

## 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. Please do not submit a policy unless it is changing.)* 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 implement?
  - (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. The specific subset must be listed in the policy. *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/or Supportive Services (ATSS) (Older Americans Act (OAA), Section 502(c)(6)(C), 42 USC 3056(c)(6)(C)).** The OAA permits SCSEP grantees to request to use additional funds for training and supportive service costs. Such requests must be approved by ETA and allow you to use not less than 65 percent of program funds for participants' wages and fringe benefits (rather than the standard 75 percent minimum), so that up to an additional 10 percent of funds are available for training and supportive services. ETA encourages you to consider submitting such ATSS requests as part of your overall strategy for preparing participants for employment and/or supporting participants to enable their successful participation in SCSEP. ***To facilitate the allotment review process, grantees may submit a copy of their ATSS requests to their FPO and NOL by email at the time of or earlier than the grant submission for review. To the extent possible, ETA will approve favorable ATSS submissions at the time of grant awards.***

ATSS requests can include participant training activities, supportive services, or a combination of both. In general, ETA expects that proposed training components will provide training that prepares participants with skills relevant for employment in in-demand jobs in their community. Further, ETA expects that proposed supportive services components will supplement and enhance the supportive services provided through primary grant funds, enabling more participants to mitigate, and overcome financial and logistical barriers to SCSEP participation.

***Instructions***

If you wish to request the use of additional funds for training and supportive services, you must provide a brief proposal according to the following instructions:

- (a) **Identify the percentage of federal funds and the dollar amount** that will be dedicated to the training and/or supportive services (this is the "ATSS request" amount and must be less than or equal to 10% of your federal grant funds).
- (b) **Describe the activities** for which you will spend the ATSS grant funds identified in item (a) above, and describe how the proposed activities will improve the effectiveness of your project, including, as applicable:
  - (i) How the activities will better prepare participants for successful placement in unsubsidized employment in in-demand jobs, and how you estimate the activities will improve employment outcomes for individuals served; and/or
  - (ii) How the activities will better support participants in overcoming barriers to participating in your SCSEP project.
- (c) **Provide a proposed budget and work plan** for the activities identified in item (b) above, which must detail:
  - (i) The additional training and/or supportive services that will be provided to SCSEP participants.
  - (ii) The associated cost for each activity, and the number of participants who will benefit; and
  - (iii) Note that, consistent with 20 CFR 641.874(a)(3), grantees must use ATSS funds to pay the wages for the hours that individual participants spend in training funded under the ATSS request.
- (d) **Describe how you will allocate ATSS funds among sub-recipients** (if applicable). 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, identify the amount of ATSS funding that you will allocate to each sub-recipient.
- (e) **Describe the impact of the ATSS request on overall service levels**, specifically:
  - (i) Please state if there will be displacement of eligible individuals or elimination of positions for such individuals will occur; and
  - (ii) Provide information on the number of such individuals to be displaced and of such positions to be eliminated.

***Important Considerations for ATSS Requests***

Please note the following important considerations in submitting an ATSS request:

- **Include ATSS costs in your overall grant budget request:** In responding to the instructions in this TEGl for submitting your PY 2023 grant documents, prepare your SF-424A and Budget Narrative so that they are consistent with your ATSS request. Please ensure that items described in the work plan under item (c) above are also included in the Budget Narrative. In the event that ETA denies your ATSS request, you must resubmit a revised SF-424A and Budget Narrative.
- **Adhere to allowable training activities:** Participant training costs under an ATSS request may include, but are not limited to, the reasonable costs of instructors, classroom rental, training supplies, materials, equipment, tuition, grant staff salaries and wages that directly support the development, design, coordination, execution, and improvement of participant training, and

other costs that are directly related to participant training. Such training may be provided on the job, in a classroom setting, in a virtual setting, or pursuant to other appropriate arrangements. Note that such costs do not include activities such as general staff development that relate to participant training only indirectly or tangentially.

- *Adhere to allowable supportive services:* Participant supportive services under an ATSS request may include, but are not limited to, the payment of reasonable costs of transportation, health and medical services, special job-related or personal counseling, incidentals (such as work shoes, badges, uniforms, eyeglasses, and tools), child and adult care, temporary shelter, follow-up services, and grant staff salaries and wages that directly support the design, coordination, delivery, and improvement of supportive services.
- *Assurances regarding programmatic funds:* Through submission of an ATSS request, consistent with 20 CFR 641.874(a)(4), you agree that any remaining grant funds (i.e., funds *other than* those allocated for ATSS, participant wages and benefits, and administrative costs) will be used for participant training, job placement assistance, participant supportive services, and outreach, recruitment and selection, intake, orientation, and assessment. You also agree that no ATSS funds may be used to pay for any administrative costs, consistent with 20 CFR 641.874(a)(3).

- 3. 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 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.) ETA will consider requests to authorize an increase in the amount available for administrative costs from 13.5 percent to no more than 15 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.
- 4. 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.
  - (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.
5. **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](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.
6. **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.
7. **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.