EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, DC 20210

CLASSIFICATION

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ADVISORY :

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TO

Senior Community Service Employment Program (SCSEP)

Grantees

FROM

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/Administrator

Chief

Office of National Programs

Div. of Older Worker Programs

SUBJECT

The State Senior Employment Services Coordination Plan

- 1. <u>REFERENCES</u>: Sections 503, 507(b) and 508 of the Older Americans Act Amendments of 2000 (OAA Amendments).
- 2. <u>BACKGROUND</u>: Section 503 of the reauthorized OAA Amendments provides that the Governor of each State must complete an annual State Senior Employment Services Coordination Plan (the "State Plan"). The State Plan describes the planning and implementation process for SCSEP services in the State. The purpose of the State Plan is to encourage coordination among SCSEP grantees and assist stakeholders in working together in furtherance of SCSEP goals.

The State Plan should not be construed solely as a "stand-alone" document. In fact, the State Plan, the Equitable Distribution (ED) Report, the SCSEP grant application and the WIA Strategic Five-Year Plan are all potentially interrelated. The State Plan may be submitted to the Department as an independent document or as part of the WIA Strategic Five-Year Plan. The State Plan also relates to the ED Report, as required at sections 507(b) and 508 of the reauthorized OAA. The ED Report is prepared by State agencies and provides a basis for improving the distribution of SCSEP positions within the State.

3. <u>DIRECTIVE</u>:

Plan Development

The Governor of each State is responsible for developing and submitting the State Plan to the Department However, the Governor may delegate responsibility for developing and submitting the State Plan, provided that any such delegation is consistent with State law and regulations. To delegate such responsibility, the Governor must submit to the Department a statement signed by both parties indicating the individual and/or organization that will be submitting the State Plan on his or her behalf. Any State Plan submitted by a designee for whom a signed designation statement has not previously or simultaneously been submitted will be considered a non-submission.

Plan Content

The Attachment outlines the minimum information that must be included in the State Plan for PY 2004.

Frequency of Submission

In PY 2004, the Governor, or his/her designee, is required to submit a full State Plan. This year, the Department expects there to be significant changes to existing State Plans due to the recent competition of the National grantees, the new 2000 Census data, and the new program requirements resulting from the OAA Amendments. In PY 2005, grantees will be permitted to submit modifications to their 2004 State Plans unless a major program change necessitates submission of a full State Plan.

Public Comment

The Governor, or his/her designee, must seek the advice and recommendations of the individuals and organizations identified at section 503(a)(2) of the OAA Amendments prior to submission of the PY 2004 State Plan. Copies of the public comments relating to the State Plan must accompany its submission to the Department.

- 4. <u>SCHEDULE:</u> The PY 2004 State Plan must be provided to the Department by April 1, 2004. An original plus two copies must be sent to the Division of Older Worker Programs (DOWP). Electronic copies are acceptable, although the signature pages must be faxed or expressed mailed. Electronic copies may be submitted to appropriate Federal Project Officer via e-mail.
- 5. INQUIRIES: Questions should be directed to your Federal Project Officer.

ATTACHMENT, Outline for the State Senior Employment Service Coordination Plan

OUTLINE FOR THE STATE SENIOR EMPLOYMENT SERVICES COORDINATION PLAN

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

Section 2. Involvement of organizations and individuals. As required in section 503(a)(2) of the OAA, the State Plan must describe the involvement of the following parties in the planning process:

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

Section 3. Public Comments.

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

Section 4. State Plan Provisions.

Section 503(a)(4) and (6) of the OAA Amendments address the mandatory content requirements for the State Plan. The Department believes that most of the data required for this information can be accessed from readily available sources—i.e., the U.S. Census and data that grantees already possess and/or report. In addition, grantees can utilize the detailed data on the characteristics of the eligible population that will be distributed by DOWP in CD format in the near future.

The State Plan must provide information on the following particulars:

a. Basic Distribution of SCSEP Positions within the State. State Plans must provide information on the ratio of individuals in each service area to the total eligible population in the State. Reference should be made to the Equitable Distribution (ED) Report, which is required by Section 508 of the OAAAmendments. This report provides the basic information needed to assess the location of the eligible population and the current distribution of people being served. The report may be summarized to identify the areas, if any, that are significantly underserved or over-served. In addition, a report and/or timeline should be included detailing plans to move the positions to underserved areas. The most recent ED Report must be attached as a second appendix to the State Plan.

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

- **b. Rural and Urban Populations.** State Plans must provide information about the relative distribution of individuals residing in rural and urban areas within the State. For 2004, this information may be included on a statewide basis, a county-by-county basis or some other geographic area basis. The Governor or his/her designee must decide which approach will be utilized.
- c. Special Populations: State Plans must provide information about the relative distribution of those eligible individuals with greatest economic needs, eligible individuals who are minorities, and eligible individuals with the greatest social needs. As indicated in item (b) above, the Governor or his/her designee may decide on how this information is to be displayed. The following descriptions will be used for submitting this information:
- (1) "Greatest economic need" means those persons at or below the poverty level established by the Department of Health and Human Services and approved by the Office of Management and Budget;
- (2) "Minorities" include: American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino American, and Native Hawaiian or Other Pacific Islander;
- (3) "Greatest social need" means needs caused by non-economic factors. It includes persons with physical and mental disabilities; language barriers; and cultural, social, or geographic isolation, including isolation brought about by racial or ethnic status.

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

- **d. Type of Skills.** The State Plan must describe the employment situations and the skills available among the eligible population. The source of this information must be identified, as well as progress and results in the collection of data.
- e. Community Service Needs. The State Plan must identify the types of community services that are needed, and the places where these services are most needed. The State Plan should specifically identify the needs and locations of those individuals most in need of community services and the groups working to meet their needs.

The term community service includes, but is not limited to, social, health, welfare and educational services (including literacy tutoring); legal assistance, and other counseling services, including tax counseling and assistance and financial counseling; library, recreational and other similar services; conservation, maintenance, or restoration of natural resources; community betterment of beautification; anti-pollution and environmental quality efforts; weatherization activities; and economic development.

- f. Coordination with the Workforce Investment Act. The State Plan must describe actions taken or planned to coordinate activities of SCSEP grantees with the activities being carried out in the State under title I of WIA. The State Plan must describe the steps being taken to ensure that the SCSEP is an active partner in each One-Stop Delivery System, and the steps that will be taken to encourage and improve coordination with the One-Stop Delivery System. Examples of specific collaborative efforts would be a description of the co-enrollment of SCSEP participants in the One-Stop Delivery System and a description of how States will coordinate SCSEP planning activities with planning under WIA Title I for the new Five-Year Strategic Plan, which will commence in PY 2005.
- g. Avoidance of Disruptions. The State Plan must describe the steps the Governor, or his/her designee, will take to avoid disruptions. When there are new Census data indicating that there has been a shift in the location of the eligible population or when there is over-enrollment for any other reason, the Department recommends that all grantees gradually shift positions and encourage employment to make positions available for eligible individuals in the areas where has been an increase in the eligible population. The Department does not define disruptions to mean that participants are entitled to remain in a subsidized community service employment position indefinitely.
- Section 5. State Plan Recommendations. The State Plan may include recommendations to the Secretary of Labor on actions to be taken by SCSEP grantees in the State to improve SCSEP services. The recommendations may include such topics as the location of positions, the types of community services, the time required to make changes in the distribution of positions, and the types of participants to be enrolled. If recommendations are provided, they should reflect the items discussed in Section 4, above, State Plan Provisions. They should also be realistic recommendations that the Secretary may consider.