

U. S. Department of Labor
Employment and Training Administration
Senior Community Service Employment Program
Instructions for SCSEP Optional Requests

Grantees that wish to make optional requests or optional request amendments must submit each request in a separate, clearly-titled document. To receive 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 seven 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 seven 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. Optional Additional Funds for Participant Training and Supportive Services (OATSS) (Older Americans Act (OAA), Section 502(c)(6)(C)).** *Note: In the past, OATSS requests were required with the grant document submission at the beginning of each new program year. To allow long-term strategic planning for use of OATSS funds, beginning in PY 2024, ETA encourages grantees to consider submitting OATSS requests that span the duration of the four-year cycle. This four-year approach remains consistent with the current SCSEP regulations while allowing for more consistent use of funds for training. This change will help grantees successfully support participants by regularly providing training from year to year and streamlining the annual ETA grant review and approval processes. Prepare your Budget Narrative so that it is consistent with your OATSS 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.

OATSS 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, and expects grantees to conduct relevant labor market analysis and work with employers to ensure strong alignment between training activities and the needs of employers (as explained further below). 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 – For first-time requests

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 "OATSS 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 OATSS 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; how you determined which in-demand industries, occupations, and/or skills to target (citing relevant labor market and skills information); how you involved employers in validating and/or participating in the training activities; 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 OATSS funds to pay the wages for the hours that individual participants spend in training funded under the OATSS request.
- d. **Describe how you will allocate OATSS 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 OATSS funding that you will allocate to each sub-recipient.
- e. **Describe the impact of the OATSS 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.

Instructions – For amendments to PY 2024 requests:

- a. **Identify the percentage of PY 2025 federal funds and the dollar amount** that will be dedicated to the training and/or supportive services (this is the "OATSS request" amount and must be less than or equal to 10% of your federal grant funds).
- b. **Describe any adjustments to the activities** for which you will spend the OATSS grant funds identified in item (a) above, and describe how the proposed activities have improved the effectiveness of your project, including, as applicable:
 - i) How the activities improved participants' preparation for successful placement in unsubsidized employment in in-demand jobs, and how you estimate the activities will improve employment outcomes for individuals served for this program year; and/or
 - ii) How the activities have and will better support participants in overcoming barriers to participating in your SCSEP project.

Important Considerations for OATSS Requests

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

- ***Include OATSS costs in your overall grant budget request:*** In responding to the instructions in this TEGl for submitting your PY 2024 grant documents, prepare your SF-424A and Budget Narrative so that they are consistent with your OATSS 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 OATSS request, you must resubmit a revised SF-424A and Budget Narrative.
- ***Adhere to allowable training activities:*** Participant training costs under an OATSS 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 OATSS 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 OATSS request, consistent with 20 CFR 641.874(a)(4), you agree that any remaining grant funds (i.e., funds *other than* those allocated for OATSS, 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 OATSS 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 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.)* 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 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 Section 515 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)).** *(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 utilize OJE, you must 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 for 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.