


<b>EMPLOYMENT AND TRAINING ADMINISTRATION          ADVISORY SYSTEM          U.S. DEPARTMENT OF LABOR          Washington, D.C. 20210</b>	CLASSIFICATION
	SCSEP
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TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 26-04

TO: ALL SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM GRANTEES

FROM: EMILY STOVER DeROCCO  
 Assistant Secretary 

SUBJECT: Program Year (PY) 2005 State Senior Employment Services Coordination Plan

1. **Purpose.** To delineate requirements for the PY 2005 State Senior Employment Services Coordination Plan (State Plan).
2. **References.** Sections 503, 507(b) and 508 of the Older Americans Act Amendments of 2000 (OAA Amendments), Pub. L. 106-501; 20 CFR §§ 641.300-641.365.
3. **Background.** As provided at 20 CFR §641.340, the Governor or his/her designee is not required to submit a full State Plan each year. Program Year (PY) 2004 State Plans were a full year plan (July 1, 2004-June 30, 2005). In general, PY 2005 State Plans need only contain modifications, unless there have been major program changes in the State. However, grantees should review their PY 2004 submissions carefully, paying close attention to the requirements identified in Attachment I, the new State Plan Outline. The submission is intended to be a bonafide plan, looking to the future, not just a "snapshot" report of the current situation in the State. The Governor or his/her designee must provide action plans specifying how the grantees operating in the State will work towards achieving the specifics delineated in the sections of the State Plan requiring implementation in PY 2005.

This advisory also provides guidance on the regulatory and administrative modifications that are required for the PY 2005 State Plan.

4. **Plan Development and Content.** The Governor of each State is responsible for developing and submitting the State Plan or necessary modifications to the Department of Labor (the Department). However, the Governor may delegate responsibility for developing and submitting the State Plan or modifications

thereto, provided that any such delegation is consistent with State law and regulations. Unless otherwise noted, the Department will accept the designee provided in the PY 2004 State Plan.

Attachment I outlines the minimum information that must be included in the PY 2005 State Plan. The Governor or his/her designee must submit modifications to address the requirements specified in Section 5 of this advisory (if applicable); to update any information that is no longer accurate; to provide action plans relative to requirements in the State Plan Outline as indicated in Section 3; and to meet the requirements in Section 6 of this directive.

5. **Regulatory Requirements for Modification of the State Plan.** Modifications are required when:

- There are changes in Federal or State law or policy that substantially change the assumptions upon which the State Plan is based;
- There are changes in the State's vision, strategies, policies, performance indicators, or organizational responsibilities;
- The State has failed to meet performance goals and must submit a corrective action plan; or
- There is a change in a grantee or grantees.

The Governor or his/her designee should follow established State procedures to solicit and collect public comments on all PY 2005 State Plan submissions.

6. **Administrative Requirement for Modification of the State Plan.** All grantees must elaborate upon the PY 2004 State Plan provision addressing their coordination with the WIA One-Stop delivery system. As provided in §641.200, the Senior Community Services Employment Program (SCSEP) is a required partner under WIA, and as such, is a part of the One-Stop delivery system. Accordingly, the Department requires a Memorandum of Understanding (MOU) between SCSEP grantees and their Local Workforce Investment Boards (Local Boards). This requirement may be satisfied by developing a single MOU between each SCSEP grantee and the Local Board or an umbrella MOU involving all the SCSEP providers in one area. The MOU must outline how services will be provided by all parties.

For the PY 2005 State Plan submission, the Department requires more detailed information about the MOU development process. The Governor or his/her designee must specify which MOUs have been developed, and provide detailed information about the particulars therein. To facilitate this effort, Attachment II provides a sample checklist to enable the Governor or his/her designee to list each grantee within the State and each local area in which they operate their grant. The sample checklist specifies the information that the Department requires about the MOU status of each grantee in the State—e.g., whether an MOU exists, the MOU

type, and the grantee and partners for each MOU. If individual grantees within the State have not yet consummated MOUs with some or all of their Local Boards, the Governor or his/her designee must indicate the reason why and provide a timeline for completion of the outstanding MOUs.

7. **Schedule.** The PY 2005 State Plan requirements must be provided to the Department by May 31, 2005. An original plus two copies must be sent to DOWP by May 31, 2005. Copies of the public comments relating to the changes in the State Plan must accompany its submission to the Department. Electronic copies are acceptable, although the signature pages must be faxed or expressed mailed. Electronic copies may be submitted to the appropriate Federal Project Officer via e-mail. These policies will also apply to both modified and newly submitted State Plans.
8. **Action Required.** SCSEP grantees must begin work on their PY 2005 State Plan submission requirements.
9. **Inquiries.** Questions should be directed to your Federal Project Officer.
10. **Attachments.**

Outline for the State Senior Employment Services Coordination Plan  
MOU Checklist

# ATTACHMENT I

## OUTLINE FOR THE STATE SENIOR EMPLOYMENT SERVICES COORDINATION PLAN

### **Section 1. Plan Participation.**

As required in section 503(a)(1) of the OAA, the State Plan must describe the process the Governor or his/her designee used to ensure the participation of interested organizations and individuals in the development of the State Plan.

### **Section 2. Involvement of organizations and individuals.**

As required in section 503(a)(2) of the OAA, the State Plan must describe the involvement of the following parties in the planning process:

- State and Area Agencies on Aging
- State and Local Boards under the Workforce Investment Act (WIA)
- Public and private nonprofit agencies and organizations providing employment services, including each grantee operating an SCSEP project within the State, except national grantees serving older American Indians
- Social service organizations providing services to older individuals
- Grantees under title III of the OAA Amendments
- Affected communities
- Underserved older individuals
- Community-based organizations serving older individuals
- Business organizations
- Labor organizations
- Other interested organizations and individuals, including SCSEP participants

### **Section 3. Public Comments.**

As required in section 503(a)(3) of the OAA Amendments, the State Plan must provide a description of the State's procedures and time line for ensuring an open and inclusive planning process that provides a meaningful opportunity for public comment. The State Plan should include an appendix of all public comments received, and a summary thereof.

### **Section 4. State Plan Provisions.**

Section 503(a)(4) and (6) of the OAA Amendments address the mandatory content requirements for the State Plan. The Department believes that most of the data required to satisfy these mandatory content requirements can be accessed from readily available sources—i.e., the U.S. Census and data that grantees already possess and/or report. In addition, grantees may utilize the detailed county by county data on the characteristics of the eligible population that by county was be distributed by DOWP last year. If you are unable to find [this information](#) please [contact the DOWP](#).

The State Plan must provide information on the following:

**a. Basic Distribution of SCSEP Positions within the State.** State Plans must provide information on the ratio of individuals in each service area to the total eligible population in the State. Reference should be made to the Equitable Distribution (ED) Report, which is required by Section 508 of the OAA Amendments. This report provides the basic information needed to assess the location of the eligible population and the current distribution of people being served. The report may be summarized to identify the areas, if any, that are significantly under-served or over-served. The most recent ED Report, must be attached as a second appendix to the State Plan. The State Plan must identify where slots need to be moved by a grantee(s) from over- to under-served areas and what the procedures to accomplish this will be. The Plan must also describe the timelines for how this will be accomplished.

Both the national and the State grantees are expected to move positions from over-served to underserved locations. Any prior practice and policies that permitted the retention of positions in an over-served area is not consistent with the OAA Amendments. The State Plan must reference and build on the ED Report in addressing the requirement to describe the basic distribution of SCSEP positions within the State. Grantees may not move slots from one geographic area to another without first notifying the State agency responsible for preparing the State Plan and the ED Report and receiving approval from the Department.

**b. Rural and Urban Populations.** State Plans must provide information about the relative distribution of individuals residing in rural and urban areas within the State. For 2005, this information may be included on a statewide basis, a county-by-county basis or some other geographic area basis. The Governor or his/her designee must decide which approach will be utilized.

Both rural and urban areas of a State need to be served equitably. If rural areas of the State have inadequate resources to enable program requirements to be met (e.g., few host agencies or employers, lack of transportation, low educational levels of eligible individuals, etc.), the State Plan must address what the project plans to do to address those needs, and how the plan will be accomplished, including time lines.

**c. Special Populations.** Consistent with the requirements at § 641.525, State Plans must provide information about the relative distribution of those eligible individuals with greatest economic needs, eligible individuals who are minorities, and eligible individuals with the greatest social needs. The State Plan must address how all grantees operating with the State will recruit and serve these populations in PY 2005.

As indicated in item (b) above, the Governor or his/her designee may decide how information on special populations is to be displayed. The following descriptions will be used for submitting this information:

(1) "Greatest economic need" means those persons at or below the poverty level

established by the Department of Health and Human Services and approved by the Office of Management and Budget;

(2) "Minorities" include: American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino American, and Native Hawaiian or Other Pacific Islander;

(3) "Greatest social need" means needs caused by non-economic factors. It includes persons with physical and mental disabilities; language barriers; and cultural, social, or geographic isolation, including isolation brought about by racial or ethnic status.

When preparing to discuss the items mentioned in items (b) and (c) above, it will be necessary to make use of the best available information at the local level.

**d. Type of Skills.** The State Plan must describe the employment situations and the skills available among the eligible population in PY 2005. The source of this information must be identified, as well as progress and results in the collection of data.

The type of skills available among the eligible population has direct implications for host agencies recruited and developed; types of training positions available at the host agencies; skill training offerings located or developed; and training linkages negotiated and established with the One-Stop. The State Plan must discuss how all the grantees in the State will address these issues to ensure that projects are truly providing skill training that meets the needs of both participants and employers.

**e. Community Service Needs.** The State Plan must identify the types of community services that are needed, and the places where these services are most needed. The State Plan should specifically identify the needs and locations of those individuals most in need of community services and the groups working to meet their needs. Once unmet community service needs are identified, it is the responsibility of each grantee operating in the State to work toward meeting those needs through recruitment of appropriate host agencies. The State Plan must discuss the process that will be employed to identify community service needs and the timeline for identifying and recruiting appropriate host agencies to meet those needs.

**f. Coordination with the Workforce Investment Act.** The State Plan must describe actions taken or planned to coordinate activities of SCSEP grantees with the activities being carried out in the State under title I of WIA. The State Plan must describe the steps being taken to ensure that the SCSEP is an active partner in each One-Stop delivery system, and the steps that will be taken to encourage and improve coordination with the One-Stop delivery system. Examples of specific collaborative efforts would be a description of the co-enrollment of SCSEP participants in the One-Stop delivery system and a description of how States will coordinate SCSEP planning activities with planning under WIA Title I for the Strategic Plan, which will commence in PY 2005.

The State Plan must also provide detailed information about the MOU development process. A sample checklist to capture this information is provided in Attachment II.

**g. Avoidance of Disruptions.** The State Plan must describe the steps the Governor, or his/her designee, will take to avoid disruptions. When there are new Census data indicating that there has been a shift in the location of the eligible population or when there is over-enrollment for any other reason, the Department recommends that all grantees gradually shift positions and encourage employment to make positions available for eligible individuals in the areas where has been an increase in the eligible population. (The Department does not define disruptions to mean that participants are entitled to remain in a subsidized community service employment position indefinitely.) The State Plan must describe the procedures the grantees will employ to avoid disruptions in situations where there are population shifts or over-enrollments and the timelines for accomplishing the shifting of positions.

**Section 5. State Plan Recommendations.** The State Plan may include recommendations to the Secretary of Labor on actions to be taken by SCSEP grantees in the State to improve SCSEP services. The recommendations may include such topics as the location of positions, the types of community services, the time required to make changes in the distribution of positions, and the types of participants to be enrolled. If recommendations are provided, they should reflect the items discussed in Section 4, above, State Plan Provisions. They should also be realistic recommendations that the Secretary may consider.

