F. Senior Community Service Employment Program (SCSEP)

At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

(a) Economic Projections and Impact

States must:

(1)   Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d))(May alternatively be discussed in the economic analysis section of strategic plan.)

The ICOA's long term senior employment strategies focus on the Workforce Development Council's four main industry sectors: Advanced Manufacturing, High Tech, Health Care and Power & Energy. The trends in these sectors show more opportunities in Health Care and Advanced Manufacturing. Below is the number of jobs per targeted industry and the growth over the past seven years.

SCSEP Table 1: Workforce Development Council's Target Industries

WDC Target Industries	2010	2011	2012	2013	2014	2015	2016	Growth
Advanced Manufacturing	53,124	54,501	56,510	59,186	59,823	61,577	63,769	10,645
Aerospace	1,867	1,882	1,900	2,016	1,988	2,170	2,304	437
Food Processing	15,407	15,322	15,620	16,359	16,437	16,809	17,452	2,045
High Tech	49,635	50,230	50,237	49,613	50,456	52,393	52,194	2,559
Health Care	68,989	70,561	71,492	74,538	77,634	80,407	82,822	13,833
Power & Energy	10,617	10,647	10,583	10,496	10,465	10,760	11,153	536

Source: Idaho Department of Labor, Quarterly Census of Employment & Wages 2010- 2016

The occupations identified as high demand provide the data needed for ICOA and Easterseals-Goodwill to develop and recruit specific organizations to consider employing individuals 55+. The Top Ten High-Demand Occupations by annual openings is identified below.

SCSEP Table 2: Top Ten High-Demand Occupations by Annual Openings

Occupation	2014 Employment	2022 Projected Employment	Annual Openings*	Median Hourly Wage
Retail Salespersons	22,349	26,814	1,221	$11.04
Cashiers	15,007	16,825	820	$9.36
Waiter and Waitresses	10,733	13,145	757	$8.90
Customer Service Representatives	16,265	19,646	738	$13.71
Combined Food Preparation and Serving Workers, Including fast Food	11,082	14,538	704	$8.92
Farmers, Ranchers, and Other Agricultural Managers	14,350	17,983	607	$28,72
Office Clerks, General	14,350	17,409	558	$13,70
General and Operations Managers	15,077	14,244	556	$31.53
Registered Nurses	11,629	14,357	524	$29.90
Heavy and Tractor Trailer Truck Drivers	11,933	16,322	507	$18.33

Annual Openings include openings due to growth and replacement needs
SOURCE: 2014-2024 Idaho Department of Labor Occupational and Industry Projections
Communications and Research November 2016

(2) **Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))**

The Idaho SCSEP has 20 active Host Agencies. Each agency serves as a training site to improve occupational skills needed for high demand jobs. The following chart represents the types of Host Agencies and corresponding occupational training.

SCSEP Table 3: High Demand Jobs and Active Training Host Sites

Host Agency Types	Number of Active Sites	High Demand Skill Sets
Social Assistance	11	Customer Service Representatives, Office Clerks, Administrative Assistants
Stores	3	Customer Service Representatives, Office Clerks, Administrative Assistants, Maintenance and Repair Workers
Shelters	1	Customer Service Representatives, Office Clerks, Administrative Assistants
Meal Sites	3	Customer Service Representatives, Office Clerks, Administrative Assistants

Historical Centers	1	Customer Service Representatives, Office Clerks, Administrative Assistants
Health Clinic	1	Personal Care Aides, Nursing Assistance

Source: SPARQs SCSEP Reporting System

In addition, SCSEP participants have access to online training certifications for Customer Service Representative, Essential Entry-Level Workplace and Clerical Skills, Supervisor/Manager, Essential Entry-Level Work Skills, Essential Medical Office Skills, Administrative Assistant, and Sales Representative.

**(3)	Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner- Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))**

In the table below, ICOA utilized the Wagner-Peyser Act statistical information to identify projected senior employment opportunities for the targeted occupation based on senior education level. ICOA's SCSEP contractor provides seniors with training to compete in the marketplace for these occupations.

TABLE 4 Targeted Occupations	2024 Projected Employment	Annual Openings*	Wage	Education	Senior Education 65+
Retail Sales Person	26,814	1,221	$11.04	LHS	29,020
Cashier	16,825	820	$9.36	LHS	29,020
Waiter and Waitress	13,145	757	$8.90	LHS	29,020
Customer Service Representative	19,646	738	$13.71	HDE	71,167
Combined Food Preparation and Serving Workers, Including fast Food	14,538	704	$8.92	LHS	29,020
Farmers, Ranchers, and Other Agricultural Managers	17,983	607	$28.72	HDE	71,167
Office Clerks, General	17,409	558	$13.70	HDE	71,167
General and Operations Manager	14,244	556	$31.53	BD	34,808
Registered Nurses	14,357	524	$29.90	BD	71,167
Heavy and Tractor-Trailer truck Drivers	16,322	508	$18.33	PHDA	71,167

2012-2016 American Community Survey 5-year Estimates - Table B15001. No formal educational credential includes two groups: less then 9th grade and 9th to 12th grade, no diploma. Note: Education level data from Bureau of Labor Statistics. Source: 2014-2024 Occupational & Industry Projections Released November 2016, Idaho Department of Labor, Communications & Research. Source: 2012-2016 American Community Survey 5-year Estimates released December 7, 2017, February 15, 2018.

(b) Service Delivery and Coordination

States must:

(1) Provide a description of actions to coordinate SCSEP with other programs

This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

(A) Actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA one-stop delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))

Strategy: ICOA collaborated with one-stop partners to develop a Memorandum of Understanding outlining roles and responsibilities.

Planned Actions:

o This Memorandum of Understanding includes referral information between SCSEP, the Idaho Department of Labor, the Idaho Division of Vocational Rehabilitation, the Idaho Commission for the Blind and Visually Impaired, the Idaho Division of Career and Technical Education, and the Department of Health and Welfare.
o IDOL will provide Adult and Dislocated Worker Program training to ICOA's SCSEP contractor.
o ICOA will build the agreement roles and responsibilities into statewide contractor reviews.

(B) Actions to coordinate activities of SCSEP grantees with the activities to be carried out in the State under the other titles of the OAA. (20 CFR 641.302(h))

Strategy: ICOA will coordinate employment resource sharing between ICOA's SCSEP contractor and the Area Agencies on Aging's (AAAs).

Planned Actions:.
o SCSEP participants have the opportunity to participate in services available through their local AAA`s such as administrative assistants, food service, health care, housing, recreation and social service agencies. SCSEP employment Training Coordinators will meet with the AAA Directors in each of the six areas.
o ICOA`s SCSEP contractor will provide eligibility training, establish referral protocols with the AAAs and coordinate regional resources and outreach activities.

(C) Actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith- based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))

Strategy (Private Agencies): ICOA will develop a schedule to meet one on one with following WIOA Advisory Groups for resource sharing and outreach:

o Title I - Adult, Dislocated, and Youth Programs
o Title II - Adult Education and Family Literacy Programs
o Title III - Wagner-Peyser/Employment Services
o Title IV-Vocational Rehabilitation

- Vocational Rehabilitation Services in Idaho are provided through two agencies: The Idaho Division of Vocational Rehabilitation and the Idaho Commission for the Blind and Visually Impaired
- Combined Plan Partner - Jobs for Veterans State Grant Program
- Combined Plan Partner - Trade Adjustment Program
- One-Stop Partner - Unemployment Insurance
- One-Stop Partner - Carl D Perkins and Career-Technical Education
- One-Stop Partner - Community Development Block Grant
- One-Stop Partner - TANF & SNAP
- One-Stop Partner - Idaho Commission for the Libraries

Planned Actions:
- ICOA will plan to collaborate with the Idaho Commission for the Libraries to share information about the SCSEP program at the 140 libraries and ICOA connected the Employment Training Coordinators (ETCs) with the six AAA`s to do presentations for their providers including their three Tribes in Idaho. ICOA will connect the ETCs with all contracted 97 meal sites in Idaho. This collaboration has the potential to establish additional host agencies and attract more participants. ICOA`s SCSEP contractor will provide training and establish referral protocols with all WIOA partners and the Centers for Independent Living. This training will focus on referral coordination and meeting participants' supportive service needs, such as, transportation, caregiver support, congregate meals and health promotions.

(D) Actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

Strategy: Through collaboration with the State WIOA Advisory Group (IDOL, Division of Career-Technical Education, Vocational Rehabilitation, Commission for the Blind and Visually Impaired and ICOA), ICOA will promote job training initiatives through ICOA's SCSEP contractor, the Area Agencies on Aging and the Centers for Independent Living.

Planned Actions:
- ICOA participates in the quarterly State WIOA Advisory Group meetings to ensure strategies are being implemented throughout Idaho.
- ICOA will distribute job training initiatives to local ICOA's SCSEP contractor offices, Area Agencies on Aging and Centers for Independent Living to be implemented.

(E) Actions the State will take to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)

Strategy: ICOA worked with the Idaho Department of Labor to develop a standardized Memorandum of Understanding between state organizations and contracted providers.

Planned Actions:
- ICOA works with partners to standardize requirements to be incorporated into regional and local Memorandums of Understanding.

(F) Efforts the State will make to work with local economic development offices in rural locations.

Strategy: ICOA's SCSEP contractor will conduct SCSEP outreach to economic development offices located in rural counties with persistent unemployment.

Planned Actions:

ICOA`s SCSEP contractor will provide SCSEP outreach to local economic development offices in rural counties with persistent unemployment: Benewah, Bonner, Boundary, Butte, Jefferson, Latah, Minidoka, Nez Perce, Oneida, Payette, Shoshone, Valley, Washington.

(2) Describe the long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (Alternately, the State may discuss this in the State strategies section of strategic plan if submitting a Combined Plan.)

Strategy: Out of the four Workforce Development Council targeted industries (Advanced Manufacturing, High Tech, Health Care and Power & Energy), ICOA will focus on increasing the two highest growth sectors - Health Care and Advanced Manufacturing.

Planned Actions:
  o ICOA's SCSEP contractor will recruit nonprofit Health Care and Advanced Manufacturing organizations to participate as Host Agencies and prepare participants to compete for these job positions.

(3) Describe the long-term strategy for serving minorities under SCSEP. (20 CFR 641.302 (c))

Strategy: ICOA evaluates SCSEP labor and management reports and develops strategies to increase minority participation.

Planned Actions:
  o ICOA will work with regional one-stop offices and ICOA's SCSEP contractor to address low minority participation as identified in the SCSEP management and USDOL's SCSEP State minority reports.

(4) List needed community services and the exact places where these services are most needed. Specifically, the plan must address the needs and location(s) of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

Strategy: ICOA will develop strategies connecting individuals who are most in need with community services in the Targeted Industry.

Planned Actions:
  o ICOA's SCSEP contractor will identify non-profit/governmental Host Agencies to provide individuals, who qualified for the SCSEP program, the training needed to compete for jobs in the Workforce Development Council Targeted Industries. The target locations are those counties that are not meeting equitable distribution level as identified in SCSEP Table 8.

SCSEP Table 5: Community Job Service Needs

Non-profit or Governmental Host Agencies that meet community service training needs	Targeted Industries

Warehouses (shipping and receiving), Thrift stores, Correctional Industries, Restore, Habitat for Humanity	Advanced Manufacturing
Technical Businesses, Universities, City, County and State Governments	High Tech
Hospitals, Home Health Companies Doctor Offices, non-profit clinics (i.e. Terry Reilly)	Health Care
Utility Organizations	Power and Energy

(5) Describe the long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))

Strategy: Participate with WIOA partners to align the SCSEP vision and mission with other agencies employment strategies.

Planned Actions:
- o   As part of the WIOA's State Plan Advisory Group, ICOA will coordinate SCSEP efforts with one-stop offices, develop on the job experience policy, coordinate statewide SCSEP resource training, promote job training initiatives, provide outreach to economic development offices, focus skill development on high job growth sectors, increase minority participation, and target service needs.

(6) Describe a strategy for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

Strategy: ICOA works closely with the SCSEP contractor to exceed "enter employment" levels. In program years 2015 and 2016, ICOA achieved the program goal of 72% and 85% for entered employment.

Planned Action:
- •   ICOA monitors the SCSEP contractor quarterly and develops strategies to meet USDOL's annual goals.

SCSEP Table 7: Performance Measure

Program Year	PY 15			PY 16		
Performance Measure	Goal	Performance	Goal %	Goal	Performance	Goal %
Entered Employment	44.70%	32.10%	72%	46.10%	39.10%	85%

Source: SPARQs SCSEP Reporting System

(c) Location and Population Served, including Equitable Distribution

States must:

(1) Describe the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

Strategy: ICOA's SCSEP contractor will meet the Equitable Distribution levels set by USDOL.

Planned Action: ICOA uses the USDOLS`s Equitable Distribution level and determines the underserved areas to be targeted by the SCSEP contractor. Currently there are 14 counties that are underserved and 5 counties that are overserved.

SCSEP Table 8: SCSEP Authorized Positions by County

Urban and Rural Counties	2018 Authorized Positions	2019 Authorized Positions	2019 Current Under Served (1 Quarter)	2019 Current Over Served (1 Quarter)
ADA (U)	3	3	0	2
ADAMS (R)	0	0	0	0
BANNOCK (U)	0	0	0	2
BEAR LAKE (R)	0	0	0	0
BENEWAH (U)	0	0	0	0
BINGHAM (R)	0	0	0	0
BLAINE	0	0	0	0
BOISE (R)	0	0	0	0
BONNER (R)	2	2	-2	0
BONNEVILLE (U)	2	2	-2	0
BOUNDARY (R)	1	1	-1	0
BUTTE (R)	1	1	-1	0
CAMAS (R)	0	0	0	0
CANYON (U)	4	4	0	0
CARIBOU (R)	0	0	0	0
CASSIA (R)	1	1	-1	0
CLARK (R)	0	0	0	0
CLEARWATER (R)	1	1	0	0
CUSTER (R)	0	0	0	0
ELMORE (R)	1	1	-1	0
FRANKLIN (R)	1	1	-1	0
FREMONT (R)	1	1	-1	0
GEM (R)	1	1	0	1
GOODING (R)	1	1	0	0
IDAHO (R)	0	0	0	0
JEFFERSON (R)	1	1	-1	0
JEROME (R)	2	2	0	0
KOOTENAI (U)	1	1	0	0
LATAH (U)	1	1	0	0

LEMHI (R)	1	1	0	0
LEWIS (R)	0	0	0	0
LINCOLN (R)	0	0	0	0
MADISON (U)	0	0	0	0
MINIDOKA (R)	2	2	0	0
NEZ PERCE (U)	1	1	-1	0
ONEIDA (R)	1	1	-1	0
OWYHEE (R)	2	2	-1	0
PAYETTE (R)	5	6	-2	0
POWER (R)	0	0	0	0
SHOSHONE (R)	1	1	-1	0
TETON (R)	0	0	0	0
TWIN FALLS (U)	2	2	0	4
VALLEY (R)	1	1	0	2
WASHINGTON (R)	2	2	0	0

(2) List the cities and counties where the SCSEP project will take place. Include the number of SCSEP authorized positions and indicate if and where the positions changed from the prior year.

Strategy: ICOA implements the SCSEP program in the 27 counties in Idaho to meet the USDOL's required Equitable Distribution levels. The bolded numbers above indicate where the positions changed from their prior year.

Planned Action:
- ICOA uses data from www.scseped.org (shown in SCSEP Table 8) to identify changes in performance and areas that are underserved or have no positions.

(3) Describe any current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

Strategy: ICOA will develop a policy to meet the USDOL's equitable distribution level and focus on increasing enrollment in the underserved areas.

Planned Action:
- Develop a policy that sets maximum participation levels and transition from overenrolled areas to underserved.
- The Policy will be submitted with the PY2018 grant and incorporated into the SCSEP contract.

(4) Explain the State's long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

(A) Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365.

Strategy: ICOA will analyze the state equitable distribution to determine the need to move authorized positions from the state to the federal program or vice versa. Planned Action:

- o For those ICOA areas that are over or underserved, ICOA would work with the federal contractor to determine if a position transfer would allow both programs to meet USDOL's goals.

(B)   Equitably serves both rural and urban areas.

Strategy: ICOA will ensure rural and urban counties are served equitably.

Planned Action:
- o The ICOA will require the SCSEP contractor to follow and meet the equitable distribution formula released by the USDOL.
- o The SCSEP contractor will conduct outreach to eligible host agencies that reside in rural areas to address underserved rural areas.

(C)   serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

Strategy: The ICOA requires the SCSEP contractor to follow the service rule priority.

Planned Action:
- o ICOA will monitor priority of service (65 Years of age or older, Disabled, Limited English proficiency or low literacy skills, Resides in a rural area, Veteran, Low employment prospects, Failed to find employment, Homeless or at risk of homelessness) through quarterly progress reports.

(5)   Provide the ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

The Idaho counties and "Ratio of Eligible Individuals" (55 years old and over and below 125% poverty) are listed in SCSEP Table 9: Relative Distribution of Eligible Individuals.

(6)   Provide the relative distribution of eligible individuals who:

Provide the relative distribution of eligible individuals who:

A. Reside in urban and rural areas within the State

B. Have the greatest economic need

C. Are minorities

D. Are limited English proficient.

E. Have the greatest social need. (20 CFR 641.325(b))

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties	Population 55 & Over	Ratio of Eligible State Population	Greatest Economic Need	Minorities: 65+ & Unemployed	Limited English Proficient	Greatest Social Need
Ada (U)	114,223	24.66%	3,355	166	925	1,668
Adams (R)	1,923	0.42%	39	8	0	48

County	Votes	Pct				
Bannock (U)	21,396	4.62%	325	5	39	547
Bear Lake (R)	2,032	0.44%	49	0	0	37
Benewah (U)	3,576	0.77%	79	6	0	120
Bingham (R)	11,495	2.48%	250	30	161	262
Blaine (R)	7,298	1.58%	170	0	61	50
Boise (R)	3,296	0.71%	121	0	0	101
Bonner (R)	17,554	3.79%	498	1	0	261
Bonneville (U)	25,563	5.73%	326	5	126	498
Boundary (R)	4,348	0.94%	57	0	0	96
Butte (R)	942	0.20%	15	0	0	17
Camas (R)	382	0.08%	4	0	0	10
Canyon (U)	50,266	10.85%	1,493	140	820	1,087
Caribou (R)	2,137	0.46%	30	0	15	54
Cassia (R)	5,947	1.28%	129	12	129	139
Clark (R)	232	0.05%	3	0	17	8
Clearwater (R)	3,670	0.79%	97	0	0	85
Custer (R)	1,897	0.41%	87	0	0	92
Elmore (R)	6,220	1.34%	134	11	144	228
Franklin (R)	3,369	0.73%	82	13	0	20
Fremont (R)	3,877	0.84%	70	0	63	85
Gem (R)	6,316	1.36%	270	12	1	279
Gooding (R)	4,409	0.95%	105	30	129	142
Idaho (R)	7,005	1.51%	172	9	13	267
Jefferson (R)	6,221	1.34%	78	0	18	78
Jerome (R)	5,494	1.19%	111	0	97	198
Kootenai (U)	49,324	10.65%	874	188	19	810
Latah (U)	9,134	1.97%	174	20	7	180
Lemhi (R)	3,625	0.78%	137	11	0	54
Lewis (R)	1,630	0.35%	29	0	2	53
Lincoln (R)	1,309	0.28%	40	0	12	42
Madison (U)	4,901	1.06%	69	0	35	76
Minidoka (R)	5,840	1.26%	147	0	251	184
Nez Perce (U)	13,470	2.91%	289	40	13	276
Oneida (R)	1,464	0.32%	49	0	9	19
Owyhee (R)	3,497	0.75%	156	0	99	123
Payette (R)	6,944	1.50%	219	22	63	226
Power (R)	2,046	0.44%	21	0	3	4
Shoshone (R)	4,964	1.07%	160	5	0	114
Teton (R)	2,370	0.51%	27	0	3	2
Twin Falls (U)	22,222	4.80%	652	17	176	734
Valley (R)	4,453	0.96%	49	0	0	89
Washington (R)	3,958	0.85%	81	2	73	160

County Population: 55 years and older, <u>Greatest Economic Need</u>: 55 years old or over and below 125% of poverty, <u>Ratio of Individuals</u>: those individuals 55 years or older and below 125% of poverty compared to the total population, <u>Minorities</u>: 65 or older who are unemployed, <u>Limited English Proficient</u>: 55 years or older, <u>Greatest Social Need</u>: 65 years or older with a disability and below 125% of poverty.

Source: U.S. Bureau of Census, Annual estimates of the Residential Population by Sex, Age, Race and Hispanic. Origin: July 1, 2016, Released : June 22, 2017

2012-2016 American Community Survey 5-year Estimates Table C1830 -Age by Disability Status by Poverty Status (Income in the 4 past 12-months below poverty with no disability)

2012-2016 American Community Survey 5-year Estimates Tables 23001 & C23002A

2012-2016 American Community Survey 5-year Estimates Table B16004-Speak English "not well" & "not at all".

2012-2016 Amercian Community Survey 5-year Estimates Table C1830-Age by Disability

Status by Poverty Status (Income in the 4 past 12-months below poverty with a

disability)2012-2016 American Community Survey 5-year Estimates released December 7,

2017 Provided by the IDOL & Communications & Research Division February 15, 2018

(7) Describe the steps taken to avoid disruptions to service for participants to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data becomes available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

Strategy: ICOA will collaborate with partners to reduce negative impacts of redistribution, new Census or over-enrollment.

Planned Action:
- o   ICOA will negotiate participant's transfers with national grantee when USDOL's releases the authorized positions, will update target employment areas based on , Census and labor market reports, and reviews quarterly progress reports and works with one-stop partners and SCSEP contractor to address over-enrollment.

(d) SCSEP Operations
(1) *Administrative*: describe the organizational structure of the project and how subprojects will be managed, including:

   (A) identification of the key staff, including the primary responsibilities and the amount of time assigned to the SCSEP grant;

   Easterseals-Goodwill Staff:
   Michelle Belknap (10 years SCSEP experience) – President/CEO
   Shelley Oksness (10 years SCSEP experience) – Senior VP Program Development
   Tina Johnson (8 years SCSEP experience) – AVP Workforce Development
   Cindy Lehmann (8 years SCSEP experience) – SCSEP Program Director
   Mark Sherman (6 years SCSEP experience) – Chief Financial Officer

Karen Service (10 years SCSEP experience) – Grant Analyst
Michelle Miller (new to SCSEP; 18 years Workforce Development experience) – Employment Specialist
Nanette Fisher (new to SCSEP; 3 years Workforce Development experience) – Employment Specialist

ICOA Staff:
Admir Selimovic (new to SCSEP; 3 years nonprofit/Area Agency on Aging experience) – SCSEP Director (ICOA Program Specialist)
Susan Bradley (4 years SCSEP experience) – Data Validation
Katie Bennett (1 year SCSEP experience) – Financial Specialist Senior
Kevin Bittner (10 years SCSEP experience) – Program Manager
Vicki Yanzuk (6 years SCSEP experience) – Grants/Contracts Specialist

(B) Include an organization chart depicting any subgrantees or local affiliates implementing the grant. Include a table with authorized positions for each subgrantee or affiliate, if applicable;

Organization chart for Easterseals-Goodwill attached at bottom of this document (see Appendix A)

Authorized Positions ESGW – Idaho SCSEP

XFIPS	County	State	PY18 State Grantee AP	PY19 State Grantee AP
16001	Ada	ID	3	3
1	A	I	0	0

16003	dams	ID		
16005	Bannock	ID	0	0
16007	BearLake	ID	0	0
16009	Benewah	ID	0	0
16011	Bingham	ID	0	0
16013	Blaine	ID	0	0
16015	Boise	ID	0	0
16017	Bonner	ID	2	2
16	Bo	ID	2	2

019	nneville			
16021	Boundary	ID	1	1
16023	Butte	ID	1	1
16025	Camas	ID	0	0
16027	Canyon	ID	4	4
16029	Caribou	ID	0	0
16031	Cassia	ID	1	1
16033	Clark	ID	0	0
1603	Clearw	ID	1	1

5	ater			
160037	Custer	ID	0	0
160039	Elmore	ID	1	1
160041	Franklin	ID	1	1
160043	Fremont	ID	1	1
160045	Gem	ID	1	1
160047	Gooding	ID	1	1
160049	Idaho	ID	0	0
160051	Jefferson	ID	1	1
160055	Jerome	ID	2	2

3				
16055	Kootenai	ID	1	1
16057	Latah	ID	1	1
16059	Lemhi	ID	1	1
16061	Lewis	ID	0	0
16063	Lincoln	ID	0	0
16065	Madison	ID	0	0
16067	Minidoka	ID	2	2
16069	Nez Perce	ID	1	1
16	On	ID	1	1

071	eida			
16073	Owyhee	ID	2	2
16075	Payette	ID	5	6
16077	Power	ID	0	0
16079	Shoshone	ID	1	1
16081	Teton	ID	0	0
16083	Twin Falls	ID	2	2
16085	Valley	ID	1	1
16087	Washin	ID	2	2

		gt o n			
				4 3	4 4

(C) describe training that will be provided to local staff;

ICOA is working towards providing ESGW staff with training consistent with programmatic assurances. The training will consist of topics related to the federal review corrective action findings: "ICOA also must provide documentation reflecting that their subrecipients are receiving the required case management training to develop effective IEPs that will meet the participants service needs." (Note: ICOA has already provided ESGW with training on models of effective case management, case management activities, content of a comprehensive assessment, and content of an effective IEP.). Future trainings will consist of but are not limited to: writing effective case notes, career coaching for participants, developing effective outreach strategies, and outreach to minority/at-risk populations.

(D) describe how projects will be monitored for program and financial compliance, including audit plans; and
ICOA as the grantee holds monthly or quarterly conference calls. Policies, procedures, and technical assistance are provided on calls and as changes occur. The SCSEP Program Specialist will communicate continually with the ESGW State Director and the ETCs to ensure quality outcomes for older Idahoans. The SCSEP Program Specialist facilitates quarterly if needed monthly meetings with the Financial Specialist Senior to monitor the program's budget and Sub-recipient's financial compliance. The SCSEP Program Specialist will communicate with ESGW staff regularly including the Financial Manager, National Operations Manager and the ESGW State Director. The ICOA Program Specialist conducts the following monitoring and compliance activities:

• SPARQ data quarterly monitoring: There are standardized reports in SPARQ and ICOA runs them to see what areas need to be corrected prior to the 20th after the quarter ends. By the 10th, if Sub-recipients have not started to clear the Rejections, Durational Rejections or Warning 1's, ICOA will follow up with them.

• Follow-up report in SPARQ: This is used to see if each of the Sub-recipient's regions have any follow-up dates that have been missed. It is suggested that Sub-recipients run the report twice a month, so they don't miss any of the follow-ups. ICOA will run this report monthly and will notify the Sub-recipient if any follow-up dates have been missed.

• Durational Limits: Make sure all participants who have reached the 12-month and 6-month time period from the 48-month durational limit have Transition Plans in their Individual Employment Plan (IEP).

• Quarterly performance measure report: The Sub-recipient must submit a quarterly performance report on the seven SCSEP performance measures. Performance report needs to be submitted to ICOA by the 20th of the month after the quarter ends: October 20th, January 20th, April 20th and

July 20th. The performance measures have been set by DOL and the contractor must be able to meet or exceed the measures annually with a quarterly progress report submitted to ICOA outlining the status of each of the measures and if the measure appears not to be met at the end of the program year to provide and implement a corrective action strategy. The narrative report format is given by USDOL and needs to be followed.

• Annual monitoring and data validation: ICOA will schedule at least one on-site review of host agencies and participants in each of the areas per Sub-recipient annually. These reviews will be up to ICOAs schedule. The review will consist of the following:
Programmatic Review: ICOA will review a sampling of the Sub-recipients Participant Files, Host Agency Files,

o   Participant Interview: The Sub-recipient will schedule time for ICOA to meet with the random selected participants.

o   Host Agency Interview: The Sub-recipient will schedule time for ICOA to meet with the random selected Host Agencies.

o   ICOA will meet with ETC`s and might talk to participant assistants as well

• DOL annual quality assurance surveys report:

The ICOA will provide the Sub-recipient with DOL's analysis of the annual quality assurance surveys report. The analysis will include areas to improve as recommended by DOL. The goal of the Idaho SCSEP is to meet at minimum the average Quality Assurance level nationwide with 85.8%.

• Participant file maintenance: All information regarding the individual and their families obtained through program forms, interviews, assessments, evaluations, and other related activities are required to be maintained in the participants' case file as well as case notes, including programmatic documentation and forms.

• Host agency file maintenance: All information regarding the host agency and the participant's supervisor obtained through program forms, interviews, assessments, evaluations, and other related activities, is confidential. Certain documents and forms with signatures are required to be maintained in the host agency's case file.

• After monitoring: ICOA will prepare a report identifying program compliance and noncompliance areas and will send it along with a date driven action plan to the Sub-recipient.

• Sub-recipient monitoring report review: The Sub-recipient will have twenty (20) days to accept or request changes to the corrective actions or the corrective action dates.

• ICOA final determination: It is up to ICOA to determine if corrective action/dates need to be changed or not and will notify the Sub-recipient of the final decision.

The ICOA conduct reviews in all three areas within the entire State of Idaho and has monthly meetings with ICOA financial staff and the sub-recipient to ensure compliance. If there are any discrepancies, ICOA will develop a corrective action plan.

Program oversight: ICOA's Program Manager reviews SCSEP semi-annual financial and operational reports and works with the SCSEP Director to help plan actions to meet goals. Program Improvement Plans have been developed to address gaps, needs and issues in the service delivery as well as to identify opportunities for coordination and collaboration. Annually, a performance report is presented to ICOA's Commissioners identifying areas that were met or not met during the program year.

(E) describe how the State will manage its providers and how it will transfer participants if new providers are selected to serve in the State.

(2) *Recruitment*: describe how grantee will recruit and select of participants will be achieved. The eligibility of participants is described under 20 CFR 641.500 and 641.525.

Participant recruitment efforts and strategies will adhere to Idaho SCSEP Operations Manual Section 6.2 ("Participant Outreach and Recruitment"):

The purpose of participant outreach and recruitment is to ensure the maximum number of eligible individuals have an opportunity to participate in SCSEP.

   a. **Outreach and Recruitment:** *Use the following efforts to provide equitable services among the population segments eligible to participant in SCSEP:*
      1. Targeted Demographics: *Provide outreach to broaden the composition of the pool of applicants to include members of both sexes, various race/ethnic groups, veterans, individuals with disabilities, limited English speakers, American Indian, and those who have the greatest economic need in proportion to their numbers in the service area.*
      2. Collaborative Relationships: *Establish collaborative relationships with agencies providing services to older persons, to persons with low incomes, and to persons of various race/ethnic backgrounds:*
      3. Outreach Type: *Use the following communications methods to provide outreach to the population segments eligible to participant in SCSEP:*
         • Technology based Communication: *Websites, Facebook, Twitter, blogs, alerts.*
         • Traditional Media Types: *Place flyers, brochures, posters and other advertisements in public places where older individuals tend to congregate.*
         • Use Low or No Cost Advertising: *Develop community and public service radio, TV announcements, human interest articles in local newspapers and newsletters.*
         • Presentations: *Make presentations to senior groups or the general public to spread the word about opportunities available through the program.*

(3) Income Eligibility: describe how participant income will be recertified each year, including where eligibility records will be maintained.

Income eligibility guidelines, including participant income recertification and maintenance of eligibility records, will adhere to Idaho SCSEP Operations Manual Sections 6.15 and 4.7, respectively ("Recertification of Participant" and "Participant File Maintenance"):

6.15 RECERTIFICATION OF PARTICIPANT:
Verification of continued income eligibility must be conducted annually of each program year for all active participants.

 a. Recertification Notification: *Participants shall be provided with written notification at least*
  30 days prior to the date the re-certification is scheduled to occur. The notification shall include the Participant Income Statement and the same supporting income and household documentation in Section 6.4.b.2 and 3.

 b. Recertification Meeting: *Re-certification shall be conducted in-person with the participant.*
  Participant recertification is a good time to do assessment and IEP updates.
  1. *The Participant Form section "Recertification" is to be completed in its entirety and the data elements entered into SPARQ in accordance with the SCSEP Data Collection Handbook*

 c. Ineligibility Based on Re-certification: *Participants who are determined during re- certification to be ineligible for continued enrollment shall be given immediate written notice that enrollment will be terminated **30 days after date of notice** as described in the Termination Policy. When feasible, the participant should be referred to other potential sources of assistance.*

4.7 PARTICIPANT FILE MAINTENANCE:
All information regarding the individual and their families obtained through program forms, interviews, assessments, evaluations, and other related activities, is confidential.
 a. Release of Information: *Information should only be divulged as necessary for purposes related to the performance or evaluation of the project and only to persons having official responsibilities to the extent necessary for proper administration of the program. Releasing information to others is prohibited without the permission of the program participant.*

 b. Monitoring Participant's Case Notes: *Case notes are required to be maintained in the participant's case file and the following will be reviewed:*
  • *The date of entry of the case note*
  • *The name or initials of the staff person making the case note entry*
  • *Reference to corresponding/supporting documentation that may be found elsewhere*
  • *Most in need factors*
  • *The date of entry of the case note*
  • *The name or initials of the staff person making the case note entry*
  • *Reference to corresponding/supporting documentation that may be found elsewhere*
  • *Most in need factors*

c. Monitoring Participant's Programmatic Documentation and Forms:
The following documents and forms with signatures are required to be maintained in the participant's case file and will be reviewed:
- Participant Application
- Participant Income Statement
- Participant Self Assessment
- Staff Assessment of Participant
- Participant Individual Employment Plan (IEP)
- Participant Form (SPARQ)
- Enrollee Commitment Certification
- Participant Orientation Checklist
- Participant Physical Exam Offer
- Participant Timesheet
- Host Agency Evaluation of Participant
- Participant Durational Limit Waiver
- Participant Unsubsidized Employment (SPARQ)
- Participant Exit (SPARQ)

(4) *Orientation*: describe the orientation procedures for:
    (A) Participants

Participant orientation procedures will adhere to Idaho SCSEP Operations Manual Section 6.9 ("Orientation"):

The purpose of orientation is to provide essential information which participants need to be successful with their enrollment and participation in SCSEP.

a. Requirement: An orientation will be given to all new participants **before** they begin their Community Service Training Assignments. Because orientation is mandatory, participants **must** be compensated for their attendance. Following are the items that need to be reviewed with the participant and are included in the Orientation Checklist:
- Participant Handbook
- Commitment Certification
- Duration Limit Policy
- Grievance Policy
- Termination Policy
- Prohibit Political Activities
- Drug-free work place
- Wage & Benefits
- Workers Compensation
- Physical Exam/Physical Exam Waiver
- IEP and updates
- Training Prior to starting at Host Agency
- Supportive Services
- IEP Assessment
- Obligation to seek unsubsidized employment
- Obligations to report income changes
- Opportunity to Rotate Community Service Assignment
- Community Service Assignment

(B) Host Agencies

Host agency orientation will adhere to Idaho SCSEP Operations Manual Section 5.0 ("Host Agency") (**Note: all of the policies and procedures in Section 5.0 will be discussed with host agency supervisors by the subrecipient):

The objective of this section is to setup and define the role of a Host Agency and provide the resources needed to implement the program.

Following is the web-link needed to access the resources indentified in this section:

a.   ICOA:

https://aging.idaho.gov/worker/index.html b. Host Agency Handbook and Questionnaire

c.   Host Agency Participant Evaluation

Form d.   Host Agency Participant

Orientation

e.   Host Agency Review and Recertification

f. Host Agency Safety Monitoring Checklist

g.   Host Agency Agreement Addendum with Sub-grantee

h.   Host Agency Employment Agreement with Sub-

grantee i.   Host Agency Supervision Report Form

5.1 QUALIFICATIONS OF A HOST AGENCY:

a.   Agency/Organization Type: Must be a public (government) agency or a private non-profit organization:

1.   A non-profit must be recognized by the Internal Revenue Service (IRS) as meeting the requirements of Section 501(c)(3) of the Internal Revenue Code.

2.   Sub-grantee must obtain a copy of the IRS 501(c)(3) non-profit status from the Host

Agency and keep it in the Host Agency's

file.

b.   Comply with Maintenance of Effort: Must be able to ensure the following Maintenance of

Effort requirements:

1.   Does not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals who are not SCSEP participants.

2.   Does not displace currently employed workers (including partial displacement, such as a reduction in non-overtime work, wages, or employment benefits).

3.   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.

4.   Does not 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.

c. Provide Work-based Skill Training: *Is able to provide Work-based Skill training being sought by the participant, as specified in a participant's Individual Employment Plan (IEP).*

d. Provide Safe Work Environment: *Needs to provide a safe and hazard-free work-based training environment. Participants shall not be permitted to work in buildings, or surroundings, or under conditions that are unsanitary, hazardous, or dangerous to the enrollee's health or safety*

e. Provide Supervision: *Needs to be able to provide supervision to the SCSEP participant.*

f. Must NOT be a place used for Sectarian Religion: *A Host Agency can be a religious organization as long as the assignments in which participant is being trained does **not** involve the construction, operation, or maintenance of any facility used or to be used as a place for sectarian religious instruction or worship.*

g. Must NOT be a political party

h. Submit Application: *Must submit an Application and be approved as a Host Agency.*

5.2 RESPONSIBILITIES OF A HOST AGENCY:

a. Review Enrollee's Individual Employment Plan (IEP): *If sub-grantee finds a match for the Host Agency, the sub-grantee will send the enrollee's IEP to the Host Agency for review. After reviewing the IEP the Host Agency notifies the sub-grantee if it wants to proceed with an interview.*

b. Interview Enrollee: *The sub-grantee notifies the enrollee of the potential work-based training site and provides the contact information to the enrollee who contacts the Host Agency to set up the interview.*

c. Notify the Sub-grantee after Interview: *After the interview the Host Agency notifies the sub-grantee if it wants to proceed with community service assignment or not.*

d. Develop Work-based Training Job Description: *The sub-grantee will provide work-based training job description **form** for the Host Agency. The Host Agency completes the form based on its needs and the needs identified in the enrollee's IEP.*

e. Sign Work-based Site Agreement: *Before the participant begins training at the Host Agency, the sub-grantee meets with the Host Agency for orientation and development of the Work-based Site Agreement.*

f. **_Provide Site Orientation to Participant:_** *Host Agency will use the SCSEP Orientation form and go over it with the participant.*

g. **_Track Participant Hours on Timesheet:_** *Host Agency will use the SCSEP Timesheet and submit a signed copy weekly.*

h. **_Track Host Agency In-kind Match:_** *The Host Agency will use the participant's timesheet to record allowable, non-federal in-kind match through supervisor's hours, materials and space that the SCSEP participant is directly using.*

i. **_Evaluate the Participant:_** *At least once per year the Host Agency will use the SCSEP Participant evaluation form and submit it to the sub-grantee.*

j. **_Address On-site Injury:_** *In the event a SCSEP participant suffers an on-the-job accident, the Host Agency must seek first-aid for all injuries (however minor they may seem), then contact the sub-grantee.*

k. **_Address Disciplinary Problems:_** *If a disciplinary problem with an SCSEP participant occurs at the Host Agency, contact the sub-grantee as soon as possible. The sub-grantee will work with the Host Agency and the participant to resolve the problem. If the problem cannot be resolved, the sub-grantee may consider transferring the participant.*

l. **_Address Participant Termination:_** *The sub-grantee's case manager is the only person authorized to terminate a participant.*

m. **_Address Community Service Assignment Termination:_** *Either party, the sub-grantee or the Host Agency may terminate the Community Service Assignment from date of notification.*

n. **_Complete National Host Agency Survey:_** *Will need to complete a National Host Agency survey once a year that is sent out between August and September.*

5.3 _RESPONSIBILITIES OF THE SUB-GRANTEE:_
   a. **_Recruit Host Agencies_**
      1. **_Direct Recruitment:_** *Actively contact public and non-profit agencies to educate them about the opportunities of becoming a SCSEP Host Agency.*
      2. **_Indirect Recruitment:_** *Use newspapers, radio, TV, posters, word-of-mouth, agency referrals.*
      3. **_Examples of Host Agency focus areas:_**

- *Social, health, welfare, and educational services (particularly literacy tutoring); legal assistance, and other counseling services, including tax counseling and assistance and financial counseling; library, recreational, day care and other similar services; conservation, maintenance, or restoration of natural resources; community betterment or beautification; pollution control and environmental quality efforts; weatherization activities; and intergenerational projects, etc.*
    4. ***Examples of Host Agency exclusions:***
        - *Building and highway construction (except that which normally is performed by the project sponsor) and*
        - *Work that primarily benefits private, for-profit organizations.*

b. Approve Host Agency:
   1. *After reviewing the Host Agency Application, notify the applicant if it is accepted or not. If not, let the applicant know why and what needs to be done to qualify.*

c. Follow Priority Assignment of a Host Agency:
   1. *Priority will be given to agencies serving low-income and elderly, agencies that provide meaningful employment opportunities, and agencies that have demonstrated a potential for transitioning enrollees into unsubsidized employment.*

d. Notify Enrollee of Potential Assignment:
   1. *Before sub-grantee notifies the Host Agency, the sub-grantee notifies the enrollee to see if he/she is interested in the Community Service Assignment.*

e. Notify Host Agency of a Potential Participant:
   1. *If Enrollee is interested in assignment, the sub-grantee notifies the Host Agency and sends over the enrollee's Individual Employment Plan (IEP) to see if the Host Agency wants to interview the enrollee.*

f. Refer Participant to Host Agency:
   1. *If Host Agency is interested after review of enrollee's IEP, the sub-grantee notifies the*
   Enrollee who then needs to contact the Host Agency for interview.

g. Develop Site Agreement with Host Agency:
   1. *If Host Agency and participant want to proceed with Community Service Assignment, the sub-grantee develops a Work-based Training Site Agreement and contacts the Host Agency for an orientation which includes the following:*
      o *Site agreement and work-based training job description (to be filled out by Host)*
      o *Participant Orientation Checklist*
      o *Participant and Supervisor Timesheet*
      o *Host Evaluation of Participant form*

- *Reiterate there is a National survey sent out once a year during August and September that Host Agency will need to complete and mail back.*

h. *Monitor Host Agency:*
  1. *Weekly monitoring:*
     - *Thorough review of timesheet. Make sure Host Agency is recording allowable in- kind match along with proper documentation of participant's hours on the timesheet*
  2. *Annual Monitor:*
     - *Ensure that adequate supervision is provided by host agencies regarding Participant's Individual Employment Plan (IEP), job responsibilities and safety.*
     - *Conduct periodic on-site monitoring/evaluation visits to ensure that enrollees receive adequate supervision and training.*

(5) Duration Limits: describe any policy for maximum duration of enrollment or maximum time in community service and provide a copy of the current Duration Limit policy.

Copy of Durational Limit policy attached at bottom of the document (see Appendix B)

Durational limit policies will adhere to Idaho SCSEP Operations Manual Section 6.16 ("Durational Limits"):
Although, USDOL has set duration limits with an option for one (1) year extension for each year a person qualifies, the intent of SCSEP is to move eligible participants into unsubsidized employment as quickly as possible. The following has been developed to notify participants of the program duration as well as to provide further assistance to those who need more training to gain unsubsidized employment:

a. Notifying Participants of Duration Limits: All SCSEP participants will be notified of the durational limits during initial enrollment and during every assessment afterwards.

b. SCSEP Duration: Eligible individuals may participate in SCSEP for a period not to exceed 48 months from date of enrollment.

c. Durational Limit Goal: The grantee is required to manage projects to maintain an average project duration of 27 months or fewer. This is the average length of participation for all participants a grantee serves, not a limit for individuals.

d. Tracking Durational Time in SCSEP:
  1. Time includes any and all enrollments a participant may have had with one or more grantees from first day of original enrollment.
  2. Tracking does not include the time a participant was on an approved break documented in SPARQ.

e. <u>Updating Waiver Factors:</u> On an annual basis, the sub-grantee must update the following waiver factors in SPARQ:
1. Severe disability
2. Frail
3. 75 years of age or older
4. Low literacy skills
5. Old enough for, but not receiving, Social Security Title ll
6. Severely limited employment prospects in areas of persistent unemployment
7. Limited English proficiency

f. <u>Waiver Criteria:</u> Participants may be eligible for a 12-month waiver of the 48 month durational limit if there is documentation that meets the following factors:
1. Have a severe disability
2. Are frail or age 75 or older
3. Meet the eligibility requirements related to age, but do not receive benefits under Title II of the Social Security Act
4. Live in an area with persistent unemployment and are individuals with severely limited employment prospects
5. Have limited English proficiency or low literary skills.

g. <u>Transition Plan:</u> The sub-grantee must create a transition plan in each of the participant's
Individual Employment Plans (IEP) and update it during the following times:
1. At 1-year before reaching the 48 month duration limit, the sub-grantee will meet with all participants and develop a transition plan out of SCSEP.
2. At 6-months before reaching the 48 month duration limit, the sub-grantee will meet with the participant to update the transition plan.

h. <u>Participant Notification of Durational Limit Exit and Termination:</u>
Written notification that a participant will be exited from SCSEP must go out for all of those participants who reach their 48 month Duration limit on June 30, 2011.
1. Every month, the sub-grantee must send out letters to participants that will meet the
48 month duration limit within thirty (30) days. This follows the termination policy.

i. <u>Waiver Request</u>: The sub-grantee must submit a Durational Limit Waiver request with supporting documentation to ICOA sixty (60) days prior to the participant reaching the 48 month duration limit.
1. The waiver request must be submitted on the authorized form and contain the
following supporting documentation:

• **Severe Disability** is likely to continue indefinitely and results in substantial functional limitation. All confidential information must be submitted securely:

- Medical records
- Certification from a medical professional
- Physician's statement
- Psychologist's diagnosis
- Rehabilitation evaluation
- Disability records
- Veteran's medical records
- Vocational rehabilitation letter
- Worker's Compensation record

- **Is Frail or age 75 or older**: Sub-grantee must provide case notes and age verification.

- **Not receiving benefits under Title II of Social Security Act**: Must provide verification.
  Lives in an area with persistent unemployment: Sub-grantee must provide the latest employment demographic documentation that shows the annual average unemployment rate for a county or city is more than 20 percent higher than the national average for two out of the last three years.

- **Severely limited employment prospects**: Sub-grantee must provide documentation showing two or more significant barriers to employment that make it highly unlikely that the participant will find employment without the assistance of SCSEP or another workforce development program.

- **Has limited English proficiency or low literary skills**: Provide case note as supporting documentation and testing scores.

j. **Entering Documentation:** ICOA will confirm all waiver request information and enter the request into the SPARQ utility to determine if a waiver factor has been updated in the appropriate time period.
  1. The request will then be submitted to the U.S. Department of Labor for final approval.
     If approved, SPARQ will indicate a 12-month extension of the durational limit.

(6) Assessments: describe the procedures for assessing job aptitudes, job readiness, and job preferences of participants and their potential to transition into unsubsidized employment. Also describe how the assessment will be used to develop the participant's Individual Employment Plan (IEP).

Procedures for assessing participants' job aptitudes, job readiness, job preferences, potential to transition into unsubsidized employment, and how this assessment will be used to develop the IEP will adhere to Idaho SCSEP Operations Manual Section 6.5 ("Assessment"):

The purpose of the assessment is to identify appropriate employment, training, or service activities for each participant and record them in the Enrollee's IEP.

a. **_Assessment Interview:_** The assessment shall be in consultation with the Enrollee and must consider the following:
1. The Enrollee's work history.
2. The Enrollee's preference for work interests and goals.
3. Skills, skill gaps, knowledge, abilities, talents, aptitudes and physical capabilities.
4. Barriers to employment and required training needed to overcome barriers.
5. Enrollee's support system.
6. Potential for performing community service training assignment duties.
7. Potential for transitioning to unsubsidized employment.

b. **_Enrollee's Self Assessment:_** This covers the Enrollee's employment goal, availability and preferences for work, educational background and aptitudes, and employment history.
1. It must be signed and dated by the participant and the interviewer.
2. Analysis of this information is the first step in evaluating the applicant's work history, potential need for supportive services and indication of existence most-in-need factors.

c. **_Staff's Assessment of the Enrollee:_** This creates a record of the interviewer's perceptions of a participant's job readiness. It allows the interviewer to evaluate a participant's marketable skills, applicable work experience, job seeking skills, motivation for finding a job, communication skills, access to transportation, etc. The form also provides space for narrative descriptions of any additional factors or observations the interviewer made during the assessment.
1. If testing is used, attach the test results and other assessment findings to the
   assessment. Acceptable testing tools to be used include, but not limited to the following resources:
   • Career OneStop   http://www.careeronestop.org/
   • Onet http://online.onetcenter.org/
   • AARP Foundation WorkSearch (
   http://aarpworksearch.org/pages/default.aspx)

d. **_Most-in-need:_** This measures the average number of barriers to participant. There are two categories: one that can't be updated after the other that can be updated:
1. _First most-in-need category:_

- *Has a disability*
- *Has limited English proficiency*
- *Has low literacy skills*
- *Resides in a rural area*
- *Has low employment prospects*
- *Has failed to find employment after utilizing services provided under Title I of the Workforce Innovations and Opportunity Act*
- *Is homeless or at risk of becoming homeless*

2. ***Second most-in-need category*** *is comprised of the following barriers to employment that are part of the waiver factors for the durational limit.* ***They may be entered into SPARQ whenever they are identified:***
   - *Severe disability*
   - *Frail*
   - *Old enough for SS retirement but not eligible to receive it*
   - *Severely limited employment prospects in an area of persistent unemployment*
   - *Age 75 and over*

e. ***Assessment and Reassessment Frequency:*** *An assessment is essential for monitoring the progress of the participant and should trigger updating of the participant's training assignment and IEP.*
   1. *Initial assessment should be completed within 30-days of enrollment.*
   2. *Subsequent assessments must be completed once every six-months in addition to the following:*
      - *Participants who are within one-year of the 48-month duration limit, must have an assessment and transition plan completed.*
      - *Participants within 6 months of the 48 month duration limit, needs to have an additional assessment done and transition updated.*
      - *Additional assessments should be done as warranted by changes in the participant's abilities or situation.*

(7) *Community Service Assignments*: describe how the participant will be assigned to community service including:

(A) the types of community service activity that will be emphasized and how they were chosen; methods used to match participants with community service training;

As outlined in the Idaho SCSEP PY 2019 Programmatic Assurances, assessment information obtained from the participant during the initial assessment will be used to determine the most appropriate community service assignment (CSA). (*Note: when appropriate and as indicated by a participant's IEP, ICOA and ESGW will work on emphasizing and placing participants in CSAs deemed as "high-demand occupations" by the Workforce Development Council)

(B) the extent to which participants will be placed in the administration of the project itself;

As outlined in the Idaho SCSEP Operations Manual Sections 6.10a, 6.10b, and 6.10c ("Job Description," "Work-based Training Site Agreement," and "Site Orientation to Participant," respectively):

a. **_Job Description:_** *The sub-grantee will provide work-based training job description* **form** *to*
   the Host Agency. The Host Agency completes the form based on its needs and the needs identified in the enrollee's IEP.

b. **_Work-based Training Site Agreement:_** *Before the participant begins training at the Host Agency, the sub-grantee meets with the Host Agency for orientation and development of the Work-based Site Agreement.*

c. **_Site Orientation to Participant:_** *Host Agency will use the SCSEP Orientation form and go over it with the participant.*

(C) the types of host agencies used and the procedures and criteria for selecting the assignments;

The types of host agencies and the qualifications to be a host agency are outlined in Idaho SCSEP Operations Manual Sections 5.1 ("Qualifications of a Host Agency"):

a. **_Agency/Organization Type_**: *Must be a public (government) agency or a private non-profit organization:*
   1. *A non-profit must be recognized by the Internal Revenue Service (IRS) as meeting the requirements of Section 501(c)(3) of the Internal Revenue Code.*
   2. *Sub-grantee must obtain a copy of the IRS 501(c)(3) non-profit status from the Host Agency and keep it in the Host Agency's file.*

b. **_Comply with Maintenance of Effort:_** *Must be able to ensure the following Maintenance of Effort requirements:*
   1. *Does not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals who are not SCSEP participants.*
   2. *Does not displace currently employed workers (including partial displacement, such as a reduction in non-overtime work, wages, or employment benefits).*
   3. *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.*
   4. *Does not 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.*

c. **_Provide Work-based Skill Training:_** *Is able to provide Work-based Skill training being sought by the participant, as specified in a participant's Individual Employment Plan (IEP).*

d. _Provide Safe Work Environment:_ *Needs to provide a safe and hazard-free work-based training environment. Participants shall not be permitted to work in buildings, or surroundings, or under conditions that are unsanitary, hazardous, or dangerous to the enrollee's health or safety.*

e. _Provide Supervision:_ *Needs to be able to provide supervision to the SCSEP participant.*

f. _Must NOT be a place used for Sectarian Religion:_ *A Host Agency can be a religious organization as long as the assignments in which participant is being trained does **not** involve the construction, operation, or maintenance of any facility used or to be used as a place for sectarian religious instruction or worship.*

g. _Must NOT be a political party_

h. _Submit Application:_ *Must submit an Application and be approved as a Host Agency.*

The criteria for selecting the assignment will adhere to the policies outlined in (7)(B) of this document (i.e., the subrecipient works with the host agency on developing a site agreement based on the participants' IEP and needs of the host agency. Once established, the host agency will use the SCSEP Orientation form and go over this with the participants.)

(D) the average number of hours in a participant's training week;

The average number of hours in a participant's training week will be determined based off Idaho SCSEP Operations Manual Section 6.12 ("Work-Based Training Hours"):

In general, SCSEP Enrollees must not exceed part time hours set at 20 hours per week. However, to give the sub-grantee flexibility to meet an enrollee's needs identified in the IEP, a maximum part time hour is set at 25 hours per week. If a situation arises where more than 25 hours is needed, the sub-grantee must obtain written approval from ICOA.

a. _Exceptions:_ *The only exception to the part time hours is for those Enrollees who participate in the "On-the-Job Experience" where the OJE requirements must be followed.*

b. _Managing Hours:_ *The sub-grantee must manage their enrollees' hours and budgets in order to meet or exceed the participant slots and participants served goals for their areas.*

(E) the fringe benefits offered (if any); and

Fringe benefits offered to participants are outlined in Idaho SCSEP Operations Manual Section 6.13 ("Wage and Fringe Benefits"):

Upon enrollment a participant shall receive a training wage rate of $7.25 per hour, excluding fringe benefits for all part time hours including paid hours for orientation, training, sick leave and holiday leave and issues participant payroll.

a. **_Social Security and Workers Compensation:_** *Sub-grantee provides each participant with social security and workers compensation coverage.*

b. **_Timesheet:_** *All participants must complete, sign, and submit timesheets and leave requests to the host agency supervisor for signature. Timesheets must include the following elements:*
- *Name and signature of the participant*
- *SPARQ-generated participant identification number (PID)*
- *Name of the host agency*
- *Timeframe of pay period*
- *Daily Scheduled Hours*
- *Daily hours in community service assignment (Hours do not include time taken for lunch)*
- *Daily hours in other SCSEP approved/funded training (Hours do not include time taken for lunch)*
- *Approved leave requests*
- *Community service assignment supervisor signature. (An authorized signature of the host agency staff may substitute in the absence of the community service assignment supervisor. All host agency authorized signatures must match those on the Host Agency Agreement.)*
- *Authorized signature of the sub-grantee indicating acceptance of the timesheet*
- *Supervisor must account for hours, materials or space used for SCSEP as in-kind match.*

(F) procedures for ensuring adequate supervision.

Based on provisions agreed upon by ESGW and the host agency as identified in the Idaho SCSEP Operations Manual 5.1e, host agencies need to be able to provide supervision to the SCSEP participant. Additionally, as outlined in the Idaho SCSEP Operations Manual Section 5.3h ("Monitor Host Agency"), ESGW will conduct the following to ensure that host agencies are providing adequate participant supervision:

1. *Weekly monitoring:*
   o *Thorough review of timesheet. Make sure Host Agency is recording allowable in- kind match along with proper documentation of participant's hours on the timesheet*
2. *Annual Monitor:*
   o *Ensure that adequate supervision is provided by host agencies regarding Participant's Individual Employment Plan (IEP), job responsibilities and safety.*
   o *Conduct periodic on-site monitoring/evaluation visits to ensure that enrollees receive adequate supervision and training.*

(8) Training: describe the training that will be provided during community service assignments and any other types of training provided, including linkages with local one- stop centers, and Registered Apprenticeship.

All training that is provided during community service assignments, including other types of training opportunities, are identified in the Idaho SCSEP Operations Manual and are as follows:

Section 5.1c: Host agency needs to be able to provide Work-Based Skill Training being sought by the participant, as specified in a participant's Individual Employment Plan (IEP)

Section 6.7 ("Pre-Placement Training"): Training may be arranged for participants to prepare them for their community service assignments. However, a <u>participant must first be assigned to the community service assignment</u> prior to undertaking the training.

a. <u>**Must be Identified in IEP:**</u> The need for any pre-placement training is to be consistent with
and documented in the participants IEP and in case notes with appropriate supporting documentation including the justification, cost and source of the service and the length of time the service for which the service is authorized.

b. <u>**Cost Threshold:**</u> Any pre-placement training cost exceeding $500 must be approved by ICOA before cost is incurred. The requested must be in writing by the sub-grantee and a copy maintained in the participant's program file.

c. <u>**Goals for Pre-Assignment Training:**</u> The goal is to include activities that teach skills beyond those related to a specific work task.
   1. Some Focus Areas:
      - Understand the complexities of interpersonal, group, and community relationships;
      - Learn what behaviors are appropriate in the workplace;
      - Develop the personal and social skills needed for successful job performance;
      - Accept and use feedback from supervisors to improve job performance;
      - Learn communication skills to promote healthy relationships with coworkers; and
      - Develop a sense of personal and occupational identity which will help them define realistic job goals.

d. <u>**Finding Pre-Assignment Training Opportunities:**</u> It is strongly encouraged to find training for participants at reduced or no cost to SCSEP through local community programs. Training sites/host agencies can be important sources of no-cost, pre-placement training for participants, and should be contacted. Training may be provided through the following:
   1. Lectures,
   2. Seminars,
   3. Classroom instruction

4. *Individual instruction*
5. *Employment and training programs*
6. *Adult and vocational education*

   e.   Allowable Training Costs:
   1. *Reasonable costs of instructors*
   2. *Classroom rental*
   3. *Training supplies*
   4. *Materials*
   5. *Equipment*
   6. *Tuition.*

Section 6.11 ("On-the-Job Experience (OJE)"): If a participant's IEP shows a goal of obtaining an unsubsidized job with a public or private employer that requires specific skills not attainable through the regular community service assignment, the sub-grantee may elect to provide the participant with an OJE assignment.

   a.   Negotiate Contract: *First, negotiate a contract, specifying skills, timelines and benchmarks the participant must achieve in order to be hired permanently by a public or private employer.*
   1. *The potential employer will then place the participant in a suitable training assignment*
      for no more than 40 hours a week for up to twelve (12) weeks to accommodate the gap between actual and needed skill levels.
   2. *It must also stipulate that at the end of the training period, if the participant's OJE has been satisfactory, the participant will remain on the potential employer's payroll.*

   b.   OJE Reimbursement: *The potential employer may be reimbursed for up to 100 percent of the wages earned by each participant in OJE training that will last no more than 4 weeks.*
   1. *For OJE training that will exceed 4 weeks, the potential employer may be reimbursed for up to 50 percent of the wages earned by each participant in OJE training.*
   2. *The Employer must provide workers compensation coverage for the participant.*

   c.   On-The-Job Experience Requirements:
   1. *The contract for the on-the-job experience may be with a public or private employer that is <u>not</u> also an active host agency. An active host agency is an organization that currently provides community service to any SCSEP participant.*
   2. *The contract must detail the specific skills to be learned; the training timelines and benchmarks to be achieved; the hours the participant will work each week; and the number of weeks the participant will work for this employer.*

3. *The contract must stipulate that the employer will retain the participant in a permanent part-time or full-time job at the end of the training period if the participant has performed satisfactorily.*
4. *The contract must stipulate that there will be significant follow-up to resolve potential unsafe conditions or issues that arise with the employer or the participant.*
5. *The contract must stipulate the amount the employer will be reimbursed and the amount the participant will be paid in the OJE training. NOTE: Participants must be paid the prevailing wage while in an OJE training assignment.*
6. *No participant may work for more than 40 hours per week, which includes time spent*
   in a community service assignment if the participant is participating in OJE and community service.
7. *OJE training may not exceed 12 weeks in duration per participant.*
8. *Sub-grantee must retain copies of all OJE contracts in the participant's file and agree to supply such information to ICOA upon request.*
9. *OJE training may be combined with other training activities, such as community service, classroom training, lectures, seminars, individual instruction, or specialized training.*

(9) Supportive Services: describe the supportive services that will be offered to help participants obtain and retain an unsubsidized job, including transportation assistance (if applicable).

Supportive services for participants are offered and will adhere to standards outlined in the Idaho SCSEP Operations Manual Section 6.8 ("Supportive Services"):

6.8   *SUPPORTIVE SERVICES:*
Supportive services should be provided to help participants successfully perform their community service work training assignments, and to prepare them for jobs in the private and public sectors. Supportive services may include, but are not limited to the following:

   a. **Must be Identified in IEP:** *The need for any supportive services is to be consistent with and documented in the participants IEP and in case notes with appropriate supporting documentation including the justification, cost and source of the service and the length of time the service for which the service is authorized.*

   b. **Cost Threshold:** *Any supportive service cost exceeding $500 must be approved by ICOA before cost is incurred. The requested must be in writing by the sub-grantee and a copy maintained in the participant's program file.*

   c. **Counseling:**
      1. *Designed to assist participants with their community service training assignments and with obtaining unsubsidized employment.*

2. *Designed to assist participants with health and nutritional matters, Social Security, Medicare benefits, and laws regarding retirement*

   d. **_Providing Incidentals:_** *Work shoes, safety glasses, eyeglasses, and hand tools, etc. (**NOTE: Training sites should provide incidentals such as uniforms if participants are required to wear them.**)*

   e. **_Transportation_**: *A participant may **not** be reimbursed for the cost of traveling between home and the work-based training site.*

(10) *Termination*: describe procedures for terminating a participant, including Individual Employment Plan(IEP)
   terminations. Please provide a copy of the current termination procedures.

   Participant Termination Policy is attached at the bottom of this document (see Appendix C).

   Below are policies within the Idaho SCSEP Operations Manual that outline procedures for terminating a participant, including IEP terminations:

   Section 5.2l: Address Participant Termination: The sub-grantee's case manager is the only person authorized to terminate a participant.

   Section 5.2m: Address Community Service Assignment Termination: Either party, the sub-grantee or the Host Agency may terminate the Community Service Assignment from date of notification.

   Section 6.16h: Written notification that a participant will be exited from SCSEP must go out for all of those participants who reach their 48 month Duration limit on June 30, 2011.
   1. Every month, the sub-grantee must send out letters to participants that will meet the 48 month duration limit within thirty (30) days. This follows the termination policy.

   Section 6.17c: There must be a written notification for all termination. The termination letter must be dated, the reason clearly stated, the date that the termination is in effect and the letter needs to be signed. Below are reasons for termination with corresponding termination timeframes:
   - *Participants incorrectly declared eligible as a result of false information knowingly given by that individual.*
   - *Incorrectly determined to be eligible through no fault of the participant.*
   - *Individuals who are to be terminated for this reason are to be given written notification explaining the reason for termination and terminated from the program no later than 30 days from the date of determination.*
   - *Participants found to be ineligible during recertification. Individuals who are to be terminated for this reason are to be given written notification explaining the reason for termination and terminate from the program no later than 30 days from the date of determination.*
   - *Durational Limit (NOTE: this reason for exit will result in a negative outcome and count against the performance measures)*
   - *Administrative (for reasons other than cause or durational limits) (NOTE: this reason for exit will result in a negative outcome and count against the performance measures)*

(11) *Complaints & Grievances*: describe the procedures for addressing and resolving participant complaints and grievances related to program termination. Please provide a copy of the current complaint/grievance policies.

Participant Complaints and Grievances Policy is attached at the bottom of this document (see Appendix D).

(12) *Maximizing enrollment*: describe procedures for fully enrolling all available slots, including over enrolling participants, and how over-enrollments will be balanced with equitable distribution requirements.

In order to maximize enrollment and manage over-enrollment, the following procedures will be adhered to as outlined in the Idaho SCSEP Operations Manual:

Maximizing enrollment:

Section 6.1: The Equitable Distribution website http://scseped.org/ provides the distribution of authorized positions within a state, and optimum number in each designated area based on the latest available Census data. The goals should quantify the following:
   a. *Participant Positions: Based on past participant positions and changes in the population demographic in the service area, the total participant positions for upcoming contract/program year are calculated.*

   b. *Service Level: Is a core performance measure in the Quarterly Progress Report (QPR): Service Level goals are calculated by multiplying the total Participant Positions by 160%, which results in the total participants served/service level goal.*

Section 6.2 ("Participant Outreach and Recruitment"): The purpose of participant outreach and recruitment is to ensure the maximum number of eligible individuals have an opportunity to participate in SCSEP.
   a. *Outreach and Recruitment: Use the following efforts to provide equitable services among the population segments eligible to participant in SCSEP:*
       1. *Targeted Demographics: Provide outreach to broaden the composition of the pool of applicants to include members of both sexes, various race/ethnic groups, veterans, individuals with disabilities, limited English speakers, American Indian, and those who have the greatest economic need in proportion to their numbers in the service area.*
       2. *Collaborative Relationships: Establish collaborative relationships with agencies providing services to older persons, to persons with low incomes, and to persons of various race/ethnic backgrounds:*
       3. *Outreach Type: Use the following communications methods to provide outreach to the population segments eligible to participant in SCSEP:*
           • *Technology based Communication: Websites, Facebook, Twitter, blogs, alerts.*
           • *Traditional Media Types: Place flyers, brochures, posters and other advertisements in public places where older individuals tend to congregate.*
           • *Use Low or No Cost Advertising: Develop community and public service radio, TV announcements, human interest articles in local newspapers and newsletters.*
           • *Presentations: Make presentations to senior groups or the general public to spread the word about opportunities available through the program.*

b. *Vacancies in Program: At no time should vacancies exist in the program when funding is available to provide training opportunities for seniors.*

Managing over-enrollment:

Section 6.4f: Applicants determined eligible for enrollment but there are no appropriate community service assignments or authorized positions available are to be placed on a SCSEP waiting list.

Section 4.10: The sub-grantee shall ensure the most accurate data is collected for SCSEP services for its respective service area.

    a. SPARQ Management Reports: The sub-grantee will utilize the following reports to identify possible errors with data and to identify program areas that are not meeting goals. Following are a list of Management Report Categories that the sub-grantees should become familiar with and use:

    1. *Applicants*
- *Pending*
- *Ineligible*
- *Eligible, Not Assigned or on Waiting List*
- *Waiting List*

    2. *Participants*
- *Current/Exited*
- *Started Employment but Not Yet Achieved Entered Employment*
- *Achieved Entered Employment but Not Yet Achieved Retention*
- *Waiver of Durational Limit*

    3. *Participants Who Have Reached Durational Limit*
- *Participants With Approved Break(s)*

    4. *Follow-ups*
- *Pending*
- *Pending, Displayed by Quarter*
- *Volunteerism Follow-Up*
- *PY18 Pending*
- *Preliminary Employment Rate/Median Earnings*

    5. *Actions*
- *Participant Actions*
- *Host Agency Actions*
- *Pending Employer Surveys*
- *Most in Need/Waiver Factor Actions*

    6. *Host Agencies*
- *Host Agencies*
- *Assignments by Host Agency*

    7. *Employers*
- *Unsubsidized Employers*
- *Placements by Employer*

(13) *Performance:* include a proposed level for each performance measure for each of the program years covered by the plan. While the plan is under review, the State will negotiate with the Employment and Training Administration to set the appropriate levels for the next year. The State may also negotiate performance levels in a subsequent modification. At a minimum, States must identify the performance indicators required under the SCSEP Final rule published on September 1, 2010, and, for each indicator, the State must develop an objective and quantifiable performance goal for the next year. The performance measures include:

(A) Entered employment,
(B) Employment retention,
(C) Average earnings,
(D) Service level,
(E) Service to most-in-need, and
(F) Community service

On July 30, 2018, the Employment and Training Administration (ETA) of the U.S. Department of Labor published the [Senior Community Services Employment Program Performance Accountability Final Rule 2018](#) in the Federal Register. The following are changes made to the performance measures for SCSEP and are core performance measures ICOA and its subrecipient adhere to:

A) *Service Level – Goal: 151.3%*
B) *Community Service – Goal: 76.9%*
C) *Service to Most in Need – Goal: 2.90*
D) *Employment Rate – 2nd Quarter after Exit – Goal: 31.5%*
E) *Employment Rate – 4th Quarter after Exit – Goal: 26.0%*
F) *Median Earnings - 2758*
G) *Effectiveness in serving:*
   a. *Employers – Goal: 85.8%*
   b. *Participants – Goal: 80.5%*
   c. *Host Agencies – Goal: 80.7%*

(14) *Administrative Costs*: describe any request for an increase in administrative costs consistent with section 502(c)(3) of the Older Americans Act.

An optional special request for an Increase in Administrative Costs for Program Year 2019 was submitted to the Division of National Programs, Tool, and Technical Assistance's Older Workers Unit and the Federal Project Officer for SCSEP. The request for an increase of 13.5% to 15% was approved. See Appendix E for more information

SCSEP Assurances

The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on

aging;   Yes State and

local boards under WIOA;   Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State,

except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b);   Yes

Social service organizations providing services to older individuals;

Yes Grantees under Title III of

OAA;   Yes

Affected Communities;   Yes
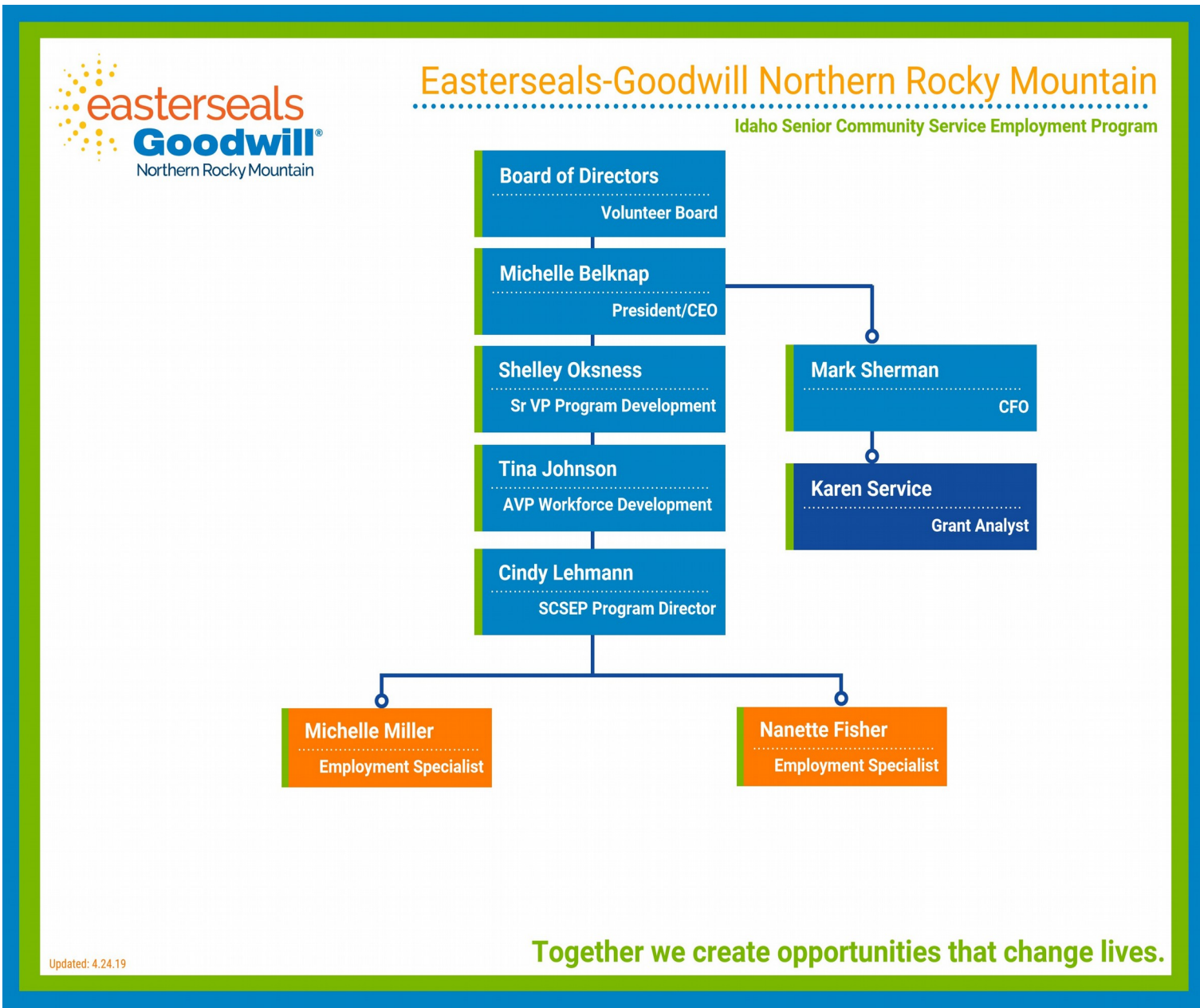
Unemployed older

individuals;   Yes

Community-based organizations serving older individuals;

Yes Business

organizations; and   Yes

Labor organizations.   Yes

Policy Subject	Policy #
Senior Community Service Employment Program (SCSEP) **Durational Limits**	**SCSEP-2018-D0525**

Purpose:

The purpose is to ensure that SCSEP participants understand the durational limit policy.

Scope:

All participants who are one-year from reaching the 48-month durational limit must be informed of the duration limit policy, the waiver criteria and participate in the development of a transition plan.

The time period for calculating the 48-months begins from July 1, 2007, or when the participant first enrolls in the program after that date. ICOA will extend a onetime, one-year program extension in situations where participant meets one of the following criteria:

1) Has a severe disability
2) Is frail
3) Is 75 or older
4) Meets the eligibility requirements related to age, but do not receive benefits under Title II of the Social Security Act (42 USC 401 et seq)
5) Lives in an area with persistent unemployment and are individuals with severely limited employment prospects
6) Has limited English proficiency or
7) Has low literary skills

Definitions:

- ICOA: Idaho Commission on Aging: SCSEP Grantee
- SPARQ: Federal SCSEP reporting system
- 20 CFR Part 641.570 Final Rule: Gives the SCSEP program requirement.

Procedures:

1) Use SPARQ to identify which participants have reached one-year or six-months from the 48 month duration limit, and update their Individual Employment Plan and create a transition plan.
2) Review duration limits and waiver criteria with each participant during the initial orientation and at one-year from reaching the durational limit.
3) Develop an initial transition plan one-year from reaching the durational limit and update it at a minimum of six-months from reaching the durational limit date.
4) Within two-months from the participant reaching the durational limit, the case manager must submit a "Request for Durational Limit Waiver" with supporting documentation to ICOA for approval.

Exceptions:

1) Exceptions are based on unforeseen issues or situations

References:

1) Final Rule: http://www.doleta.gov/Seniors/pdf/FinalRule2010.pdf

Federal Requirement:

1) SCSEP Final Rule part 641.570 Individual time limit:
2) SCSEP Final Rule part 641.730 Transition planning

Policy Subject	Policy #
Senior Community Service Employment Program (SCSEP)	**SCSEP-2018-T0817**

Participant Involuntary Termination Policy

There are six (6) reasons a participant may be involuntarily terminated from SCSEP. The reasons are listed below along with an explanation. This Termination Policy will be followed fairly and equitably when involuntarily terminating participants. Participants will not be terminated based on age; there is no upper age limit for participation in SCSEP. Except as noted below in the case of serious violations, participants will receive progressive discipline and an opportunity for corrective action before a formal termination notice is issued. In all cases, participants will receive a 30 day termination letter notifying them of the date of exit, the reason for the termination, and the right to appeal under the Idaho Commission on Aging's (ICOA) grievance procedure. A copy of the grievance procedure will be attached to the termination letter. Participants will receive both a copy and a verbal explanation of the Involuntary Termination Policy during orientation. This policy is based on the Older Americans Act Amendments of 2006 and the SCSEP Final Rule, effective on October 1, 2010.

Types of Involuntary Terminations

A participant can be involuntarily terminated from the SCSEP for six (6) reasons. The reasons are:

1. Knowingly providing false information in the eligibility process

2. Being incorrectly determined eligible at enrollment or the annual recertification

3. Being determined no longer eligible at recertification

4. Reaching the maximum 48 months enrollment limit

5. Becoming employed during enrollment

6. For cause, including refusing to accept a reasonable number of job offers or referrals to unsubsidized employment based on the Individual Employment Plan (IEP) (with no extenuating circumstances hindering the participant from moving to unsubsidized employment)

1. Termination Due to Knowingly Providing False information in the Eligibility Process

A participant may be terminated for fraudulent actions, such as intentionally providing inaccurate information to qualify for the SCSEP. If this occurs, the participant will be placed on Leave without Pay immediately, and a 30 day notification of termination will be sent to the participant.

2. Termination Due to Being Incorrectly Determined Eligible

A participant will be terminated if found ineligible for participation in the SCSEP either after enrollment or after the annual recertification through no fault of the participant. A participant may be enrolled or deemed eligible for continued enrollment based on an error in determining program eligibility, e.g. income may be recorded or calculated inaccurately. When this occurs, the participant will be notified regarding the error and immediately sent a 30 day notification of termination letter. The participant will be able to continue participating in the program until the date of exit as noted in the letter.

3. Termination Due to No Longer Being Eligible

Annually, or more frequently if there is a substantial change in circumstances, each participant is recertified to determine if he or she continues to be eligible for participation. During the recertification, a participant may be determined no longer eligible

due to a change in eligibility criteria such as income, family of one due to a change in disability status, employment status, and number of household members. The participant will be notified and immediately sent a 30 day notification of termination letter. The participant will be able to continue participating in the program until the date of exit as noted in the letter.

4. Termination Due to 48 Month Participation Limitation

A participant will be terminated when he or she meets the 48 month maximum participation date, unless he or she has a qualified, documented waiver factor based on ICOA's SCSEP Durational Limit Policy. A waiver factor qualifies the participant for a temporary one-year extension from the date of reaching the 48 month maximum participant date. If the participant does not qualify for a temporary extension, he or she will be sent a 30 day notification of termination letter 30 days before the 48 month maximum participation date. The participant will be able to continue participating
in the program until the date of exit as noted in the letter.

5. Termination Due to Becoming Employed During Enrollment

To qualify for enrollment in the SCSEP, a participant has to be unemployed; all participants are informed that they may not be employed while participating in the program and that they must notify the program representative immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the program of the employment will be terminated from the program. If this occurs, the participant will be placed on Leave without Pay immediately, and a 30 day notification of termination will be sent to the participant.

6. Termination for Cause

There are several reasons to terminate a participant "for-cause." When warranted, a participant may be terminated for certain behaviors and/or conduct. The following are specific reasons; however, other similar reasons that demonstrate willful misconduct or an intentional disregard of program rules may cause involuntary termination:

- Individual Employment Plan (IEP) related reasons: Refusing to accept a reasonable number of job offers or referrals to unsubsidized employment or for not complying with the IEP. A participant may be subject to disciplinary action up to and including termination when he or she refuses a total of three job offers and/or referrals to job openings and/or to follow through with objectives to achieve goals that are based on the IEP. If the participant fails, without good cause, to cooperate fully with ICOA's SCSEP provider staff to accomplish the goals of his or her service strategy, an IEP-related termination "for-cause" may be in order. Examples of lack of cooperation with ICOA's contractor to accomplish IEP service strategies may include but are not limited to the following when provided for in the participant's IEP:
    o   Refusing to search for a job
    o   Sabotaging a job interview, for example, a participant tells the interviewer that he or she is not interested in the job or tells the interviewer that he or she is not qualified.
    o   Refusing or not participating fully in training opportunities
    o   Refusing to transfer to a new community service training assignment
    o   Refusing to register at the One-Stop/Job Service
    o   Refusing to take advantage of WIA opportunities
    o   Refusing to accept or lack of follow-through in obtaining supportive services that will enhance the participant's ability to participate in a community service assignment consistent with the IEP
    o   Refusing to cooperate with other IEP-related referrals
    o   Refusal to cooperate with the assessment or IEP process, e.g., refusing to participate in completing the assessment and training development plan

- Non-IEP related reasons:
    - Refusal to cooperate in recertifying eligibility, for example, refusing to provide required document to determine continued eligibility or refusing to attend or be available for the recertification appointment.
    - Failure or refusal to perform assigned duties, e.g., refusing without good cause to do assignments that are part of the training description and required to increase skills and knowledge
    - Falsification of official records, such as timesheets, for example, intentionally signing the signature of the host agency supervisor on a timesheet or other official document, or including hours on a time sheet that are not accurate

- Intentional disclosure of confidential or private information obtained from the host agency, grantee, or local project, for example, informing others of information that is supposed to be kept private or confidential
- Frequent tardiness or unauthorized absences, including reporting to the assignment late or not reporting to the assignment and not informing the supervisor. Generally, three instances of absence without good cause or without proper notice may warrant termination.
- Insubordination, defined as intentionally refusing to carry out the direction or instructions of a host agency supervisor or ICOA's contracting staff member, provided there were no extenuating circumstances and the directions or instructions were reasonable
- Workplace harassment or discrimination on the basis of sex, race, color, religion, national origin, age, marital status, or disability
- Obscene, abusive, harassing, or threatening language or behavior
- Physical violence or intentional destruction of property, for example, being violent and threatening to or carrying out threats that physically harm individuals or property
- Theft, meaning illegal taking or withholding the property of another without permission
- Causing an imminent threat to health or safety of self or others
- Non-compliance with drug and alcohol free policy, which prohibits participants from consuming, selling, purchasing, manufacturing, distributing, possessing or using any illegal or non-prescribed drug or from being under the influence of alcohol and or drugs while performing their host agency assignment or while carrying out objectives required by the IEP. Legally prescribed medications are excluded if they do not affect the participant's ability to perform his or her duties or protect the safety of the participant or others.
- Exceeding approved Leave without Pay by failing to return from an approved break by the required date without due notice or good cause

Participant Corrective Action and Warning

A participant will be given an opportunity to correct his or her behavior or conduct, or his or her failure to comply with the IEP requirements, except in cases involving serious harm or imminent threat to health, safety, property, etc. At any point, if a participant makes positive efforts or the participant's lack of action is justified, corrective action will be discontinued. The following steps for corrective action will be taken:

- Step 1: First Formal Warning
  If a participant displays behavior or conduct outlined in the reasons for "for-cause" terminations or refuses to comply with the IEP requirements, the participant will be given a verbal warning and counseled to correct his or her actions. Absent extenuating circumstances, the participant will be informed in writing by the ICOA's contractor's designated official of the requirement to correct his or her behavior or conduct.

- Step 2: Second Formal Warning
  When a participant for a second time displays behaviors or conduct outlined in the reasons for "for-cause" terminations or refuses to comply with the IEP requirements, the participant will be verbally warned and counseled to correct his or her actions. Absent extenuating circumstances, ICOA's contractor's designated official will send the participant a written warning that he or she has 30 days from the date of the letter to correct his or her behavior or conduct. In the case of an IEP violation, the participant may be directed to complete specific IEP-related task. The written warning will include a statement that failure to make improvement or complete the IEP-related tasks will result in termination.

- Step 3: When a participant does not make improvement in his or her actions or for a third time displays behavior or conduct outlined in the reasons for "for-cause" terminations, a letter will be sent notifying the participant that he or she will be exited 30 days from the date of the letter.

  For example, a participant's training goal is to become computer literate in preparation for a clerical position. First the Employment and Training Coordinator (ETC) identified a community service assignment at the library but the participant refused it because she wouldn't have her own cubicle (she would be in an open area) so she turned down that opportunity. Next, the ETC identified a training site in a school, but the participant turned down that opportunity. Finally, the ETC tried the local museum, and the participant

refused the training assignment at the museum, too. The ETC spoke with the participant, and she had no legitimate reason for refusing the training offered at various assignments. After the first refusal, the ETC asked the assigned contracting official to send the participant the first written warning letter. The assigned contracting official sent her the second warning letter stating that she risked being terminated if she continued to fail to follow her IEP or to take corrective action. When Ms. Short turned down a third assignment and there was no extenuating circumstance, the assigned contracting official sent a 30-day notification of termination letter.

For-Cause Terminations that Require Immediate Removal from Host Agency and Leave without Pay Pending Termination

When a participant's violation of ICOA's policy is of a serious nature, immediate action to remove the participant from the host agency may be required. In this case, the participant will be placed on leave without pay and a written 30- day notice of termination sent. Examples of circumstances warranting immediate removal from the host agency and leave without pay include, but are not limited to:

- Gross misconduct such as violating ICOA's contractor's Drug and Alcohol Policy or intentionally endangering the lives of themselves or others
- Violence, including but not limited to physical or extreme verbal violence at the training site

Appendix D

Policy Subject	Policy #
Senior Community Service Employment Program (SCSEP) **<u>Participant Grievance</u>**	**SCSEP-2018-G0525**

Purpose:
The purpose is to ensure SCSEP applicants, employees and participants understand the grievance process and understand they can use it if they feel they have been unfairly treated.

Scope:
This policy sets a process to resolve grievances informally at the local level (Case Manager), then formally through the contractor's grievance procedures, which can be appealed to state (ICOA) for final resolution. For allegations concerning federal law or Civil Rights that cannot be resolved with this policy's procedures, claimants may appeal directly to the U.S. Department of Labor as described in exceptions below.

Definitions:
- <u>ICOA</u>: Idaho Commission on Aging: SCSEP Grantee

Procedures:
1) Grievances shall first be resolved informally and in writing at the local level with the contractor's State Director.

2) If resolution is not agreed upon within 10 business days, a formal complaint should be filed in writing to the contractor's Director of Operations with a copy to ICOA's SCSEP State Director. The contractor's Director of Operation has 10 business days to resolve the complaint.

3) If the dispute remains unresolved, a written complaint may be filed with the Idaho Commission on Aging within 10 business days following the contractor's Director of Operations' decision. At that time, the ICOA will establish a complaint file which contains all SCSEP participant's application, enrollment forms, the complaint statement, chronological log of events, relevant correspondence, and a record of the resolution attempted. Depending on the nature of the complaint, the ICOA Administrator will render a decision or elevate the complaint to a hearing officer for final determination. Final determination will be made by ICOA within 30 business days of receiving the complaint.

Exceptions:
1) Complaints alleging violations of law, which cannot be resolved within 60 business days as a result of the recipient's procedures, may be filed with the Director of Division of National Programs, Tools and Technical Assistance, USDOL, 200 Constitution Avenue NW, Washington, DC 20210.
2) Complaints alleging discrimination on the basis of race, color, religion, sex, national origin, disability, or age, may be directed or mailed to the Director, Civil Rights Center, U.S. Department of Labor, Room N–4123, 200 Constitution Avenue, NW, Washington, DC 20210.

References:
2) 20 CFR part 641: SCSEP Final Rule: http://www.doleta.gov/Seniors/pdf/FinalRule2010.pdf
3) 29 CFR Administrative Requirements:
   https://www.gpo.gov/fdsys/pkg/CFR-2011-title29-vol1/pdf/CFR-2011-title29-vol1-part34.pdf
4) State Agreement, Section 19 Complaint Resolution (page 17)

Federal Requirement:
1) Grievance Procedures 20 CFR part 641.910

U.S. Department of Labor   Employment and Training Administration
                                   200 Constitution Avenue NW
                                      Washington, D.C. 20210

September 13, 2019

Ms. Judy B. Taylor
Administrator
Idaho Commission on Aging
341 West Washington Street
Boise, Idaho 83702-0007
vicki.yanzuk@aging.idaho.gov, *birgit.luebeck@aging.idaho.gov*

Dear Ms. Taylor:

The Division of National Programs, Tools, and Technical Assistance's Older Workers Unit and your Federal Project Officer have reviewed your Program Year 2019 optional special requests. Your request for an Increase in Administrative Costs from 13.5 percent to 15 percent and your request for On-the-Job-Experience policy are approved.

This approval letter will be incorporated into your grant file. Please contact your Federal Project Officer if you have any questions or need additional information.

Sincerely,

Jimmie Curtis
Grant Officer

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM

Summary of PY 2019 Goals and Targets*	
Grantee: Idaho	
Q2 Employment Target:	31.5%
Q4 Employment Target:	26.0%
Median Earnings Target:	$2,758
Community Service Goal:	76.9%
Service Level Goal:	151.3%
Most-in-Need Goal:	2.9
Effectiveness in Serving Participant:	80.5
Effectiveness in Serving Host Agency:	80.7
Effectiveness in Serving Employer:	85.8

*PY19 Goals and Targets Condition: The Department of Labor reserves the right to recalculate the goals and targets for PY 2019 after further analysis of the PY18 Q4 performance data.