

**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. **Additional Funds for Participant Training and Supportive Services (ATSS) (Older Americans Act (OAA), Section 502(c)(6)(C), 42 USC 3056(c)(6)(C))**. (*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 sub-recipients, 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 641.570(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 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.

4. **On-the-Job Experience (OJE) Training.** *(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 https://www.doleta.gov/seniors/Other_docs/04-04.pdf). You must also provide a copy of your OJE policy and sample contracts to ETA for approval before you can exercise this option.

5. **Cross-Border Agreements (20 CFR 641.515(c)).** *(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. **Rotation Policy (20 CFR 641.575).** *(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.