

 COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF AGING Harrisburg, PA 17101	PENNSYLVANIA DEPARTMENT OF AGING	
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	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: FISCAL YEAR (FY) 2011-12 TITLE V ALLOCATION, SLOT LEVEL, FISCAL, PROGRAM AND REPORTING REQUIREMENTS

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.	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: 
 Brian M. Duke
 Secretary
 Pennsylvania Department of Aging

PURPOSE: The purpose of this Aging Program Directive (APD) is to transmit to the Area Agencies on Aging (AAAs) the FY 2011-12 Title V allocations and number of slots, Title V Budget information, Title V Program Reporting requirements and information about Title V Financial Reporting requirements. This APD also provides citations to the applicable Title V Policy documents that shall govern the AAA's administration of the Title V Program.

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I. Title V Program Background and Requirements

The Senior Community Service Employment Program (SCSEP), or what is commonly referred to as the Title V Program, is funded under Title V of the Older Americans Act (OAA) Amendments of 2006, PL 109-365, 20 CFR Part 641, October 17, 2006. As authorized by Title V of the OAA of 2006, the SCSEP fosters and promotes useful part-time work-based training opportunities in community organizations for unemployed individuals ages 55 and older whose incomes do not exceed 125% of the most recent federal poverty guidelines. Program participants receive on-the-job training at local public agencies operated by units of government or non-profit agencies with certification under Section 501 (c) (3) of the Internal Revenue Code. Eligible individuals that participate in the SCSEP are reimbursed the federal or state minimum hourly wage, whichever is greater, for approximately 20 hours per week during their job training. The ultimate goal of SCSEP is to assist the transition of older individuals into unsubsidized employment that leads to self-sufficiency.

Prior to July 1, 2005, the Department provided all 52 AAAs with a Title V allocation. As of July 1, 2011, 38 of the 52 AAAs have relinquished their Title V funds to the Department and no longer operate a Title V Program. The Department has selected Experience Works, Inc. to provide SCSEP services in these AAA Planning and Service Areas in FY 2011-12 through a direct contract with the Department. If the Department has determined that certain counties are currently over-served according to the U.S. Department of Labor's most recent Equitable Distribution Report, then the Department reserves the right to move its slots to under-served counties. The U.S. Department of Labor (USDOL) requires its state SCSEP grantees to work with the National SCSEP Sponsors to manage the distribution of SCSEP slots in each state so that the result is equity in each county per an equitable distribution formula prescribed by the USDOL.

The 14 AAAs that will continue to receive Title V funds from the Department in FY 2011-12 are: Philadelphia, Lancaster, Lehigh, Northampton, Schuylkill, Allegheny, Washington/Fayette/Greene, Butler, Westmoreland, Armstrong, Erie, Luzerne-Wyoming, Northumberland, and Lycoming-Clinton.

The AAAs shall make income eligibility determinations pursuant with the USDOL's Training and Employment Guidance Letter No. 12-06 and the most recent federal poverty guidelines issued by the U.S. Department of Health and Human Services. AAAs shall use APD # 07-05-01, SCSEP Eligibility Determination, Assessment, Individual Employment Plan (IEP) and IEP Related Termination Requirements and Forms when determining eligibility, conducting assessments and preparing IEPs. All permissible training activities to be provided by the AAA with Title V funds provided by PDA shall be in accordance with the USDOL's Older Worker Bulletin No. 04-04. The AAAs assure that they will conform to all of the attached programmatic assurances and will sign and date the attached programmatic assurances and return them to the Department no later than July 15, 2011.

AAAs will be expected to meet the following PDA SCSEP performance goals in FY 2011-12. These are: Entered Employment – 42%, Retention – 59.7%, Earnings - \$7,605 Service Level – 100%, Community Service – 50%, Most-in-Need – 2.46.

II. Program Reporting Instructions

The AAAs are required to enter new participant, host agency and employer data and update data on current participants, host agencies and employers in the SCSEP Data Collection and Reporting System on a regular basis. The AAAs must generate a Quarterly Progress Report (QPR) no later than 30 days after the end of each quarter. Due dates for generation of the QPRs are as follows:

- Generate First Quarter QPR by October 30, 2011
- Generate Second Quarter QPR by January 30, 2012
- Generate Third Quarter QPR by April 30, 2012
- Generate Fourth Quarter QPR by July 30, 2012
- Generate Final QPR by September 30, 2012

The AAAs are also responsible for generating Data Quality Reports (DQRs) after the generation of the QPR. All errors starting with durational rejects must be corrected and another QPR must be generated. It is expected that the AAAs generate error free QPRs by the 30th day following the end of the quarter.

III. Fiscal Information

The Department issued a renewal letter to the Title V Agreement to the AAA on May 3, 2011. The AAA will extract the U0112XX.XLS file from the BUDZIP12.EXE file in the AS/400 in the AAAEXCEL Folder and complete the file according to the instructions listed below. The files are available in the AAAEXCEL folder. The file will be renamed and macroed according to the instructions contained in the "Procedures for Area Agency on Aging To Submit Program Financial Reports To Pennsylvania Department Of Aging Fiscal Year 2011-2012" manual extracted from the BUDZIP11.EXE file. Follow the instructions in the instruction manual for submitting the .prn text file created from the macro to the Department. The Department will provide the AAA with a letter along with the budget approving the budget submission.

Instructions for completing Document U01-12 are as follows:

The line item budget should identify only Title V funds and any matching funds for each line item. The Title V dollar amount to be budgeted for each AAA is contained in Exhibit 1.

The USDOL will pay no more than 90% of the total cost of activities carried out under a Title V grant. Consequently, a 10% non-federal match is required. The non-federal match could include cash and in-kind services including, but not limited to, supervision of participants at host agencies.

The PDA will control Title V expenditures by the following budget categories: Administration, Participant Wages and Fringe Benefits (PWFB) and Other Participant Costs (as identified on the Title V budget). A minimum of 78% of the available funds must be allocated and expended for PWFB. The Department may change the 78% PWFB funding parameter at any time during the fiscal year and it will notify the AAAs if there is a

change. No more than 10% of the available funds can be allocated and expended for administrative costs. Functions that are considered administrative for SCSEP purposes are: accounting, financial & cash management, procurement, property management, personnel management, payroll, coordinating the resolution of audit or monitoring findings, audits, legal services, developing systems and procedures and monitoring of administrative functions. Administrative costs include: goods and services required for administrative functions and travel costs to carry out administrative activities. Administrative costs associated with information technology include the costs of information systems related to administrative functions such as payroll, accounting, procurement and purchasing systems. It also includes the costs associated with the purchase, development and operation of information systems.

Other Participant Costs (OPC) includes: intake and eligibility determination, participant assessment, Individual Employment Plan (IEP) preparation, host agency development, outreach and recruitment, classroom training, job placement assistance and participant support services. Participant support services may include: transportation and incidentals, such as work shoes, badges, uniforms, eyeglasses, tools, child and adult care, and temporary shelter. Some information technology costs can also be charged to OPC, such as the cost of tracking and monitoring participant and performance information, developing employment statistics and performance information. Please note that if a Title V participant performs work involving assessment and planning for other participants, those costs should be included in the Participant Wages and Fringe Benefits category.

SCSEP funds can only be used to pay for the following benefits: FICA, the costs of physical examinations and worker's compensation. SCSEP funds shall not be used to pay for pension benefits, annual leave, accumulated sick leave, unemployment compensation costs for SCSEP participants or bonuses to SCSEP participants.

Monthly Expenditure Report

Document U11-12, will be utilized to complete and submit the monthly expenditure report. The AAA will extract the U1112XX.XLS file from the PFRZIP12.EXE file in the AS/400 in the AAAEXCEL Folder and complete the file according to the same instructions and rules under which the budget was developed.

In order to comply with federal reporting timeline requirements set by the U. S. Department of Labor, expenditure reports must be submitted to the Department no later than the 10th day of the subsequent month. The expenditure reports are to be completed using at a minimum a modified accrual system. A modified accrual system accounts for expenditures according to the period in which the benefit for the expenditure occurs. Accounts payable as well as estimated expenditures for invoices not received should be included.

Reimbursement for reported expenditures will continue to be paid on a Quarterly basis.

The U1112XX.XLS files are available in the AAAEXCEL folder. The file must be renamed and macroed according to the instructions contained in the "Procedures For Area Agency on Aging To Submit Program Financial Reports To Pennsylvania Department Of Aging FY 2011-2012" manual extracted from the BUDZIP12.EXE or PFRZIP12.EXE file. Follow the instructions in the instruction manual for submitting the .prn text file created from the macro to the Department.

The AAAs are required to submit the Title V monthly expenditure reports to the Department by the dates listed below in order to comply with federal reporting requirements:

<u>Report</u>	<u>Quarter</u>	<u>Due Date</u>
1	July	August 10, 2011
2	August	September 9, 2011
3	September	October 10, 2011
4	October	November 10, 2011
5	November	December 9, 2011
6	December	January 10, 2012
7	January	February 10, 2012
8	February	March 9, 2012
9	March	April 10, 2012
10	April	May 10, 2012
11	May	June 8, 2012
12	June	August 15, 2012

The Department will monitor and control the AAAs' expenditures at the service cost level (Administration, PWFB and OPC). The AAAs may reallocate funds between service cost centers in an amount up to 10% or \$10,000, whichever is greater, of the amount budgeted in that cost center. Any reallocation of funds between service cost centers in excess of 10% or \$10,000 must receive prior approval from the Department. No reallocation may cause the budget or expenditure of Title V federal funds to violate the parameters for Administration (no more than 10%) or PWFB (no less than 78%).

Program, including program reporting related questions, should be directed to Rocco Claroni at (717) 772-2932 or via e-mail at rclaroni@state.pa.us. Fiscal reporting and other fiscal related questions should be directed to Rob Heinlen at (717) 772-0192 or via e-mail at RHeinlen@state.pa.us.

EXHIBIT 1

PA DEPT. OF AGING AAA FY 2011-12 SCSEP ALLOCATION & SLOTS

AAA	2011-12 ALLOCATION	2011-12 SLOTS
01 ERIE	\$ 84,905	9
06 ALLEGHENY	481,128	51
07 WESTMORELAND	141,508	15
08 WASHINGTON/FAYETTE/GREENE	188,678	20
14 LYCOMING/CLINTON	56,603	6
16 NORTHUMBERLAND	47,169	5
26 LANCASTER	150,942	16
31 PHILADELPHIA	867,918	92
33 LEHIGH	84,905	9
34 NORTHAMPTON	66,037	7
37 LUZERNE/WYOMING	169,810	18
40 SCHUYLKILL	75,471	8
45 ARMSTRONG	37,736	4
50 BUTLER	56,603	6
TOTAL	\$ 2,509,413	266

PROGRAMMATIC ASSURANCES – PY 2011 GRANT

The programmatic assurances below reflect standard grant requirements that the Department of Labor has determined are consistent with sound program practices.

Please certify that your agency or organization conforms, and will continue to conform, to these assurances throughout the period of the grant by checking off the assurances below.

The subgrantee acknowledges and certifies that it:

Recruitment and Selection of Participants

Has developed and implemented methods to recruit and select participants to assure that a maximum number of eligible individuals are able to participate in the program.

Uses income definitions and income inclusions and exclusions for SCSEP eligibility, as described in TEGL 12-06, to determine and document participant eligibility. TEGL 12-06 may be accessed on www.doleta.gov/seniors under "Technical Assistance".

Has developed strategies to recruit applicants who have priority of service as defined in OAA Section 518(b)(1)-(2) and by the Jobs for Veterans Act, P.L. 107-288.

Priority is to be afforded to individuals who:

- a) Are covered persons in accordance with the Jobs for Veterans Act.
- b) Are 65 years or older.
- c) Have a disability.
- d) Have limited English proficiency or low literacy skills.
- e) Reside in a rural area.
- f) Have low employment prospects.
- g) Have failed to find employment after utilizing services provided through the One-Stop Delivery System.
- h) Are homeless or are at risk for homelessness.

In addition, veterans' priority of service means that "covered persons" (veterans and certain spouses, including widows and widowers) who are eligible for SCSEP must receive services instead of, or before, non-covered persons.

Assessment

- Assesses participants at least twice per 12 month period.
- Uses assessment information to determine the most appropriate community service assignments for participants.

Individual Employment Plan (IEP)

- Establishes an initial goal of unsubsidized employment for all participants.
- Updates the IEP at least as frequently as the assessments (at least twice per 12 month period).
- Modifies the IEP as necessary to reflect other approaches to self-sufficiency, if it becomes clear that unsubsidized employment is not feasible for a participant.
- For participants who will reach the individual durational limit or would not otherwise achieve unsubsidized employment, has provision in the IEP to transition to unsubsidized employment or other services.

Community Service Assignment (CSA)

- Ensures that the initial CSA is based on the assessment done at enrollment.
- Uses the IEP to determine when, if appropriate, to rotate participants through assignments to acquire skills necessary for unsubsidized employment.
- Selects host agencies that are designated 501(c)(3) organizations or public agencies.
- Has procedures in place to assure adequate supervision of participants at host agencies.
- Has procedures in place to ensure safe and healthy working conditions.

Recertification of Participants

- Recertifies the income eligibility of each participant at least once every 12 months, or more frequently if circumstances warrant.

Physical Examinations

- Offers physicals to participants upon program entry and each year thereafter as a benefit of enrollment.
- Obtains a written waiver from each participant who declines to have a physical.
- Does not receive a copy or use the results of the physical exam.

Host Agencies

- Has developed and implemented methods for recruiting new host agencies to provide a variety of training options that will enable participants to increase their skill level and transition to unsubsidized employment.

- Maintenance of Effort: Does not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals who are not SCSEP participants.
 - Does not displace currently employed workers (including partial displacement, such as a reduction in non-overtime work, wages, or employment benefits).
 - 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.
 - 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.

Orientation

Provides orientations for its participants and host agencies, including information on:

Program Overview

- Project goals and objectives
- Community service assignments
- Training opportunities
- Available supportive services
- The availability of a free physical examination
- Participant rights and responsibilities
- Host agencies
- Sub-recipients must also provide sufficient orientation to applicants and participants, which should include the following information:
 - Grantee and local project roles, policies, and procedures
 - SCSEP goals and objectives
 - Role of supervisors and host agencies
 - Evaluation of participant progress
 - Maximum individual duration policy
 - Provision of safe working environment
 - Annual monitoring and safety assessment
 - Documentation requirements
 - Termination policies
 - Grievance procedures

- Development of Individual Employment Plans
- Maximum individual duration policy, including the possibility of waiver
- Termination policies
- Grievance procedures
- Holiday and sick leave

Wages

Provides participants with the highest applicable required wage for time spent while in orientation, training and community service assignment. The applicable wage is either the highest of the federal or state minimum wage.

Participant Benefits

- Provides benefits that are required by state or Federal law (such as workers' compensation) and the costs of physical examinations.
- Has established written policies relating to compensation for scheduled work hours during which host agency is closed for Federal holidays.
- Adheres to written PDA policy relating to approved breaks in participation and necessary sick leave that is not part of an accumulated sick leave program.
- Does not use grant funds to pay the cost of pension benefits, annual leave, accumulated sick leave, or bonuses.

Durational Limits

Maximum Project Duration: 27 Months

- Complies with an average project duration of 27 months or less, unless DOL approves an extension to 36 months.

Maximum Participant Duration: 48 Months

- Complies with the requirement that participants may participate in the program no longer than 48 months (whether or not consecutively) unless the participant receives a waiver in accordance with PDA policy.
- Notifies participants of 48 month maximum duration requirement, including the possibility of a waiver, if applicable, at the time of enrollment and each year.

Transition Services

- Has a system in place to transition participants to unsubsidized employment or other assistance before the participants maximum enrollment duration has expired.
- Provides 30 day written notice to participants prior to durational limit exit from the program.

Termination Procedures

- Provides a 30 day written notice for all terminations that states the reason for termination and informs participants of grievance policies.
- Written Termination Policies Are in Effect for:
 - Provision of false information.
 - Incorrect initial eligibility determination.
 - Income ineligibility determined at recertification.
 - Cause
 - Participant has reached individual durational limit
 - Participant has become employed while enrolled
 - IEP related termination

Over-Enrollment

- Manages over-enrollment to minimize impact on participants and avoid layoffs.

Administrative Systems

- Ensures representation at any and all SCSEP Trainings sponsored by the Department of Aging.
- Ensures that all financial and program reports are accurate and are submitted in a timely manner, as required.
- Has a written plan in place for both disaster response and recovery so the SCSEP may continue to operate and provide services.

Collaboration and Leveraged Resources

- Collaborates with other organizations to maximize opportunities for participants to obtain workforce development, education, and supportive services to help them move into unsubsidized employment. These organizations may include (but are not limited to): Workforce Investment Boards, One-Stop Career Centers, vocational

rehabilitation providers, basic education and literacy providers, and community colleges.

Supportive Services

- Provides supportive services, as needed, to help participants participate in their community service assignment and to obtain and retain unsubsidized employment.
- Has established criteria to determine when participants will receive supportive services, including after obtaining unsubsidized employment.

Complaint Resolution

- Establishes and uses written grievance procedures for complaint resolution for applicants, employees and participants.
- Provides applicants, employees, and participants with a copy of grievance procedures.

Procedures for Payroll and Workers' Compensation

- Makes all required payments for payroll and workers' compensation premiums on a timely basis.
- Ensures that host agencies do not pay workers' compensation costs for participants.

Maintenance of Files and Privacy Information

- Maintains participant files for three program years after the program year in which all follow-up activity for a participant is completed.
- Participant records are securely stored and access is limited to appropriate staff in order to safeguard personal identifying information.
- Participant medical records are securely stored separately from all other participant records and access is limited to authorized staff for authorized purposes.
- Safeguards to preclude tampering with electronic media are established, e.g., personal identification numbers (PINs).
- Ensures that the PA Department of Aging is immediately notified in the event of any potential security breach of personal identifying information, whether electronic files, paper files, or equipment is involved.
- Complies with, and ensures that authorized users under its grant comply with, all SPARQ access and security rules.

Documentation

- Maintains documentation of waivers of physical examinations by participant.
- Maintains documentation of the provision of complaint procedures to participants.

- Maintains documentation of eligibility determinations and recertifications.
- Maintains documentations of terminations and reasons for termination.
- Maintains records of grievances and outcomes.
- Maintains records required for data validation.

Data Collection and Reporting

- Ensures that accurate data are submitted a timely manner to SPARQ, as required.
- Ensures that those capturing and recoding data are familiar with the latest instructions for data collection, including Department administrative issuances, e.g., Older Worker Bulletins, TEGs, Data Collection Handbook, and internet postings.

If the subgrantee has not checked a specific box(es) herein, information must be provided on a separate attachment indicating what specific steps it will take to conform to this standard grant requirement(s).

Signature of Authorized Representative

Date