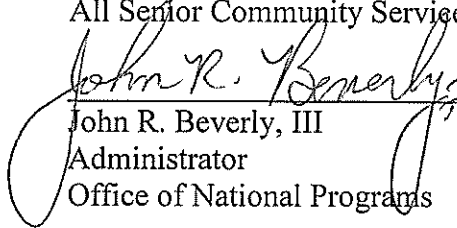
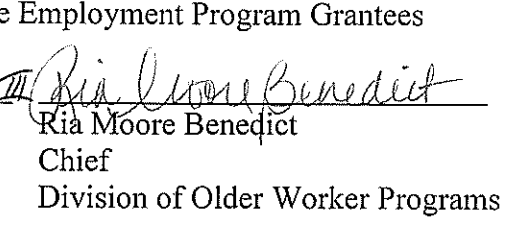


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TO: All Senior Community Service Employment Program Grantees

FROM:

 John R. Beverly, III Administrator Office of National Programs	 Ria Moore Benedict Chief Division of Older Worker Programs
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1. PURPOSE: To provide grantees with a framework for permissible training activities under the regular Senior Community Service Employment Program (SCSEP).

2. REFERENCES: Sections 502(b)(1)(I), 502(b)(1)(N)(ii), 502(b)(3), and 502(c)(6)(A)(ii)(iii) of the Older Americans Act Amendments of 2000 (OAA Amendments), Pub. L. 106-501; 20 CFR Part 641.

3. BACKGROUND: Quality training must have a foundation of a good assessment followed by the development of a service strategy which is documented on the Individual Employment Plan (IEP). A good assessment is an ongoing process that lasts throughout a participant's enrollment in SCSEP.

The Individual Employment Plan (IEP) is a decision-making process that utilizes information collected during assessment, including skills, interests, hobbies, barriers, aptitudes, personal preferences, service needs, work history, etc. The IEP functions as a roadmap that clarifies the participant's goals, supportive service needs, and the training required to accomplish the participant's goals and attain unsubsidized employment. SCSEP participants should receive training consistent with their IEP that enables them to: (1) perform their community service assignment; (2) increase self-confidence, skills, educational levels, and job placement potential; (3) improve the quality of the participant's life; and (4) obtain unsubsidized employment.

This bulletin serves to outline the types of training that are permissible under the general SCSEP program.

4. PERMISSIBLE TRAINING ACTIVITIES: Although private-sector training authorized under Section 502(e) of the OAA Amendments is limited by the availability of resources, there are other training resources that may be utilized under the regular program. This bulletin will provide a detailed description of these permissible activities.

Overview of Permissible SCSEP Training.

The SCSEP can offer some practical training opportunities that lead to increased participant self-sufficiency. Grantees are encouraged to approach the provision of training thoughtfully and creatively. With care, training opportunities can be created for participants that are designed especially for the needs of older learners. This bulletin will provide clarification as to the types of permissible training, as well as the conditions that must be met in order to gain permission to provide them.

The training activities that are permissible under the SCSEP are as follows:

- Community service job training
- Skills training
- Classroom instruction
- Lectures
- Seminars
- Individual instruction
- Training through other employment & training programs and/or colleges
- On-the-job experience
- Self-development training

NOTE: (1) No grantee may require a participant to pay for SCSEP training. (2) Workers compensation provided for participants must include on and off- paid community service site training activities. (3) Stand alone job search activities or job clubs are not permitted.

A. Community Service Assignment Training

Community service training is provided through a host agency. This training offers the participant an opportunity through the community service assignment to receive needed skill training at a 501(c)(3) organization or a public agency. A detailed training plan must be developed through the IEP that lists the needed skills and a realistic timeline for learning them.

This type of training at the work place is often more practical than that offered in the classroom. The participant works on real tasks, with actual equipment, dealing with current issues. It may be less time sensitive because the participant can work at his/her own speed to learn a new skill or refresh an old one. Both of these characteristics have been described as helpful for older learners.

Learning on the community service assignment should be promoted as it may be the most cost-effective and participant-friendly approach to serving those who are most in need. Grantees should seek to place individuals in community service assignments which are similar to "in demand" private sector jobs. In addition, grantees may wish to consider rotating

participants to different host agencies where they may obtain additional skills to prepare the participants for unsubsidized employment. When a participant masters the skills needed for a job, they are candidates to move off the program into unsubsidized employment. Additional skill training designed to either allow the participant to more effectively perform the community service assignment or lead to unsubsidized employment is permitted. This training may involve classroom, lectures, seminars, individual instruction, training through other employment and training programs and community colleges. These activities may be combined with each other or with job search activities or job clubs.

Community Service is defined at section 516(1) of the Older Americans Act Amendments of 2000.

Community Service Assignment Requirements:

- A contract is not required, but there must be a host agency agreement.
- The recipient of the training must be a SCSEP participant who is assigned to a community service assignment prior to receiving training.
- The participant must have an IEP that details skills to be attained and timelines for achieving the goal.
- The host agency agreement must specify the nature of the community service assignment, the hours the participant will train, and the circumstances and number of participants the host agency will train.
- Rotation to new host agencies is encouraged to maximize skills attained.
- Specific approval from DOL is not required.

Other Specification(s):

- Community Service may be combined with other training activities, such as skills training, classroom training, lectures, seminars, individual instruction, or on-the-job experience.

B. General Training

General training is training designed to enhance or refresh a participant's basic skills. It includes training activities such as skills training, classroom training, lectures, seminars, and individual instruction. This training must be consistent with the participant's IEP and must be reasonable. In addition, the grant agreement must describe the types of general training that may be offered to participants.

General Training Requirements:

- The grant agreement must assure that individuals trained are eligible SCSEP participants.
- The recipient of the training must be a SCSEP participant who is assigned to a community service assignment prior to receiving training.

- The participant must have an IEP that details skills to be attained and timelines for achieving the goal.
- The training must be consistent with the participant's IEP.
- The types of training to be provided and the training curriculum (if applicable) must be described in the grant agreement or a modification to the grant agreement, whether provided by the grantee or other training vendor.
- The training cost must be reasonable and at no or low cost to the program.
- Grantees must negotiate a contract with third-party training vendors, if applicable.

Other Specification(s):

- General training may be combined with other training activities, such as community service, specialized training, on-the-job experience, or other general training options.

C. Specialized Training

The grantee may elect to provide specialized training designed to prepare a participant for a particular job or industry. After completion of the assessment, the IEP, and assignment to a community service position, a participant may be qualified to benefit from specialized training designed to enhance the participant's opportunity to obtain unsubsidized employment. If the grantee has a specialized training curriculum that meets the approval of the Department through the grant application or a modification of the grant, it may elect to provide this training at no cost to the participant. Or the grantee may elect to enroll the participant in a customized training class through a workforce partner, an educational institution or other training vendor. In this instance, a training contract must be negotiated with deliverable timelines and specific skills learned. Part of the negotiation should involve cost, which may be paid by the grantee, another workforce partner or be provided free of charge. At the end of the training, and consistent with the IEP, the participant may be placed into job search or job club, directly into an unsubsidized job, back into a community service assignment or on-the-job-experience (OJE).

Specialized Training Requirements:

- Training may be provided through the grantee, a workforce partner, an educational institution, or other training vendor.
- A contract must be negotiated with the provider if the provider is not the grantee.
- The contract must detail the specific skills to be learned, the deliverable timelines, and payment responsibilities.
- The types of training to be provided and the training curriculum (if applicable) must be described in the grant agreement or a modification to the grant agreement, whether provided by the grantee or other training vendor.
- The grant agreement must assure that individuals trained are eligible SCSEP participants.
- The training must be consistent with the participant's IEP.
- The training cost must be reasonable.

Other Specification(s):

- Specialized training may be combined with other training activities, such as community service, classroom training, lectures, seminars, individual instruction, or on-the-job experience.

C. On-The-Job-Experience (OJE)

Participation in an appropriate community service assignment provides the opportunity to develop and practice the skills and/or experience the participant must attain in order to secure a desired position. In some instances, however, a participant's IEP may show a goal of obtaining an unsubsidized job with a public or private employer that requires specific skills that are not attainable through the regular community service assignment. In these instances, if the participant has completed at least two weeks at a community service assignment, the grantee may elect to provide the participant with an "on-the-job experience" (OJE) assignment.

The grantee must 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. 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. It must also stipulate that at the end of the training period, if the participant's OJE has been satisfactory, the participant will be placed or remain on the potential employer's payroll.

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. 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. In lieu of a reimbursement arrangement, grantees may opt to pay 100 percent of the participant's wages earned while in OJE training.

NOTE: Grantees must determine how much they will reimburse employers. For example, some grantees may wish to reimburse 100 percent for certain participants if they are certain that this employer will hire many participants or to attract new employers. In any case, grantees must balance the "number of individuals served" performance measure requirement with the funding committed to OJE projects.

During the OJE, the grantee must provide significant follow-up in order to address any issues, such as safety concerns or problems with the employer or the participant that may occur. Each grantee may exercise the OJE training option with a particular participant once in any twelve (12) month period. Each grantee may exercise the OJE training option with the same employer, but no more than 5 times per year for the same job category.

OJE Requirements:

1. Contract Requirements

- The contract for the on-the-job experience may be with a public or private employer that is not also an active host agency. An active host agency is an organization that currently provides community service to any SCSEP participant.
- 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.
- The contract must stipulate that the employer will hire or 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.
- 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.
- The contract must stipulate the amount the employer will be reimbursed or the amount the participant will be paid in the OJE training. NOTE: Participants may be paid the prevailing wage while in an OJE training assignment.
- The contract must detail whether the grantee or the employer will be responsible for workers compensation claims that derive from the participant's participation in the OJE training.
- 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.
- OJE training may not exceed 12 weeks in duration per participant.
- Grantees may reimburse employers for up to 100 percent of the costs of the wages for each participant in an OJE training that does not exceed 4 weeks.
- Grantees may reimburse employers for up to 50 percent of the costs of the wages for each participant in an OJE training that is more than 4 weeks in duration but does not exceed 12 weeks.
- In lieu of a reimbursement arrangement, grantees may opt to pay the participant 100 percent of the wages earned in the OJE training not to exceed 12 weeks.
- Grantees must retain copies of all OJE contracts in the participant's file and agree to supply such information to DOL upon request.

2. Grant Requirements

- A sample contract must be attached to the grant agreement or submitted as part of a modification to the grant agreement.
- The grant application must describe the types of OJE projects that are contemplated by the grantee, including specific locations anticipated, how much employers will be reimbursed, how many hours participants will work, and how many weeks the projects will last. Sample descriptions of anticipated training must also be included.
- The grant application must stipulate that this option will only be exercised with a particular participant once in any twelve (12) month period.

- The grant application must describe the characteristics of the participant who would be eligible for OJE.
- The grant application must describe the types of employers that the grantee intends to contact.
- The grant application must assure that the individuals trained in OJE are eligible SCSEP participants.
- The grant application must assure that training will be based on the IEP.
- The grant application must describe how grantees will ensure safe and healthy work conditions prior to the OJE assignment and how significant follow-up will be accomplished (including potential timeframes) to ensure safe and reasonable work conditions are maintained, as well as to resolve any employer or participant complaints.
- The grant application must stipulate that participants will be in a community service assignment for at least 2 weeks before participating in an OJE.
- The grant application must stipulate that the grantee will not contract for OJE with any organization that is an active host agency.
- The grant application must describe how the grantee will maintain records for OJE participants.

Other Specification(s):

- OJE training may be combined with other training activities, such as community service, classroom training, lectures, seminars, individual instruction, or specialized training.

NOTE: The Department must approve the OJE training option in the grant or a modification to the grant before the grantee may exercise this option.

6. **EFFECTIVE DATE:** Immediately.
7. **INQUIRIES:** Questions should be directed to your Federal Project Officer.