

PY 2016 OPTIONAL SPECIAL REQUESTS

Grantees with special requests in one or more of the following areas must submit each request in a separate, clearly-titled document. 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) Waiver Options.** (*Submit only if you are requesting a change.*) To change your current IDL policy, you must request and receive Departmental approval for one of the following IDL policies. If you are changing your policy to make it more restrictive, it must have an effective date of at least 120 days after written approval.

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

- a) Your currently-approved IDL policy.
- b) Which of the options below you propose to adopt:
 - i. *Option 1:* No extensions to any participants; all participants exit at 48 months.
 - ii. *Option 2:* Extensions to every participant who meets at least one of the seven waiver factors.
 - iii. *Option 3:* Extensions to every participant who meets a specific subset of the seven waiver factors, and/or extensions are limited to one-time 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. Additional Funds for Participant Training and Supportive Services (ATSS) – Older Americans Act (OAA), Section 502(c)(6)(C).** (*Approvals for this option expire at the end of each program year so you must submit a new request if you would like exercise this option.*) The 2006 Amendments to the OAA permit an exception to the 75 percent minimum level of expenditures on participant wages and fringe benefits. This exception allows you to use not 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 PY 2016, you must provide:

- a) A description of the activities for which the grantee will spend the grant funds described in paragraphs (a)(3) and (a)(4) of Federal Regulations - 641.874;
- b) Description of how the provision of such activities will improve the effectiveness of the project, including:
 - o An explanation of whether any displacement of eligible individuals or limitation of positions for such individuals will occur.
 - o Information on the number of individuals to be displaced and of positions to be eliminated.
 - o Clarification of how the activities described 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 Federal Regulations – 641-874. The budget and work plan should detail both the additional training and support services that will be provided to SCSEP participants and the associated cost for each activity. Please ensure that items discussed in the work plan are included clearly in the budget or budget narrative.
- d) Grantees with approved requests for ten percent additional funds may choose to apply the provision unilaterally for all sub recipients, or to individual sub-recipients but need not provide this opportunity to all their sub recipients. If the grantee applies this provision to their sub recipients, the grantee should provide a detailed description on how the funds will be allocated, include a detailed budget, and work plan for each sub recipient, if they are not applying the provision unilaterally.

Please also note grantees must pay participant wages and fringe benefits for participants who are engaged in this training out of the “10% ATSS” funds, per OAA 502(c)(6)(C) and 20 CFR 671.874(a)(3). Also please note that under those same statutory and regulatory provisions, grantees may not use these “10% ATSS” funds to pay for any administrative costs. The SF-424A and budget narrative must reflect the cost of the specific training and supportive services activities that you will provide if your request is approved. If this optional special request is not approved, you will need to submit a revised SF424A and budget narrative to reflect costs without this waiver.

3. Increase in Administrative Cost Limitations – 20 CFR 641.870. *(Approvals for this option expire at the end of each program year so you must submit a new request if you would like to exercise this option.)* The Department may authorize an increase in the amount available for administrative costs to not more than 15 percent if it determines that it is necessary to carry out the project, and if you demonstrate *one* of the following:

- a) You are incurring major administrative cost increases in necessary program components.
- b) The number of community service assignment positions or eligible minority individuals participating in the project will decline if administrative costs are not increased.
- 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 project funding.

4. Extension of Average Project Duration – OAA Section 502(b)(1)(C)(ii). *(Approvals for this option expire at the end of each program year so you must submit a new request if you would like to exercise this option.)* The maximum average project duration based on overall participation is 27 months, but you may request permission from the Department to increase your maximum average project duration to 36 months. Your request must include:

- a) A statement of your current average duration and an estimate of your average duration for the coming program year.
- b) A description of your efforts to achieve an average duration of 27 months.
- c) The exceptional circumstances that warrant an extension to 36 months, as set forth in the regulations:
 - 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 you, relative to other areas of the state or nation;

- ii. Significant downturns in the economy of an area served by you or in the national economy;
- iii. Significant numbers or proportions of participants with one or more barriers to employment (including “most-in-need” individuals as described in 20 CFR 641.710(a)(6)) served by you, relative to such numbers or proportions for grantees serving other areas of the state or nation;
- 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 you.

5. **On-the-Job Experience (OJE) Training Option.** *(Approvals for this option expire at the end of each program year so you must submit a new request if you would like to exercise this option.)* If you wish to utilize OJE, you must meet the requirements stipulated in Older Worker Bulletin 04-04. You must provide a copy of your OJE policy and sample contracts to the Department for approval before you can exercise this option.
6. **Cross-Border Agreements 20 CFR 641.515(c).** *(Approvals for this option expire at the end of each program year so you must submit a new request if you would like 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 slots, and must be submitted for Departmental approval.
7. **Rotation Policy 20 CFR 641.575.** *(Approvals for this option expire at the end of each program year so you must submit a new request if you would like 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. You must assure that you will make an individualized determination that a rotation is in the best interest of the participant, and that it will further the acquisition of skills listed in the individual employment plan (IEP).