



**AGING PROGRAM DIRECTIVE**

<b>APD#</b> 22-05-01	
<b>Issuance Date:</b> June 27, 2022	<b>Effective Date:</b> July 1, 2022
<b>Program Area:</b> Senior Community Service Employment Program (SCSEP)	<b>Disposition:</b> Note Well and File for Reference
<b>Origin:</b> Bureau of Aging Services	<b>Contact:</b> David Miles 717-783-0178

**Subject:** Fiscal Year (FY) 22-23 Title V Allocation, Slot Level, Fiscal, Program and Reporting Requirements

**To:** Executive Staff  
AAA of Westmoreland County  
Lycoming/Clinton Bi-County Office of Aging  
Greater Erie Community Action Committee  
Southwestern Pa. AAA, Inc.  
Lancaster County Office of Aging  
Luzerne/Wyoming Counties Bureau for Aging  
Philadelphia Corporation for Aging

**From:** \_\_\_\_\_  
Robert Torres  
Secretary

**Purpose:** The purpose of this Aging Program Directive (APD) is to transmit to the Area Agencies on Aging (AAAs) the FY 22-23 Title V allocations and number of slots, Title V budget information, and Title V program and financial reporting requirements. This APD also provides citations to the applicable Title V policy documents governing the AAA’s administration of the Title V Program.



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### **I. Title V Program Background and Requirements**

Funding for the Senior Community Service Employment Program comes from the US Department of Labor/Employment and Training Administration. The *Catalog of Federal Domestic Assistance (CFDA) number is 17.235*. The federal award grant period is 7-1-2022 to 6-30-2023 and the sub award grant period is also 7-1-2022 to 6-30-2023.

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 of 1965 (P.L. 89-73) as amended and reauthorized in 2020 (P.L. 116-131), 42 U.S.C. §§3001 *et seq.* The SCSEP fosters and promotes useful part-time work-based training opportunities in community organizations for unemployed individuals age 55 and older whose income does 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, 2022, 45 of the 52 AAAs have relinquished their Title V funds to the Department and no longer operate a Title V Program. Through a Request for Grant Applications, the Department selected a contractor to provide SCSEP services in these AAA Planning and Service Areas in FY 22-23 through a direct contract with the Department. The seven AAAs continuing to receive Title V funds from the Department in FY 22-23 are: Philadelphia, Washington/Fayette/Greene, Lancaster, Luzerne-Wyoming, Westmoreland, Erie, 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. Sub-grantees shall not change the eligibility requirements as they are outlined in 20 CFR § 641.500- § 641.512 of the federal register. All permissible training activities 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. AAAs shall follow the Department's Durational Limit (DL) Policy that is contained in APD 18-05-03. AAAs shall also follow all the policies governing federal holidays, necessary sick leave, leave of absences, terminations and grievances that are contained in APD 18-05-04.

**Note:** Due to the COVID-19 crisis, grantees and sub-grantees were notified through [TEGL 22-19](#) of changes to the Durational Limit Policy for SCSEP individuals participating in the program as of March 1, 2020. The Durational Limit was extended for twelve additional months beyond the normal 48-month limit. Every participant that was enrolled in SCSEP as of March 1, 2020, has received the 12-month extension in the SCSEP Performance and Results QPR (SPARQ) system. Sub-grantees are to follow the Durational Limit (DL) dates in SPARQ when enforcing the department's DL policy as outlined in APD 18-05-03.

The AAAs are required to meet USDOL prescribed SCSEP performance goals in FY 22-23 for the following eight performance measures:

- Entered Employment: 38%
- 4th Quarter Employment: 24%
- Median Earnings Goal: \$2,525
- Service Level Goal: 156.6%
- Community Service Goal: 71%
- Most in Need Goal: 3.2
- Customer Satisfaction-Participant: 84.6
- Customer Satisfaction-Host Agency: 85

## 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 SPARQ system on a regular basis. The AAAs shall generate a Quarterly Progress Report (QPR) no later than 30 days after the end of each quarter. The exact due dates for generation of the QPRs for each quarter shall be forwarded to the AAAs by the Department during the fiscal year. 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 AAAs generate error free QPRs by the Department's prescribed due dates, which shall be sent to the AAAs during the fiscal year.

### **III. Fiscal Information**

Each participating AAA is responsible for entering their budget and expenditure data in AccuFund accurately and in a timely manner. The line-item budget shall 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 shall 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 shall 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 approved total federal award contained in Exhibit 1 shall be allocated and expended for PWFB. No more than 10% of the available funds can be allocated and expended for administrative costs. Functions considered administrative for SCSEP purposes are: accounting, financial & cash management, procurement, property management, personnel management, payroll, 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) include 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, and unemployment compensation costs for SCSEP participants or bonuses to SCSEP participants.

SCSEP sub-grantees are required to withhold all applicable federal, state, and local payroll taxes from participants' paychecks.

**Expenditure Report**

The expenditure reports are to be completed using 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 shall continue to be paid on a quarterly basis.

All reporting shall be done through AccuFund. AAAs are required, at a minimum, to upload quarterly expenditure information. The due dates for the quarterly expenditure uploads are:

<u>Months Covered</u>	<u>Due to PDA</u>
July-September	October 10 <sup>th</sup>
October-December	January 10 <sup>th</sup>
January-March	April 10 <sup>th</sup>
May-June	August 1st

The Department shall 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 shall 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%).

The Programmatic Assurances for FY 22-23 SCSEP Funds (see Exhibit 2) shall be signed and submitted to David Miles by August 1, 2022. Program related questions should be directed to David Miles at (717) 783-0178 or via e-mail at [davimiles@pa.gov](mailto:davimiles@pa.gov). Fiscal reporting and other fiscal related questions should be directed to Rob Heinlen at (717) 772-0192 or via e-mail at [rheinlen@pa.gov](mailto:rheinlen@pa.gov).

**Attachments:** Exhibit 1 AAA Title V Slot Allocations FY 22/23  
Exhibit 2 Programmatic Assurances



**EXHIBIT 1**

**AAA FY 22-23 SCSEP ALLOCATION & SLOTS**

<b>AAA</b>	<b>ALLOCATION</b>	<b>SLOTS</b>
01 ERIE	\$112,965	12
07 WESTMORELAND	\$122,379	13
08 WASHINGTON/FAYETTE/GREENE	\$131,793	14
14 LYCOMING/CLINTON	\$47,069	5
26 LANCASTER	\$141,207	15
31 PHILADELPHIA	\$903,722	96
37 LUZERNE/WYOMING	\$131,793	14
TOTAL	\$1,590,928	169



**EXHIBIT 2**

**Senior Community Service Employment Program (SCSEP) Programmatic Assurances**

You must certify that you will conform to these assurances throughout the period of the grant by checking each of the assurances below. These assurances apply fully to any sub-recipient, local project, or grantee staff involved in the delivery of services. Please provide an explanation for any unchecked boxes.

**You agree to the following:**

Recruitment and Selection of Participants

- Develop and implement methods to recruit and select eligible participants to assure maximum participation in the program.
- Use income definitions and income inclusions and exclusions for SCSEP eligibility as described in TEG L No. 12-06 to determine and document participant eligibility.
- Develop and implement methods to recruit minority populations to ensure at least proportional representation in your assigned service area as listed in the latest Minority Report.
- Develop and implement strategies to recruit applicants who have priority of service as defined in Older Americans Act section 518(b)(1)-(2) and by the VOW (Veterans Opportunity to Work) to Hire Heroes Act of 2011.

Individuals with priority are those who:

- Are covered persons in accordance with the VOW (covered persons who are SCSEP-eligible must receive services instead of or before all non-covered persons);
- Are 65 years or older;
- Have a disability;
- Have limited English proficiency;
- Have low literacy skills;
- Reside in a rural area;
- Have low employment prospects;
- Have failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunity Act (WIOA);



- Are homeless or are at risk for homelessness; or
- Are formerly incarcerated or on supervision from release from prison or jail within five years of the date of initial eligibility determination.

## Assessment

- Assess participants at least twice per 12-month period, or more frequently if appropriate.
- Use assessment information to determine the most appropriate community service assignments for participants.

## Individual Employment Plan (IEP)

- Establish an initial goal of unsubsidized employment for all participants.
- Update the IEP at least as frequently as assessments occur (at least twice per 12-month period).
- Modify the IEP as necessary to reflect other approaches to self-sufficiency, if it becomes clear that unsubsidized employment is not feasible.
- For participants who will reach the individual durational limit or would not otherwise achieve unsubsidized employment, include a provision in the IEP to reflect other approaches to self-sufficiency, transition to other services or programs.
- Rotate participants to a new host agency (or a different assignment within the host agency) based on a rotation policy approved by the Employment and Training Administration (ETA) in the grant agreement and only after making an individualized determination that the rotation is in the best interest of the participant. Such rotation must further the acquisition of skills listed in the IEP.

## Community Service Assignment

- Base the initial community service assignment on the assessment made at enrollment.
- Select only designated 501(c)(3) organizations or public agencies as host agencies.
- Put in place procedures to ensure adequate supervision of participants at host agencies.



- Ensure safe and healthy working conditions at the community service assignment through annual monitoring of the host agency site and annual safety consultation with the participant at the host agency site.

## Recertification of Participants

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

## Physical Examinations

- Offer physical examinations to participants upon program entry, and each year thereafter, as a benefit of enrollment.
- Obtain a written waiver from each participant who declines a physical examination.
- Not obtain a copy or use the results of the physical examination to establish eligibility or for any other purpose.

## Host Agencies

- Develop and implement methods for recruiting new host agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Comply with maintenance of effort: Ensure that community service assignments do not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals who are not SCSEP participants. You must specifically ensure that community service assignments do not:
  - Displace currently employed workers (including partial displacement, such as a reduction in non-overtime work, wages, or employment benefits).
  - Impair existing contracts or result in the substitution of Federal funds for other funds in connection with work that would otherwise be performed.
  - 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

- Provide orientations for participants and host agencies, including information on:
  - Project goals and objectives
  - Participant rights and responsibilities
  - Community service assignments
  - Opportunities for paid training outside the community service assignment
  - Available supportive services
  - Availability of free physical examinations
  
- Local staff must address the topics listed above and provide additional orientation to participants on:
  - SCSEP goals and objectives
  - Grantee and local project roles, policies, and procedures
  - Holiday and sick leave
  - Assessment process
  - Development and implementation of IEPs
  - Evaluation of participant progress
  - Health and safety issues related to each participant's assignment
  - Role of supervisors and host agencies
  - Maximum individual duration policy, including the possibility of an extension, if applicable, and the documentation required to support an extension
  - Termination policy
  - Grievance procedure

## Wages

- Provide participants with the highest applicable required wage (highest of Federal, state, or local minimum wage for the most nearly comparable covered employment or minimum wage under the Fair Labor Standards Act of 1938, or the prevailing rate of pay for persons employed in similar public occupations by the same employer) for time spent in orientation, training, and community service assignments.

## Participant Benefits

- Provide workers' compensation, other benefits required by state or Federal law (such as unemployment insurance), and the costs of physical



examinations.

- Provide compensation for scheduled work hours during which the participant's host agency is closed for Federal holidays, which may be paid or in the form of rescheduled work time, and establish written policies related to this compensation.
- Establish written policies relating to approved breaks in participation and any necessary sick leave that is not part of an accumulated sick leave program.
- Not use grant funds to pay the cost of pension benefits, annual leave, accumulated sick leave, or bonuses.

#### Procedures for Payroll and Workers' Compensation

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

#### Durational Limits

##### *Maximum Average Project Duration - 27 Months*

- Maintain average project duration of 27 months or less, unless ETA approves an extension to 36 months.

##### *Maximum Individual Participant Duration - 48 Months*

- Allow participants to participate in the program no longer than 48 months (whether or not consecutively), unless your approved policy allows for an extension and the participant meets the extension criteria.
- Notify participants of your policy pertaining to the maximum duration requirement, including the possibility of an extension if applicable, at the time of enrollment and each year thereafter, and whenever ETA has approved a change of policy.
- Provide 30-day written notice to participants prior to durational limit exit from the program.



## Transition Services

- Develop a system to transition participants to unsubsidized employment or other assistance before each participant's maximum enrollment duration has expired.
- Begin transition planning for participants who will exit for durational limit at least 3-6 months prior to their exit date.

## Termination Policies

- Provide a 30-day written notice for all involuntary terminations that states the reason for termination and informs the participants of grievance procedures and right to appeal.
- Maintain written termination policies in effect and provide to participants at enrollment:
  - Provision of false eligibility information by the participant
  - Incorrect initial eligibility determination at enrollment
  - Income ineligibility determined at recertification
  - Participant has reached individual durational limit
  - Participant has become employed while enrolled
  - IEP-related termination
  - Cause (must be approved by ETA prior to implementation)

## Equitable Distribution

- Comply with the equitable distribution plan for each state in which the grantee operates and only make changes in the location of authorized positions within a state in accordance with the state equitable distribution plan and with prior ETA approval.
- Comply with the authorized position allocations/equitable distribution listed at [www.scseped.org](http://www.scseped.org).
- Collaborate with all grantees authorized to serve in a state in which you operate to achieve compliance with authorized positions while minimizing disruption to the participants.

## Over-Enrollment

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



## Administrative Systems

- Ensure representation at all ETA-sponsored required grantee meetings.
- Communicate grant policy, data collection, and performance developments and directives to staff, sub-recipients, and local project operators on a regular basis.
- Develop a written monitoring tool that lists items you will review during monitoring visits, and provide this tool to sub-recipients and local project operators.
- Develop an annual monitoring schedule, unless the federal project officer approves a different standard; notify sub-recipients and local project operators of monitoring plans; and monitor sub-recipients and local project operators on a regular basis.
- Develop and provide training to increase sub-recipients' and local project operators' skills, knowledge, and abilities.
- When appropriate, prescribe corrective action and follow-up procedures for sub-recipients and local project operators to ensure that identified problems are remedied.
- Monitor the financial systems and expenditures, including sub-recipients and local project operators on a regular basis to ensure compliance with cost allocations as specified in the regulations.
- Ensure that sub-recipient and local project operators receive adequate resources to effectively operate local projects.
- Train sub-recipients and local project operators on SCSEP financial requirements to help them effectively manage their own expenditures, and provide general financial training as needed.
- Ensure that all financial reports are accurate and submit them in a timely manner, as required.
- Ensure full implementation and monitoring of requirements for customer satisfaction surveys, including participant, host agency and employer surveys.
- Develop a written plan for both disaster response and recovery so that the project may continue to operate and provide services under emergency



circumstances.

## Collaboration and Leveraged Resources

- Collaborate 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 development boards, American Job Centers, vocational rehabilitation providers, disability networks, basic education and literacy providers, and community colleges.

## Supportive Services

- Provide supportive services, as needed, to help participants participate in their community service assignment and to obtain and retain unsubsidized employment.
- Establish criteria to assess the need for supportive services and to determine when participants will receive supportive services, including after obtaining unsubsidized employment.

## Sub-Recipient Selection (If Applicable)

- In selecting sub-recipients in areas with a substantial population of individuals with barriers to employment, national grantees will give special consideration to organizations with demonstrated expertise in serving individuals with barriers to employment (including former recipients of national grants), as defined in the statute.

## Complaint Resolution

- Establish and use written grievance procedures for complaint resolution for applicants, employees, sub-recipients, and participants.
- Provide applicants, employees, sub-recipients, and participants with a copy of the grievance policy and procedures.

## Maintenance of Files and Privacy Information

- Maintain participant files for three program years after the program year in which the participant received his/her final follow-up activity.
- Ensure that all participant records are securely stored by the grantee or sub-



recipient and access is limited to appropriate staff in order to safeguard personal identifying information.

- Ensure that all participant medical records are securely stored by the grantee or sub-recipient separately from all other participant records and access is limited to authorized staff for authorized purposes.
- Establish safeguards to preclude tampering with electronic media (e.g., personal identification numbers and SPARQ or other data system logins).
- Ensure that ETA/SCSEP national office is immediately notified in the event of any potential security breach of personal identifying information, whether electronic files, paper files, or equipment are involved.
- Comply with and ensure that authorized users under the grant comply with all SPARQ and other data system access and security rules.

## Documentation

- Maintain all documentation required for compliance with record retention rule set forth in the first bullet of the prior section, Maintenance of Files and Privacy Information.
- Maintain documentation of waivers of physical examinations by participant.
- Maintain documentation of the provision of complaint procedures to participants.
- Maintain documentation of eligibility determinations and re-certifications.
- Maintain documentations of terminations and reasons for termination.
- Maintain records of grievances and outcomes.
- Maintain records required for data validation.
- Maintain documentation of monitoring reports for sub-recipients and host agencies.

## Data Collection and Reporting

- Ensure the collection and reporting of all SCSEP required data according to specified time schedules.



- Ensure the use of the Office of Management and Budget-approved SCSEP data collection forms and the SCSEP Internet data collection and evaluation system, SPARQ, or the successor data system as designated by ETA.
- Ensure at the grantee or sub-recipient level that those capturing and recording data are familiar with the latest instructions for data collection, including ETA administrative issuances (e.g., Training and Employment Guidance Letters, Data Collection and Data Validation Handbooks, and the Older Worker Community of Practice).
- Ensure data are entered directly into the WDCS/SPARQ, or the successor data system as designated by ETA.
- Legally obligate sub-recipients to turn over complete data files in the specified electronic format, as well as hard copy case files, to the grantee when sub-recipients cease to administer SCSEP.
- Legally obligate new sub-recipients to collect and enter complete data related to any participants whom they acquire upon becoming sub-recipients, including any participants who are still in the follow-up period.

If the grantee is not in compliance with any of the assurances above, provide information on a separate attachment indicating what specific steps the grantee is taking to conform to these standard grant requirement(s).

By signing below, the grantee certifies that their organization will comply with each of the listed requirements and will remain in compliance for the program year for which they are submitting this application.

\_\_\_\_\_  
Signature of Authorized Representative

\_\_\_\_\_  
Date