



***Florida Department of Elder Affairs***  
***Senior Community Service Employment Program***  
***Handbook***



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## **INTRODUCTION**

The Florida Department of Elder Affairs (DOEA) Senior Community Service Employment Program (SCSEP) Operations Handbook is a guide for sub-grantees to follow for implementation of required program activities in accordance with contractual obligations, as well as state and federal guidelines. Sub-grantees are not to impose policies that are in direct conflict with the information outlined in this handbook. All policy changes are subject to prior DOEA approval. The most current version of this handbook should always be used. To ensure proper tracking and processing of requests, your assigned contract manager is your first source for information; however, the SCSEP State Director is available as needed to provide guidance and clarity or to expedite decisions.

## **PROGRAM OVERVIEW**

SCSEP is a program administered by the U.S. Department of Labor (USDOL) and funded under Title V of the Older Americans Act (OAA) of 1965, Public Law 109-365, as amended in 2006. It serves unemployed low-income persons who are 55 years of age and older and who have poor employment prospects by training them in part-time community service assignments and assisting them in developing skills and experience to facilitate their transition to unsubsidized employment.

## **OAA REAUTHORIZATION AND SCSEP**

On March 21, 2016, the U.S. House of Representatives passed S. 192, the Older Americans Act Reauthorization Act of 2016, by unanimous voice vote. The legislation amends the bill passed by the U.S. Senate on July 16, 2015. A bipartisan group of 65 Representatives wrote to the House Education and the Workforce Committee leaders urging them to action on OAA reauthorization. The Senate unanimously approved the House amendments on April 7, and President Obama signed it into law on April 19, 2016. The House bill adds language in two areas.

1. Specific authorization levels for each year throughout the three-year reauthorization.
2. Updating Senior Community Service Employment Program (SCSEP) to reflect the recently-enacted workforce development reauthorization and improving the grant process.

For additional information please visit:

<https://www.ncoa.org/public-policy-action/older-americans-act/house/house-oaa-reauthorization-act-of-2016/>

## **PROGRAM PURPOSE**

The purposes of SCSEP are to foster individual economic self-sufficiency and promote useful part-time opportunities in community service assignments for unemployed low-income persons who are 55 years of age or older, particularly persons who have poor employment prospects, and to increase the number of older persons who may enjoy the benefits of unsubsidized employment in both the public and private sectors. (OAA§ 502(a)(1)).

## **SUB-GRANTEE RESPONSIBILITIES**

Organizations that contract with DOEA for SCSEP services must adhere to the following requirements:

1. Follow provisions outlined in the standard contract and Attachment I.
2. Maintain complete and accurate participant records, including case notes.
3. Meet or exceed performance goals.
4. Monitor host agencies to assure safe and healthy working conditions and proper training of participants.
5. Submit accurate and timely programmatic and financial reports as required.
6. Establish cooperative relationships with other SCSEP providers, Workforce Innovation and Opportunity Act (WIOA) boards and providers, Area Agencies on Aging (AAA), and other agencies serving older Floridians.
7. Establish appropriate cost-effective systems for payment of SCSEP wages.
8. Provide uniform fringe benefits per DOEA directives.
9. Expend SCSEP funds in accordance with established budget limitations and federal regulations.
10. Enter accurate participant data in the SCSEP Performance and Results QPR (SPARQ) system in a timely manner.
11. Review participant data and make corrections and updates as required.
12. Reimburse mileage at the rate of \$0.445, in accordance with the contractual agreement and Chapter 287, Florida Statutes.
13. Obtain approval for all out-of-state or conference travel that must be charged to the contract.
14. Convene periodic meetings with participants to provide training and program information.
15. Work in a cooperative manner with other SCSEP grantees to avoid placing participants at agencies that are already served by another SCSEP grantee. Exceptions must be considered on a case-by-case basis.
16. Carry out the duties of this program in accordance with Title V OAA, Federal Regulations and contractual requirements.
17. Provide transitional services to durational limit participants to ensure that they are prepared to exit the program.

## **REQUIRED ACTIVITIES**

- Recruitment and Selection of Participants
- Participant Orientation
- Host Agency Orientation
- Eligibility Determination
- Continued Eligibility for Enrollment Certification
- Assessment

- Community Service Assignments
- Individual Employment Plan Development
- Training
- Supportive Services
- Data Collection and Reporting
- Payment of Wages and Fringe Benefits
- Coordination with WIOA and Similar Organizations
- Job Development
- Placement into Unsubsidized Employment
- Management of Average and Maximum Duration Caps
- Tracking and Reporting of Non-Federal Match
- Post-Placement Follow-up

## **RECRUITMENT**

All activities related to outreach and recruitment must be marketed in a manner that supports the goals of SCSEP. Sub-grantees must promote SCSEP in their communities by participating in job fairs; arranging speaking engagements with key organizations; seeking opportunities for free or reduced cost advertisements with the local media; and dissemination of flyers, postcards and other promotional material at churches, senior centers, nutritional centers, supermarkets and other prominent locations. Due to the limited number of funds available for recruitment of participants, sub-grantees should take advantage of public service announcements and potential in-kind resources or donations to assist in attracting eligible individuals to the program. All efforts must be documented and maintained in the sub-grantee's outreach and recruitment file.

One-Stop Career Centers should be asked to display promotional material produced nationally and locally in strategic locations, to incorporate information about the program in workshops and training presentations, to provide meeting and office space for recruitment activities and program staff, and to endorse the value and skill set of program participants through various regional initiatives.

## **NEW RECRUITMENT STRATEGIES**

New strategies must be used to recruit applicants who can meet the income eligibility guidelines include targeting low-income areas and organizations that serve this population. Minority recruitment and enrollment should be targeted to communities where such populations are concentrated. Marketing and outreach efforts should include the following:

- a. Free or low-cost ads placed in newspapers, bulletins, and newsletters that serve targeted populations;
- b. Presentations to organizations that serve targeted populations;
- c. Posting and dissemination of fliers in targeted population communities; and
- d. Developing partnerships with agencies, faith-based organizations, civic organizations, and other groups that serve targeted populations.

## **MEDIA APPROVAL**

All media, including but not limited to publications, radio, or television spots and interviews, require prior approval by the DOEA Communications Director.

**Publications and Flyers** – Please submit all requests to your contract manager in writing with a draft copy of the publication in an editable format prior to items. Templates with interchangeable information like cities or phone numbers can also be approved.

The DOEA logo is required on all publications paid with State SCESP grant funds. The logo is required to be of equal or greater size to the sub-grantee's logo. By providing us an editable version of your document, we can assure that this requirement is upheld.

Once a publication, template or advertisement has been approved, repeat approval is not necessary; however, you are required to verify that the most current version of the DOEA logo and other pertinent information is up to date.

**Interviews and/or Radio** – Please submit a request to your contract manager in writing for approval of interviews and/or radio spots with a list of questions or narrative for the activity prior to the activity start.

It is understood that interviews may be unplanned. If this happens, please notify your contract manager within 24 business hours in writing, including a description of the events.

**Presentations** – Please submit all requests to your contract manager in writing with a draft of the PowerPoint or slide show presentation to be used for SCSEP outreach. This only pertains to presentations that have a visual component. When possible, submit to your contract manager at least 30 days in advance of the presentation. Once a presentation has been approved, repeat approval is not necessary; however, you are required to verify that the most current version of the DOEA logo and other pertinent information is up to date.

It is our goal to expedite the approval process; however, we ask that you make your request as soon as you can to avoid delays that may impact you.

## **PRIORITY OF SERVICE**

Priority is to be afforded to individuals who are 65 years of age and older or those who:

1. Have a disability;
2. Have limited English proficiency or low literacy skills;
3. Reside in a rural area;
4. Are veterans or spouses of veterans as defined in 20 CFR 641.520(a)(2);
5. Have low employment prospects;
6. Have failed to find employment after utilizing services provided through the One-Stop Delivery System; or
7. Are homeless or are at risk for homelessness.
8. In addition, documentation must be maintained to show efforts made to serve minority individuals.

Sub-grantee staff is not expected to locate such participants, but rather, when faced with enrolling several individuals, preference must be given to the individuals with these characteristics. If no individuals possess the preference characteristics, enrollment must still be based on the age and veteran's priorities.

## **PROGRAM ELIGIBILITY REQUIREMENTS**

*Eligibility must be determined at the time an individual applies to participate in the program. Job-Ready individuals must be referred to One-Stops for unsubsidized employment assistance. The following eligibility factors must be examined and properly documented in each participant's file:*

1. **Age:** 55 and older
2. **Employment Status:** Unemployed (Including prior to application with reasonable determination)
3. **Income:** Family income cannot be more than 125 percent of federal poverty levels. (The actual includable income for the 12 months preceding application or re-certification must be used.) (See OWB-04-05 for a list of includable income.) Income must be re-certified at least once every 12 months.
4. **Residence:** The applicant must live in the state where the project is authorized at the time of enrollment.

*The sub-grantee's intake person must be properly trained on how to complete an income eligibility form to determine the annualized family income as described in Training and Employment Guidance Letter (TEGL) No. 12-06 by using form OMB Approval Number: 1205-0040 Expiration Date: 8/31/2018 found at: <http://www.charteroakgroup.org/resources/scsep.shtml>*

*(also included with this guide) or by entering the information gathered directly into SPARQ and then printing a copy for the file. Creation of your own form is acceptable however, it must contain space and/or a series of choices that are acceptable for documenting the four eligibility factors, eligibility information and categories regarding the calculation method, amount of income, source of income and the organization providing the information. It must also identify both included and excluded income. The intake worker and the applicant must certify the information is correct by signing and dating the form. All altered forms must have DOEA approval prior to implementation. Copies of all required documents must be collected, and maintained in the applicant's file and stored in a secure location. Telephone verifications and electronic signatures can only be used when official documentation cannot be obtained or when the cooperating agency, employer, or other organization agrees to supply such information. Applicants must be notified in writing of their acceptance or rejection through a formal notification process within 30 days of completing the eligibility process.*

## **CONTINUED ELIGIBILITY FOR ENROLLMENT**

Sub-grantees are responsible for verifying the continued income eligibility of program participants at least once every 12 months. Re-certifications may also be completed as circumstances require. DOEA requires all sub-grantees to start annual re-certifications in March, as strongly recommended in TEGL No. 12-06. Due to the extended amount of time it takes to coordinate and re-certify all enrolled participants, DOEA has extended the completions of re-certifications to May of each year. Those who cannot comply with this schedule must submit a written justification to amend the recertification period. Income documentation to support recertification must be retained in each participant's file. Self-

attestation of income is not allowed. The re-certification process is designed to avoid duplication and to reduce the number of actual documents attained from participants if there has not been a significant change in income or family size that may affect eligibility. If there has been a significant change, income documentation to support the re-certification must be obtained and placed in the participant's file. Documentation must be maintained at the intake office for both favorable and unfavorable determinations unless DOEA has approved alternative locations.

## **ELECTRONIC FILING**

Electronic storage of files is acceptable but must include all the documentation that is held in a hard copy file and must meet the same standard of security required per DOL and HIPAA. It is required that files are readily accessible, legible, and organized in the same order as the hard copy file. Participant files must not be emailed or faxed unless using secured encryption, and Personally Identifiable Information (PII) and Protected Health Information (PHI) must be redacted. For purposes of monitoring, it is permissible to use secure file share systems and file copies sent certified mail. Hard copy original files should only be sent by certified mail when deemed necessary by DOEA.

## **SERVICE TO MINORITIES**

Targeted recruitment efforts must be incorporated into program operations to increase minority enrollments if this is identified as a concern by the contract manager based on data contained in the quarterly progress report. The contract manager may request documentation or written explanation as to how these processes may be improved if deficiencies are found.

Enhanced recruitment efforts may be necessary in minority communities, including advertising in minority newspapers, canvassing local venues to promote the program by displaying brochures or posting flyers, speaking before minority groups, and communicating with faith-based organizations and health facilities that are frequented by minority members of the community.

## **WAGES**

No wages can be paid to participants until they have been assigned to a community service position. The highest minimum wage (state or federal) for time spent in orientation and training must be paid to participants.

- The federal minimum wage - \$7.25
- The state minimum wage - \$8.10\*
- Participant staff wage maximum - \$12.00

\* Florida's minimum wage will be \$8.25 per hour, effective January 1, 2018.

## **PARTICIPANT FRINGE BENEFITS**

Fringe benefits must be provided to participants in accordance with section 502(c)(6)(A)(i) OAA Amendments. Each sub-grantee must include the fringe benefit policy in their participant's handbook, and participants must be properly informed about the fringe benefit policy during orientation. Sub-

grantees cannot develop or implement policies that conflict with DOEA directives. All policies and procedures created by the sub-grantee must be approved in writing by DOEA prior to implementation.

**A copy of each sub-grantees' fringe benefit policy must be evaluated and approved for use to ensure it complies with program requirements and provides benefits to participants uniformly.**

All SCSEP sub-grantees must ensure that participants are covered under a worker's compensation policy. Since this is a training program and participants are not employees while enrolled in the program, unemployment compensation is not a required fringe benefit.

If participants are scheduled to work in a community service assignment during the following holidays established under federal law (5 U.S.C. 6103), they shall be properly compensated for hours worked: New Year's Day, Dr. Martin Luther King Jr.'s Birthday, Presidents' Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans Day, Thanksgiving Day, and Christmas. If a host agency is closed for any of these holidays, the sub-grantee's participant handbook must have a policy for holiday hours, choosing one of the following forms of compensation:

- The participant must be compensated at the participant's hourly wage for their missed scheduled training hours; or
- The participant must be allowed to make up their missed scheduled hours. The participant shall work with the host agency supervisor and Project Director to reschedule hours. Holiday hours must be made up no later than the following pay period, and participants cannot exceed 29 hours of paid training per week.

Participants are not permitted to earn or accumulate annual leave; however, participants can make up missed training hours. The participant's scheduled hours and make up hours cannot exceed 29 hours in a week, and all hours must be made up no later than the following pay period.

## **LEAVE OF ABSENCE**

This policy governs approved breaks in participation, including breaks for necessary sick and personal leave. Violation of the policy is grounds for termination and is subject to DOEA's grievance procedure. See Section 641.580(d) of the regulations. Participants should acknowledge in writing their receipt of this policy.

Sub-grantees must provide necessary sick leave to participants, but they are not permitted to earn or accumulate sick leave or annual leave. However, participants can make up time if they must be away from their community service assignment due to illness, death in the family, jury duty, or personal leave, if it is approved by the host agency supervisor and the sub-grantee administrator. Any absence longer than four days or 20 hours requires a Leave of Absence Request Form, which must be maintained in the participant's file. The DOEA Contract Manager will review these forms during annual programmatic monitoring. Once on Leave of Absence, participants are not eligible to make up time. A participant on an approved break is still a participant. A Leave of Absence places a hold on the participant's time in the program, extending their Durational Limit date to accommodate for approved leave beyond four days or 20 hours. However, the break cannot exceed 90 days. The affected participant should be contacted when they have been on leave for approximately 45 days to determine his/her status and the anticipated return date. If the anticipated return date exceeds the 90-day maximum, the participant should be given a 30-day termination notice and informed that his/her termination date will be on the 90<sup>th</sup> day. Once the participant reaches 60 days of approved leave, they should be given a 30-day termination notice and informed that his/her termination date will be on the 90<sup>th</sup> day. It is permissible for a participant to return after a termination letter has been sent but prior to the termination day.

Termination letters must clearly state the reason for termination, and a copy of the grievance procedures must be included. Participants cannot be placed on a leave of absence and left in this status indefinitely. DOEA staff will monitor the Leave of Absence Report in SPARQ and request corrective actions as warranted.

## **PHYSICAL EXAMINATIONS**

Participants must be offered the opportunity to have a free physical examination when they begin with the program and annually thereafter. They must be informed that physical examinations are a fringe benefit of the program, and the results of the exam must not affect their eligibility. Participants must be informed that they have the option of sharing the results of their physical examination or to maintain their privacy by not sharing the results. When participants elect to provide a written report of their physicals, the results must be maintained in accordance with HIPAA laws, rules, and regulations (<https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/>). If a participant refuses the physical examination, staff must document the refusal by obtaining the participant's signature on a physical examination waiver. Refusal to have the physical examination cannot affect the participant's eligibility.

When possible, local physicians should be asked to provide participants free physical examinations. Community resources such as local public health clinics must also be used to serve participants in this capacity. The importance of participant physical examinations must be stressed to ensure that potentially serious health conditions are detected and treated as necessary.

## **ORIENTATION**

Participants and host agencies must be provided orientation in a one-on-one setting or in a group using the appropriate orientation checklist. The document must be signed and dated by the participant and/or Host Agency Supervisor dependent on which orientation has been provided. This signature states that they understand all of the elements listed and that the sub-grantee representative has explained all elements of the orientation form. A copy of all documents outlined in the orientation must be given to each participant and/or host agency.

Host agency orientation must be provided in the following situations:

- New HA Orientation – Has never been a HA and must be conducted prior to the start of their first SCSEP participant. This must be done in person.
- New Supervisor Orientation – A new supervisor at an active HA has been appointed the role of participant supervisor. This can be done in person, over the phone, or via video chat.
- HA Refresher – Refresher training of a HA that has been inactive or as seen necessary by the sub-grantee. This can be done in person, over the phone, or via video chat.

## **ASSESSMENTS**

Participant assessments must be completed upon enrollment into the program and no less than six months after the enrollment date and then no less than twice during a 12-month period. The assessment must be made in partnership with the participant and must consider the participant's educational level, work history, skills, interests, talents, physical capabilities, aptitudes, potential for

performing proposed community service assignments, and the existence of any other issues that may affect their ability to secure unsubsidized employment. Sub-grantee staff must complete assessments by conducting personal interviews with participants to determine their job aptitude, level of job readiness, and the types of jobs they are interested in pursuing. Formal assessment instruments may be incorporated into the evaluation process to better identify the skills, abilities, and interests of the participant. The ability for a participant to transition into unsubsidized employment must be part of an on-going assessment process that continues throughout each participant's enrollment in the program and includes a review of performance in community service assignments, personal motivation, and job search activities. Information revealed during the assessment process must be used as a starting point for discussion with the participant to help determine the most suitable community service assignment and to help identify appropriate training and unsubsidized employment objectives. In addition, the assessment must be used to identify supportive services that may be needed to enhance each participant's chance of success in the program. The results of the assessment must be utilized in the development of the Individual Employment Plan (IEP).

### **INDIVIDUAL EMPLOYMENT PLAN (IEP)**

Information revealed or discovered during the assessment process must be recorded in each participant's IEP and must be used as a road map for outlining a specific plan for achieving program goals. The IEP must identify services needed to assist the participant in securing a community service assignment and eventually unsubsidized employment. The IEP must be jointly prepared and signed by the participant and sub-grantee staff, and it must be updated bi-annually for the first 36 months of active participation. However, if there are changes in the participant's progress, interest, attitude, or employment goal, the IEP must be updated more frequently to accommodate any changes. Since the IEP identifies action items for participants, they must be aware of its content. Therefore, sub-grantee staff must meet with participants to identify realistic goals that must be achieved at various intervals throughout their participation in the program. The goals must be reviewed periodically to determine if they need to be modified to better demonstrate the participant's progress and/or ability to achieve the goal.

The initial IEP should include an appropriate employment goal for each participant. If it is later determined that the participant is not likely to obtain unsubsidized employment, the IEP must reflect other approaches to help the participant achieve self-sufficiency, including the transition to other services or programs. All IEP's, including Transitional IEP's, must be saved in the participant file.

### **TRANSITIONAL INDIVIDUAL EMPLOYMENT PLAN (T-IEP)**

The T- IEP replaces the IEP the last 12 months of participation. The T-IEP consists of three pages of reviews needed prior to a participant's durational limit exit date. Each page is tailored for the time left with the SCSEP to identify additional or outstanding needs not yet met by the sub grantee or the participant. All T-IEP's must be saved in the participant file.

### **COMMUNITY SERVICE ASSIGNMENT**

Participants must be assigned to community service employment activities and receive training based on information discovered during the assessment and as identified in the Individual Employment Plan. The types of community service activities that must be emphasized in assigning participants to

subsidized jobs include services to the elderly, office and clerical, educational services, and work that contributes to the general welfare of the community. The assignments must be based on a combination of elements ranging from the expressed needs of the participant, the results of the assessment process, and other factors that influence the participant's ability to perform successfully.

Each participant must be interviewed so that an employment plan can be developed that identifies the participant's job aptitude, job readiness, work experience, skills, and interest. The information discovered during the assessment process and recorded on the IEP must be used to match participants to appropriate community service assignments.

Sub-grantees must use host agencies that are public agencies and private organizations exempt from taxation under the provisions of Section 501(C) (3) of the Internal Revenue Code of 1986 and projects sponsored by organizations other than political parties. **State issued documents cannot be used to satisfy non-profit status.**

Examples of host agencies that must be used include the following: public schools, hospitals, nutrition centers, community action agencies, Area Agencies on Aging, state and local governments, and public libraries. Participants cannot be assigned to work involving the construction, operation, or maintenance of any facility used or to be used as a place for sectarian religious instruction or worship, or to work which primarily benefits private, profit-making organizations. The agency should contribute to the general welfare of the community and should provide services related to publicly owned and operated facilities and projects. The procedures and criteria for selecting working assignments must be evaluated on the uniqueness of job descriptions, innovative nature of services offered, appropriateness of job assignments for older workers, and potential for unsubsidized employment.

## **HOST AGENCY MONITORING**

Sub-grantees are required to conduct on-site reviews to ensure that participants are receiving training that would increase opportunities for unsubsidized employment and that adequate work site supervision is provided. In addition to taking into consideration the interest, skills, and desire of program participants when developing community service assignments, sub-grantees must also analyze labor market information as it relates to industries that offer career opportunities for SCSEP participants. DOEA's issued Host Site Assessment form must be used for this purpose.

## **TARGETING OF KEY INDUSTRIES**

The sub-grantee and DOEA will evaluate the types of community service assignments that are developed in each regional economy and determine if sub-grantees are targeting key industries that are critical to the success of the area. It is not expected that all key industries or occupations will be appropriate for program participants due to the nature of the work. However, labor market information must be used to assist in identifying occupations that are in demand in the service area.

## **PARTICIPANT WORK HOURS**

Each participant must be offered an opportunity to work an average of 20 hours a week; however, some participants may work fewer hours per week if both the participant and the sub-grantee mutually agree. In addition, participant hours may be reduced per DOEA directives to manage funding reductions. DOEA must be made aware of major adjustments to participant work hours to determine if the adjustments will have a positive or negative impact on the program's budget. Sub-grantees may submit a written request to increase participant work hours for up to five extra hours per week if it appears that

attrition or funding adjustments will prevent a portion of the project funds from being fully utilized. This must be approved in writing by DOEA. **Participant work hours must be recorded in each participant's file and should include days and times.**

## **HOURLY WAGE AND AVERAGE WORK HOURS**

The hourly wage paid to participants during community service assignments is the Florida State minimum wage. The hourly wage paid to participants assigned to project administration may not exceed \$12.00. Each participant must be offered an opportunity to work an average of 20 hours weekly. Participants are responsible for completing their own timesheets and turning them into the Host Agency supervisor. Host Agency supervisors should review and sign/approve for accuracy and then submit approved time sheets to the sub-grantee for final approval and payment. Discrepancies or timesheet disputes should be discussed with the participant, Host Agency supervisor, and the Director/Training Coordinator for that region.

## **PARTICIPANT ROTATION**

DOEA does not impose time limits for community service assignments; however, it does encourage sub-grantees to closely monitor the progress of participants to determine if they are gaining skills in their assignments that must enhance their opportunity for unsubsidized employment. If the assignment is not in the best interest of the participant, the sub-grantee may consider initiating a change in host agencies after discussing a potential training improvement plan with the participant and host agency. If training activities or opportunities for employment do not improve, the participant may be transferred to an alternate training site. Rotation of a participant's site cannot be based solely on the time they have been at their host site.

## **WORK SITE SUPERVISION**

Sub-grantee staff must ensure that participants are given adequate work site supervision by making occasional announced and unannounced site visits to host agencies to review the level of supervision provided. They must also meet with participants to discuss the amount and type of supervision they are being provided. DOEA staff must also evaluate the level of supervision provided during on-site monitoring reviews. If it is determined that proper supervision is not being provided, DOEA staff must implement corrective measures immediately. Under no circumstance, shall a SCSEP participant be the only representative at a host agency.

## **SAFETY CHECKS**

Safety checks must be completed by sub-grantee staff prior to placing a participant at a host agency to ensure that participants will not be working in an unhealthy or hazardous environment. Sub-grantee staff must also periodically review the sites after assignments are made to ensure that the working conditions continue to remain safe and meet the standards of the program.

## **PARTICIPANT STAFF**

Participants serving in program administration positions may be paid higher wages due to the nature of their community service assignment, which might involve maintenance of sensitive records. All participants must be served under the same administrative requirements as outlined in each sub-grantee's participant handbook. Any violations observed or discovered during program reviews or interviews with participants must result in mandatory corrective action. **Sub-grantee staff cannot delegate the sole responsibility of eligibility determination and other major program requirements to participant staff.** There must be proper supervision because the participant is still considered to be in a training position. **All work processed by participant staff will be reviewed by a paid staff member and his/her signature must be properly affixed to the paper work.**

## **TRAINING**

### **SPECIALIZED TRAINING**

Sub-grantees may arrange for additional training for participants beyond their community service assignment when it will assist participants in gaining new skills that will increase opportunities for unsubsidized employment. A participant must be assigned to a Community Service Assignment, and must complete at least two weeks at the Host Agency, before being assigned to a Specialized Training. A participant's paid hours still may not exceed 29 hours per week, which consists of combined hours at a Host Agency and Specialized Training, or hours only at the Specialized Training (unless prior approval is received by the DOEA Contract Manager).

A variety of training options must be available that may be related to the participant's SCSEP community service assignment duties or it may be designed to enhance the participant's unsubsidized employment opportunities. Training may be offered through classroom instruction, lectures, seminars, other employment, and training programs and local educational institutions. **(See OWB 04- 04 Permissible Training Activities).**

In addition to community service employment assignments, participants may be provided training based on their expressed needs or desires in the following occupations:

- Administrative and support services,
- Social assistance,
- Telecommunications,
- Educational services, and/or
- Health and personal care.

Organizations that may provide the training must be determined based on locally negotiated training agreements with various public and private training institutions. Sub-grantees must first seek to develop training that can be provided at a reduced rate or that is free to program participants. Most training opportunities of this nature are identified through working relationships established with one-stop career centers, public libraries, and other community-based organizations. Training can also be leveraged through partnerships with various entities within the community. Trainings must be requested and approved by DOEA, only when training exceeds the approved training hours, there are anticipated costs to the contract, or OJE. Items to be included for the approval process include a copy of the current IEP and course information including cost. This should be submitted to your DOEA contract manager five days prior to the class start date.

Training provided to program participants must be identified in each participant's Individual Employment Plan as an outcome that will lead to greater employment opportunities. Ideally, employment commitments should be developed during the training period so that the participant can enter employment immediately after the training ends.

## COMPUTER TRAINING

Computer training is often requested by program participants to increase their job marketability or for social purposes. An assessment must be conducted to determine the level of interest in computer training for all SCSEP participants. This can be in the form of an IEP or detailed case notes. All participants that need the training to help develop skills that will lead to unsubsidized employment opportunities must be encouraged to take advantage of free or low-cost training programs within the community. Sub-grantees are required to identify programs that will accommodate participants as needed.

If job search or job club activities are conducted, they must be combined with other activities. A training plan must be developed that describes how training is related to the participant's assessment and the IEP. Detailed case notes are acceptable. When necessary, sub-grantees are encouraged to seek WIOA funds to supplement SCSEP training. Time spent by participants in training is considered as employment under the project and shall be reimbursed at the participant's established rate of pay. To leverage additional training opportunities for program participants, meetings must be scheduled to discuss specific methods for making new training opportunities available for program participants. The desired outcome is the establishment of mutually rewarding Memorandums of Understanding (MOU). Sub-grantees are not permitted to engage participants in new training opportunities that are not specifically identified in their contract without advance approval.

## On-the-Job Experience (OJE)

Sub-grantees may develop OJE contracts with a public or private employer when a participant's goal is to obtain 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 sub-grantee may provide the participant with an OJE assignment. The sub-grantee must first negotiate the OJE contract with the public or private employer, specifying skills, timelines, and benchmarks the participant must achieve in order to be hired permanently by the public or private employer.

The sub-grantee shall ensure the potential employer places the participant in a suitable training assignment for no more than 40 hours a week for up to twelve weeks to achieve the needed skill levels. The potential employer must also stipulate that at the end of the training period, if the participant's OJE has been satisfactory, the participant must be placed or remain on the potential employer's payroll. *All OJE contracts must be developed in accordance with OWB 04-04.*

OJE assignments must be requested and approved by DOEA, using the Electronic Specialized Training Request Form. Items to be included for the approval process include a copy of the current IEP and OJE contract. This must be submitted to your DOEA contract manager five days prior to the OJE assignment start date.

## **SUPPORTIVE SERVICES**

A supportive service policy should be maintained, which describes how free or low-cost services will be secured. It should also identify community partners that will be used to help participants address barriers to employment. Support services may be offered to participants to help them enter and maintain community service assignments while preparing for unsubsidized employment. Assistance may also be offered after a participant enters unsubsidized employment to improve retention. Supportive services may include uniforms, eyeglasses, counseling, and supplies necessary to help enrollees better perform their job duties. Community resources from organizations such as United Way, one-stop career centers, free counseling centers, community colleges, Elder Helplines, public schools, Legal Aid, The Red Cross, community health centers, Area Agencies on Aging/Aging and Disability Resource Centers,

and community action agencies must be utilized prior to using Title V funds for these services. Documentation, including case notes, should be kept in the participant file showing community services were utilized or were unable to be acquired and the reason(s).

## **PARTICIPANT TRANSPORTATION**

Transportation assistance may be offered to participants when opportunities for providing free or reduced cost services through local resources are not available. If program funds are used to pay for such services, **the need must be fully documented in each participant's IEP.** Sub-grantees must have an approved transportation policy, which stipulates the maximum rate of reimbursement for mileage cannot exceed the state statutory rate of \$0.445 per mile. In addition to mileage reimbursement, bus passes and related public transportation expenses may be used when deemed necessary to assist the participant in fulfilling the goals of the program. Transportation expenditures should provide a benefit to participants and cannot be used to support other programs or services.

## **PLACEMENT INTO UNSUBSIDIZED EMPLOYMENT**

Sub-grantees must develop and maintain positive working relationships with host agencies, businesses, and community organizations to maximize placement of participants into unsubsidized employment. It is not the sole responsibility of participants to find jobs but also the responsibility of the sub-grantee to contact private and public employers directly or through the one-stop delivery system, to identify suitable unsubsidized employment opportunities. The sub-grantee must also encourage host agencies to assist participants.

## **CUSTOMER SATISFACTION SURVEYS**

An employer survey must be delivered to all employers if unsubsidized employment was the result of a substantial service provided to the employer and the employer was aware of the referral. The *SCSEP Data Collection Handbook* provides detailed instructions regarding employer and other survey requirements. **Deliberate violation of this important program requirement could result in program suspension or termination.**

In addition, sub-grantees should refer to the customer survey instructions posted at <http://www.charteroakgroup.com/resources/scsep.html>.

## **DURATIONAL LIMIT**

All program participants must be informed about the 27-months-average participation cap and the 48-months-in-the-aggregate maximum time a participant may spend in the program. The sub-grantee is required to have each participant sign the DOEA Durational Limit Acknowledgement Form during initial orientation, and they must ensure that participants understand this requirement. Participants must also be reminded about this requirement during their bi-annual assessment and/or recertification.

The SCSEP SPARQ system must be used to identify participants who are approaching the maximum time they can spend in the program. Program staff must work to transition participants from the program into unsubsidized employment or into an alternate training program that will assist them in meeting their

employment and training goals. DOEA's Transitional IEP must be used to record all activities starting at least one year prior to exit.

## **PARTICIPANT COMPLAINT RESOLUTION**

In cases where an adverse action is contemplated against participants or in cases where an applicant for enrollment wishes to dispute an unfavorable determination of eligibility, the grievance procedures issued by DOEA must be used to resolve complaints.

During participant orientation, intake staff must discuss the grievance procedures and give each participant a copy of the procedures. Participants with complaints alleging discrimination on the basis of race, color, religion, sex, national origin, handicap, or age must be notified of their right to appeal to the Civil Rights Center for investigation and possible resolution. Participants must also be informed of their right to appeal to USDOL if it is alleged that federal law has been broken. Documentation of all adverse actions and steps to resolve complaints must be maintained in programmatic records.

## **OVER-ENROLLMENTS**

Should attrition or funding adjustments prevent a portion of the project funds from being fully utilized, sub-grantees may use those funds during the period of the agreement to over-enroll eligible individuals. Payments to, or on behalf of, participants in such positions must not exceed the amount of the unused funds available. Over-enrolled participants must be utilized in the same capacity as regularly enrolled participants, and they must be afforded the same rights and opportunities.

## **MAINTENANCE OF EFFORT**

Host agencies must be informed verbally and in writing that the employment of participants funded under Title V of OAA shall comply with Maintenance of Effort provisions as specified in the federal regulations (<https://www.doleta.gov/Seniors/pdf/FinalRule2010.pdf>) and OAA.

### **DOEA must evaluate adherence to the requirements on a continuous basis to ensure that the provisions stated below are not violated:**

- (1) Increase in employment opportunities over those that would otherwise be available;
- (2) Must not result in displacement of currently employed workers, including partial displacement, such as a reduction in hours, overtime work, wages, or employment benefits;
- (3) Must not impair an existing contract for service or result in the substitution of federal funds for other funds in connection with work that would otherwise be performed;
- (4) Must not substitute project jobs for existing federally assisted jobs;
- (5) Must not employ or continue to employ any enrollee to perform work, which is the same or substantially the same as that performed by any other person who is on layoff.

## **COLLABORATION**

SCSEP state sub-grantees must collaborate with other entities serving the same area to maximize opportunities for SCSEP participants in a variety of ways to help with training services and unsubsidized employment. Some successful ways of collaboration include the following:

- Referral of participants to WIOA-funded job training programs;
- Participation on Regional Workforce Boards;
- Participation on one-stop Committees;
- Establishment of Memorandums of Understanding with Regional Workforce Boards;
- Development of Host Site Agreements with one-stop centers;
- Access to labor market information and local job listings;
- Office space within One-Stop Centers; and
- Joint participation in Job Fairs.

## **PERFORMANCE STANDARDS AND REPORTING REQUIREMENTS**

Program data must be collected and submitted regarding the program performance measures and the core indicators of performance in accordance with instructions provided by the USDOL and DOEA. Submitting reports that cannot be validated or verified as accurately counting and reporting activities in accordance with the reporting instructions may be treated as failing to submit reports. This may result in failing one of the responsibilities outlined in 641.440 and 514(d) of the OAA. The following Monthly Management Reports are available in SPARQ and must contain up-to-date and accurate information:

- Pending applicants,
- Ineligible applicants,
- Eligible, not assigned or on waiting list applicants,
- Waiting list applicants **(Manual waiting lists cannot be maintained internally in lieu of entering data into SPARQ),**
- Participant Action Report,
- Active participants,
- Exited participants,
- Started employment, but not yet achieved entered employment,
- Pending follow-ups,
- Pending follow-up report by month,

- Follow-up completion report,
- Beyond due date follow-up,

The Quarterly Progress Report (QPR) must also contain up-to-date and accurate statistics that must be used to determine the achievement of required program performance measures.

## **INVOICING AND FINAL REPORTS**

All requests for payment and expenditure reports must be submitted by the 15<sup>th</sup> of each month to the DOEA Fiscal Department using the 105 and 106V forms. Each invoice must contain the amount, source, and method of calculation for all non-federal match.

The Contractor must implement the contract as detailed in ATTACHMENT I. Any changes in the total amounts of funds identified in the Budget Summary (ATTACHMENT VII) for Administration, Programmatic Activities Cost: Participant Wages/Fringe Benefits, or Programmatic Activities Costs: Other require prior approval, provided in writing by the Department's Contract Manager. Any changes between line items in the Line Item Budget (Attachment VIII) that do not affect the total of the individual cost category: Administration, Programmatic Activities Cost: (Participant Wages/Fringe Benefits), or Programmatic Activities Costs: (Other) must be provided to the Contract Manager in writing prior to monthly invoicing. The Contractor shall include a detailed methodology for each budget change request. The Department reserves the right to deny Budget Changes.

When contract amendments are required, they are not valid until they are properly executed by the DOEA Secretary or his delegate.

Payments may be withheld pending the receipt and approval by DOEA of all financial and programmatic reports and any adjustments, including any disallowance not resolved. The sub-grantee must maintain documentation to support payment, which must be available to the Department of Financial Services (DFS) or DOEA upon request. DOEA and DFS reserve the right to request additional source documentation for verification of items invoiced at any time.

A final receipt and expenditure report must be forwarded to DOEA within forty-five (45) days after the contract ends or is terminated. All monies which have been paid to the sub-grantee and not used to retire outstanding obligations of the contract being closed out must be refunded to DOEA along with the final receipt and expenditure report.

## **TECHNICAL ASSISTANCE AND REQUIRED TRAINING**

The DOEA SCSEP unit and other professionals will provide technical assistance and training to sub-grantee staff continuously. Mandatory formal training will be provided annually.

## **DATA VALIDATION AND MONITORING**

On-site programmatic and financial monitoring will be conducted at least once during the funding period to ensure that the requirements of Title V of OAA Amendments of 2006, are achieved. In addition, Data Validation will be conducted per instructions issued by USDOL. We will also evaluate adherence to federal regulations promulgated under the Act and contractual requirements. Monitoring must be

conducted at established intervals to evaluate the performance of sub-grantees. Remedial action will be required when necessary through a written report. A Corrective Action Plan must be submitted to address all concerns within 20 days after the report is issued.

A follow-up review may be conducted within 60 days after the initial review to ensure that any major problems identified have been properly addressed. Sub-grantee reports must be validated through submittal of official documentation showing implementation of corrective actions, a signed attestation statement verifying completion of any findings, and follow-up reviews may be conducted after the initial visit to verify the implementation of any required corrective actions. Desk reviews will be conducted monthly and on-site fiscal monitoring will be conducted of each sub-grantee annually to review program expenditures. Invoices, general ledgers, audits, payroll records, time sheets, and other fiscal documents will be included in the monitoring process to determine adherence to the budget and contractual requirements. On-site reviews will be conducted annually, but program auditors and the SCSEP State Director may review spending levels at any time to determine if they are appropriate for each sub-grantee.

Follow-ups will be conducted on a routine basis to ensure corrective measures have been implemented to address areas of non-compliance. Financial reports will be validated through examination of supportive cost documentations and quarterly desk reviews.

## **AUDITS**

Audit coverage and plans to audit local projects are as follows: If a sub-grantee expends \$750,000 or more in federal awards in its fiscal year, the sub-grantee must have a single or program specific audit conducted in accordance with the provisions of OMB Circular A-133, as revised. An audit of the sub-grantee conducted by the Auditor General in accordance with the provisions OMB Circular A-133, as revised must meet the requirements of this part.

If the sub-grantee expends less than \$750,000 in federal awards in its fiscal year, an audit conducted in accordance with the provisions of OMB Circular A-133, as revised, is not required. In the event that the sub-grantee expends less than \$750,000 in federal awards in its fiscal year and elects to have an audit conducted in accordance with the provisions of OMB Circular A-133, as revised, the cost of the audit must be paid from non-federal funds.

Copies of audit reports for audits conducted in accordance with OMB Circular A-133 must be submitted, when required by Section.320 (d), OMB Circular A-133, as revised, by or on behalf of the sub-grantee directly to the SCSEP State Director within 180 days of the sub-grantee's fiscal year end.

Any reports, management letters, or other information required to be submitted to DOEA must be submitted timely in accordance with OMB Circular A-133, Florida Statutes, and Chapter 10.600, Rules of the Auditor General, as applicable. Sub-grantees, when submitting audit reports to the Department for audits done in accordance with OMB Circular A-133, Florida 10.600, Rules of the Auditor General should indicate the date that the audit report was delivered to the sub-grantee in correspondence accompanying the audit report.

Financial reporting packages required under this part must be submitted within the earlier of 30 days after receipt of the audit report or 9 months after the end of the Contractors fiscal year end.

## **NATURAL DISASTER PLAN**

It is the responsibility of the sub-grantee to have a plan in place for both disaster response and recovery. It must contain provisions to contact participants notifying them of business closures and re-openings and an evaluation should be made by the sub-grantee to determine when a participant should not report to a location even if the Host Agency is open (i.e. sustained winds of 45 miles per hour or when schools and government offices shut down).

## **EQUAL OPPORTUNITY REQUIREMENT**

The following items must be prominently displayed in program offices:

Equal Opportunity Policy Letter,

Equal Opportunity Poster,

Equal Opportunity Notice of Rights, and

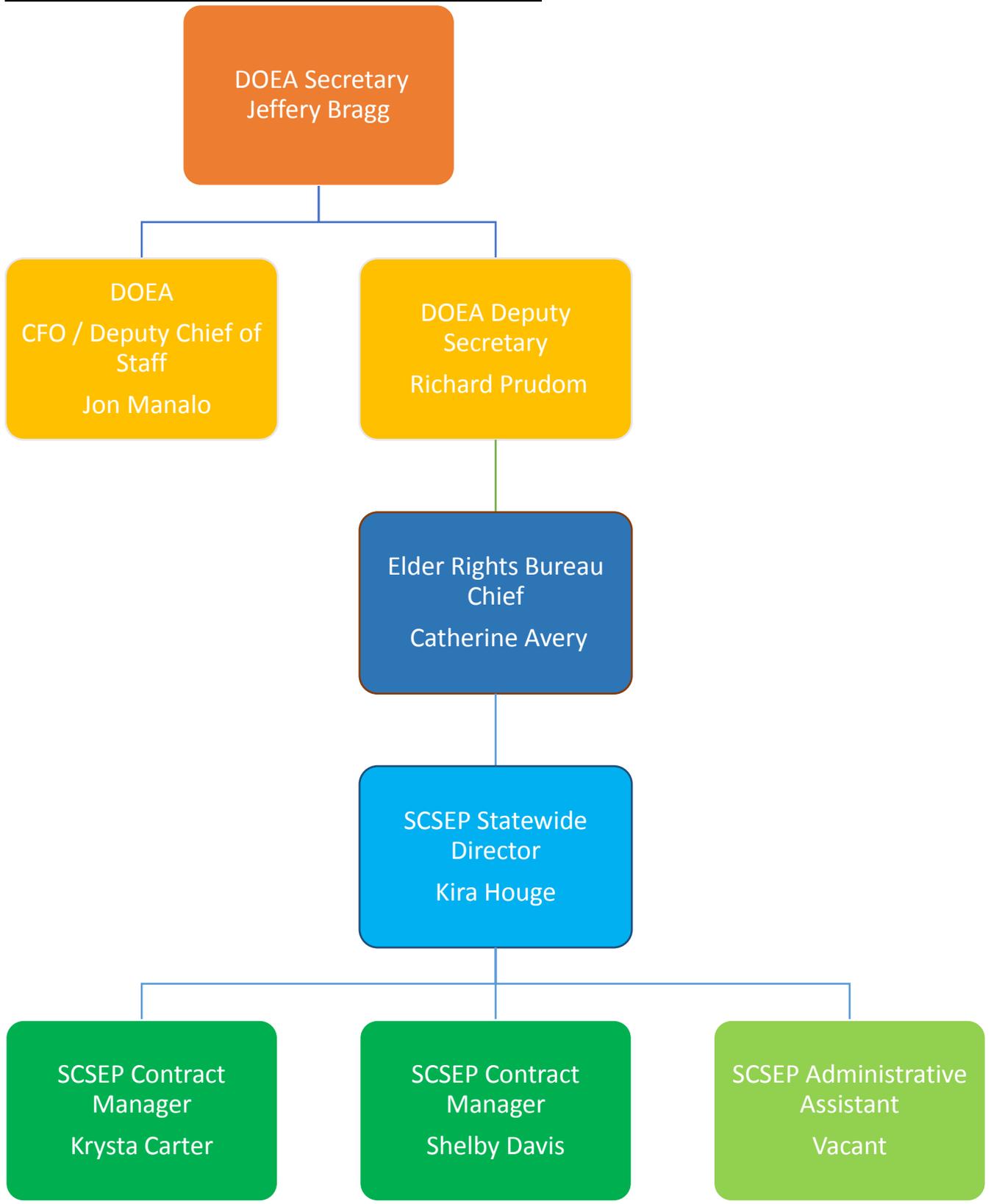
Providers must also have a readily accessible 504 self-evaluation of their facility.

## **BACKGROUND SCREENING REQUIREMENTS**

All persons requiring to be screened must be eligible prior to being hired to work in a position that provides direct service. This includes participant staff. It is required for all screenings to be initiated through the Clearinghouse website prior to sending an applicant to a Livescan Service Provider for fingerprinting. Initiating the screening through the Clearinghouse provides the ability to track a screening through the process, and receive email updates when an employee's status has been changed or updated.

Level 2 screening records are confidential and may not be shared with anyone other than the individual that was screened. The employer should contact the person screened if delays exist. Please go to: <http://elderaffairs.state.fl.us/doea/backgroundscreening.php#docs> for additional information.

# DOEA SCSEP ORGANIZATIONAL CHART



## **ADDITIONAL RESOURCES AND INFORMATION**

Department of Labor SCSEP - <https://www.doleta.gov/SENIORS/>

Charter Oak Groups - <http://www.charteroakgroup.org/>

Electronic Code of Federal Regulation - [https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title20/20cfr641\\_main\\_02.tpl](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title20/20cfr641_main_02.tpl)

Older Works Bulletins - [https://www.doleta.gov/seniors/html\\_docs/library.cfm](https://www.doleta.gov/seniors/html_docs/library.cfm)

Department of Labor Guidance and Resources (TEGL's) - [https://www.doleta.gov/Seniors/html\\_docs/TechAssist.cfm](https://www.doleta.gov/Seniors/html_docs/TechAssist.cfm)

### DOEA Contacts

Program Director,  
Kira Houge, FCCM (850)414-2351

Contract Manager,  
Krysta Carter, FCCM (850)414-2171

Contract Manager,  
Shelby Davis, FCCM (850)414-2123

## **APPENDIX**

- Termination Policy
- Durational Limit Policy
- Grievance Procedures
- Required Forms (Re-creation of required forms to better suit the needs of your local program, is acceptable however, prior approval in writing must be given before implementation of form use. Forms are required to have the same data elements captured on DOEA and DOL / Charter Oak Group forms at minimum.