

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION SCSEP
	CORRESPONDENCE SYMBOL OWI-DAS
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 32-07

TO: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM GRANTEEES

FROM: BRENT R. ORRELL *Brent R. Orrell*
Deputy Assistant Secretary

SUBJECT: Guidance on Program Year (PY) 2007 State Plan Requirements

1. **Purpose.** To inform grantees of the extension of the due date for State Plans to June 30, 2008, and to clarify the status of current State Plans as of July 1, 2008.
2. **References.** Section 503 of the Older Americans Act (OAA), as amended by the 2006 OAA Amendments, Public L. 109-365; 20 CFR 641.300-641.365, Senior Community Service Employment Program (SCSEP) Final Rule (April 9, 2004); Training and Employment Guidance Letter (TEGL) 25-06; Training and Employment Guidance Letter (TEGL) 16-07.
3. **Background.** Section 503 as amended by the 2006 OAA Amendments mandates significant changes to the SCSEP State Plan requirements. In order to receive SCSEP funds, Section 503(a)(1) of the law now requires the Governor or his/her designee to submit a State Plan that includes a four-year strategy for the statewide provision of community services and other authorized activities for eligible individuals under the SCSEP. The Department of Labor (Department) has issued two TEGLs relevant to the new state plan requirements in the OAA 2006 amendments. The first TEGL, TEGL 25-06, was issued on May 31, 2007, to delay implementation of the new State Plan requirements until PY 2008 due to the extensive changes in the law requiring

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grantees to submit plans including four-year strategies, rather than annual plans. TEGL 25-06 also stated that to meet the requirement that state grantees have approved state plans in place before grants can be awarded, the most recently approved State Plans from PY 2006 would suffice for PY 2007 grant awards. The second TEGL, TEGL 16-07, was issued on December 31, 2007, to inform the grantees of the new state plan requirements mandated by the 2006 OAA amendments. It established a due date of March 31, 2008, for submission of State Plans. This was intended to allow sufficient time for the Department and the Administration on Aging (AOA) to review and approve these plans as required before the PY 2008 grants would be awarded on July 1, 2008. This TEGL provides that confirmation.

Shortly after the TEGL was released on December 31, 2007, the Department realized that the three month time period was insufficient for the grantees to complete the new statutory planning requirements by March 31, 2008. The grantees were informed in all-grantee conference calls and by e-mail that the time period would be extended to June 30, 2008, and that a subsequent TEGL would be issued to confirm the continued applicability of the currently approved state plans for purposes of awarding PY 2008 grants on July 1, 2008.

We have discovered that the three month January - March 2008, time period is inadequate for several reasons:

- Lengthier timeframes are required to appropriately consult with all of the required stakeholders, develop a consensus plan, and obtain all the required signatures within the state;
- The new state plan, with its focus on four-year strategies, involves, by its longer term strategic nature, a more complex process than the previous one-year plans required;
- All grantees are conducting data validation for the first time during this same time period;
- The HHS Administration on Aging, which is statutorily required to review SCSEP state plans, is in the process of having several states prepare their AOA two year plans in this same time frame;
- The essential purpose and value of the four year state plan is to encourage thoughtful, deliberative planning that fully involves all relevant stakeholders in developing and providing appropriate services to low income seniors throughout each state, a purpose that can only be fulfilled with sufficient time allowed; and
- Competing programmatic requirements make it impossible for states to do thorough and useful strategic plans in the original shorter time period.

We consider these factors to be outside the control of the states and have determined that it would be unfair to state grantees, and potentially disruptive to program

participants, to delay the award of PY 2008 grants to states affected by these factors. Therefore, we have determined that it is appropriate to extend states' PY 2006 coordination plans and to consider such plans as meeting the requirements of Section 503.

4. **Guidance.** Therefore, the Department extends the due date for PY 2007 State Plan submission to June 30, 2008. State and territorial grantees must submit their State Plans to their Federal Project Officer. Official approval of the plans will follow review by the Department and the HHS Administration on Aging. In order to comply with the requirement that states and territories have an approved coordination plan in order to be eligible for PY 2008 funding, the Department will consider the state's current PY 2006 coordination plan to be extended until October 31, 2008.
5. **Inquiries.** Questions should be directed to your regional Federal Project Officer.