

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION SCSEP
	CORRESPONDENCE SYMBOL OWI-DAS
	DATE June 1, 2009

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 28-08

TO: ALL SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP) GRANTEES

FROM: DOUGLAS F. SMALL /s/
Deputy Assistant Secretary

SUBJECT: Program Year 2009 Planning Instructions and Allotments for All Senior Community Service Employment Program (SCSEP) Grant Applicants

1. **Purpose.** The purpose of this guidance is to provide all SCSEP grant applicants with application instruction and procedures for Program Year (PY) 2009 funds, with a period of performance beginning July 1, 2009.
2. **References.** The following references may be used for additional information:
 - 2006 Older Americans Act Amendments (OAA), (Pub. L. 109-365; 42 USC 3056 et. seq. 20 CFR part 641);
 - SCSEP Performance Accountability Interim Rule (72 Fed. Reg. 35831; June 29, 2007);
 - "Revised Income Inclusions & Exclusions and Procedures for Determining SCSEP Eligibility," Training and Employment Guidance Letter 12-06;
 - "2009 Federal Poverty Guidelines" Training and Employment Guidance Letter 12-08;
 - Priority of Service for Covered Persons (Final Rule 20 CFR Part 1010, 73 Fed. Reg. 78132; Dec. 19, 2008);
 - SCSEP Performance Data Collection Approval (OMB No. 1205-0040);
 - American Recovery and Reinvestment Act of 2009 (Public Law 111-05);

RESCISSIONS: TEGL 30-07	EXPIRATION DATE: June 30, 2010
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3. **Background.** The 2006 Amendments to the Older Americans Act (OAA) were signed into law on October 17, 2006. A “planning guidance” Training and Employment Guidance Letter (TEGL) is released each year which assists all SCSEP grant applicants in preparing their application for the annual OAA Title V appropriation. Applicants can access Title V of the OAA for a detailed description of the statute (Pub. L. 109-365, 42 USC 3056 et. seq. 20 CFR part 641).

On February 17, 2009, Congress enacted and President Obama signed into law the American Recovery and Reinvestment Act of 2009. It is intended to preserve and create jobs, promote the nation’s economic recovery, and assist those most impacted by the recession. Title VIII of Division A of that Act made available \$120 million to the Department of Labor for use by SCSEP to serve additional unemployed low-income senior citizens. As outlined in TEGL 15-08, the overall intent of Recovery Act funding is to supplement, not supplant, current SCSEP activities.

Thus, states are expected to spend PY 2009 funds concurrently with Recovery Act funding to increase the availability of services quickly and effectively. With this infusion of PY 2009 funding, along with the recent release of Recovery Act funds, states and local areas should consider how their funding decisions and implementation activities can help best achieve the goals of SCSEP.

Additionally, to provide sufficient funds for evaluation, training and assistance and other activities authorized under Section 502(e) for PY 2009, the Department has determined that it must exercise its discretionary authority provided in Section 506(a)(1) of the OAA and reserve a percentage of PY 2009 appropriated SCSEP funds. While the statute provides authority to reserve up to 1.5%, the Department is reserving less than 0.5% to support activities authorized in Section 502(e).

4. **Overall Approach.** For PY 2009, the Department of Labor chose a targeted approach to narrative requirements. It builds on the application and planning documents submitted for Recovery Act funds in accordance with TEGL 15-08. It will require narratives from all applicants only in certain critical subject areas that are universally essential for effective grant operation and that can vary significantly from grantee to grantee (see Attachment B).

The Employment and Training Administration (ETA) has critical policy objectives in some of these areas, and grantees are asked to address these objectives as well. ETA will also require individual narratives from any

applicant that has special requests in one or more of the following areas: 1) a waiver to use up to an additional 10 percent of grant funds for additional training and supportive services; 2) a request for an increase in the amount available for administrative costs from 13.5 to 15 percent; 3) a request to impose a lower durational limit for participants than the statutory 48-month limit; 4) a request to extend the program durational limit from the statutory 27-month limit to 36 months; 5) a request to utilize the on-the-job-experience training option; and 6) any request for cross-state border agreements to permit cross-state border enrollment of eligible participants (see Attachment D).

5. **Grant Application Procedural Requirements.** All SCSEP grant applicants must submit a grant application package in order to receive PY 2009 funding. The Grant Officer will not approve a grant application for funding that fails to provide any of the required information outlined in this guidance. The Department requires the following items in the grant application package:

Program Narrative (Attachment B). A narrative in accordance with the description in Attachment B.

Programmatic Assurances (Attachment C). Grantees must submit signed programmatic assurances that reflect standard grant management requirements.

Optional Special Requests (Attachment D). Additional optional narratives, described in Attachment D, are required from any applicant with special requests in one or more of the following areas:

- Waiver for additional funds for training and supportive services;
- Administration cap limit changes;
- Reduction of Maximum Participant Duration;
- Extension of Maximum Project Duration;
- On-the-job experience (OJE) training option; and/or
- Cross-border agreements.

Budget Forms (Attachment G and Attachment I). A signed SF-424 Form, Application for Federal Assistance and an SF-424A Form with a detailed budget narrative. Instructions for filling out these forms can be found in Attachment F and Attachment H.

Grantees should not include updated manuals and operating procedures in the application submission. SCSEP Federal Project Officers (FPOs) may request these under separate cover. The grant narrative will become the

Scope of Work in the grant agreement; also, the Grant Officer will incorporate the Programmatic Assurances in the grant agreement when the grant is returned to the applicant for signature.

6. **PY 2009 Program Allotments.** See Attachment J for funding levels and authorized positions.
7. **Schedule and Action Requested.** Applicants must comply with the following:
 - Provide the SF-424 and SF-424A Grant Application forms and narrative to the State Office on Aging and the Area Agencies on Aging no later than the date of submission to the Department of Labor/ETA, Division of Adult Services; and
 - Submit the PY 2009 grant application to the United States Department of Labor, Employment and Training Administration, Office of Workforce Investment, Division of Adult Services no later than June 15, 2009. However, applicants are encouraged to submit their applications as soon as possible.
8. **Method of Submission.** Applicants must submit electronic copies of the items listed in Section 5 of this TEG. The materials should be sent via e-mail to: grants.scsep2009@dol.gov and to their FPO (Attachment K). If a grantee is unable to submit electronically, the grantee must submit hard copy applications via overnight delivery or by fax to 202-693-3817. If mailing, application packages must be mailed to:

Ms. Alexandra Kielty
Division of Adult Services
U.S. Department of Labor
200 Constitution Avenue, N.W.
Room S-4209
Washington, D.C. 20210
9. **Grant Application Intergovernmental Review.** In accordance with Section 502(d) of the OAA as amended in 2006, applicants must share applications on an intrastate basis and provide appropriate Area Agencies on Aging (AAAs) with copies of the SF-424, Application for Federal Assistance, including a summary of the project locations and an explanation of the services that the applicant will provide in each state. In addition, state applicants should follow procedures established by Executive Order 12372, which implements the Single Point of Contact (SPOC) system, unless the state SPOC has waived this requirement.

Applicants should include documentation supporting these requirements with the grant application.

10. Eligibility Review/Responsibility Review/Grant Application Review.

The Department will conduct a grant application review as provided at Sec. 514 of the 2006 OAA Amendments and 20 CFR 641.430-440 of the current regulations. The Department will not issue final approval for PY 2009 funding if grantees:

- Fail to meet the eligibility tests of Section 514(c) of the 2006 OAA Amendments and criteria as provided at 20 CFR 641.430 of the current regulations; or
- Fail to meet the responsibility tests of Section 514(d) of the 2006 OAA Amendments and criteria as provided at 20 CFR 641.440 of the current regulations; or
- Fail to submit the materials listed in this TEG.

11. Inquiries. Questions may be directed to the appropriate FPO.

12. Attachments.

- Attachment A: Table of Contents
- Attachment B: Program Narrative Instructions
- Attachment C: Programmatic Assurances
- Attachment D: Optional Special Requests
- Attachment E: SF-424 Instructions
- Attachment F: SF-424
- Attachment G: SF-424A Instructions – Developing a Budget
- Attachment H: SF-424A with Budget Tool
- Attachment I: Funding and Authorized Positions
- Attachment J: Federal Project Officers (FPO) List