

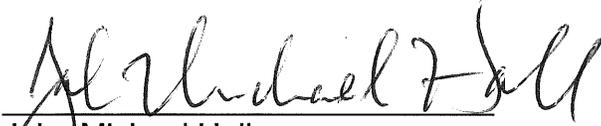
 <p>COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF AGING Harrisburg, PA 17101</p>	PENNSYLVANIA DEPARTMENT OF AGING	
	1. File Number: APD # 10-05-03	2. Disposition: Note Well and File for Reference
	3. Issuance Date: December 8, 2010	4. Effective Date: Immediately
	5. Program Area: Senior Community Service Employment Program (Title V)	
6. Origin: Bureau of Individual Support		7. Contact: Rocco Claroni (717) 772-2932

AGING PROGRAM DIRECTIVE

SUBJECT: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP) INDIVIDUAL DURATIONAL LIMIT POLICY

TO:

EXECUTIVE STAFF ALLEGHENY COUNTY AAA ARMSTRONG COUNTY AAA BUTLER COUNTY AAA LYCOMING/CLINTON BI-COUNTY OFFICE OF AGING GREATER ERIE COMMUNITY ACTION COMMITTEE SOUTHWESTERN PA AAA, INC. EXPERIENCE WORKS, INC.	LANCASTER COUNTY OFFICE OF AGING LEHIGH COUNTY AAA LUZERNE/WYOMING COUNTIES BUREAU FOR AGING NORTHAMPTON COUNTY AAA NORTHUMBERLAND COUNTY AAA PHILADELPHIA CORPORATION FOR AGING SCHUYLKILL COUNTY OFFICE OF SENIOR SERVICES AAA OF WESTMORELAND COUNTY
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FROM: 
 John Michael Hall
 Secretary
 Pennsylvania Department of Aging

PURPOSE: The purpose of this Aging Program Directive (APD) is to transmit to the Area Agencies on Aging (AAAs) and Experience Works, Inc. the Department's SCSEP Individual Durational Limit Policy which includes transition services that must be provided to participants who will reach the 48 month SCSEP durational limit on July 1, 2011 and thereafter.

I. Background

Section 518 (a)(3) of the Older Americans Act Amendments of 2006 states that individual participants are only eligible to receive SCSEP services for a lifetime total of 48 months, unless a waiver is granted. The U.S. Department of Labor (USDOL) has provided the Pennsylvania Department of Aging (PDA) with three Individual Durational Limit (IDL) policy options. These are: 48 months with the possibility of a waiver; 48 months without the possibility of a waiver; or less than 48 months if a separate request is included in the grant application and approved by the USDOL. The USDOL is also requiring the PDA to include in its IDL policy information related to how it will inform participants of the durational policy and of the possibility of a waiver. The PDA IDL policy is also required to include a detailed description of the transitional services and planning process for participants who will not achieve unsubsidized employment prior to reaching their durational limit. The USDOL is also requiring the PDA IDL policy to be provided to all participants.

II. Requirements

Participants will be subject to a maximum of 48 months of SCSEP participation, excluding approved breaks in service, unless the participant has a documented characteristic that meets the durational limit waiver criteria. When a participant has at least one documented durational limit waiver criteria in the year that he or she is subject to the 48-month limit, the AAA or Experience Works, hereinafter referred to as "Subgrantees", shall not terminate the participant. The 48-month durational limit shall be waived for those participants who meet one or more of the following seven durational limit waiver factors or criteria:

- Severely disabled
- Frail
- Age 75 or older
- Old enough but not receiving Social Security Title II benefits
- Severely limited employment prospects and live in an area of persistent unemployment
- Limited English proficiency
- Low literacy skills

Definitions of each of the aforementioned seven waiver factors are listed in the most recent edition of the SCSEP Data Collection Handbook, Rev. 6 (4/19/10). Source documentation requirements for each of the seven waiver factors are listed in the most recent edition of the SCSEP Data Validation Handbook, dated January 19, 2010. If it is determined through the SCSEP Data Validation Process or a PDA Subgrantee Monitoring visit that sufficient source documentation is not included in the participant's file for whom a waiver to the individual durational limit policy was previously approved, the participant shall be terminated within 30 days of written notification from the PDA. If

the subgrantee can present satisfactory documentation of the waiver factor in question to the PDA within 7 days of the PDA finding, the participant shall not be terminated.

Subgrantees shall immediately begin to inform all applicable participants and host agencies, both in writing and verbally, that the affected participants will be leaving the program on 7-1-11 or thereafter unless they meet one of the aforementioned seven waiver factors. For those participants scheduled to leave SCSEP on 7-1-11 due to the durational limit policy, subgrantees shall send letters to these individuals and their host agencies immediately. For those participants scheduled to leave SCSEP after 7-1-11 due to the durational limit policy, subgrantees shall send letters to these individuals and their host agencies at least eleven months prior to their scheduled exit dates. Similar letters must again be sent to affected participants and host agencies six months prior to their 48 month durational limit and again at 90 days and 30 days prior to the effective dates of their exit from SCSEP.

At a minimum of eleven months prior to their scheduled exit dates, subgrantees shall obtain an honest assessment of the participants' strengths and weaknesses from the host agency supervisor (For those participants scheduled to leave SCSEP in July and August 2011, it is understood that an honest assessment cannot be conducted at a minimum of eleven months prior to the participants' scheduled dates. In these cases, an honest assessment shall be conducted within two weeks of the subgrantee's receipt of this policy). Subgrantees will then bring in each participant and start over with Reorientation, a Redesigned Individual Employment Plan (IEP) and Host Agency rotation. Subgrantees will immediately place these individuals at a host agency that is able to hire. A redesigned IEP is a process for helping each individual participant accomplish as much as possible on the program, with an unsubsidized job and economic security as the end result. Subgrantees will have sufficient time to prepare long-term participants for a permanent job before the first 48 month durational limit hits on 7-1-11. The redesigned IEP will keep subgrantees and the participant focused and on task. The reassessment is critical for participants with multiple barriers to employment. The reassessment may trigger a completely new IEP, often with different goals and action plans. The IEP shall be realistic in terms of the community's job market; achievable within the participant's scope of accomplishment for the period of time addressed; clear enough that all parties understand what is to be accomplished, in what sequence and time frame and comprehensive enough to enable the participant to achieve greater economic security and a better quality of life. Host agency rotation will most likely be part of this process and is also a valuable tool for moving participants along.

To help with IEPs for participants of increasing age and frailty, subgrantees will need to: recruit host agencies able to provide a supportive environment for participants with personal barriers or growing frailties; ask such agencies for referrals to their colleagues in the same field; attend United Way meetings to learn of other agencies serving vulnerable populations; and make certain agencies maintain a safe environment and have the capacity to make adaptations to accommodate disabilities. Subgrantees shall carefully review the local job market and qualifications for jobs to determine that the jobs are: suitable for the needs of this particular client group; with employers known for hiring older workers and persons with disabilities; and part-time, not physically strenuous, easily adaptable to accommodations. Subgrantees shall also seek available training opportunities that lead to these identified job opportunities and that utilize appropriate adult education methodologies. For participants who will reach their durational limit on

7-1-11 or thereafter and do not meet one of the seven waiver factors, subgrantees shall refer them to appropriate programs, well in advance of reaching their durational limit, that could provide further employment assistance such as the local CareerLinks, or stipend volunteer programs such as AmeriCorp and SeniorCorp which fund local RSVP, Senior Companions, Foster Grandparents, and other volunteer programs. Participants with disabilities shall be referred to the local Office of Vocational Rehabilitation well in advance of reaching their durational limit. For participants who will reach their durational limit on 7-1-11 or thereafter and do not meet one of the seven waiver factors, subgrantees shall also take the time to make certain that these participants have a budget which they can follow and that they are signed up for all appropriate social service programs. Subgrantees shall also try to determine if these participants have a social support network and alert them to the participants' impending vulnerability.

All current and incoming participants shall be informed in writing of the Department's Individual Durational Limit Policy. The Department's grievance procedure is in effect for any participants who wish to appeal terminations, including durational limit terminations, and a copy of the grievance procedure shall be given to each participant whenever the participant is informed of any durational limit termination.

It should be noted that Experience Works and those AAAs that also receive funding from national SCSEP sponsors must adhere to the PDA's IDL policy. Experience Works and those AAAs that also receive funding from national SCSEP sponsors cannot use their national sponsor's IDL policy. Questions should be directed to Rocco Claroni at (717) 772-2932 or via e-mail at rclaroni@state.pa.us.