

ATTACHMENT I **SCSEP STATE PLAN MODIFICATION REQUIREMENTS**

Following are the requirements for Senior Community Service Employment Program (SCSEP) State Plan modifications. Grantees should only submit information on the following subjects if there have been changes or if there are scheduled changes in the next two years. If the state has any modifications or changes to any of the sections described below, please make the changes and include them as part of the modified plan.

Section 1. Purpose of the State Plan Modification. The State Plan modifications allow states to provide updated information on the longer term, strategic view of the SCSEP, projected state changes in demographics, economy and the labor market. Modifications of the State Plan should address the role of SCSEP with other workforce programs, whether or not they serve older workers. Plan modifications should articulate how all grantees will enhance the goals of the program. National grantees [except for those exempt under Final Rule Section 641.320(b)] must coordinate activities and participate in state planning activities in order to be eligible to receive SCSEP funds, thus state grantees must seek the advice and recommendations of those national grantees operating in their state as provided in 641.345(d).

Section 2. Involving Organizations and Individuals. Section 503(a)(2) of the Older Americans Act (OAA) Amendments of 2006 requires that the State Plans describe the state's process for ensuring the involvement, advice and recommendations of representatives from the following entities:

- State Units on Aging and Area Agencies on Aging
- State and Local Boards under the Workforce Investment Act (WIA)
- Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the state, except national grantees serving older American Indians or Pacific Island Asian Americans (although they are encouraged to participate) - see OAA Section 503(a)(8)
- Social service organizations providing services to older individuals
- Grantees under Title III of the OAA
- Affected communities (i.e., grantee service areas)
- Unemployed older individuals
- Community-based organizations serving older individuals
- Business organizations
- Labor organizations

States may also seek the advice and recommendations of other interested organizations and individuals, including SCSEP participants, but this is not required by the statute.

In order to document statutorily required involvement of specific organizations and individuals, grantees must include an appendix containing letters from all required parties attesting to their participation in the state plan modification process.

Section 3. Soliciting and Collecting Public Comments. The State Plan must describe how it ensures an open and inclusive planning process with meaningful opportunity for public comment. Grantees must also include the state's procedures and schedule and comply with those procedures. Any individual or organization may comment on the State Plan. (20 CFR 641.350)

Section 4. Increased Unsubsidized Employment and Employer Outreach. In this section, the state must describe if there were changes in the overall goals and strategies related to placing participants in unsubsidized employment, including 1) partnerships with employers; 2) identifying employment opportunities with career potential; 3) placing individuals in high-growth industries and occupations as well as industries and occupations that provide substantial employment opportunities for participants; and 4) retention activities to assist former participants to retain unsubsidized employment.

The modification must also discuss whether this strategy has increased grantee performance levels for unsubsidized employment, including the grantee plans to improve training during community service employment assignments. Such training may include lectures or seminars, classroom or individual instruction, online instruction, private sector on-the-job experience, work experience or other arrangements as described in OAA Section 502(c)(6)(A)(ii).

The state plan modification must also specify what the state has done to ensure that the state grantee is meeting its negotiated goal.

Section 5. Community Service Needs. The State Plan must identify the localities and populations for which community service projects of the type authorized by SCSEP are most needed. Once grantees identify unmet community service needs, they must specify how they will recruit appropriate host agencies, including a prospective timeline.

The current and projected employment opportunities in the state and the types of skills available among the eligible populations have direct implications for the host agencies that grantees recruit to participate in the program; the types of training positions available at the host agencies; skill training offerings that grantees locate or develop; and training linkages that grantees negotiate and establish with the One-Stop. Grantees must discuss how, if at all, the grantees in the state have collaboratively addressed those issues to ensure that community service employment assignments are truly providing skill training that meets the needs of both participants and employers and if they were successful.

Section 6. Coordinating with Other Programs, Initiatives, and Entities. The State Plan must describe overall goals and strategies for coordinating SCSEP activities with other entities, including the following:

- Coordination of activities with the state's Title I WIA activities. The State Plan must describe the steps the state is taking to ensure that SCSEP is an active

partner in each One-Stop delivery system, and the actions it will take to encourage and further improve coordination with the One-Stop delivery system.

- State activities being carried out in the state under other titles of the OAA.
- Collaboration with other public and private entities and programs that provide services to older Americans, such as community-based organizations, transportation programs, and programs for those with special needs or disabilities.
- Collaboration with other partners, including state vocational rehabilitation agencies, adult education and literacy providers, and education and training providers such as community colleges.
- Collaboration with other labor market and job training initiatives.
- Leveraging resources from key state partners to support SCSEP activities, including state and local government agencies, foundations, employers, community-based organizations, and other entities.

Section 7. Avoiding Service Disruptions. The state must describe how their planned actions will comply with the statutory requirement to avoid disruptions to participants. If population, economic, labor market and/or skill sets indicate that there may have been changes in eligible population or that there is over-enrollment for any other reason, the Department recommends a gradual shift that encourages current participants in subsidized community service assignments to move into unsubsidized employment to make positions available for eligible individuals in the areas facing a relatively greater need. OAA Section 518(a)(3)(B)(i) places time limits on SCSEP community service assignments, requiring transition to unsubsidized employment.

Section 8. Improving SCSEP Services. The plan must describe any changes in the long-term strategy to improve SCSEP services, including design changes to the program and planned changes in the use of SCSEP grantees and program operators including frequent formal collaboration activities among all SCSEP grantees within the state, more stringent criteria to select sub-recipients, and sharing best practices.

Grantees may also make recommendations to the Department, on such topics as allowable types of community services, deadlines for changes in the distribution of positions, and strategies to improve services to minorities, veterans, and those most-in-need.

Section 9. Distribution of SCSEP Positions within the State.

A. Distribution of Positions. SCSEP 20 CFR 641.360 requires state grantees to prepare an equitable distribution report that describes how the state distributes positions (or “slots”). SCSEP 20 CFR 641.325 requires state grantees to include a written summary describing the ratio of eligible individuals in each service area to the total state eligible population in their State Plan. When preparing their State Plan, we recommend that States leverage their most recent Equitable Distribution (ED) report when describing the current distribution of individuals being served along with a summary of the areas, if any, significantly under-served or over-served.

B. Rural and Urban Population Distribution. Information about the relative distribution of eligible individuals residing in rural and urban areas. Grantees can find areas designated as rural in the SCSEP Performance and Results Quarterly Progress Report (also known as “SPARQ”).

Where applicable, the State must describe how it ensures that rural and urban areas are served equitably. If rural areas possess inadequate resources to meet program requirements (e.g., too few host agencies or employers, lack of transportation, etc.), the State Plan must indicate how grantees plan to address these needs, and include timelines.

C. Specific Population Distribution. States must consider the relative distribution of eligible individuals afforded priority for service in OAA Section 518(b) and certain other population groups cited below. All grantees operating within the state must describe the recruitment and selection techniques for priority individuals.

OAA Section 518(b) defines priority individuals as those who qualify based on one or more of the following criteria:

1. Is 65 years of age or older; or
2. a. has a disability;
 - b. has limited English proficiency or low literacy skills;
 - c. resides in a rural area;
 - d. is a veteran or a spouse who meet the requirements of the Jobs for Veterans Act, 38 U.S.C. § 4215(a)(1);
 - e. has low employment prospects;
 - f. has failed to find employment after utilizing services provided under Title I of WIA; or
 - g. is homeless or at risk for homelessness.

Other populations identified in the statute as most in need, are defined in OAA Section 503(a)(4)(C)(i)(iv) as eligible individuals based on:

- “greatest economic need” (as defined in 20 CFR 641.140);
- minority status; and
- “greatest social need” (as defined in 20 CFR 641.140).

Note: The statute also identifies eligible individuals who have limited English proficiency in section 518(b), but these are not included in this list because they are already identified in the list of priority individuals.

Section 10. Copies of Public Comments. The State Plan must include copies of any public comments received, if applicable.