ensure that the components of the grant application package are consistent with each other.
 - i. Application and Budget Information Form. Grantees must submit current versions of the SF-424 Application for Federal Assistance and the SF-424A Budget Information Form. Budgets must include the non-Federal share of at least 10 percent of the total cost (OAA Sec. 502(c)(1), 42 USC §3056(c)(1)). These interactive documents and accompanying instructions are available at the following link¹: <u>https://www.grants.gov/forms/sf-424-family.html</u>.
 - **ii. Geographic Areas.** Item 14 of the SF-424 requires a list of the "Areas Affected by Project." Grantees must list the states and counties the grant will serve and must use <u>www.scseped.org</u> to obtain that information. Grantees can export the data for the service area(s) to an Excel spreadsheet and attach the list as a separate document.
 - **iii. Budget Narrative (Attachment II).** Grantees must submit a budget narrative that provides the information outlined in Attachment II, including:

¹ Choose the SF-424 and SF-424A that note "Agency Owner" as "Grants.gov".

- A detailed description of costs associated with each line item on the SF-424A Budget Information Form;
- Both the percentage and total dollar amount allocated to participant wages and fringe benefits as described at 20 CFR 641.565;
- Both the percentage and total dollar amount allocated to administrative costs as described at 20 CFR 641.856; and
- Infrastructure contributions to the workforce system in accordance with WIOA Sec. 121(h), 29 USC §3151(h).
- **iv. Program Narrative (Attachment III).** All grantees must submit a narrative that includes the information outlined in detail in Attachment III, including:
 - SCSEP operation, service delivery, and coordination;
 - Services to minorities; and
 - Organizational structure, monitoring, and audits.

Additionally, national grantees may also choose to provide any relevant updates to the statement of work that was included in the grant award documents following the PY 2020 National Competition. State grantees may also choose to provide any updates since submission of the SCSEP portion of the PY 2020 State Plan.

- v. Programmatic Assurances (Attachment IV). Grantees must review, sign, and submit the programmatic assurances in Attachment IV that outline program requirements based on the OAA and the SCSEP regulations at 20 CFR Part 641. Adobe signatures are acceptable. The signatory must be the same individual as the Authorized Representative listed in item 21 of the SF-424.
- vi. Optional Requests (Attachment V). Grantees may submit one or more of the optional requests described in Attachment V.
- c. Notices of Award. ETA will issue Notices of Award with new grant numbers and allocation amounts to SCSEP grantees for PY 2021.
- **d.** Office of Management and Budget (OMB) Approval. As required by the Paperwork Reduction Act, OMB has reviewed and approved this information collection (OMB Control Number 1205-0040, which expires on November 30, 2021). Under 5 CFR 1320.5(b), an agency cannot conduct, sponsor, or require a response to a collection of information unless the collection displays a valid OMB Control Number.
- e. Poverty Guidelines. HHS published updated Federal poverty guidelines on January 13, 2021. These guidelines provide the basis for determining the income eligibility of SCSEP applicants and enrollees. Grantees must multiply the appropriate base poverty guideline by 125 percent (or 1.25) to convert the poverty guidelines to "low income" as defined at Section 518(a)(3)(A) OAA, 42 USC § 3056p(a)(3)(A). The poverty guidelines are published annually on the HHS website and in the Federal Register. The HHS website that provides federal poverty guidelines (<u>https://aspe.hhs.gov/poverty-guidelines</u>) also provides a chart with percentages of the guidelines, including 125 percent levels.

Until last year, ETA published an annual TEGL indicating the numbers to be used for SCSEP eligibility, based on the definition at OAA Section 518, 42 USC § 3056p and derived from the HHS guidelines. Given the availability of this information via the

Federal Register and the HHS website, going forward, ETA will no longer publish annual TEGLs to convey poverty guidelines. Rather, grantees should review the poverty guidelines to be used on one of these sites, which provide the poverty guideline numbers that are effective as of the publication date. ETA will notify grantees informally once the poverty guidelines are published, and will post links to the guidelines at https://www.dol.gov/agencies/eta/seniors and <a href="https://www.dol

<u>Continued SCSEP Provisions of the CARES Act</u>. The CARES Act, (Pub.L 116-136, March 27, 2020) Sec. 3223(2) provided the Secretary authority to increase the administrative costs for a project as described in OAA Sec. 502(c)(3) (42 USC §3056(c)(3)) to an amount not to exceed 20 percent of the grant amount if such an increase is appropriate due to the effects of the COVID-19 public health emergency. This TEGL provides SCSEP grantees the opportunity once again to request an increase to their administrative cost limitation to up to 20 percent of the grant amount if the grantee can demonstrate that such an increase will help it mitigate the impact of the COVID-19 public health emergency on its operations, employees, or participants. As noted above in the instructions for the Budget Narrative and in Attachment II, grantees should note in their Budget Narrative whether they plan to request the increased 20 percent cost limitation. To use this flexibility, grantees must request and obtain ETA's approval according to the instructions in Attachment V, Optional Special Requests, addressing the justification requirements in 20 CFR 641.870.

- 5. <u>Inquiries</u>. Please direct inquiries to the appropriate Federal Project Officer.
- 6. <u>References</u>.
 - Older Americans Act of 1965, as amended, 42 USC §3056, et seq.; Older Americans Act Reauthorization Act of 2016, Pub.L. 114-144 (April 19, 2016); Supporting Older Americans Act of 2020, Pub.L.116-131 (March 25, 2020);
 - Consolidated Appropriations Act, 2021 [Including Coronavirus Stimulus & Relief], Pub.L. 116-260 (December 27, 2020);
 - TEGL 17-20, Update Guidance on Priority of Service, Durational Limits, and State Plan Submissions (April 15, 2021)
 - Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act), Pub. L. 116-136 (March 27, 2020)
 - TEGL 17-16, *Infrastructure Funding of the One-Stop Delivery System* (January 18, 2017);
 - Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128, Sec. 121, Funding of One-Stop Infrastructure;
 - Paperwork Reduction Act of 1995, Pub. L. 104-13 (May 22, 1995);
 - SCSEP Performance Data Collection Approval (Office of Management and Budget No. 1205-0040) (expiration date November 30, 2021);
 - OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule, 78 FR 78589 (December 26, 2013), published at 2 CFR Part 200;

- TEGL 12-06, *Revised Income Inclusions and Exclusions and Procedures for Determining Senior Community Service Employment Program (SCSEP) Eligibility* (December 28, 2006);
- VOW (Veterans Opportunity to Work) to Hire Heroes Act of 2011, Pub. L. 112-56 (November 21, 2011);
- *Federal Poverty Guidelines*, Federal Register 86 FR 7732 (February 1, 2021); or HHS website at <u>https://aspe.hhs.gov/poverty-guidelines</u>.

7. <u>Attachments</u>.

Attachment IA-IE:	Funding Allocations and Authorized Positions
Attachment II:	Budget Narrative Instructions
Attachment III:	Program Narrative Instructions
Attachment IV:	Programmatic Assurances
Attachment V:	Optional Requests

USDOL/ETA Senior Community Service Employment Program PY 2021 Authorized Positions and Funding* for State Agencies and Territories, by State

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Northern Marianas 31 302,909 Virgin Islands 94 908,723	American Samoa		908,723						
Virgin Islands 94 908,723	Guam	94	908,723						
	Northern Marianas	31	302,909						
Territories Total313\$3,029,078	Virgin Islands								
	Territories Total	313	\$3,029,078						

* Based on cost per position of \$9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor / Employment & Training Administration

Senior Community Service Employment Program

PY 2021 Authorized Positions* for Non-Minority National Sponsors, by State

State	AARP	ABLE	ANPPM	A4TD	ES	GII	IPDC	Mature	NAPCA	NCBA	NCOA	NICOA[G]	NOWCC	NULI	OPERABLE	SER	SSAI	TWP	Total
Alabama	0	0	0	0	189	0	0	0			0		0	0	0	0	411	0	600
Alaska	0	0	0	0	0	0	0	0		0	0		0	0	0	0	0	0	0
Arizona	0	0	147	0	169	0	0	0			0		0	0	0	0	0	0	316
Arkansas	205	0	0	0	0	0	0	0	0		0		0	0	0	0	0	0	590
California	0	0	551	0	0	0	166	0		0	366		172	0	0	812	0	0	2,467
Colorado	141	0	0	0	0	0	0	0			0		0	0	0	186	0	0	327
Connecticut	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	356	356
Delaware	0	0	0	0	0	0	0	0	0		0		0	0	0	0	0	0	0
District of Col	0	0	56	0	0	0	0	0	0		0		0	0	0	0	0	0	186
Florida	1,142	0	0	0	0	0	0	0	0		0		0	400	0	0	0	0	1,909
Georgia	223	0	0	0	0	0	0	0			494		0	0	0	0	0	0	717
Hawaii	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0
Idaho	0	0	0	0	156	0	0	0	0		0		0	0	0	0	0	0	156
Illinois	0	103	0	0	172	81	0	0		90	0		0	0	0	0	366	0	1,197
Indiana	199	69	0	0	0	382	0	0	0	0	0		0	0	0	0	197	0	847
Iowa	238	176	0	0	0	0	0	0			0		0	0	0	0	0	0	414
Kansas	0	0	0	0	0	0	0	0	0	0	0		0	0	0	319	0	0	319
Kentucky	0	0	0	0	0	270	0	0	0		219		0	124	0	0	0	0	613
Louisiana	0	0	495	0	0	0	0	0			0		0	0	0	0	0	0	495
Maine	0	0	0	199	0	0	0	0	0	0	0		0	0	0	0	0	0	199
Maryland	0	0	0	0	0	0	0	0			0		0	0	0	0	445	0	445
Massachusetts	0	0	0	0	0	0	0	0	0		0		0	0	356	0	307	0	663
Michigan	0	0	0	0	0	0	0	0	0		0		0	226	0	0	0	0	1,030
Minnesota	0	0	0	0	0	0	0	0	0		0		0	0	0	0	752	0	752
Mississippi	0	0	0	0	0	0	0	0	0	156 221	0		0	0	0	0	243	0	399
Missouri	272		0	0	0	175	0	0			0		0	0	0	110	0	0	778
Montana	0	0 239	0	0	0	201	0	0	0		0		0	0	0	0	0	0	201
Nebraska	159			0	0	0	0			0	0				0	0			239 159
Nevada	159	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	159
New Hampshire	0	0	0	0	292	0	0	0	0		391		0	232	0	0	0	0	
New Jersey	0	0	0	0	0	156	0	0	0		0		0	252	0	0	0	0	915 156
New Mexico New York	0	0	0	442	137	0	0	0	86	0	215		0	303	0	0	555	342	2,080
North Carolina	0	0	0	0	0	0	0	0	0		215		0	0	0	0	452	0	847
North Dakota	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	432	0	194
Ohio	270	0	0	0	128	252	0	474	0		147		0	0	0	0	0	0	1,411
Oklahoma	270	0	0	0	389	0	0	4/4			0		0	0	0	0	0	0	389
Oregon	0	0	0	0	476	0	0	0	0	0	0		0	0	0	0	0	0	476
Pennsylvania	342	0	130	165	470	0	0	0			555		0	153	0	0	0	351	1,696
Puerto Rico	169	0	0	0	0	0	0	0	0	0	276		0	0	0	0	0	0	445
Rhode Island	0	0	0	0	0	0	0	0	0		0		0	0	0	0	0	172	172
South Carolina	0	0	0	0	0	441	0	0			0		0	0	0	0	0	0	441
South Dakota	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	201
Tennessee	0	0	0	0	0	0	0	0			157		0	0	0	0	504	0	661
Texas	1,016	0	0	0	0	0	0	0	0		0		0	0	0	333	391	0	1,740
Utah	0	0	0	0	216	0	0	0	0		0		0	0	0	0	0	0	216
Vermont	0	0	0	177	0	0	0	0		· · · · · · · · · · · · · · · · · · ·	0		0	0	0	0	0	0	177
Virginia	233	0	0	0	0	243	0	0	0	0	208		0	0	0	0	0	0	684
Washington	255	0	0	0	0	164	0	0	0		0		0	0	0	0	0	0	420
West Virginia	0	0	0	0	0	0	0	0	0		364		0	0	0	0	0	0	364
Wisconsin	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	564	239	0	803
Wyoming	0	0	0	0	0	0	0	0			0		156	0	0	0	0	0	156
Total	4,865	587	1,379	983	2,324	2,365	166	474	871	2,472	3,608	395	328	1,438	512	2,324	4,862	1,221	31,174

* Based on cost per position of \$9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor / Employment & Training Administration

Senior Community Service Employment Program

PY 2021 Authorized Funding* for Non-Minority National Sponsors, by State

State	AARP	ABLE	ANPPM	A4TD	ES	GII	IPDC	Mature	NAPCA	NCBA	NCOA	NICOA[G]	NOWCC	NULI	OPERABLE	SER	SSAI	TWP	Total
Alabama	\$0	\$0	\$0	\$0	\$1,832,082	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,984,050	\$0	\$5,816,132
Alaska	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arizona	0	0	1,424,484	0	1,637,673	0	0	0	0	0	0	0	0	0	0	0	0	0	3,062,157
Arkansas	1,986,685	0	0	0	0	0	0	0	0	3,731,091	0	0	0	0	0	0	0	0	5,717,776
California	0	0	5,342,541	0	0	0	1,609,550	0	3,878,433	0	3,548,766	0	1,667,726	0	0	7,873,219	0	0	23,920,235
Colorado	1,368,445	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,805,182	0	0	3,173,627
Connecticut	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3,449,025	3,449,025
Delaware	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District of Col	0	0	542,898	0	0	0	0	0	0	1,260,300	0	0	0	0	0	0	0	0	1,803,198
Florida	11,077,339	0	0	0	0	0	0	0	0	3,559,881	0	0	0	3,879,979	0	0	0	0	18,517,199
Georgia	2,163,773	0	0	0	0	0	0	0	0	0	4,793,291	0	0	0	0	0	0	0	6,957,064
Hawaii	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Idaho	0	0	0	0	1,511,608	0	0	0	0	0	0	0	0	0	0	0	0	0	1,511,608
Illinois	0	999,246	0	0	1,668,643	785,815	0	0	3,735,044	873,127	0	0	0	0	0	0		0	11,612,592
Indiana -	1,930,329	669,310	0	0	0	3,705,455	0	0	0	0	0	0	0	0	0	0	1,910,929	0	8,216,023
Iowa	2,310,722	1,708,769	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,019,491
Kansas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3,094,943	0	0	3,094,943
Kentucky	0	0	0	0	0	2,619,517	0	0	0	0	2,124,719	0	0	1,203,037	0	0	0	Ŭ	5,947,273
Louisiana	0	0	4,799,784		0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,799,784
Maine	0	0	0	1,934,339	0	0	0	0	0	0	0	0	0	0	0	0	4.314.560	0	1,934,339 4,314,560
Maryland Massachusetts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3,450,429	0	2,975,511	0	4,314,560
	0	0	0	0	0	0	0	0	0	7,795,237	0	0	0	2,191,199	5,450,429	0	2,975,511	0	6,425,940 9,986,436
Michigan	0	0	0	0	0	0	0	0	0	1,195,251	0	0	0	2,191,199	0	0	7,291,475	0	7,291,475
Minnesota Mississippi	0	0	0	0	0	0	0	0	0	1,512,566	0	0	0	0	0	0	2,356,112	0	3,868,678
Missouri	2,638,610	0	0	0		1,697,635	0	0	0	2,143,871	0	0	0	0	0	1,067,085	2,330,112	0	7,547,201
Montana	2,038,010	0	0	0	0	1,097,033	0	0	0	2,145,671	0	0	0	0	0	1,007,085	0	0	1,954,010
Nebraska	0	2,321,207	0	0	0	1,754,010	0	0	0	0	0	0	0	0	0	0	0	0	2,321,207
Nevada	1,540,915	2,521,207	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,540,915
New Hampshire	1,540,515	0	0	0	0	0	0	0	0	0	0	0	0	0	1,511,608	0	0	0	1,511,608
New Jersey	0	0	0	0	2,831,197	0	0	Ŭ	0		3,791,090	0	0	2,249,445	1,011,000	<u>0</u>	0	0	8,871,732
New Mexico	0	0	0	0	2,001,129	1,511,608	0	0	0	0	0	0	0	2,2.19,110	0	<u>0</u>	0	0	1,511,608
New York	0	0	0	4,287,430	1.328.909	0	0	0	834.206	0	2.085.515	0	0	2.939.120	0	0	5.383.538	3.317.423	20,176,141
North Carolina	0	0	0	0	0	0	0	0	0	1,734,940	2,093,559	0	0	0	0	0	4,380,967	0	8,209,466
North Dakota	0	0	0	0	0	0	0	0	0	0	0	1,881,883	0	0	0	0	0	0	1,881,883
Ohio	2,618,604	0	0	0	1,241,412	2,444,030	0	4,597,105	0	1,357,795	1,425,684	0	0	0	0	0	0	0	13,684,630
Oklahoma	0	0	0	0	3,770,322	0	0	0	0	0	0	0	0	0	0	0	0	0	3,770,322
Oregon	0	0	0	0	4,616,186	0	0	0	0	0	0	0	0	0	0	0	0	0	4,616,186
Pennsylvania	3,317,504	0	1,261,040	1,600,550	0	0	0	0	0	0	5,383,670	0	0	1,484,147	0	0	0	3,404,807	16,451,718
Puerto Rico	1,638,563	0	0	0	0	0	0	0	0	0	2,675,997	0	0	0	0	0	0	0	4,314,560
Rhode Island	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,665,499	1,665,499
South Carolina	0	0	0	0	0	4,275,217	0	0	0	0	0	0	0	0	0	0	0	0	4,275,217
South Dakota	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	1,947,453
Tennessee	0	0	0	0	0	0	0	0	0	0	1,523,167	0	0	0	0	0	4,889,659	0	6,412,826
Texas	9,855,159	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3,230,086	3,792,684	0	16,877,929
Utah	0	0	0	0	2,091,709	0	0	0	0	0	0	0	0	0	0	0	0	0	2,091,709
Vermont	0	0	0	1,717,956	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,717,956
Virginia	2,258,196	0	0	0	0	2,355,114	0	0	0	0	2,015,900	0	0	0	0	0	0	0	6,629,210
Washington	2,481,949	0	0	0	0	1,589,999	0	0	0	0	0		0	0	0	0	0	0	4,071,948
West Virginia	0	0	0	0	0	0	0	0	0	0	3,527,710	0	0	0	0	0	0	0	3,527,710
Wisconsin	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5,471,301	2,318,513	0	7,789,814
Wyoming	0	0	0	0	0	0	0	0	0	0	0	0	1,511,608	0	0	0	0	0	1,511,608
Total			13,370,747	9,540,275		22,938,400	1,609,550	4,597,105	8,447,683	23,968,808	34,989,068	3,829,336	3,179,334	13,946,927	4,962,037	22,541,816	47,148,715	11,836,754	302,321,621

 \ast Based on cost per position of \$9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor / Employment & Training Administration Senior Community Service Employment Program PY 2021 Authorized Positions* for Minority National Sponsors, by State

State	IID	NAPCA	NICOA	Total
Alabama	0	0	0	0
Alaska	0	0	0	0
Arizona	0	0	120	120
Arkansas	48	0	0	48
California	0	162	0	162
Colorado	0	0	0	0
Connecticut	0	0	0	0
Delaware	0	0	0	0
District of Col	0	0	0	0
Florida	0	0	0	0
Georgia	0	0	0	0
Hawaii	0	0	0	0
Idaho	0	0	0	0
Illinois	0	62	0	62
Indiana	0	0	0	0
Iowa	0	0	0	0
Kansas	0	0	0	0
Kentucky	0	0	0	0
Louisiana	106	0	0	106
Maine	0	0	0	0
Maryland	0	0	0	0
Massachusetts	0	75	0	75
Michigan	0	0	0	0
Minnesota	0	0	19	19
Mississippi	37	0	0	37
Missouri	0	0	0	0
Montana	0	0	0	0
Nebraska	0	0	0	0
Nevada	0	0	0	0
New Hampshire	0	0	0	0
New Jersey	0	0	0	0
New Mexico	0	0	48	48
New York	0	57	0	57
North Carolina	0	0	0	0
North Dakota	0	0	13	13
Ohio	0	0	0	0
Oklahoma	0	0	89	89
Oregon	0	0	0	0
Pennsylvania	0	53	0	53
Puerto Rico	0	0	0	0
Rhode Island	0	0	0	0
South Carolina	0	0	0	0
South Dakota	0	0	18	18
Tennessee	0	0	0	0
Texas	55	55	0	110
Utah	0	0	0	0
Vermont	0	0	0	0
Virginia	0	0	0	0
Washington	0	105	0	105
West Virginia	0	0	0	0
Wisconsin	0	0	17	17
Wyoming	0	0	0	0
Total	246	569	324	1,139

* Based on cost per position of \$9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor / Employment & Training Administration Senior Community Service Employment Program PY 2021 Authorized Funding* for Minority National Sponsors, by State

State	IID	NAPCA	NICOA	Total
Alabama	\$0	\$0	\$0	\$0
Alaska	0	0	0	0
Arizona	0	0	1,164,197	1,164,197
Arkansas	465,679	0	0	465,679
California	0	1,571,665	0	1,571,665
Colorado	0	0	0	0
Connecticut	0	0	0	0
Delaware	0	0	0	0
District of Col	0	0	0	0
Florida	0	0	0	0
Georgia	0	0	0	0
Hawaii	0	0	0	0
Idaho	0	0	0	0
Illinois	0	601,502	0	601,502
Indiana	0	0	0	0
Iowa	0	0	0	0
Kansas	0	0	0	0
Kentucky	0	0	0	0
Louisiana	1,028,374	0	0	1,028,374
Maine	0	0	0	0
Maryland	0	0	0	0
Massachusetts	0	727,623	0	727,623
Michigan	0	0	0	0
Minnesota	0	0	184,331	184,331
Mississippi	358,961	0	0	358,961
Missouri	0	0	0	0
Montana	0	0	0	0
Nebraska	0	0	0	0
Nevada	0	0	0	0
New Hampshire	0	0	0	0
New Jersey	0	0	0	0
New Mexico	0	0	465,679	465,679
New York	0	552,993	0	552,993
North Carolina	0	0	0	
North Dakota	0	0	126,121	126,121
Ohio	0	0	0	120,121
Oklahoma	0	0	863,446	863,446
	0	0		003,440
Oregon Pennsylvania			0	-
Pennsylvania Puerto Rico	0	514,187	0	514,187
	0		-	0
Rhode Island	0	0	0	0
South Carolina	0	0	0	0
South Dakota	0	0	174,629	174,629
Tennessee	522.500	0	0	1 067 180
Texas	533,590	533,590	0	1,067,180
Utah	0	0	0	0
Vermont	0	0	0	0
Virginia	0	0	0	0
Washington	0	1,018,672	0	1,018,672
West Virginia	0	0	0	0
Wisconsin	0	0	164,928	164,928
Wyoming	0	0	0	0
Total	2,386,604	5,520,232	3,143,331	11,050,167

* Based on cost per position of \$9,698, with enacted minimum wage increase effective 7/24/09

Senior Community Service Employment Program (SCSEP) Budget Narrative Instructions Program Year 2021

Grantees must provide a detailed budget narrative that includes the information outlined below.

- 1. <u>Detailed Description of Costs on SF-424A Budget Information Form</u> (Section 6, Object Class Categories). Provide a detailed description for each line item on the SF-424A and ensure that each line item in the Budget Narrative indicates the same dollar amount as on the SF-424A.
 - **a. Personnel.** Refers to wages/salaries paid to employees of the grantee who are directly involved in grant implementation. This line item does not include personnel hired by the sub-grantee; those costs are included in the "Contractual" line item. Provide the following information:
 - i. Position: Include titles for all SCSEP staff positions and they must match the information provided in the program narrative. If there is more than one employee in the same position, at the same salary level and employed for the same period of time, enter each employee on a separate line.
 - ii. Percent of Time: List the percent of time each staff person will devote to the project. For example, if a staff person were full-time but only spending 75 percent of their time on the project, indicate ".75 FTE" (full-time equivalent).
 - iii. Monthly Salary: Enter the average monthly salary, not the average full-time salary. Since pay periods vary from organization to organization, the average would be the annual total salary divided by 12 months. If you expect that an employee will receive a salary increase during the grant period, figure the average monthly salary for the entire year based on the sum of the two salary figures for the number of months the employee will receive each salary.
 - iv. Number of Months: Enter the projected number of months an employee will fill the position during the grant period.
 - v. Cost: The total cost equals (Percent of Time) times (Monthly Salary/Wage) times (Number of Months).
 - **b.** Fringe Benefits. Refers to the cost of benefits paid to the personnel on the grant, including the cost of employer's share of FICA, health insurance, workers' compensation, and leave. Provide a detailed list of the benefits provided to employees as well as the fringe benefit percentage:
 - i. Positions that receive fringe benefits.
 - ii. Benefits: The type of benefits that you will provide employees. If multiple benefits are included in the base amount, list each of them in a separate row.
 - iii. Rate: Include the fringe benefit rate used to calculate benefits for each source. If the list of fringe benefits is itemized, list the source for each item.
 - iv. Base Amount: Enter the Gross Salary used against the rate for the salary (or salaries) you are calculating.
 - v. Cost: The total cost is (Rate) times (Base Amount).
 - **c. Travel.** Refers to personnel travel costs that are reasonable and necessary to effectively manage and carry out grant activities, provide oversight, or measure program effectiveness (such as mileage, plane fare, meals and incidentals, and lodging). When air

travel is necessary, obtain it at the lowest possible customary standard (coach or equivalent fare). You may charge travel costs on an actual basis or on a per-diem or mileage basis in lieu of actual costs. This line item does not include a sub-recipient's travel expenses; those costs are included in the "Contractual" line item. Provide a narrative describing the purpose of the travel and the assumptions used to generate the travel amounts. Enter each type of travel cost (mileage, per diem, etc.) on separate lines.

- i. Item: Briefly describe the travel item you will charge to the grant. Remember to enter travel for contracted employees under the "Contractual" category.
- ii. Number of Staff: Provide the number of staff who will charge this type of travel.
- iii. Number of Units: Provide the number of units you estimate you will charge to the grant per traveler (staff) for the year.
- iv. Cost per Unit: Provide the cost of the travel item per traveler. If calculating based on mileage, enter the cost per mile.
- v. Cost: The total cost is (Number of Staff) times (Number of Units) times (Cost per Unit).
- **d.** Equipment. Refers to non-expendable personal property that has a useful life of more than one year and a per-unit cost of \$5,000 or more. The only type of equipment that you may acquire with federal funds is equipment necessary for the operation of the grant. In the instance of a purchase, prorate the cost of the equipment over the projected life of the equipment to determine the cost to the grant. Use of grant funds to purchase equipment with a unit cost of \$5,000 or more requires special review and approval from the grant officer prior to purchase. Include necessary shipping, delivery, and installation in the budgeted amount.

If you wish to obtain approval for the purchase of equipment at the time of your grant proposal submission, state this in the Budget Narrative and provide the following information: an explanation of how this equipment will be used to further the grant's objectives, a justification for the need for the equipment, the basis for valuation of the equipment, and a description of the equipment to be purchased. If the grant officer approves the equipment, your grant approval letter will state this. Otherwise, you must make a subsequent written request to the grant officer for approval.

- e. Supplies. Refers to all consumable materials costing less than \$5,000 per unit (such as copy paper, pens and pencils, computers, any training materials, agreements for evaluating the grant, or providing training). Include the total supply costs of all sub-grant contracts in this line item. Charge supply purchases to the grant at their actual prices after deducting all cash discounts, trade discounts, rebates, or allowances. Include any necessary shipping and delivery costs. Lump supplies under larger categorical headings and provide detailed information on computations justifying the respective amounts. Indicate the basis for all estimates.
- **f. Contractual.** Refers to the cost of any contract or sub-grant agreement. Include the cost of any contract or sub-grant agreement between the grantee and another organization (i.e., vendor). Examples of contractual costs are sub-agreements for evaluating the grant, providing training, maintenance contracts, or other service contracts. Provide the name of the vendor if known, an explanation of the services that will be provided under the contract or sub-agreement, and the contracted amount. Include information about what

specific fringe benefits you will charge to the grant, including the fringe benefit percentage.

- **g.** Construction. SCSEP regulations typically **do not allow** expenditures for construction (20 CFR 641.850(e)).
- **h.** Other. Refers to items that do not fit under any of the other cost categories, such as rent, utilities, supportive services, and training/tuition costs. If you have items under this category itemize them along with an explanation and justification for the items.
- i. Total Direct Cost. The sum of lines a through h.
- **j. Indirect Cost.** Refers to costs incurred for common or joint objectives that benefit more than one project. They may originate in your unit or in other parts of your organization that supply goods, services, or facilities to the SCSEP grant. Most often, the term "indirect costs" indicates costs incurred to support the overall operation of the organization. Indirect costs may be both administrative and programmatic.

If you have a single funding source then you do not need an indirect cost rate. If you have multiple funding sources, especially federal funding sources, that support the operations and activities of the organization, you need an indirect cost rate.

An indirect cost rate equitably distributes costs to all benefiting activities. It provides for the systematic allocation of indirect cost-to-cost objectives in reasonable proportion with the benefits received. These costs are not readily assignable to specific awards and activities because a direct relationship to cost objectives (such as grants, contracts, fundraising, or services to members) cannot be shown or would be arbitrary in nature.

If you have an approved indirect cost rate, include a copy of the indirect cost agreement or cost allocation plan, signed by the issuing Federal agency, as an attachment to the grant proposal. Organizations with no prior approved indirect cost rate that intend to charge indirect costs to the grant must develop an indirect cost rate proposal and submit it to a cognizant agency no later than 90 days after the effective date of the agreement.

- **k.** Totals. The sum of lines i and j.
- 2. <u>Participant Wages and Fringe Benefits</u>. You must clearly list both the percentage and total funding dollar amount allocated to participant wages and fringe benefits as defined at 20 CFR 641.565 in the appropriate section of the SF-424A. The SF-424A does not have a line item exclusively for participant wages and fringe benefits. In most cases, list participant wages and fringe benefits on the "Contractual" or "Other" line.
- 3. <u>Administrative Costs</u>. You must clearly list both the percentage and total funding dollar amount allocated to administrative costs as described at 20 CFR 641.856. In general, SCSEP has a maximum allowed administrative costs total of 13.5 percent of the federal grant funds (or up to 20 percent if you have requested and received approval from ETA per the instructions in Attachment V). The SF-424A does not have a line item for Administrative

costs. Because your administrative costs may come from multiple line items, you must clearly itemize and summarize your administrative costs separately.

4. Infrastructure Contributions to the Workforce System. You must clearly identify your infrastructure contributions to the workforce system. WIOA, Sec. 121(h) describes the responsibilities of required partners, including SCSEP. Training and Employment Guidance Letter (TEGL) 17-16, "Infrastructure Funding of the One-Stop Delivery System," outlines how one-stop partners must determine and pay for infrastructure and additional costs in the local one-stop delivery systems. The SF-424A does not have a line item exclusively for infrastructure contributions. List your infrastructure contributions on the "Administrative," "Contractual," or "Other" line as appropriate. If you are not paying any infrastructure contributions into the workforce system, explain why you are not doing so in the Budget and Program Narrative. This explanation alone does not relieve any SCSEP grantee from the requirements of WIOA Sec. 121(h), but ETA will review an explanation before further discussions with a grantee.

Senior Community Service Employment Program (SCSEP) Program Narrative Instructions Program Year 2021

All grantees must provide a program narrative that concisely covers the areas below. As indicated in the Training and Employment Guidance Letter, national grantees may also provide any updates to the statement of work that were included in the grant award documents following the PY 2020 National Competition. State grantees may also provide any updates to the SCSEP portion of the PY 2020 State Plan.

- 1. <u>Services to Minorities (OAA Title V, Section 515)</u>. Grantees must describe efforts to serve individuals from minority populations, as well as any disparities in those participants' outcomes. The minority report does not have participation and enrollment data for the three Pacific territories and the U.S. Virgin Islands; these four grantees will answer the questions in terms of outcomes only. Using the PY 2019 SCSEP Minority Report (the Outcome section of Volume II of the report was distributed to grantees via email on March 4, 2021 for PY 2021 grant planning purposes; the Participation section of Volume II will be sent to grantees around the end of April), as well as SPARQ and InfoSPACE data for PY 2020, grantees must describe any significant disparities in enrollment levels or performance outcomes for minority individuals identified in the PY 2019 report, the extent to which those disparities existed in prior years, and the extent to which they continue to exist. Include:
 - a. The factors that may have caused these disparities in enrollment and outcomes; and
 - b. The steps you have already taken and/or plan to take to address any under-service or disparities in outcomes for minorities.
- 2. <u>Organizational Structure, Monitoring, and Audits (Uniform Administrative Guidance (2</u> <u>CFR part 200)</u>. Describe the structure of your SCSEP project and explain how you will effectively manage any subprojects. Ensure that these descriptions are consistent with the information in your Budget Narrative. Include:
 - a. A description of your SCSEP key staff, including experience implementing SCSEP, primary responsibilities, and the amount of time each individual is assigned to the grant. If you have sub-recipients or local affiliates, include a table with their names, locations, the number of authorized positions for which they are responsible, and their level of experience implementing SCSEP;
 - b. A legible SCSEP organizational chart (may be an attachment) that depicts key SCSEP staff and includes sub-recipients or local affiliates involved in implementing the grant (including host agencies).
 - c. A description of how you ensure that policies, procedures, and other important information are communicated and implemented throughout the program, and a description of how training will be provided to local staff, sub-recipients, or affiliates; and
 - d. A description of how you will monitor projects for program and financial compliance, including audit plans and how you will transfer participants if new providers are selected to serve in the State.

Senior Community Service Employment Program (SCSEP) Programmatic Assurances

You must certify that you will conform to these assurances throughout the period of the grant by checking each of the assurances below. These assurances apply fully to any sub-recipient, local project, or grantee staff involved in the delivery of services. Please provide an explanation for any unchecked boxes.

You agree to the following:

Recruitment and Selection of Participants

- □ Develop and implement methods to recruit and select eligible participants to assure maximum participation in the program.
- □ Use income definitions and income inclusions and exclusions for SCSEP eligibility as described in TEGL No. 12-06 to determine and document participant eligibility.
- Develop and implement methods to recruit minority populations to ensure at least proportional representation in your assigned service area as listed in the latest Minority Report.
- □ Develop and implement strategies to recruit applicants who have priority of service as defined in Older Americans Act section 518(b)(1)-(2) and by the VOW (Veterans Opportunity to Work) to Hire Heroes Act of 2011.

Individuals with priority are those who:

- Are covered persons in accordance with the VOW (covered persons who are SCSEPeligible must receive services instead of or before all non-covered persons);
- Are 65 years or older;
- Have a disability;
- Have limited English proficiency;
- Have low literacy skills;
- Reside in a rural area;
- Have low employment prospects;
- Have failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunity Act (WIOA); or
- Are homeless or are at risk for homelessness.

Assessment

□ Assess participants at least twice per 12-month period, or more frequently if appropriate.

□ Use assessment information to determine the most appropriate community service assignments for participants.

Individual Employment Plan (IEP)

- □ Establish an initial goal of unsubsidized employment for all participants.
- □ Update the IEP at least as frequently as assessments occur (at least twice per 12-month period).
- □ Modify the IEP as necessary to reflect other approaches to self-sufficiency, if it becomes clear that unsubsidized employment is not feasible.
- □ For participants who will reach the individual durational limit or would not otherwise achieve unsubsidized employment, include a provision in the IEP to reflect other approaches to self-sufficiency, transition to other services or programs.
- Rotate participants to a new host agency (or a different assignment within the host agency) based on a rotation policy approved by the Employment and Training Administration (ETA) in the grant agreement and only after making an individualized determination that the rotation is in the best interest of the participant. Such rotation must further the acquisition of skills listed in the IEP.

Community Service Assignment

- □ Base the initial community service assignment on the assessment made at enrollment.
- \Box Select only designated 501(c)(3) organizations or public agencies as host agencies.
- □ Put in place procedures to ensure adequate supervision of participants at host agencies.
- □ Ensure safe and healthy working conditions at the community service assignment through annual monitoring of the host agency site and annual safety consultation with the participant at the host agency site.

Recertification of Participants

□ Recertify the income eligibility of each participant at least once every 12 months, or more frequently if circumstances warrant.

Physical Examinations

- □ Offer physical examinations to participants upon program entry, and each year thereafter, as a benefit of enrollment.
- □ Obtain a written waiver from each participant who declines a physical examination.
- □ Not obtain a copy or use the results of the physical examination to establish eligibility or for any other purpose.

Host Agencies

- Develop and implement methods for recruiting new host agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- □ Comply with maintenance of effort: Ensure that community service assignments do not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals who are not SCSEP participants. You must specifically ensure that community service assignments do not:
 - □ Displace currently employed workers (including partial displacement, such as a reduction in non-overtime work, wages, or employment benefits).
 - □ Impair existing contracts or result in the substitution of Federal funds for other funds in connection with work that would otherwise be performed.
 - □ Assign or continue to assign a participant to perform the same work, or substantially the same work, as that performed by an individual who is on layoff.

Orientation

- □ Provide orientations for participants and host agencies, including information on:
 - □ Project goals and objectives
 - □ Participant rights and responsibilities
 - □ Community service assignments
 - □ Opportunities for paid training outside the community service assignment
 - □ Available supportive services
 - □ Availability of free physical examinations
- □ Local staff must address the topics listed above and provide additional orientation to participants on:
 - □ SCSEP goals and objectives
 - □ Grantee and local project roles, policies, and procedures
 - □ Holiday and sick leave
 - □ Assessment process
 - □ Development and implementation of IEPs
 - □ Evaluation of participant progress
 - $\hfill\square$ Health and safety issues related to each participant's assignment
 - \Box Role of supervisors and host agencies
 - □ Maximum individual duration policy, including the possibility of an extension, if applicable, and the documentation required to support an extension
 - □ Termination policy
 - □ Grievance procedure

Wages

□ Provide participants with the highest applicable required wage (highest of Federal, state, or local minimum wage for the most nearly comparable covered employment or

minimum age under the Fair Labor Standards Act of 1938, or the prevailing rate of pay for persons employed in similar public occupations by the same employer) for time spent in orientation, training, and community service assignments.

Participant Benefits

- □ Provide workers' compensation, other benefits required by state or Federal law (such as unemployment insurance), and the costs of physical examinations.
- □ Provide compensation for scheduled work hours during which the participant's host agency is closed for Federal holidays, which may be paid or in the form of rescheduled work time, and establish written policies related to this compensation.
- □ Establish written policies relating to approved breaks in participation and any necessary sick leave that is not part of an accumulated sick leave program.
- □ Not use grant funds to pay the cost of pension benefits, annual leave, accumulated sick leave, or bonuses.

Procedures for Payroll and Workers' Compensation

- □ Make all required payments for participant payroll and pay workers' compensation premiums on a timely basis.
- □ Ensure that host agencies do not pay workers' compensation costs for participants.

Durational Limits

Maximum Average Project Duration - 27 Months

□ Maintain average project duration of 27 months or less, unless ETA approves an extension to 36 months.

Maximum Individual Participant Duration - 48 Months

- □ Allow participants to participate in the program no longer than 48 months (whether or not consecutively), unless your approved policy allows for an extension and the participant meets the extension criteria.
- □ Notify participants of your policy pertaining to the maximum duration requirement, including the possibility of an extension if applicable, at the time of enrollment and each year thereafter, and whenever ETA has approved a change of policy.
- Provide 30-day written notice to participants prior to durational limit exit from the program.

Transition Services

- □ Develop a system to transition participants to unsubsidized employment or other assistance before each participant's maximum enrollment duration has expired.
- □ Begin transition planning for participants who will exit for durational limit at least 3-6 months prior to their exit date.

Termination Policies

- □ Provide a 30-day written notice for all involuntary terminations that states the reason for termination and informs the participants of grievance procedures and right to appeal.
- □ Maintain written termination policies in effect and provide to participants at enrollment:
 - □ Provision of false eligibility information by the participant
 - □ Incorrect initial eligibility determination at enrollment
 - □ Income ineligibility determined at recertification
 - □ Participant has reached individual durational limit
 - □ Participant has become employed while enrolled
 - □ IEP-related termination
 - □ Cause (must be approved by ETA prior to implementation)

Equitable Distribution

- □ Comply with the equitable distribution plan for each state in which the grantee operates and only make changes in the location of authorized positions within a state in accordance with the state equitable distribution plan and with prior ETA approval.
- □ Comply with the authorized position allocations/equitable distribution listed at <u>www.scseped.org</u>.
- □ Collaborate with all grantees authorized to serve in a state in which you operate to achieve compliance with authorized positions while minimizing disruption to the participants.

Over-Enrollment

□ Manage over-enrollment to minimize impact on participants and avoid layoffs.

Administrative Systems

- □ Ensure representation at all ETA-sponsored required grantee meetings.
- □ Communicate grant policy, data collection, and performance developments and directives to staff, sub-recipients, and local project operators on a regular basis.
- □ Develop a written monitoring tool that lists items you will review during monitoring visits, and provide this tool to sub-recipients and local project operators.

- □ Develop an annual monitoring schedule, unless the federal project officer approves a different standard; notify sub-recipients and local project operators of monitoring plans; and monitor sub-recipients and local project operators on a regular basis.
- □ Develop and provide training to increase sub-recipients' and local project operators' skills, knowledge, and abilities.
- □ When appropriate, prescribe corrective action and follow-up procedures for subrecipients and local project operators to ensure that identified problems are remedied.
- □ Monitor the financial systems and expenditures, including sub-recipients and local project operators on a regular basis to ensure compliance with cost allocations as specified in the regulations.
- □ Ensure that sub-recipient and local project operators receive adequate resources to effectively operate local projects.
- □ Train sub-recipients and local project operators on SCSEP financial requirements to help them effectively manage their own expenditures, and provide general financial training as needed.
- □ Ensure that all financial reports are accurate and submit them in a timely manner, as required.
- □ Ensure full implementation and monitoring of requirements for customer satisfaction surveys, including participant, host agency and employer surveys.
- □ Develop a written plan for both disaster response and recovery so that the project may continue to operate and provide services under emergency circumstances.

Collaboration and Leveraged Resources

□ Collaborate with other organizations to maximize opportunities for participants to obtain workforce development, education, and supportive services to help them move into unsubsidized employment. These organizations may include but are not limited to: workforce development boards, American Job Centers, vocational rehabilitation providers, disability networks, basic education and literacy providers, and community colleges.

Supportive Services

- □ Provide supportive services, as needed, to help participants participate in their community service assignment and to obtain and retain unsubsidized employment.
- □ Establish criteria to assess the need for supportive services and to determine when participants will receive supportive services, including after obtaining unsubsidized employment.

Sub-Recipient Selection (If Applicable)

□ In selecting sub-recipients in areas with a substantial population of individuals with barriers to employment, national grantees will give special consideration to organizations with demonstrated expertise in serving individuals with barriers to employment (including former recipients of national grants), as defined in the statute.

Complaint Resolution

- □ Establish and use written grievance procedures for complaint resolution for applicants, employees, sub-recipients, and participants.
- □ Provide applicants, employees, sub-recipients, and participants with a copy of the grievance policy and procedures.

Maintenance of Files and Privacy Information

- □ Maintain participant files for three program years after the program year in which the participant received his/her final follow-up activity.
- □ Ensure that all participant records are securely stored by the grantee or sub-recipient and access is limited to appropriate staff in order to safeguard personal identifying information.
- □ Ensure that all participant medical records are securely stored by the grantee or subrecipient separately from all other participant records and access is limited to authorized staff for authorized purposes.
- □ Establish safeguards to preclude tampering with electronic media (e.g., personal identification numbers and SPARQ or other data system logins).
- □ Ensure that ETA/SCSEP national office is immediately notified in the event of any potential security breach of personal identifying information, whether electronic files, paper files, or equipment are involved.
- □ Comply with and ensure that authorized users under the grant comply with all SPARQ and other data system access and security rules.

Documentation

- □ Maintain all documentation required for compliance with record retention rule set forth in the first bullet of the prior section, Maintenance of Files and Privacy Information.
- □ Maintain documentation of waivers of physical examinations by participant.
- □ Maintain documentation of the provision of complaint procedures to participants.
- □ Maintain documentation of eligibility determinations and re-certifications.

- □ Maintain documentations of terminations and reasons for termination.
- □ Maintain records of grievances and outcomes.
- □ Maintain records required for data validation.
- □ Maintain documentation of monitoring reports for sub-recipients and host agencies.

Data Collection and Reporting

- □ Ensure the collection and reporting of all SCSEP required data according to specified time schedules.
- □ Ensure the use of the Office of Management and Budget-approved SCSEP data collection forms and the SCSEP Internet data collection and evaluation system, SPARQ, or the successor data system as designated by ETA.
- □ Ensure at the grantee or sub-recipient level that those capturing and recording data are familiar with the latest instructions for data collection, including ETA administrative issuances (e.g., Training and Employment Guidance Letters, Data Collection and Data Validation Handbooks, and the Older Worker Community of Practice).
- □ Ensure data are entered directly into the WDCS/SPARQ, or the successor data system as designated by ETA.
- □ Legally obligate sub-recipients to tum over complete data files in the specified electronic format, as well as hard copy case files, to the grantee when sub-recipients cease to administer SCSEP.
- □ Legally obligate new sub-recipients to collect and enter complete data related to any participants whom they acquire upon becoming sub-recipients, including any participants who are still in the follow-up period.

If the grantee is not in compliance with any of the assurances above, provide information on a separate attachment indicating what specific steps the grantee is taking to conform to these standard grant requirement(s).

By signing below, the grantee certifies that their organization will comply with each of the listed requirements and will remain in compliance for the program year for which they are submitting this application.

Signature of Authorized Representative

Date

Instructions for Senior Community Service Employment Program (SCSEP) Optional Requests

Grantees that wish to make optional requests must submit each request in a separate, clearly-titled document. To receive Employment and Training Administration (ETA) approval, requests must adhere to the statute and regulations and provide a substantive rationale such as improved program management, better service to participants, or least disruption possible to participants.

1. Change 48-Month Individual Durational Limit (IDL) (20 CFR 641.570(a)(3))). (This

section is relevant only if you are requesting a change.) To change your current IDL policy, you must request and receive ETA approval for one of the IDL policies listed below. If a grantee changes the current IDL policy to a more restrictive policy, it must have an effective date of at least 120 days after written approval from ETA.

If you propose to change the existing IDL policy, you must describe:

- a. Your current, ETA-approved IDL policy and procedure.
- b. Which of the options below you propose to adopt:
 - i. *Option 1:* No extensions for any participants; all participants exit at 48 months.
 - ii. *Option 2:* Extensions to every participant who meets at least one of the eight waiver factors. *Indicate the length of the extension (e.g. one-time twelve-month only, unlimited, three times only).*
 - iii. Option 3: Extensions to every participant who meets a specific subset of the eight waiver factors. Indicate the length of the extension (e.g. one-time twelve-month only, unlimited, three times only).
- c. A reasonable transition plan that addresses when and how you will notify participants of the change, and the planned activities to prepare participants for exit from the program.

2. <u>Additional Funds for Participant Training and Supportive Services (ATSS) (Older</u> <u>Americans Act (OAA). Section 502(c)(6)(C). 42 USC 3056(c)(6)(C))</u>. (Approvals for this

option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option. Prepare your Budget Narrative so that it is consistent with your ATSS request. If ETA denies your request, you must resubmit a revised SF-424A and Budget Narrative.) The OAA permits ETA to grant an exception to the 75 percent minimum level of expenditures on participant wages and fringe benefits. This exception allows you to use no less than 65 percent of program funds for participant's wages and fringe benefits, so that up to an additional 10 percent of funds are available for training and supportive services that directly benefit participants.

If you wish to request the use of additional funds for training and supportive services for the Program Year, you must provide:

- a. A description of the activities for which you will spend the grant funds described in paragraph 20 CFR 641.874(a)(3), an identification of the percentage of federal funds and the dollar amount that will be dedicated to the training, and an assurance that any remaining grant funds will be used for participant training, job placement assistance, participant supportive services, and outreach, recruitment and selection, intake, orientation, and assessment (20 CFR 641.874(a)(4)).
- b. A description of how the provision of such activities will improve the effectiveness of the project, including:

- i. An assurance that no displacement of eligible individuals or limitation of positions for such individuals will occur; and
- ii. A description of whether the number of individuals served will be reduced, a plan for meeting the service level goal, and an estimate of how the activities will improve employment outcomes for the individuals served.
- c. A proposed budget and work plan for the activities, including a detailed description of how the funds will be spent on the activities described in paragraphs (a)(3) and (a)(4) of 20 CFR 641.874. The budget and work plan must detail the additional training and supportive services that will be provided to SCSEP participants, the associated cost for each activity, and the number of participants who will benefit from the training. Please ensure that items described in the work plan are also in the Budget Narrative.
- d. Grantees with approved requests may choose to apply the provision uniformly to all subrecipients, but need not provide this opportunity to every sub-recipient. If you choose not to apply the provision uniformly to all sub-recipients, you must provide a detailed description of how you will allocate the funds among sub-recipients and must include a detailed budget and work plan for each sub-recipient.

Increase in Administrative Cost Limitations (20 CFR 641.870). (Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option. Prepare your Budget Narrative so that it is consistent with your Administrative Cost Increase request. If ETA denies your request, you must resubmit a revised SF-424A and Budget Narrative.) Grantees will again have the opportunity to request to increase the administrative cost limitation to up to 20 percent of the grant amount if the grantee can demonstrate that such an increase will help it mitigate the impact of the COVID-19 public health emergency on its operations, employees, and/or participants. Accordingly, ETA will consider requests to authorize an increase in the amount available for administrative costs from 13.5 percent to no more than 20 percent if: 1) we determine that it is necessary to carry out the project; and 2) you demonstrate *one* of the following conditions:

- a. Your project is incurring major administrative cost increases in necessary program components (e.g. liability insurance, payments for workers' compensation for staff, costs associated with achieving unsubsidized placement goals, or other operation requirements imposed by the Department of Labor);
- b. The number of community service assignment positions or eligible minority individuals participating in your project that will decline if the amount available for paying the cost of administrative costs is not increased; or
- c. The project size is so small that the amount of administrative expenses incurred to carry out the project necessarily exceeds 13.5 percent of the grant amount.
- **3.** Extension of Average Project Duration (20 CFR 641570(c)(2)). (Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option.) Grantees must manage SCSEP projects in such a way that the average participation length for participants does not exceed 27 months. However, grantees may request permission from ETA to increase the allowable maximum average project duration to 36 months. The request must:
 - a. State your current average duration and estimate the average duration for the coming program year;
 - b. Describe your past, current, and planned efforts to achieve an average duration of 27 months; and

- c. Describe the exceptional circumstances that warrant an extension to 36 months, as set forth in the regulations, including one or more of the following conditions:
 - i. High rates of unemployment, poverty, or participation in the program of block grants to states for temporary assistance for needy families established under part A of title IV of the Social Security Act, in the areas served by the grantee, relative to other areas of the state or nation;
 - ii. Significant downturns in the economy of an area served by the grantee or in the national economy;
 - iii. Significant numbers or proportions of participants with one or more barrier to employment (including "most-in-need" individuals as described in 20 CFR 641.710(g)) served by the grantee, relative to such numbers or proportions for grantees serving other areas of the state ornation;
 - iv. Changes in federal, state, or local minimum wage requirements; or
 - v. Limited economies of scale for the provision of community service employment and other authorized activities in the areas served by the grantee.
- 4. <u>On-the-Job Experience (OJE) Training</u>. (Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option.) If you wish to provide OJE, you must address all of the requirements outlined in Older Worker Bulletin 04-04 <u>https://www.doleta.gov/seniors/Other_docs/04-04.pdf</u>). You must also provide a copy of your OJE policy and sample contracts to ETA for approval before you can exercise this option.
- 5. <u>Cross-Border Agreements (20 CFR 641.515(c))</u>. (Approvals for this option expire at the end of each program year--grantees must submit a new request or approval each year in order to exercise this option.) State grantees may enter into agreements to permit cross-border enrollment of eligible participants. These agreements must cover both state and national grantee authorized positions, and you must submit them to ETA for approval.
- 6. <u>Rotation Policy (20 CFR 641.575)</u>. (Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option.) You may establish a policy of rotating participants to a new host agency or a different assignment within the current host agency. Your policy must assure that you will make an individualized determination that a rotation is in the best interest of the participant, and that rotation will further the acquisition of skills listed in the participant's individual employment plan.