

PROGRAM YEAR (PY) 2018 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.** *(This section is relevant **only** if the grantee is requesting a change.)* To change your current IDL policy, you **must** request and receive Departmental 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 DOL.

If a grantee proposes to change the existing IDL policy, you must describe:

- a) The currently-approved IDL policy and procedure.
- 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. *Grantee must indicate the length of the extension. (i.e. one-time twelve-month only, unlimited, three times only.)*
 - iii. *Option 3:* Extensions to every participant who meets a specific subset of the seven waiver factors. *Grantee must indicate the length of the extension. (i.e. one-time twelve-month only, unlimited, three times only)*
- c) A reasonable transition plan that addresses when and how the grantee 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 grantees must submit a new request for approval each year in order to exercise this option.)* The OAA permits 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 a grantee wishes to request the use of additional funds for training and supportive services for PY 2018, you must provide:

- a) A description of the activities for which the grantee will spend the grant funds described in paragraph 20 CFR 641.874 (a)(3) and an assurance that the 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:
 - 1. An assurance that no displacement of eligible individuals or limitation of positions for such individuals will occur.
 - 2. A description of whether the number of individuals served will be reduced and how the grantee will meet its service level goal and a description 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 should detail both the additional training and supportive 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 up to ten percent additional funds may choose to apply the provision uniformly to all sub-recipients, or to individual sub-recipients, but need not provide this opportunity to all their sub-recipients. If the grantee chooses not to apply the provision uniformly to all sub-recipients, you must provide a detailed description of how the funds will be allocated among sub-recipients and must include a detailed budget and work plan for each sub-recipient.

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 no 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; 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 project funding.

4. Extension of Average Project Duration- 20 CFR 570(5)(c)(2). (*Approvals for this option expire at the end of each program year. Grantees must submit a new request in order to exercise this option.*) The maximum average project duration for the last nine quarters based on overall participation is 27 months, but a grantee may request permission from the Department to increase your maximum average project duration to 36 months. The request must:

- a) Include a statement of the current average duration with an estimate of the average duration for the coming program year.
- b) Provide a description of the 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 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(a)(6)) served by the grantee, 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 the grantee.

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 address all of the requirements stipulated in Older Worker Bulletin 04-04 (https://www.doleta.gov/seniors/Other_docs/04-04.pdf). 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 authorized positions 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. 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 (IEP).