ATTACHMENT C
PROGRAMMATIC ASSURANCES

The programmatic assurances delineated below reflect standard grant requirements—i.e., those that are required by law or those that are consistent with sound program practices. The applicant certifies by check mark that its agency or organization will conform to the following assurances and will continue to conform to these assurances throughout the period of this grant:

Participant-Related Assurances

Recruitment and Selection of Participants

☐ The agency or organization has developed and implemented methods for recruiting and selecting participants that assure that the maximum number of eligible individuals have an opportunity to participate in the program.

☐ The income definitions and income inclusions and exclusions for determining SCSEP eligibility, as described in TEGL 12-06, are used to determine and document participant eligibility. TEGL 12-06 may be accessed on www.doleta.gov/seniors under Technical Assistance.

☐ The applicant has developed strategies to recruit applicants who have priority for service as defined at Older Americans Act (OAA) Section 518(b)(1)-(2). Priority is to be afforded to individuals who are 65 years of age or older or:

   (a) Have a disability;

   (b) Have limited English proficiency or low literacy skills;

   (c) Reside in a rural area;

   (d) Are veterans or spouses of veterans as defined in 20 CFR 641.520(a)(2);

   (e) Have low employment prospects;

   (f) Have failed to find employment after utilizing services provided through the One-Stop Delivery System; or

   (g) Are homeless or are at risk for homelessness. OAA sec. 518(b)(1)-(2)

Assessment

☐ Assesses participants at least two times per 12 month period.
☐ Uses assessment information to determine the most appropriate community service assignments for participants.

Individual Employment Plan (IEP)

☐ Establishes an initial goal of unsubsidized employment for all participants.
☐ Updates the IEP at least as frequently as the assessments.

Community Service Employment Assignment (CSEA)

☐ Ensures that the initial CSEA is based on the assessment done at the time of enrollment.
☐ Uses the IEP as the basis for determining when, as appropriate, to rotate participants through assignments within a CSEA or to other CSEAs to acquire the skills necessary to obtain unsubsidized employment.
☐ Selects host agencies that are designated 501(c)(3) organizations or public agencies.
☐ Has procedures in place for assuring adequate supervision of participants at the host agencies.
☐ Has procedures in place to ensure safe and healthy working conditions.

Recertification of Participants

☐ Recertifies the income eligibility of each participant at least once every 12 months, or more frequently if circumstances warrant.
☐ Has a written policy setting forth actions to be taken to deal with those found to be ineligible (including notification of their right to appeal the finding).

Physical Examinations

☐ Offers physicals to participants upon program entry and each year thereafter as a benefit.
☐ Obtains a written waiver from each participant who declines to have a physical.

Orientation

☐ Provides orientations for its participants and host agencies which include information on:

<u>Participant Orientation</u>

☐ Project goals and objectives
☐ Community service employment assignments
☐ Training opportunities
☐ Available supportive services
☐ The availability of a free physical examination
☐ Participant rights and responsibilities
☐ Host Agencies

☐ <u>Sub-recipients provide sufficient orientations, that may include the following information</u>:

- Grantee and local project roles, policies and procedures
- SCSEP goals and objectives
- Role of supervisors
- Evaluation of participant progress
- Provision of safe working environment
- Annual monitoring and safety assessment
- Documentation requirements
- Termination policies
- Grievance procedures

<u>Participant Benefits</u>

☐ Provides benefits that are required by State or Federal law (such as workers' compensation or unemployment insurance), and the costs of physical examinations.
☐ Has established written policies relating to compensation for scheduled work hours during which an applicant's or sub-recipient's business is closed for Federal holidays.
☐ Has established written policies relating to necessary sick leave that is not part of an accumulated sick leave program.
☐ Does not use grant funds to pay the cost of pension benefits, annual leave, accumulated sick leave, or bonuses.

<u>Durational Limits</u>

<u>Average Participation of 27 Months</u>

☐ Complies with an average participation cap for eligible individuals (in the aggregate) of 27 months.

<u>Maximum Duration of Program Participation 48 Months</u>

☐ Complies with the requirement that participants may participate in the program no longer than 48 months in the aggregate (whether or not consecutive) unless the participant receives a waiver of this requirement.
☐ Notifies participants of its policy pertaining to the maximum duration requirement at the time of enrollment.
☐ Allows participants a 48-month maximum lifetime participation in SCSEP unless it has applied for a waiver to establish a lesser maximum duration of program participation.

<u>Termination Procedures</u>

☐ Grantees will provide a reason for termination and inform participants of grievance policies. An IEP termination policy must be approved by DOL prior to implementation.

<u>Written termination policies are in effect for</u>:

☐ Provision of false information (immediate)
☐ Incorrect initial eligibility determination (30 days written notice)
☐ Income ineligibility determined at recertification (30 days written notice)
☐ Cause (immediate or corrective action, depending on infraction)
☐ If applicable and there are no extenuating circumstances that would hinder the participant from moving to unsubsidized employment, refusal to accept a reasonable number of job offers or referrals to unsubsidized employment consistent with the IEP

<u>Over-enrollment</u>

☐ Manages over-enrollment to minimize impact on participants and avoid layoffs.

<u>Administrative Systems</u>

☐ Communicates grant policy, data collection, and performance developments and directives to staff and sub-recipients and/or local project operators.
☐ Has developed a written monitoring tool and procedures for its SCSEP grant that lists items to be reviewed during monitoring visits, and provided this tool to sub-recipients and/or local project operators.
☐ Has developed a monitoring schedule, notified sub-grantees and/or local project operators of its monitoring plans, and monitors sub-grantees and/or local project operators on a regular basis.

- ☐ Provides training to increase sub-recipients' and/or local project operators skills, knowledge, and abilities.
- ☐ Prescribes corrective action and follow-up procedures for sub-recipients and/or local project operators to ensure that identified problems have been remedied, when appropriate.
- ☐ Monitors the financial systems and expenditures of sub-recipients and/or local project operators on a regular basis.
- ☐ Ensures that sub-recipients and/or local project operators receive adequate resources to effectively operate local projects.
- ☐ Has trained sub-recipients and/or local project operators on SCSEP financial requirements to help them effectively manage their own expenditures, and provides more general financial training as needed.
- ☐ Ensures that all financial reports are accurate and are submitted in a timely manner.

Sub-recipient Selection (if applicable)

- ☐ In areas where a substantial population of individuals with barriers to employment exists, a national grantee shall, in selecting sub-recipients, give special consideration to organizations (including former recipients of such national grants) with demonstrated expertise in serving individuals with barriers to employment, as defined in the statute.

Complaint Resolution

- ☐ Uses established written grievance procedures for complaint resolution for applicants, employees and participants.
- ☐ Provides applicants, employees and participants with a copy of such procedures.

Maintenance of Effort

- ☐ Does not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals not participating in the program.
- ☐ Does not displace currently employed workers (including partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits).
- ☐ Does not impair existing contracts or result in the substitution of federal funds for other funds in connection with work that would otherwise be performed.

☐ Does not assign or continue to assign any eligible individual to perform the same work or substantially the same work as that performed by any other individual who is on layoff.

<u>Procedures for Payroll and Payment of Workers' Compensation</u>

☐ Makes all required payments for payroll and Workers' Compensation premiums on a timely basis.
☐ Ensures that host agencies do not pay Workers' Compensation costs for participants.

<u>Maintenance of Files and Privacy Information</u>

☐ Maintains participant files for three (3) years after the program year in which all follow-up activity for a participant has been completed.
☐ Participant records are securely stored and access is limited to appropriate staff to safeguard personal identifying information.
☐ Safeguards to preclude tampering with electronic media are established (e.g., Personal Identification Numbers (also known as "PINs")) for recordkeeping.
☐ Complies with, and ensures that authorized users under its grant comply with all SPARQ access and security rules.

<u>Documentation</u>

☐ Maintains documentation of waivers of physical examinations by participants.
☐ Maintains documentation of the provision of complaint procedures to participants.
☐ Maintains documentation of eligibility determinations and re-determinations.
☐ Maintains documentations of terminations and the reasons for such terminations.
☐ Maintains records of grievances and outcomes.

<u>Data Collection and Reporting</u>

☐ Ensures that accurate data are submitted timely for the Quarterly Progress Reports (QPRs) and the final QPR.
☐ Ensures that those capturing and recoding data are familiar with the latest instructions for data collection, including Department administrative issuances, such as Older Worker Bulletins, TEGLs, the Data Collection Handbook and Internet postings.

☐ Legally obligates sub-recipients to turn over complete data files in the specified electronic format, as well as hard copy case files, to the grantee at the time that the sub-recipient ceases to administer SCSEP.

☐ Legally obligates any new sub-recipients to enter complete data related to any participants whom they acquire upon becoming sub-recipients.

☐ Non-Web Data Collection System users ensure that accurate data are uploaded to SPARQ in accordance with Department timelines and administrative guidance.

If the applicant has not checked a specific box(es) herein, information must be provided on a separate attachment indicating what specific steps it will take to conform with this standard grant requirement(s).

Signature of Authorized Representative

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