STATE OF NEVADA AGING AND DISABILITY SERVICES DIVISION (ADSD)

SERVICE SPECIFICATIONS Senior Community Service Employment Program (SCSEP)

Any exceptions to these Service Specifications must be requested in writing and approved by the Deputy Administrator of the Aging and Disability Services Division.

PURPOSE:

The Senior Community Service Employment Program (SCSEP) is authorized under Title V of the Older Americans Act. Funds are dispersed and administered by the U.S. Department of Labor (DOL), Employment and Training Administration (ETA). The DOL releases Training and Education Guidance Letters (TEGL) and Training and Employment Notices (TEN) that provide guidance on the administration and implementation of SCSEP.

To promote quality services, the Aging and Disability Services Division (ADSD) has established these service-specific specifications for SCSEP, which contain state and federal guidelines for administrative and operating procedures for funded services. ADSD will use these service specifications, among other measures, as a basis for assessing program performance. The service specifications that each subrecipient must follow consist of **GENERAL REQUIREMENTS** and **SERVICE-SPECIFIC REQUIREMENTS**, which are established for each type of funded service.

SERVICE DEFINITION:

The Senior Community Service Employment Program (SCSEP) provides community service and work-based job training for older adults, aged 55 and older, who are unemployed and have low-income. The program facilitates opportunities for enrolled participants to obtain training and skills development in preparation of gaining unsubsidized employment in public or private businesses and industries. These opportunities are Community Service Assignments (CSA) in non-profit organizations, government agencies, and public facilities such as schools, hospitals, and job centers.

SERVICE CATEGORIES AND UNIT MEASURES:

<u>Assessment and development of Individual Employment Plan (IEP):</u> Enrolled individuals participate in a person-centered process of identifying their interests, current skills, and barriers to employment, and set goals for skill development with the purpose of obtaining unsubsidized employment.

<u>Supportive Services:</u> Participants are offered connections to community support services to eliminate or reduce barriers to employment that are identified, such as access to bus passes, food pantries, and work clothing.

<u>Training and skills development:</u> Participants are offered a variety of training options and opportunities to increase successful transition to unsubsidized employment.

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<u>Community Service Employment:</u> Participants are placed in community service assignments based on individual interests and goals. Community Services Assignment (CSA) opportunities are guided by the current and projected industry trends in the state.

The DOL has established seven (7) core performance measures for the SCSEP program in alignment with the Workforce Investment Opportunity Act (WIOA). (20 CFR Part 641 Subpart G – Performance Accountability). (See **Appendix A:** Core Performance Measures)

GENERAL REQUIREMENTS:

- A. Comply with all federal guidance and regulations provided by the DOL ETA. (See **Appendix B**: Resources and Regulations)
- B. Collect and enter data into the required DOL ETA web-based data collection system. Program staff are required to complete the data system training modules in the first quarter of the program year, or within the first three months of hire. Data will be monitored for accuracy quarterly by ADSD and as requested by the SCSEP National Office.
- C. An annual Customer Satisfaction Survey process is coordinated by the SCSEP National Office. Upon instruction, program staff (ADSD and subrecipient staff) will participate in notifying participants, host agencies, and employers, of the upcoming survey and encourage participation.

SPECIFICATIONS:

- 1. Recruitment, Eligibility, Selection, and Recertification
 - 1.1. Develop and implement methods to recruit and select eligible participants to assure maximum participation in the program.
 - 1.2. Use income definitions and income inclusions and exclusions for SCSEP eligibility as described in TEGL No. 12-06 to determine and document participant eligibility. (See **Appendix B**: Resources and Regulations)
 - 1.3. Develop and implement methods to recruit minority populations in the assigned service area.
 - 1.4. Develop and implement strategies to recruit applicants who have priority of service as defined in Older Americans Act section 518(b)(1)-(2) and by the VOW (Veterans Opportunity to Work) to Hire Heroes Act of 2011. Individuals with priority are those who:
 - 1.4.1. Are covered persons in accordance with the VOW (covered persons who are SCSEP- eligible must receive services instead of or before all non- covered persons);
 - Are 65 years or older;
 - Have a disability;
 - Have limited English proficiency:
 - Have low literacy skills;
 - Reside in a rural area;
 - Have low employment prospects;

- Have failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunity Act (WIOA);
- Are homeless or are at risk for homelessness; or
- Are formerly incarcerated or on supervision from release from prison or jail within five years of the date of initial eligibility determination.
- 1.5. Recertify the income eligibility of each participant at least once every 12 months, or more frequently if circumstances warrant.

2. Assessment, Supportive Services, and Collaboration

- 2.1. Assess participants for their interests, goals, current skills, and barriers to employment at least twice per 12-month period, or more frequently if appropriate.
 - 2.1.1. Use assessment information to determine the most appropriate community service assignments for participants.
- 2.2. Establish criteria to assess the need for supportive services and to determine when participants will receive supportive services, including after obtaining unsubsidized employment.
 - 2.2.1. Provide supportive services, as needed, to help participants participate in their community service assignment and to obtain and retain unsubsidized employment.
- 2.3. Collaborate with other organizations to maximize opportunities for participants to obtain workforce development, education, and supportive services to help them move into unsubsidized employment. These organizations may include but are not limited to workforce development boards, American Job Centers, vocational rehabilitation providers, disability networks, basic education and literacy providers, and community colleges.

3. Individual Employment Plan (IEP)

- 3.1. Establish an initial goal of unsubsidized employment for all participants.
 - 3.1.1. Update the IEP at least as frequently as assessments occur (at least twice per 12- month period).
 - 3.1.2. Modify the IEP as necessary to reflect other approaches to self-sufficiency, if it becomes clear that unsubsidized employment is not feasible.
- 3.2. For participants who will reach the individual durational limit or would not otherwise achieve unsubsidized employment, include a provision in the IEP to reflect other approaches to self-sufficiency, transition to other services or programs. See section 7 below for additional information on the individual durational limit.
- 3.3. Rotate participants to a new host agency (or a different assignment within the host agency) based on a rotation policy approved by the Employment and Training Administration (ETA) and only after making an individualized determination that the rotation is in the best interest of the participant. Such rotation must further the acquisition of skills listed in the IEP.

- 4. Community Service Assignment (CSA) and Host Agencies
 - 4.1. Base the initial community service assignment on the assessment made at enrollment.
 - 4.2. Develop and implement methods for recruiting host agencies where participants can be placed in a CSA to increase their skill level in preparation of transition to unsubsidized employment.
 - 4.2.1. Recruit a variety of host agencies to ensure the provision of multiple training options that align with the on-demand jobs and industry growth of the service area as described in the Nevada SCSEP State Plan 2024 2027. (See Appendix B: Resources and Regulations)
 - 4.2.2. Select only designated 501(c)(3) organizations or public agencies as host agencies.
 - 4.2.3. Comply with maintenance of effort: Ensure that community service assignments do not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals who are not SCSEP participants. You must specifically ensure that community service assignments do not:
 - Displace currently employed workers (including partial displacement, such as a reduction in non-overtime work, wages, or employment benefits);
 - Impair existing contracts or result in the substitution of Federal funds for other funds in connection with work that would otherwise be performed; or
 - Assign or continue to assign a participant to perform the same work, or substantially the same work, as that performed by an individual who is on layoff.
 - 4.3. Put in place procedures to ensure adequate supervision of participants at host agencies.
 - 4.4. Ensure safe and healthy working conditions at the community service assignment through annual monitoring of the host agency site and annual safety consultation with the participant at the host agency site.

5. Orientation

- 5.1. Provide orientation for participants and host agencies, including information on:
 - Project goals and objectives;
 - Participant rights and responsibilities;
 - Community service assignments;
 - Opportunities for paid training outside the community service assignment;
 - Available supportive services; and
 - Availability of free physical examinations.
- 5.2. Subrecipient staff must address the topics listed above and provide additional orientation to participants on:
 - SCSEP goals and objectives;
 - Grantee and local project roles, policies, and procedures:

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- Holiday and sick leave;
- Assessment process;
- Development and implementation of IEPs;
- Evaluation of participant progress;
- Health and safety issues related to each participant's assignment;
- · Role of supervisors and host agencies;
- Maximum individual duration policy, including the possibility of an extension, if applicable, and the documentation required to support an extension;
- Termination policy; and
- Grievance procedure.

6. Wages, Fringe, and Benefits (WFB)

- 6.1. Ensure 75% of funding is used to support participant wages, fringe, and benefits.
- 6.2. Provide participants with the highest applicable required wage (highest of Federal, state, or local minimum wage for the most nearly comparable covered employment or minimum wage under the Fair Labor Standards Act of 1938, or the prevailing rate of pay for persons employed in similar public occupations by the same employer) for time spent in orientation, training, and community service assignments.
- 6.3. Provide workers' compensation, other benefits required by state or Federal law (such as unemployment insurance), and the costs of physical examinations.
 - 6.3.1. Ensure that host agencies do not pay workers' compensation costs for participants.
- 6.4. Provide compensation for scheduled work hours during which the participant's host agency is closed for Federal holidays, which may be paid or in the form of rescheduled work time, and establish written policies related to this compensation.
- 6.5. Establish written policies relating to approved breaks in participation and any necessary sick leave that is not part of an accumulated sick leave program.
- 6.6. Do not use grant funds to pay the cost of pension benefits, annual leave, accumulated sick leave, or bonuses.
- 6.7. Offer physical examinations to participants upon program entry, and each year thereafter, as a benefit of enrollment.
 - 6.6.1. Obtain a written waiver from each participant who declines a physical examination.
 - 6.6.2. Do not obtain a copy or use the results of the physical examination to establish eligibility or for any other purpose.

7. Individual Durational Limits (IDL) and Transition Services

- 7.1. Allow participants to participate in the program for no longer than 48 months. The months of participation do not have to be consecutive,
 - 7.1.1. Notify participants of your policy pertaining to the maximum individual duration requirement at the time of enrollment and each year thereafter.

- 7.1.2. Provide 30-day written notice to participants prior to durational limit exit from the program.
- 7.2. Develop a system to transition participants to unsubsidized employment or other assistance before each participant's maximum individual enrollment duration has expired.
 - 7.2.1. Begin transition planning for participants who will exit for durational limit at least 3-6 months prior to their exit date.

8. Policies and Procedures

- 8.1. Termination Policy
 - 8.1.1. Develop and maintain written termination policies for the following causes and provide to participants at enrollment:
 - Provision of false eligibility information by the participant;
 - Incorrect initial eligibility determination at enrollment;
 - Income ineligibility determined at recertification;
 - · Participant has reached individual durational limit;
 - Participant has become employed while enrolled;
 - IEP-related termination: and
 - Other causes as approved by ADSD.
 - 8.1.2. Provide a 30-day written notice for all involuntary terminations that states the reason for termination and informs the participants of grievance procedures and the right to appeal.
- 8.2. Complaint Resolution
 - 8.2.1. Establish and use written grievance procedures for complaint resolution for applicants, participants, employees, and host agencies.
 - 8.2.2. Provide applicants, participants, employees, and host agencies with a copy of the grievance policy and procedures.
- 9. Maintenance of Files, Documentation, and Privacy Information
 - 9.1. Maintain participant files and all documentation required for compliance for three program years after the program year in which the participant received his/her final follow-up activity. Documents will be utilized for data validation annually or as requested by the National SCSEP Office. Maintain documentation of:
 - Waivers of physical examinations by participant;
 - Provision of complaint procedures to participants;
 - Eligibility determinations and re-certifications;
 - Termination and reasons for termination;
 - · Grievances and outcomes; and
 - Monitoring reports for host agencies.
 - 9.2. Ensure that all participant records are securely stored, and access is limited to appropriate staff to safeguard personal identifying information.

- 9.2.1. Ensure that all participant medical records, if applicable, are securely stored separately from all other participant records and access is limited to authorized staff for authorized purposes.
- 9.2.2. Establish safeguards to preclude tampering with electronic media (e.g., personal identification numbers and DOL ETA required data collection systems).
- 9.2.3. Ensure that ADSD is immediately notified in the event of any potential security breach of personal identifying information, whether electronic files, paper files, or equipment are involved.

10. Data Collection and Reporting

- 10.1. Ensure the collection and reporting of all required data according to specified time schedules, utilizing the required DOL ETA web-based data collection and evaluation systems.
 - 10.1.1. Ensure staff capturing and recording data are familiar with the latest instructions for data collection, including ETA administrative issuances (e.g., Training and Employment Guidance Letters, Data Collection and Data Validation Handbooks, and the Workforce GPS Older Worker Community of Practice). (See **Appendix B**: Resources and Regulations)
 - 10.1.2. Ensure that authorized users comply with access and security rules for all DOL ETA web-based data collection and evaluation systems.
- 10.2. Turn over complete data files in the specified electronic format, as well as hard copy case files, to ADSD when organization ceases to administer SCSEP.
- 10.3. Document recruitment efforts, transition plans, challenges, or other information pertinent to program operations or as requested by ADSD.
- 10.4. Provide guarterly data and reporting to ADSD for federal reports.

APPENDIX A:

CORE PERFORMANCE MEASURES

The US Department of Labor (DOL) has established seven (7) core performance measures for the SCSEP program in alignment with the Workforce Investment Opportunity Act (WIOA). Each program year, the DOL determines the desired outcome for each performance measure. ADSD can negotiate the established performance measures with the DOL annually.

<u>Service Level</u> – The number of eligible individuals served.

<u>Community Service</u> - Total hours of community employment provided by SCSEP participants, excluding paid training hours.

Most-in-Need – The number of most-in-need individuals served, as defined in (OAA sec. 518(a)(2)(B)(ii) or (b)(2)). Most-in-need are participants with one or more of the following characteristics:

- Have a severe disability;
- Are frail;
- Are age 75 or older;
- Are age-eligible but not receiving benefits under Title II of the Social Security Act;
- Reside in an area with persistent unemployment and have severely limited employment prospects;
- Have limited English proficiency;
- Have low literacy skills;
- Have a disability;
- Reside in a rural area;
- Are veterans:
- Have low employment prospects;
- Have failed to find employment after using services provided under Title I of the Workforce Innovation and Opportunity Act;
- Are homeless or at risk for homelessness; or
- Are "formerly incarcerated" defined as (1) individuals who were incarcerated at any
 point within the last 5 years preceding the date of first determination of program
 eligibility; or (2) individuals who were under supervision at any point within the last 5
 years preceding the date of first determination of program eligibility, following release
 from prison or jail.

<u>Annual Satisfaction Surveys</u> - Participants, host agencies, and employers will be randomly selected to participate in the annual satisfaction survey coordinated by the SCSEP National Office.

<u>Employment Rate 2nd quarter after exit</u> - Percentage of participants who are in unsubsidized employment during the second quarter after exit from the project.

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<u>Employment Rate 4th quarter after exit</u> - Percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the project.

<u>Median Earnings</u> – Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the project.

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APPENDIX B:

RESOURCES AND REGULATIONS

Senior Community Service Employment Program | U.S. Department of Labor

Laws | U.S. Department of Labor

Guidance and Resources | U.S. Department of Labor

TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 12-06 | U.S. Department of Labor

WorkforceGPS - Welcome to the Older Workers Community

Nevada SCSEP State Plan 2024 - 2027