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# DEPARTMENT OF ECONOMIC SECURITY

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## **Senior Community Services Employment Program (SCSEP)**



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*Requests for clarification should be sent via e-mail to [derswfpolicy@azdes.gov](mailto:derswfpolicy@azdes.gov).*

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 1: INTRODUCTION

### I. Policy Statement

- A. The Senior Community Services Employment Program (SCSEP) fosters useful community service through part-time work-based training opportunities for unemployed low-income persons who are 55 years of age or older with poor employment prospects and assists them with transition to unsubsidized employment.
- B. Eligible individuals may participate in SCSEP for a maximum lifetime limit of 48 months from the later of July 1, 2007 or the date of the individual's enrollment in the program.
- C. The Division of Employment and Rehabilitative Services (DERS) has the overall responsibility for the administration of the SCSEP grant and is designated and referred to for purposes of this policy manual as the "state grantee".

### II. Authority

#### A. Federal Authority

- 1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V.
- 2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
- 3. Jobs for Veterans Act of 2002, P.L. 107-288 §4215.
- 4. Fair Labor Standards Act of 1938 (29 U.S.C. 201 et. seq.).
- 5. Americans with Disabilities Act of 1990, as amended 2008, P.L. 110-325.
- 6. Age in Discrimination in Employment Act of 1967, P.L. 90-202.
- 7. Age Discrimination Act of 1975 (42 U.S.C. Sections 6101-6107).
- 8. Drug Free Workplace Act of 1988.
- 9. Rehabilitation Act of 1973 (§504).
- 10. 2 CFR Part 200, Uniform Administrative Cost Principles, and Audit Requirements for Federal Awards
- 11. 20 CFR Part 641 SCSEP; Performance Accountability

12. 20 CFR Part 641 SCSEP; Additional Indicator on Volunteer Work
13. 20 CFR §676; Unified and Combined State Plans under WIOA
14. 20 CFR §677; Performance Accountability
15. 20 CFR §678; One-Stop Delivery System under WIOA
16. 20 CFR Part 1010 Application of Priority of Service for Covered Persons
17. 29 CFR §95.23; Financial and Program Management, Cost Sharing or Matching
18. 29 CFR §97.24; Financial Administration, Matching or Cost Sharing
19. [TEGL 23-19](#); Guidance for Validating Required Performance Data

**B. State Authority**

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).
2. A.R.S. § 41-5401

**III. Applicability**

**A. Purpose of SCSEP**

1. Help participants develop a sense of personal and occupational identity including defining realistic employment goals.
2. Help participants develop sufficient job-related knowledge and skills so that they will not be confined to one job opportunity but can transfer to another as opportunities for advancement arise.
3. Help participants develop personal and social skills needed for successful job performance.
4. Assist participants in achieving job success through direct case supervision.

**B. SCSEP Contracted Providers**

1. DERS contracts direct delivery of SCSEP services to organizations designated and referred to for purposes of this policy manual as “sub-grantees” or “sub-recipients”. Both may be used interchangeably.

2. Sub-grantees must comply with DAAS Policy Chapter 1900, Section 1911.2(A) regarding fingerprinting requirements of SCSEP participants.

#### IV. Acronyms and Definitions

##### A. Acronyms

A.R.S.	Arizona Revised Statutes
C.F.R.	Code of Federal Regulations
DAAS	Division of Aging and Adult Services
DES	Arizona Department of Economic Security
DERS	Division of Employment and Rehabilitation Services
DOL	United States Department of Labor
ETA	Employment and Training Administration
FLSA	Fair Labor Standards Act of 1938
OAA	Older Americans Act of 1965
TEGL	Training and Employment Guidance Letter
U.S.C.	United States Code
WIOA	Workforce Innovation and Opportunity Act of 2014

##### B. Definitions

Reference the glossary for definitions of **Community service, Grant Period, Grantee or State Grantee, Host Agency, Jobs for Veterans Act, Low employment prospects, Older Americans Act, Participant, Program Year, Sub-recipient or Sub-grantee, Title V of the OAA, Unemployed, and Veteran.**

#### V. Standards

##### A. Uniformity

All chapters of this policy manual shall be administered uniformly to all program participants.

##### B. Sub-grantee Data Collection and Documentation



1. Sub-grantees will ensure that all participant and host agency related data is entered into the authorized DOL/ETA grant performance software in a timely manner and within specified timeframes as determined by the DOL/ETA.
2. Data entry will be in accordance with the most current version of the SCSEP Data Collection Handbook issued by the Charter Oak Group on behalf of the DOL/ETA. The SCSEP Data Collection Handbook can be found at:  
<http://charteroakgroup.com/resources/scsep.shtml>.
3. Sub-grantees may utilize internally created forms for the purposes of gathering and documenting participant data, provided that:
  - a. All forms adhere to the guidance and regulations of SCSEP as required by DOL/ETA;
  - b. Include DES branding as directed by the state grantee; and
  - c. Sub-grantees have received approval by the state grantee to use internally created forms.
4. Documentation of data elements will be retained in the participant and host agency files in accordance with the SCSEP Data Collection Handbook.
5. The most current version of the SCSEP Data Collection Handbook issued by the Charter Oak Group on behalf of the U.S. Department of Labor.
6. The most current version of the SCSEP Data Validation Handbook issued by the DOL/ETA.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 2: RECRUITMENT AND SELECTION

### I. Policy Statement

Recruitment is limited to eligible individuals. Selection into the SCSEP program is not guaranteed and is dependent on available participant positions.

### II. Authority

#### A. Federal Authority

1. Jobs for Veterans Act of 2002, P.L. 107-288 §4215.
2. 38 U.S.C. §4215(a).

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).
2. A.R.S. § 41-5401

### III. Applicability

#### A. Sub-grantees

1. Sub-grantees must develop methods of recruitment and selection that assure that the maximum number of eligible individuals have an opportunity to participate in SCSEP.
2. To the extent feasible, sub-grantees should seek to enroll eligible individuals who are minorities, Indians, individuals with limited English proficiency and individuals with greatest economic need, at least in proportion to their numbers in the area.

#### B. ARIZONA@WORK

1. Sub-grantees must use the ARIZONA@WORK One-Stop delivery system as one method in the recruitment in their workforce investment area for the selection of eligible individuals to ensure that the maximum number of eligible individuals have an opportunity to participate in the program.

### IV. Acronyms and Definitions

#### A. Acronyms

ED Equitable Distribution

**B. Definitions**

Reference the glossary for definitions of **At risk for homelessness, Covered Person, Disability, Eligible Spouse, Equitable Distribution (ED) Report, Greatest economic need, Greatest social need, Homeless, Indian, Indian tribe, Limited English Proficiency, Local Board, Low literacy skills, Most-in-need, One-stop Center, One-Stop delivery system, Rural, and Title V of WIOA.**

**V. Standards**

**A. Recruitment**

All recruitment efforts are to be in accordance with the annual ED Report which provides for the distribution of the authorized positions within the State and the optimum number of participant positions in each designated area based on the latest available U.S. Census data. The ED Report will be adjusted at least annually based on a formula defined by the U.S. Department of Labor.

**B. Priority of Selection and Service**

1. Priority for selection of individuals for participation in SCSEP must be given to individuals who have one or more of the following characteristics:
  - a. Is a veteran or a eligible spouse.
  - b. Is 65 years of age or older (although age 65 and over is a priority of service, it is not included in the most-in-need measure).
  - c. Has a disability.
  - d. Has limited English proficiency.
  - e. Has low literacy skills.
  - f. Resides in a rural area.
  - g. Has low employment prospects.
  - h. Has failed to find employment after utilizing services provided under Title I of WIOA.
  - i. Is homeless or at risk of homelessness.

- j. Has been incarcerated within the last five years or is under supervision following release from prison or jail within the last five years.
- 2. Priority of service must be applied to qualifying participants in the following order:
    - a. Covered persons under §2(a) of the Jobs for Veterans Act, 38 U.S.C. §4215(a), and who possess at least one of the other priority characteristics.
    - b. Covered persons under §2(a) of the Jobs for Veterans Act, 38 U.S.C. §4215(a), who do not possess any other of the priority characteristics.
    - c. Covered persons under §2(a) of the Jobs for Veterans Act, 38 U.S.C. §4215(a), and who possesses at least one of the other priority characteristics.

**C. Documentation**

- 1. Detailed documentation must be entered into case notes and retained in the participant case file on how the priority of selection was determined by the sub-grantee.
- 2. Participants who can present official source documents that contain all the information needed to validate data elements have no need to use the relevant attestation form for that element. Official source documents, if they contain the required elements, are, by themselves, sufficient to validate any individual piece of information required.
- 3. Sub-grantees may use attestation forms as part of the documentation.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 3: ELIGIBILITY

### I. Policy Statement

- A. Eligibility is determined at the time an individual applies to participate in SCSEP.
- B. In order to be eligible for SCSEP, applicants must meet the following criteria:
  - 1. Be aged 55 years or older.
  - 2. A resident of Arizona.
  - 3. A member of a family with a household income that is not more than 125% of the current U.S. Department of Health and Human Services Poverty Guidelines. "Family" shall be defined in accordance with Training and Employment Guidance Letter (TEGL) 12-06 or any TEGL or directive promulgated by the U.S. Department of Labor, which supersedes it.
  - 4. Unemployed at the time of application; and
  - 5. Have one or more barriers to unemployment to employment and considered not "job-ready." See section III(A) of this chapter for definition of "job-ready."

### II. Authority

#### A. Federal Authority

- 1. Indian Claims Act, P.L. 93-134 and P.L. 97-458.
- 2. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
- 3. 38 U.S.C. §4106.5
- 4. [TEGL 12-06](#); Revised Income Inclusions and Exclusions and Procedures for Determining Senior Community Service Employment Program (SCSEP) Eligibility

#### B. State Authority

- 1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Job-ready Individuals

1. For SCSEP eligibility purposes “job-ready” is defined as an individual who does not require further education or training to perform work that is available in their labor market. These applicant’s will be referred to ARIZONA@WORK for assistance with additional training or job-search activities.
2. Individuals who fit the definition of “job-ready” include individuals with the following characteristics:
  - a. Are employed, even if part-time;
  - b. Were recently unemployed but have a skill set to fill jobs available in their area; or
  - c. Have received sufficient training from SCSEP or some other employment and training program to be able to perform work that is available in their labor market.

**B. Sub-grantees**

1. Eligibility determination may only be made by the sub-grantee program coordinator or designee.
2. In all cases where an application is made by an individual and eligibility or ineligibility is determined, the appropriate documentation must be included in the case notes and the applicant’s file describing how that determination was made.
3. Former SCSEP participants who seek re-enrollment in SCSEP may or may not be “job-ready” and need to be evaluated on a case-by-case basis. Clear documentation in case notes is required for either determination.

**IV. Acronyms and Definitions**

**A. Acronyms**

CPS	U.S. Census Bureau’s Current Population Survey
GPMS	Grants Performance Management System
OWB	Office of the Whistleblower
SSDI	Social Security Disability Insurance
UI	Unemployment Insurance

**B. Definitions**

Reference the glossary for definitions of **Frail**, **Grant Performance Management System**, **Job ready**, and **Persistent unemployment prospects**, **Residence**, **Severe disability**, **Severe limited employment prospects**, Title V of WIOA.

## V. Standards

### A. Income Eligibility Sources Determination

1. For purposes of eligibility, income is defined as income received during the 12-month period that ends on the date of application, or the annualized income for the 6-month period that ends on the date of application.
  - a. Annual household income must be computed by counting the includable income received by the individual during the 12-month period ending on the date of SCSEP application or by counting the annualized income for the 6-month period on that date on a case-by-case basis based upon which is more favorable to the applicant in determining eligibility.
  - b. An individual with a disability may be treated as a “family-of-one” for income eligibility purposes at the option of the applicant.
2. When determining applicant income all sources of includable income sources must be documented. If a participant is receiving income from excludable sources, these sources must be documented on the income calculation form, but not used in actual income calculations. The worksheet must be kept in the file along with documentation of all includable income sources
3. For current definitions and examples of income guidelines, see TEGs and OWBs found on DOL/ETA’s website at [https://www.doleta.gov/Seniors/html\\_docs/TechAssist.cfm](https://www.doleta.gov/Seniors/html_docs/TechAssist.cfm)
  - a. Sources of income to be included in determining eligibility (based on the U.S. Census Bureau’s Current Population Survey (CPS) definition of “income”):
    - i. Earnings.
    - ii. Seventy-five percent (75%) of gross amount of benefits received under Title II of the Social Security Act.
    - iii. Survivor benefits.

- iv. Pension or retirement income, unless SCSEP or sub-grantee would be required to pay into the retirement. See Section V.B.4 of this chapter.
  - v. Interest income.
  - vi. Dividends.
  - vii. Rents, royalties, estates and trusts.
  - viii. Educational assistance.
  - ix. Alimony.
  - x. Financial assistance from outside the household
  - xi. Other income, as determined to be includable.
- b. The following are examples of income that are to be excluded in determining eligibility:
- i. Social Security Disability Insurance (SSDI).
  - ii. UI Benefits Compensation.
  - iii. Twenty-five percent (25%) of the gross benefit received under Title II of the Social Security Act.
  - iv. Payment made to or on behalf of veterans or former members of the Armed Forces under laws administered by the Secretary of Veterans Affairs.
  - v. Supplemental Security Income.
  - vi. Public Assistance.
  - vii. Income from other employment and training programs.
  - viii. Disability benefits.
  - ix. All forms of child support.
  - x. Worker's Compensation.
  - xi. The first \$2,000 of certain per capita fund distributions to American Indians pursuant to the Indian Claims Act, P.L. 93-134 and P.L. 97-458.
  - xii. Any other income exception required by applicable Federal law – i.e., stipends from programs funded by



the Senior Corps of the Corporation for National and Community Service.

- xiii. Capital gains received (or losses incurred) from the sale of property, including stocks, bonds, houses, or cars (unless the person is engaged in the business of selling such property).
- xiv. Withdrawals of bank deposits.
- xv. Tax refunds.
- xvi. Gifts. Any object or service of material value given to a participant is considered a gift.
- xvii. Lump-sum inheritances, insurance payments, gambling or lottery earnings.

**B. SCSEP training wages and retirement income**

1. A training wage (minimum wage) is provided to all SCSEP participants assigned to a community service agency. As such, participants are recognized as “trainees”, not employees of SCEP or their sub-grantees.
2. Retirement plans differ from state to state and plan to plan. As a result, each state and/or plan has independent statutes that all retirees receiving their benefits must recognize or adhere to.
3. If an individual submits retirement income to be calculated for enrollment, the sub-grantee program coordinator will confirm whether the sub-grantee will be required to pay any retirement plan contributions resulting from participation in SCSEP.
4. SCSEP funds are not to be used to pay into any retirement system or plan contributions. Other funds must be used and as a result, this may or may not affect the individual’s participation in SCSEP. No exceptions will be made.
  - a. If it is determined that the sub-grantee will not be penalized, enrollment of the applicant may be completed, and a community service assignment developed.
  - b. If it is determined that the sub-grantee will be required to pay a contribution and other funds cannot be identified or used, the applying individual will be deemed ineligible for SCSEP services. Enrollment will not be an option. The program coordinator will refer the applicant to ARIZONA@WORK for additional training or job-search assistance

**C. WIOA Dual Eligibility**

Individuals may be dual eligible for SCSEP and WIOA funded programs. Program coordinators are to explore participant eligibility for both programs for all enrollees and participants.

**D. Wait Listing**

1. Applicants determined eligible for enrollment but for which no appropriate community service assignment or authorized positions are available may be placed on the GPMS wait list in accordance with SCSEP Data Collection Handbook.
  - a. The official wait list in GPMS should be used for eligible applicants who have not received an assignment within two weeks of their eligibility date.
  - b. Applicant's may remain on the waitlist for as long as the applicant is interested in being assigned and meets the eligibility requirements.
  - c. Program coordinators should regularly contact the applicant to determine their continued interest in the program and update them on when they may be assigned. Applicants may choose to remain on the waitlist or opt to be removed. Eligibility determinations are valid for 12 months barring a substantial change in circumstance for the participant. If they chose to withdraw, follow the directions in the Data Collection Handbook under the Participant Form Guide.
2. Sub-grantees may utilize other unofficial tracking systems or forms to track and follow-up with eligible applicants in conjunction with GPMS.

**E. Ex-Offender Eligibility**

1. SCSEP policy prohibits discrimination against ex-offenders and specifically bars the use of background checks to determine eligibility for participation in SCSEP. Grantees/sub-grantees are required to use safeguards to prevent discrimination and promote employment and training opportunities for ex-offenders.
2. Participants may not be denied enrollment or participation in SCSEP solely on a past criminal offense or conviction. Background checks on participants may only be conducted if all the following apply:

- a. It is relevant and a requirement of the specific community service assignment;
  - b. It is uniformly applied to all applicants considered for the same position; and
  - c. It is not used as a screening for eligibility into the SCSEP program.
3. If the participant fails a community service position required background check and the community service host-agency refuses the participant for training, the sub-grantee is then required to find another community service position in which the participant's criminal record will not be an issue.
  4. In every case, sensitive consideration of a participant's criminal background should be taken. If a host agency is justified in requiring information about a participant's background, the sub-grantee may disclose it with the participant's permission. If the participant does not consent to the disclosure or the host agency refuses to accept the participant, the sub-grantee is required to find another community service position in which the participant's criminal record will not be an issue.

**F. Ineligible Applicants**

1. When applicants are found to be ineligible for participation in SCSEP due to age, income, residency, employment or job-readiness, Sub-grantees should take the following actions:
  - a. Explain to the applicant why he or she is ineligible.
  - b. Discuss the grievance process and provide the applicant with a copy of the grievance policy.
  - c. Give the reason for the ineligibility to the applicant in writing, especially if the determination is that the applicant is considered job ready. Be specific as to how the determination was made. Document it in the applicant file.
  - d. Provide referrals, if appropriate, to other employment and training programs.
  - e. Make supportive service referrals, if needed, to community service agencies (i.e., social services, food banks, transportation, housing, AmeriCorps, etc.)

**G. Eligibility Determination**

1. The determination of each element of eligibility must be thoroughly documented in each participant's case file. Case notes must provide the justification for which eligibility was determined along with supporting documentation.
2. The following documents are acceptable for verifying the applicant's / participant's date of birth, including but not limited to:
  - a. Birth certificate.
  - b. Report of Armed Services Separation.
  - c. Driver's license.
  - d. Marriage license or divorce decree.
  - e. Federal, State or local identification card.
  - f. Passport.
  - g. Hospital birth record.
  - h. Public assistance / social service records.
  - i. School records or ID card.
  - j. Work permit.
  - k. Cross match with Department of Vital Statistics.
  - l. Tribal records.
  - m. Social Security award letter.
  - n. Baptismal record.
3. Applicants/participants must have documentable proof of in-state Arizona residence. One or more of the following documents are acceptable for verifying the state of residence, including but not limited to:
  - a. Approved cross-border or multi-state agreements.
  - b. Driver's license or State, Federal or Tribal ID card.
  - c. Home utility bill or other billing statement providing documentation of residence or mailing address (if different than address on license or ID).
  - d. Document from public or private institution (Independent Living housing, Community based Residence facility or assisted living facility) or Housing Authority.

- e. Official government mail dated within the last 30 days.
  - f. Bank statement with name and address.
  - g. Social Security benefits statement.
  - h. Rental agreement.
  - i. Current homeowners or rental insurance policy or statement.
  - j. Voter registration card.
4. SCSEP applicant information is to be documented and summarized in accordance with the SCSEP Data Collection Handbook.
  5. Verification of the number in family (refer to TEGL 12-06 for definitions). The following documents are acceptable for verifying the applicant's number in family household, including but not limited to official government records or other official records, including:
    - a. HUD form.
    - b. Lease.
    - c. Beneficiary forms (to substantiate a spouse for a family size of 2).
    - d. Signed attestation from a third-party who has knowledge of the participant's number in family and reflects the living situation at the time of application.
  6. Participants are prohibited from signing a self-attestation to determine number in the household.
  7. To establish that a family-of-one is due to disability, official government or other official records are acceptable, including but not limited to:
    - a. Receipt of Social Security Disability Insurance (SSDI), other Social Security Administration records.
    - b. School records.
    - c. Sheltered workshop certification.
    - d. Social service records or referrals.
    - e. Certification must be by medical professional or medical records that establish specific facts that meet the regulatory definition are acceptable, including but not limited to:
      - i. Letter from drug or alcohol rehabilitation agency.

- ii. Medical records.
  - iii. Physician's statement or certification from a medical professional.
  - iv. Psychologist's diagnosis.
  - v. Rehabilitation evaluation.
  - vi. Disability records.
  - vii. Veteran's medical records.
  - viii. Vocational rehabilitation letter.
  - ix. Worker's compensation record.
8. A signed attestation from a third-party (as opposed to a medical professional) is not acceptable in establishing family-of-one is due to disability.

**H. Calculation of Household Income**

- 1. All income eligibility calculations will be conducted in accordance with TEGl 12-06. Source documentation used in the calculations are to be attached to the Applicant's Confidential Statement of Income for the period of eligibility being determined.
- 2. Detailed case notes are to be entered and maintained in the applicant/participant file. Case notes are not acceptable for establishing "family-of-one is due to disability". To establish the number in the family at the time of application, case notes must also detail:
  - a. Number in family as defined by TEGl 12-06, and
  - b. Rationale for accepting information from that individual without a signature.
- 3. Individuals who claim income of zero ("0") must complete a self-attestation form and clearly explain how the participant supports themselves during the income look back period.
- 4. The following documents are acceptable for verifying an applicant or participant's income, including but not limited to:
  - a. Pay stubs.
  - b. Social Security Award Letters.
  - c. Earnings statements from employers.

- d. Pension statements.
- e. Bank statements showing interest.

**I. Documenting Employment Status**

1. **Employed individuals are not eligible for SCSEP.**
2. No participant may begin a job while enrolled in SCSEP. A participant who does so must be exited for unsubsidized employment.
3. A participant who does not disclose unsubsidized employment while enrolled in SCSEP may be terminated for cause as outlined in Chapter 11, Section V.H.
4. All applicants must have documentable proof of their unemployment status prior to enrollment.
5. The following documents are acceptable for verifying the employment status of applicants, including but not limited to:
  - a. Record indicating firm date of separation from military service, unemployment insurance documents.
  - b. Notice of termination from an employer.
  - c. Case notes detailing no employment at time of enrollment.
  - d. Sign attestations. Using self-attestation, or signed attestation from a third-party who has knowledge of the participant's employment status prior to participation is acceptable to establish no employment at time of application

**II. Documenting Barriers to Employment**

1. The most-in-need measure reports the average number of barriers to employment per participant. Each participant may be allowed credit for a total of thirteen (13) barriers to employment in two separate categories.
2. Priorities of Service. The following may only be recorded at the time of enrollment into SCSEP and may not be updated:
  - a. Homeless or at risk of homelessness;
  - b. Rural;
  - c. Limited English Proficiency;
  - d. Low literacy Skills;

- e. Veteran (or qualified spouse);
  - f. Disability;
  - g. Failed to find employment after using WIOA Title I; and
  - h. Low-employment prospects.
  - i. Has been incarcerated within the last five years or is under supervision following release from prison or jail within the last five years.
3. Additional Barriers. The following may be updated whenever they become known, and may be updated at any time or at a minimum each program year if applicable:
- a. Severe disability;
  - b. Frail;
  - c. Old enough for Social Security retirement benefits but not eligible to receiving them;
  - d. In an area of persistent unemployment; and
  - e. 75 years or older.

**K. Eligibility Recertification Guidelines**

- 1. Recertification must be conducted annually on or about the date of initial eligibility determination or the last calculation of eligibility due to a change of circumstances for all active participants.
- 2. Recertification is also required anytime a participant has a substantial change in circumstances that would affect their eligibility, such as marriage or spousal employment.
- 3. It is preferred that recertification activities be conducted in person whenever possible. Virtual or other alternative methods may be utilized with authorization from the state grantee.
- 4. Participants and their host agency supervisors shall be provided with written notification at least 30 days prior to the date the recertification is scheduled to occur. The notification shall include a listing of the required documentation to be provided by the participant.
- 5. The Participant Form section “Recertification” is to be completed in its entirety and the data elements entered into GPMS in accordance with the SCSEP Data Collection Handbook. Elements that affect the most-in-need measure, such as disability, homelessness, and low employment prospects remain fixed at the time of the initial application. **Do not update at recertification.**



6. Each recertification may only have the information in the recertification portion of the Participant Form over-written. Contact information may be updated at any time.
7. A hard copy of the signed recertification form must be kept in the participant case file for all instances where a recertification is performed.
8. All recertification documentation is to become a part of the participant's case file along with a participant signed copy of the recertification document. Sub-grantee staff will gather all required data for recertification and documentation will be in accordance with DOL/ETA SCSEP regulations.
9. The size of household and income eligibility determination during recertification is to be completed in accordance with Sections V.J and V.K of this chapter.
10. Participants who are determined to be ineligible during recertification for continued enrollment shall be given immediate written notice that enrollment will be terminated 30 days after date of notice as described in Chapter 11, Section V.H. Program coordinators should refer participant to other potential sources of assistance.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 4: ASSESSMENTS

### I. Policy Statement

- A. The assessment process is completed prior to placement in a community service assignment and must be conducted in partnership with the participant to identify the appropriate employment training goals and objectives.
- B. Assessments must be completed or reviewed no less frequently than two times during a twelve-month period (including the initial assessment).

### II. Authority

#### A. Federal Authority

- 1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
- 2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
- 3. 38 U.S.C. §4106.5

#### B. State Authority

- 1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Sub-grantees

Sub-grantees shall provide the applicant with an overview to the program and formally assess the applicant to determine gaps in employment skills prior to being assigned to a community service training opportunity as described in this chapter.

### IV. Acronyms and Definitions

#### A. Acronyms

IEP                      Individual Employment Plan

#### B. Definitions

Reference the glossary for definition of **Individual Employment Plan**.

## V. Standards

### A. Purpose of Assessments

1. Assessment should be on-going and use informal methods to measure and evaluate the participant's performance, development, and potential to achieve the identified goals. The assessments are essential for monitoring progress of the participant and should trigger updating of the participants training assignment and IEP.
2. The host agency supervisor's input is to be included on all re-assessments and documented in the participant file.
3. In the event the participant receives a "Needs Improvement" from the host agency supervisor, the host agency supervisor will initiate a corrective action plan.
4. The area(s) for improvement will be identified by the host agency supervisor and he or she will discuss the desired corrective actions steps with the participant in a positive and professional manner. A reasonable timeframe will be established for completion/compliance. All action steps will be documented. The form will be signed, dated and placed in the participant's case file.

### B. Assessment Criteria

1. Eligibility determination, as defined in Chapter 3 of this Policy Manual.
2. Information gathering. Participant assessments should consider the following, but not be limited to:
  - a. Personal history, including all aspects, such as work, practical life experiences, military service education, personal background and training;
  - b. Skills, interests, aptitude and talents;
  - c. Physical capabilities;
  - d. Potential for performing community service;
  - e. Need for supportive services;
  - f. Job preferences and training needs;
  - g. Participant's potential for transitioning to unsubsidized employment;

- h. Participant's reasons for applying to and their expectations of the program; and
    - i. Barriers.
  3. Development of IEP as defined in Chapter 7, Section V.B.

**C. Assessment Types**

1. **Informal** - Interviews, observations and documents. Used to get a feel for participant's work behavior and ambitions, and to determine most-in-need factors. The sub-grantee should have the applicant complete a SCSEP assessment. Analysis of this information is the first step in evaluating the applicant's work history, potential need for supportive services and could indicate the existence of most-in-need factors (e.g. limited English proficiency).
2. **Formal** - Standardized measures. Designed to provide valid information on skills, interests, knowledge, talents and aptitudes. It is advisable for sub-grantees to coordinate these assessments with qualified entities for proper evaluation purposes through the resources offered at the local ARIZONA@WORK locations. Acceptable tools to be used include, but are not limited to the following resources:
  - a. ARIZONA@WORK (<http://arizonaatwork.com>)
  - b. [O\\*NET](http://online.onetcenter.org) (<http://online.onetcenter.org>)
  - c. [ARIZONA@WORK One-stop](#)
  - d. Other public or private resources providing credible assessment of participant skills and interests from employment focused sources.

**D. Assessment Documentation**

1. An initial assessment and IEP developed under Title I of WIOA will satisfy the requirement for an initial SCEP assessment and initial SCSEP IEP.
2. Sub-grantees are to assess and document information regarding most-in-need factors. The most-in-need measure reports the average number of barriers to employment per participant. The regulation allows credit for a total of 13 barriers to employment in two separate categories. See Section Chapter 3, Section V.J.
3. All activity in relationship to assessments must be recorded in detailed case notes and maintained in the participant's file.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 5: ENROLLMENT AND RE-ENROLLMENT

### I. Policy Statement

An eligible individual shall have priority for enrollment into SCSEP, provided with a community service assignment and other authorized activities in accordance with this Chapter.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

1. Once a participant is deemed eligible and ready to enroll into the program, Sub-grantees will enter the individual into the GPMS software system. This will create a unique Participant Identification (PID) Number. This is a unique number assigned to the individual for the entire length of time the participant participates in SCSEP.

#### B. Sub-grantees

1. Sub-grantees have the discretion to re-enroll former participants. Former participants do not have an automatic right to re-enroll.

### IV. Acronyms and Definitions

#### A. Acronyms

EO	Equal Opportunity
PID	Participant Identification Number

**B. Definitions**

Reference the glossary for definitions of **Co-enrollment** and **Community Service Assignment**.

**V. Standards**

**A. Applicants and Data Collection**

1. Until an individual meets the criteria for a participant in Chapter 3 of this document, they are to be considered an applicant. The following Equal Opportunity (EO) information must be attempted to be collected from the applicants regardless of their eligibility:
  - a. Gender;
  - b. Ethnicity;
  - c. Race; or
  - d. Disability.
2. Before attempting to collect the information in Section V.A.1, the following disclosures must be made:
  - a. The disclosure of the information is voluntary.
  - b. The refusal to provide the requested information will have no effect on any decision to provide services except where disability may be used to establish eligibility or priority of service.
  - c. The information will be kept confidential as required by law.
  - d. The information will be used only in accordance with the law.
  - e. The information will be used for statistical purposes, and disability status will be used to determine priority of service (and eligibility if applicant is claiming status as family of one).

**B. Disability and Reasonable Accommodation**

1. All applicants are to be informed that if they have a physical or mental impairment, they may request reasonable accommodation for the application process.
2. If any of the host agencies to which applicants might be assigned have an affirmative action program for persons with disabilities, or a similar program designed to benefit persons with disabilities,

applicants should also be informed that if they have one or more disability and are interested in benefiting from such programs, they should notify the sub-grantee.

3. Sub-grantees should inform all participants that, if they have one or more disability and would like help deciding whether to disclose their disability status to the host agency, or if they would like the sub-grantee to make such a disclosure to the host agency on their behalf, they should notify the sub-grantee program coordinator or designated staff.

**C. Participant Enrollment**

1. An individual becomes a participant when all eligibility criteria is met, and the participant is assigned a community service assignment with a host agency. A Community Service Assignment Form must be completed and entered into GPMS.
2. The most current versions of the following documents shall be completed during enrollment and retained in the participant's file. Printed versions of forms are posted on the Charter Oak Group website (<http://charteroakgroup.com/resources/scsep.shtml>). Sub-grantees may utilize internally created forms to collect required the same information. See Chapter 1, Section V.B.3 of this document.
  - a. SCSEP Participant Form.
  - b. Applicant's Confidential Statement of Income.
  - c. Attestation Forms.
  - d. I-9 Employment Eligibility Verification.
  - e. Participant Handbook Acknowledgement.
  - f. Physical Examination Statement.
  - g. Applicable tax withholding forms.
  - h. Detailed case notes summarizing the eligibility determination and enrollment activities including notation that the Involuntary Termination policy was verbally reviewed, and a copy of such policy was provided to the participant.

**CI. Transfer and Over-Enrollment**

1. In the event a participant is to be transferred from one SCSEP grantee or sub-grantee to another, the Transfer Policy issued by the U.S. Department of Labor shall be followed. The Transfer Policy is to be found at <http://scsep-help.com>.

2. When funding is available; sub-grantees may over-enroll eligible individuals in accordance with the priorities outlined in Chapter 3 of this document. Over enrollment levels may exceed the annual service level goal as determined by the U.S. Department of Labor.
3. All participants are to be treated equally. Durational limits must be applied equally to all participants. When over-enrolling participants, it is expected that sub-grantees will manage their grant so to avoid any dislocation of participants or over expenditure of funds.

#### **E. Re-enrollment**

1. Participants who have exited for any reason may re-enroll in SCSEP provided that they meet all eligibility requirements and are not considered job ready.
2. For those individuals re-enrolling after termination from the SCSEP, eligibility must be determined as described in this Chapter.
3. Re-enrollment is at the discretion of the sub-grantee. Former participants do not have an automatic right to re-enroll. The circumstances of the participants' prior exit from SCSEP, (e.g. whether they were terminated for cause, or whether they are not job ready) should be taken into consideration. See Section III.A of this Chapter.
4. Former participants who have had employment since leaving SCSEP may be presumed to be job-ready and thus ineligible. They should be referred to the ARIZONA@WORK Center.
5. Participants seeking to re-enroll are subject to the priorities of service in effect at that time.
6. If there are no available positions or the re-enrolling participant is lower in priority than other applicants, the re-enrolling participant can be placed on a waiting list to be maintained in GPMS.
7. When re-enrolling a participant, use the same PID number that was issued upon the participant's initial enrollment into SCSEP. **Do not create a new participant profile**, only a new GPMS participant form is required.

#### **F. Right of Return**

1. Right of Return is limited to participants who exit for unsubsidized employment but do not achieve 30 days of employment within 90 days of exit. Individuals who meet the right of return criteria can



return without being subject to priorities and preferences. Their exit is reversed.

2. When a participant exercises their Right of Return:
  - a. A new Participant Form is not completed.
  - b. A returning participant must be assigned to a host agency, either the one the participant left or a new one.
  - c. A new host agency assignment must be created even if reassigned to the old host agency.
  - d. If there is no slot available at the time the participant seeks to return, the participant should be placed on an approved break in participation and given the next available assignment.
3. Right of return is not applicable if the former participant quits his or her job.
4. Re-enrollment into SCSEP for participants outside the 90-day right of return is at the discretion of the sub-grantee.

**G. Sub-grantee Discretion**

1. In deciding whether to exercise their discretion to re-enroll any former participants who otherwise satisfy the eligibility criteria, sub-grantees should consider the following:
  - a. Has the participant taken full advantage of the opportunity afforded by the prior enrollment;
  - b. Has the participant demonstrated a commitment to the program's objectives;
  - c. Has the participant violated any conduct standards during their prior enrollment; and
  - d. What were the circumstances of the participants prior exit from SCSEP (terminated for cause, employment, job-ready, etc.).
2. To ensure that these considerations are not used in a discriminatory fashion, they should be applied in all cases in which a former participant seeks re-enrollment and the sub-grantee should maintain documentation in every instances of the factors leading to their decision not to re-enroll a former participant.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 6: ORIENTATION

### I. Policy Statement

SCSEP orientation must be provided to all new participants within 10 days of enrollment. Participants may not train at the host agency until orientation is completed.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

Participants will be compensated, or paid, for the time they attend orientation. Orientation must be held during normal business hours.

#### B. Sub-grantees

Sub-grantees are responsible for providing a complete orientation for each participant who has met eligibility requirements, completed an assessment and has been assigned to a host agency assignment.

### IV. Acronyms and Definitions

#### A. Acronyms

EEO Equal Employment Opportunity

FEIN Federal Employer Identification Number

#### B. Definitions

Reference the glossary for definition of **Federal Employer Identification Number**.

**V. Standards**

**A. Participant Orientation**

1. The Participant Orientation must consist of the following elements:
  - a. An Overview of the goals and objectives of SCSEP to include authority programmatic terms as stated in Chapter 1 and the Glossary of this document;
  - b. Participant's assessment of employment skills, knowledge and abilities;
  - c. Participant's Individual Employment Plan developed during enrollment and plans for transition to unsubsidized employment;
  - d. Community Assignment Description;
  - e. The availability of supportive services;
  - f. The availability of annual physical exams;
  - g. The participant's rights and responsibilities;
    - i. Required meetings with and determined by sub-grantee staff;
    - ii. Required job searches while participating in SCSEP;
    - iii. Reporting changes in circumstances affecting eligibility to sub-grantee;
    - iv. Requirement to register with ARIZONA@WORK/One-Stop Career Center and the requirement to keep account current in order to remain active with job matching;
    - v. Requirement to provide information for Follow-ups with Employers upon unsubsidized exit;
    - vi. Requirement to participate in customer satisfaction surveying;
  - h. Training opportunities available;
  - i. Prohibited Activities;

- i. Political activity.
    - ii. Pro/Anti-Union Organizing Activities.
  - j. Program Durational Limits;
  - k. Voluntary Exits;
  - l. Involuntary Termination Policy and Procedure;
    - i. Causes for termination from SCSEP.
    - ii. Complaint resolution process.
- 2. Participants should be given a copy of the host agency's personnel policies and review the following:
  - a. Hours of community service work – based on training requirements;
  - b. Wage rate;
  - c. Submission of timesheets, schedule and method of payment of wages;
  - d. Role of supervisors; and
  - e. Evaluation of participant progress.
- 3. Sub-grantees will provide the participant with the SCSEP Participant Handbook during orientation and have participants sign documentation acknowledging receipt of the personnel policies and orientation. A copy will be given to the participant and a copy retain in the participant's case file.

**B. Documenting Orientation**

- 1. Case notes must be entered indicating orientation occurred and the participant attended.
- 2. During the orientation, participants are required to register with ARIZONA@WORK and provide proof of doing so.
- 3. Participants must sign the Acknowledgement of Participant Responsibilities found in the Participant Handbook after completing orientation. A copy of the signed document will be kept in the participant case file and a copy given to the participant.

**C. Host Agency Responsibilities**

1. Sub-grantees are responsible for assigning participants to appropriate community service assignments in host agencies that will lead to unsubsidized employment.
2. In order to be a host agency, organizations must meet and agree to the following:
  - a. Be public agencies operated by non-profit agencies or units of government with certification under Section 501(c)3 or the U.S. Internal Revenue Code.
    - i. Provide their Federal Employer Identification Number (FEIN) and Section 501(c)3 designation.
    - ii. Churches may be host agencies even though they may not have the 501(c)3 designation, however, sub-grantees can only assign participants to churches if the community service assignment does not involve any religious activities.
  - b. Agree to meet all Maintenance of Effort requirements.
  - c. Agree to not displace any current employee or volunteers with a participant or assign participant to perform the tasks of an employee on layoff or replace a Federal or state funded position (other than SCSEP) with a SCSEP participant.
  - d. Provide a safe and healthy environment for participants to work
  - e. Agree to assist participants to learn and use skills and competencies valued by local employers and help participants in order to obtain unsubsidized employment.
  - f. Provide adequate orientation, instruction and training for the participant's assignment along with a proper work environment.
  - g. Develop a training plan jointly with the sub-grantee for each participant.
  - h. Provide adequate supervision to enable each participant to perform as a productive and effective worker and gain the skills outlined in the participant's Individual Employment Plan (IEP) and training agreement
  - i. Allow sub-grantee staff to monitor site every six months when participant is actively assigned to their organization.

- j. Post proper safety and EEO signage as required under DOL/ETA.
  - k. Provide Worker's Compensation for participants to include coverage for all community service activities.
  - l. Participate in host-agency survey if selected by DOL/ETA.
3. Host agencies are prohibited from:
- a. Providing a training site for community service training for any participant whose immediate family is engaged in any host-agency SCSEP decision-making capacity, whether compensated or not.
  - b. Displace, lay-off or reduce the current number of employed workers; including partial displacement, such as reduction in hours of non-overtime work, wages, or employment benefits.
  - c. Employ or continue to employ an eligible participant to perform the same work or substantially the same work would be performed by another individual who is laid off.
  - d. Utilize SCSEP funds or participants to assist, promote or deter union organizing or political lobbying.
  - e. Request or allow a SCSEP participant to volunteer personal time to the agency outside of their community service scheduled hours.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 7: INDIVIDUAL EMPLOYMENT PLAN

### I. Policy Statement

SCSEP Individual Employment Plan (IEP) is an agreement between the program and the participant outlining the strategy that will assist participants in achieving their employment goals.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

A copy of the initial and each revised IEP shall be distributed to the following persons:

1. The participant.
2. The participant's community service assignment supervisor (providing here is no identifiable health or medical information contained in the IEP).

#### B. Sub-grantees

1. Sub-grantees should update the IEP after each significant contact with participant and record the date of each IEP revision. All updated copies must be kept in participant case file.

### IV. Acronyms and Definitions

#### A. Acronyms

IEP            Individual Employment Plan

**B. Definitions**

Reference the glossary for definition of **Host Agency**.

**V. Standards**

**A. IEP Overview**

1. The IEP is an agreement between the program and the participant outlining the strategy that will assist participants in achieving their employment goals.
2. The IEP is based on the assessment and reassessments. Points to consider in the plan are:
  - a. Expandable goals;
  - b. Employment;
  - c. Training needs;
  - d. Community Service Assignments;
  - e. Quality of Life issues; and
  - f. Aspirations and Desires for lifestyle.
3. The following actions/documents must be completed at the time of IEP review:
  - a. Participant Evaluation;
  - b. Host Agency Supervisor Evaluation;
  - c. Assessment results, if appropriate
  - d. Revised IEP, if appropriate

**B. IEP Requirements**

1. Participant IEPs:
  - a. Must be developed and completed with each participant upon enrollment;
  - b. Utilize the results of all assessments as a basis for developing an IEP;
  - c. Have specific, measurable, attainable, relevant and time limited goals and objectives;



- d. Reflect the incremental action steps to be achieved by the participant;
  - e. Be linked to the documentable labor market information and tied closely to the needs of the local labor market;
  - f. Amended at least twice during a 12-month period, or more often as needed;
  - g. Must include, but not be limited to:
    - i. Identified pre-placement training;
    - ii. Supportive services needed and a practical plan to provide needed services;
    - iii. Occupational assessments;
    - iv. In-service training;
    - v. Adult basic training;
    - vi. Job skill training (including specialized training and on-the-job experience);
    - vii. Job search training and job searches requirements;
    - viii. Reasons and timing of any transfers to new community service assignments;
    - ix. The signature of both the SCSEP staff and participant; and
    - x. The date the IEP was developed or revised.
  - h. Must be used to develop the Community Service Assignment Description (See Chapter 9, Section V.B) in conjunction with the host agency;
2. An initial assessment and IEP developed under Title I of the Workforce Innovation and Opportunity Act will satisfy the requirement for an initial SCSEP assessment and initial SCSEP IEP.
  3. Registration with ARIZONA@WORK: The sub-grantee, through reassessment of the participant's progress toward meeting their IEP goal of unsubsidized employment, is to determine the point where the participant is to enter job search as an IEP action step.

- a. Participants with “job search” as an action step must be registered with ARIZONA@WORK programs in their local area.
- b. This registration is to be validated by the sub-grantee and noted in the participant’s case notes and case file.

**C. IEP Review**

1. At a minimum, SCSEP staff shall formally review the participant’s IEP and revise, at least twice in a 12-month period.
2. The review must:
  - a. Indicate an elevation of the progress of the process participant has made in meeting IEP objectives;
  - b. A determination of the participant’s potential for transition to unsubsidized employment;
  - c. Explore needed supportive services and plans to provide needed services should be described;
  - d. Be completed with input from the participant on elements of the plan;
  - e. Have Input from the host site supervisor on any elements of the plan;
  - f. Designed to motivate the participant toward completing the plan steps;
  - g. Include any necessary revisions to the IEP due to a change of circumstance with the participant or the training site. For example, some participant may not be able to achieve the original employment goal.
3. All IEP reviews including associated reassessments are to be documented and retained as part of the participant’s permanent record with detailed case notes and updated as necessary in GPMS.

**D. Host Site Transfer Based on IEP**

1. Upon review of the IEP, a sub-grantee may develop an alternative training assignment or host site transfer for a participant under the following circumstances:

- a. When a different training assignment will provide greater opportunities for the participant to use his or her skills and aptitudes;
- b. When an alternative training assignment will provide experience that will enhance the participant's potential for unsubsidized employment;
- c. When a different training site will serve the best interests of the participant or host agency site; and/or;
- d. When a participant, host agency supervisor or SCSEP staff request the transfer.

**E. IEP Transitions and Terminations**

- 1. In the event that a sub-grantee determines that a participant is unlikely to obtain unsubsidized employment, the revised IEP must reflect approaches to help the participant achieve greater self-sufficiency, including transition to other services or programs after exit from SCSEP. See Chapter 7, Section V.E.
- 2. Participants approaching their durational limit, shall be reassessed for entry into unsubsidized employment. A transitional IEP will be initiated no later than one year prior to the participant's durational limit exit date.
- 3. The transition assessment and IEP is intended to aid participants who are approaching their durational limit of 48-month participation in SCSEP and who are still not job-ready to prepare for the loss of SCSEP income. The intent is to:
  - a. Assess participant financial, health and support network post-SCSEP;
  - b. Assist participant identify community programs and services to aid in further self-sufficiency; and
  - c. Identify community service organizational and programs to address health care, food, shelter, transportation, energy and other needs, as applicable.
- 4. Transitional IEPs should include the following as appropriate:
  - a. Up-to-date information on each participant's transferrable skills and interests and if applicable for those participants with unsubsidized placement as a goal, special action steps, such as updating their resume and job interviewing, job-search skills, additional training, and outreach strategy.

- b. Up-to-date information on goals and needs for support along with specific action steps, such as developing a personal budget without SCSEP wages; assistance with contacting social services, or other community service organizations to register, etc.
  - c. Up to date information on continuing community service goals or other plans post-exit and specific action steps, such as identifying other stipend or volunteer organizations.
- 5. Transitional IEPs should be developed with participant at 36 months of participation.
- 6. Participants refusing to complete the activities consistent with his/her IEP may, without extenuating circumstances, be terminated from SCSEP as described in Chapter 11, Sections V.H.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 8: SUPPORTIVE SERVICES

### I. Policy Statement

SCSEP Sub-grantees are required to assess all participants needs for supportive services and to make every effort to assist participants in obtaining needed supportive services.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5
4. §504 of the Rehabilitation Act of 1973 as amended
5. Americans with Disabilities Act of 1990

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

All supportive services are to be made available on an equitable basis to all participants within a sub-grantee's area of service.

#### B. Sub-grantees

Sub-grantees should identify and document in participant IEPs the need for supportive services at time of enrollment; i.e., transportation, incidentals, etc. All subsequent supportive services should be documented as part of the revised IEPs.

### IV. Acronyms and Definitions

#### A. Acronyms

ADA                      Americans with Disabilities Act of 1990

OPC            Other Participant Costs

**B. Definitions**

Reference the glossary for definitions of **Other Participant or Enrollee Costs, Supportive service** and **Career Services**.

**V. Standards**

**A. Supportive Services Overview**

1. Sub-grantees may provide directly or arrange for supportive services that are necessary to enable a participant to successfully participate in SCSEP, including but not limited to payment of reasonable costs of:
  - a. Counseling designed to assist participants with their community service training assignments and with obtaining unsubsidized training;
  - b. Counseling designed to assist participants with health and nutritional matters, Social Security, Medicare benefits and laws regarding retirement;
  - c. Reasonable costs for health and medical services;
  - d. Incidentals such as work shoes, badges, eyeglasses and hand tools, if these items are required for participation on the program and are not available from local resources at low or no cost;
  - e. Instruction designed to help the participants in their community service training assignment;
  - f. Dependent care;
  - g. Transportation and related expenses, as applicable;
  - h. Housing, including temporary shelter and needs based payments; and/or
  - i. Follow-up / retention services.
2. All supportive services must be consistent with IEP. Sub-grantees are to ensure participants understand that supportive services are not an entitlement for the length of participation.
3. In all cases, justification for supportive services should be documented in the participant case notes indicating the cost and

source of the service and the length of time in which the service is authorized.

**B. Unallowable Supportive Services**

1. SCSEP funding will not be utilized for the payment of supportive services that are unallowable under the grant guidelines, which include but are not limited to:
  - a. Payments for goods or services incurred or received prior to the participant's enrollment in the program;
  - b. Fines and penalties, such as for parking tickets, moving violations or legal fees;
  - c. The purchase of goods or services that are illegal under any federal, state, local or municipal law or statute;
  - d. Payment of debts that have been turned over to a collection agency; or
  - e. Payment of supportive services that are a conflict of interest, i.e., payment for service provided by a participant, participant family member or program staff family member.

**C. Supportive Services Requests**

1. All supportive services are based on the availability of funds and paid out of the OPC funding category. Due to the limited amount allocated, to the extent practicable, the sub-grantee should arrange for the payment of these expenses from other resources.
2. Any supportive service request exceeding \$500 must be requested in writing by the participant and maintained in the participant's program file. A Request for Supportive Services should include the following:
  - a. How the service will contribute toward enabling the participant to successfully participate in SCSEP;
  - b. Other resources sought and attempts to secure the service;
  - c. Length of time service is needed;
  - d. Signature of the authorized sub-grantee representative approving or disapproving the request;
  - e. Signature of participant;
3. Supportive services under \$500 will include the following:

- a. Documentation in case notes how the service will contribute toward enabling the participant to successfully participate in SCSEP;
- b. Pre-Approval from program coordinator, and
- c. Arrangements for how the supportive services will be provided.

**D. Sub-grantee Authorization of Supportive Services**

- 1. All participants must remain in good standing based on agreed IEPs while enrolled in career service or training activity.
- 2. Sub-grantees may use SCEP funds to meet obligations under §504 of the Rehabilitation Act of 1973 as amended, and the ADA as amended and any other applicable Federal disability nondiscrimination laws to provide physical and programmatic modifications accessibility and reasonable accommodations/modifications for and effective communication with individuals with disabilities.
- 3. To ensure successful placement and retention, sub-grantee may provide supportive services for 12-months to a participant exited to unsubsidized employment placement. Sub-grantees will determine if the individual has the necessary supportive services to remain in the job.
- 4. Participants may arrange for supportive services, with the expressed approval of the sub-grantee staff, however, payment for supportive services will be made directly to the provider. Participants will not engage in the payment transaction.



# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 9: PARTICIPANT TRAINING

### I. Policy Statement

SCSEP provides training opportunities to participants that lead to increased participant self-sufficiency.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5
4. Older Worker Bulletin No. 04-04

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

1. Only those individuals who meet the definition of “participant” as defined in Chapter 5 of this document are eligible to receive SCSEP services.
2. Participants shall not be required to pay for SCSEP training. Worker’s Compensation is provided by host agency for participants that includes coverage for all community service activities.

#### B. Sub-grantees

1. Sub-grantees may pay for participant training including the payment of reasonable costs of instructors, classroom rental, training supplies, materials, equipment, and tuition.
2. All community service assignment hours as well as other training hours must be entered into GPMS on a quarterly basis in time for the U.S. Department of Labor to process the quarterly program data.

#### IV. Acronyms and Definitions

##### A. Acronyms

CSA	Community Service Assignment
OJE	On-the-Job Experience
OWB	Older Worker Bulletin
UI	Unemployment Insurance

##### B. Definitions

Reference the glossary for definitions of **Community Service Assignment** and **IEP**.

#### V. Standards

##### A. Forms of Training

1. Community service job training;
2. Specialized Training;
3. On-the-Job Experience;
4. Skills training;
5. Classroom training;
6. Lectures;
7. Seminars;
8. Individual instruction;
9. Training through, or in coordination with other employment and training programs and/or colleges;
10. Self-development training; and
11. Other forms training that improve the participant's self-sufficiency.

##### B. Community Service Assignment

1. Training may be provided before or during a community service assignment.
2. A community service assignment based on the participant's IEP must exist for any program services and training to occur.

3. Individuals who have exited the program are not eligible for SCSEP funded training or other services unless a part of the follow-up process and will be determined on a case-by-case basis.
4. An individual without a community service assignment is not a participant and not eligible to receive program services. This does not apply to those individuals on approved break, as described in Chapter 10, Section V.G.
5. Community Service Assignment Form data must be completed and entered into GPMS when an assignment to a host agency is made, changed or ended.
6. Community service training is provided through a host agency and offers the participant an opportunity to receive the needed skills training detailed in the participant's assessment and IEP.
7. Community service training is a participant-friendly approach to serving those who are most in need. Community service training is practical, involving real work tasks, utilizing actual equipment and dealing with current organizational issues and services.
8. Community service training is developed with sub-grantee program coordinator or their designee, the participant and the host agency supervisor. Job duties are documented in the SCSEP Community Service Assignment Description.
9. Participants are not employed by the host agency. The Community Service Assignment is not a job-description, but a training outline.
10. Each Community Service Assignment Description is to be tailored for each participant and must contain the following:
  - a. A detailed description of the specific competencies to be attained.
  - b. The methodology to be used to measure and document progress toward attainment of competencies.
  - c. The intervals of assessment to measure progress toward attainment of the stated competencies.
  - d. Who will conduct the participant assessments.
11. The Community Service Assignment Description is to be completed and distributed to participants and the host agency supervisor prior to the first day of starting the assignment.

**C. Community Service Assignment Rotations**

1. Participants may be rotated to different community service assignments if it is found to be in the participant's best interest based on their IEP to obtain additional skills, and/or to increase the probability of obtaining unsubsidized employment.
2. Sub-grantees will ensure that all rotations (both internally and externally) will correspond with SCSEP administrative rules and regulations. Such rotations will be in consultation with the participant and host agency supervisor(s).
3. The consultation must be documented in case notes.
4. A participant rotation to a new host agency is subject to:
  - a. An individualized determination that rotation is in the best interest of the participant.
  - b. A host-agency rotation will further the acquisition of skills listed in the IEP.
5. Participant host agency rotations may occur under the following circumstances, but only if the factors stated in Section V.A of this Chapter are met.
  - a. All resources at the current training site have been exhausted.
  - b. The IEP determines that it is in the best interest of the participant and they have been in their current community service assignment a minimum of 12 months,
  - c. An exception to this may occur if there is a written agreement to hire the participant by the next program year. Such exception to this general limitation require prior approval from the State SCSEP Coordinator.
  - d. A participant has gained additional training through educational resources that has allowed him/her to obtain/acquire additional training opportunities that their current host agency cannot offer.
  - e. A participant may rotate within the same host agency if/when:
    - i. The participant lives in a rural area where host agency options are limited.
    - ii. The participant has specific prohibitive disabilities that have been documented and/or verified by a physician.

- iii. New training opportunities are available that will increase the potential of the participant obtaining unsubsidized employment.
- f. Additional skill training is permitted and may be combined with each other and/or with job search activities or job clubs.

**D. Community Service Assignment Participant Removal**

1. Participants are permitted to be removed and relocated from one community service assignment to another, but only when a participant is unable to continue in the position assigned to them due to unresolvable conflicts or personal circumstances.
2. Such removal and relocation are not considered a rotation for the purposes of acquiring new skills or in the best interest of the participant as outlined in their IEP and are subject to the following conditions:
  - a. Participant behavior/at fault: If the participant is at fault for behavioral conflicts and is unable to remain at the host agency due to his/her actions or behavior (disruptive, insubordinate, abusive, or similar behavior), the participant can be terminated for cause in accordance with Chapter 11, Section V.H.
  - b. If the participant requires removal from a host agency due to personal conflicts or circumstances unrelated to training, the participant may be placed on an approved break in accordance with Chapter 10, Section V.G while the sub-grantee attempts to identify a new host agency assignment. Once an appropriate assignment is identified, the participant can be reassigned.
  - c. The following procedure will be followed for removal and replacement under the above circumstances:
    - i. The participant will be placed on an approved break for a maximum of 30-days.
    - ii. The sub-grantee will contact a minimum of two (2) host agencies every seven days for the period of time that the participant is on approved break to re-assign the participant.
    - iii. The sub-grantee will document in the participant's case file every and all efforts to secure an appropriate host agency, making sure to document

dates, times, contact information and a detailed synopsis of contact.

- iv. The sub-grantee will remain in continued communication with the participant throughout the process, making detailed notes of dates, times and information provided to the participant in their case file regarding the effort to secure an appropriate host agency.
3. If after 30-days, the sub-grantee has still not been able to secure a new position for the participant, the participant's authorized position may be filled by the sub-grantee with another eligible un-assigned participant and the participant will continue to be on Administrative approved break for an additional 30 days. The following will apply during that 30-day period:
- a. The participant will be assigned to the next appropriate available host agency, and
  - b. The sub-grantee will provide the participant with a 30-day termination letter stating:
    - i. The reason the participant is on approved break and documentation regarding original host agency separation;
    - ii. The efforts made to find a new host agency on their behalf;
    - iii. The effective date of exit for the participant (30 days from date of letter); and
    - iv. The participants right to grieve the termination under the termination policy provided at orientation.
  - c. Under no circumstances will the sub-grantee exit the participant before the 60-days of approved break period concludes, with the exception of applicable cause found in Chapter 11, Section V.H.
  - d. The participant, however, may choose to voluntarily exit the program at any time as described Chapter 10, Section V.G before the 60-day approved leave period has been concluded.
4. If a host agency becomes available after the termination letter is written, the participant will not be exited. The letter will be deemed

void and retained in the participants case file with detailed notes on events surrounding the termination letter withdrawal.

5. Participants that leave host agencies without discussion or attempts to resolve issues may be terminated from the program for cause and not subject to the 60-day approved period at the discretion of the sub-grantee.
6. Under this section, participants may reject only one community assignments and forfeit their opportunity to remain in the program and will be exited in 30 days in accordance with Chapter 11, Section V.H.

**E. General Training Outside of Community Service**

1. General training is designed to enhance or refresh a participant's basic skills. It includes skills training, classroom training, lectures, seminars and individual training.
2. General training must be consistent with the participant's IEP and the costs be reasonable and made uniformly available to all participants.
3. General training may be combined with other training activities, such as community service, specialized training, on-the-job experience or other general training options.
4. All participant training related activities are to be documented in the participant IEP and case notes and maintained as part of the participant's permanent file.

**F. Specialized Training**

1. Specialized training is designed to prepare a participant for a specific job or industry. Specialized training is to conform to the requirements outlined in [DOL/ETA OWB 04-04](#).
2. The participant's assessment, IEP and assignment determine the training and skills needed to enhance the participant's opportunity to obtain unsubsidized employment. At the end of the training, and consistent with the IEP, the participant may be placed into job search or job club, directly into unsubsidized employment, back into a community service assignment or entered into an on-the job experience.
3. The sub-grantee may elect to enroll the participant in a customized training class through a workforce partner, an educational institution

or other training vendor. In this instance, a training contract must be negotiated with deliverable timelines and specific skills learned.

4. Specialized training may be combined with other training activities, such as community service, classroom training, lectures, seminars, individual instruction, or on-the-job experience.
5. Training may be provided through the sub-grantee, a workforce partner, an educational institution, or other training vendor.
6. A contract must be negotiated with the provider if the provider is not the sub-grantee.
7. The contract must detail the curriculum, including specific skills to be learned, the deliverable timelines, and payment responsibilities.
8. Sub-grantees are to notify the grantee of all specialized training considered prior to implementation.
9. The training must be consistent with the participant's IEP.
10. The training cost must be reasonable and applied to ensure uniformity of service to all participants.

**G. On-the-Job Experience (OJE)**

1. The intent of OJE is to provide a trial employment period for a participant to be considered for a permanent job with the OJE provider/employer. The type of training that a participant may acquire is determined by the sub-grantee project coordinator, as determined by the participant's IEP. Each type of training has its own rules and requirements that are distinguished by an agreement with the employer. The type of OJE assignment depends on the identified needs of employers and matching those needs with participants.
2. General OJE Requirements
  - a. All participants and employers who participate in OJE training, must meet the OJE criteria established by the Older Worker Bulletin Number 04-04.
  - b. The sub-grantee program coordinator must sign the training assignment description and the OJE agreement, which clearly documents the details, pay, and duties of the participant while in the assignment.
  - c. Participants must be in a community service assignment for at least two (2) weeks before participating in an OJE.



- d. SCSEP guidelines advise that participants not work more than 1300 community service hours per grant year, however, OJE may require participants exceed this number. Sub-grantees will manage participant hours in order to maintain performance measures and budget compliance.
  - e. An active OJE file should be maintained for all OJE employers that contain no less than the OJE agreement and safety monitoring form.
  - f. A complete assessment will be completed and an IEP developed prior to a participant entering an OJE assignment.
3. OJE Agreement
- a. The agreement may be with a public or private employer that is not an active host agency. Situations in which a single umbrella host agency has multiple branches or departments or is in different localities must be evaluated specifically prior to OJE placement.
  - b. The sub-grantee project coordinator must negotiate a separate OJE Agreement with the employer that identifies the job title, specific training period, skills, timelines, benchmarks, duties of the assignment and rate of pay.
  - c. A separate agreement must be generated for each participant OJE assignment.
  - d. The agreement must stipulate the amount the participant will be paid in the OJE training. Participants may be paid the prevailing wage while the OJE training assignment.
  - e. The agreement must stipulate whether the participant wages will be paid by the SCSEP sub-grantee during the training or whether the participant will be placed on the employer's payroll. If the participant is placed on the employer's payroll, the agreement must stipulate how much the employer will be reimbursed.
  - f. The agreement must stipulate that at the end of the training period, if the participant's OJE has been satisfactory, the participant will be hired by the employer.
  - g. The agreement must stipulate that there will be significant follow-up to resolve potential unsafe conditions or issues that arise with the employer or participant.

- h. In cases where the sub-grantee will retain participants on their payroll during the OJE training period the agreement should stipulate that the sub-grantee will be responsible for worker's compensation. If the participant is placed on the employer's payroll, the agreement must stipulate that the employer will be responsible for worker's compensation.
  - i. The SCSEP participant, the employer and the sub-grantee coordinator must sign the OJE Agreement.
  - j. A new assignment must be generated in GPMS documenting the details of the OJE assignment.
  - k. A participant may only be assigned to OJE once in a 12-month period.
4. Length of Assignment and Reimbursement/Direct Pay
- a. A defined training period must be established before the OJE assignment can begin. This training period should be entered on the OJE agreement that is signed by the participant, employer and sub-grantee project coordinator.
  - b. An employer may be reimbursed up to 100 percent of wages earned by each participant in OJE training that will last no more than four (4) weeks. For OJE training that will exceed four weeks, but not more than twelve (12), the employer may be reimbursed up to 50 percent of the wages earned by the participant in OJE training.
  - c. An OJE training assignment does not have to begin at the start of a pay period
  - d. Participants may participate in an OJE training assignment before or after a CSA assignment within a pay period but not concurrently.
5. OJE Time and Attendance Report/Pay Rate
- a. A participant in an OJE training assignment may earn a pay rate equal to what the employer would pay if the participant were hired into the position.
  - b. No participant may work for more than 40 hours per week, which includes time spent in CSA.
  - c. A separate time and attendance report must be generated and provided to the employer to document the hours the participant spent in OJE. At the end of each pay period, the

employer and the participant must sign the time and attendance report and it must be transmitted to the sub-grantee project coordinator office at the end of each pay period for processing.

- d. The time and attendance report must either be signed directly by the employer, or the sub-grantee project coordinator. The project coordinator can only sign if he or she has documented on the OJE time and attendance report that he or she (not support staff) has verified that the hours on the time and attendance report are correct.
6. If a holiday occurs when a participant is assigned to an OJE assignment the holiday can be observed if the OJE provider allows the participant to take that workday off without compensation.

#### **H. Collaboration with Other WIOA Training Programs**

1. SCSEP provides coordination with other training and placement programs through WIOA. WIOA creates a seamless service delivery system for individuals seeking workforce development services by linking the ARIZONA@WORK One-Stop partners in the One-Stop Delivery System.
2. SCSEP is a partner program under WIOA. As such, it is part of the One-Stop Delivery System. SCSEP grantees are required to follow all applicable rules under WIOA regulations.
3. SCSEP sub-grantees are to coordinate with the local WIOA One-Stop Delivery System to provide eligible and ineligible individuals with access to other activities and programs carried out by other One-Stops.

#### **I. Impact of SCSEP Training Wages on Unemployment Benefits**

1. Participants who are receiving unemployment insurance benefits are required to report their gross earnings the week they are earned. Earnings less a \$30.00 allowance will be automatically deducted from the participant's unemployment insurance weekly benefits. The participant is responsible for reporting their weekly gross SCSEP earnings.
2. Example of impact of SCSEP training wages on Unemployment Insurance (UI) Benefits:
  - Participant weekly SCSEP earnings: \$153.00
  - Weekly UI Benefit: \$200.00

- SCSEP Earnings (\$153.00) - \$30.00 allowance = \$123.00
- UI Weekly Benefit (\$200.00) - \$123.00 = \$77.00 (Adjusted UI Weekly Benefit)

**J. Use of Participant Vehicles**

1. Participants may not be forced to use their own vehicles for community service assignments.
2. If a participant does use their own vehicle for any community service-related activity:
  - a. The sub-grantee must verify the participant has a valid driver's license and liability insurance.
  - b. The participant meets all safety requirements of the sub-grantee for use of a personal vehicle.

**ARIZONA DEPARTMENT OF ECONOMIC SECURITY**

Senior Community Services Employment Program

Effective Date: January XX, 2021

**CHAPTER 10: WAGE AND FRINGE BENEFITS**

**I. Policy Statement**

Training wages and benefits are provided to participants assigned to a community service agency.

**II. Authority**

**A. Federal Authority**

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

**B. State Authority**

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

**III. Applicability**

**A. Participants**

1. Upon community service assignment, a participant shall receive a training wage consistent with the higher of the state or federal current minimum wage.
2. Fringe benefits shall be administered uniformly to all participants.

**IV. Acronyms and Definitions**

**A. Acronyms**

EFW            Enrollee Wages/Fringe Benefits

**B. Definitions**

**V. Standards**

**A. Participant Community Service Hours**

1. Sub-grantees will provide a minimum of 20 hours per week of community service for each participant.
2. Participants cannot be required to be in community service more than 20 hours per week.
3. Participants may be provided additional community service hours over 20, but only when prior approval is obtained by the State Grantee. This limitation is subject to budgetary and programmatic considerations.
4. Community service schedules are flexible and may be adjusted within the limits set forth within this Section to suit the participant's and host agency's convenience.
5. Sub-grantees must approve participant's schedule of work hours and any changes after its establishment.

**B. Timekeeping and Payroll**

1. All participants must complete, sign, and submit timesheets and leave requests to the host agency supervisor for signature. Sub-grantees and host agency supervisors may also request that participants keep a log of specific task completed during each pay period.
2. All timesheets are to be reviewed by the sub-grantee for accuracy and compliance with the intent of the program prior to being submitted for payment.
3. Timesheets must also include the following elements:
  - a. Name and signature of the participant;
  - b. GPMS generated participant PID;
  - c. Name of the host agency;
  - d. Timeframe of pay period;
  - e. Daily hours in community service assignment. Hours do not include time taken for lunch;
  - f. Daily hours in other SCSEP approved/funded training. Hours do not include time taken for lunch;
  - g. Approved leave requests and/or sub-grantee approved extended hours of training in each period;

- h. Community service assignment supervisor signature. An authorized signature of the host agency staff may substitute in the absence of the community service assignment supervisor. All host agency authorized signatures must match those of the Host Agency Agreement and
    - i. The authorized signature of the sub-grantee indicating acceptance of the timesheet.
- 4. If timesheets are submitted to the sub-grantee prior to the end of the pay period in order to meet payroll processing deadlines, the sub-grantee must verify with the host agency that the participant was in fact on-site and performed their community service assignment activities for the ours indicated on the timesheet. Verification is to be documented in the case notes in the participant's program file.

**C. Fringe Benefits**

- 1. **Workers Compensation:** Worker's Compensation coverage equal to that provided by law for covered employment.
- 2. **Offer of annual physical examination.** DOL/ETA requires that participants be offered the option to have a physical exam at time of enrollment and annually thereafter while participating in SCSEP. The following applies to the physical exam requirement:
  - a. Physical examinations are not an eligibility factor a requirement for participation in SCSEP;
  - b. Acceptance of a physical exam is voluntary. Participants refusing the physical exam must sign a Physical Examination Statement;
  - c. Documentation for each year, whether participant accepts or refuses the exam, must be kept in the participant's case file;
  - d. Results of physical exams are the sole property of the participant. Participants is not required to provide the results to the sub-grantee and sub-grantee may not request or acquire a copy from the physician or participant.
  - e. Cost of Physical Exams: sub-grantees should seek to provide physical exams through reduced or no-cost local providers.
    - i. Sub-grantees may set a reasonable allowable rate per participant; and

- ii. Physical exam should be charged to the EWF cost category.

**D. Holiday Hours**

1. Sub-grantees must provide compensation uniformly to participants for schedule hours during which a host agency's business is closed for a federal holiday. The following are recognized federal holidays:
  - a. New Year's Day;
  - b. Martin Luther King Day/Civil Rights Day;
  - c. President's Day;
  - d. Memorial Day;
  - e. Independence Day;
  - f. Labor Day;
  - g. Columbus Day;
  - h. Veteran's Day;
  - i. Thanksgiving Day; and
  - j. Christmas Day
2. If the host agency is open on any of the federal holidays listed above, the participant shall be compensated for the time worked on that day at the same rate as any non-holiday.
3. For each of the holidays listed above where the host agency's business is closed, and the participant would have had community service hours scheduled, the participant is to reschedule their community service assignment hours for that day with their host agency and/or other training time with the sub-grantee to accommodate the hours for which they would have been normally compensated on the day of the holiday.
4. If the host agency is closed on additional holidays (e.g. day after Thanksgiving), the participant shall also have the opportunity to make up those hours consistent with this Section.
5. A participant may elect not to reschedule their hours. If they chose to do so, this must be documented in the case notes. The participant will not be compensated for hours not rescheduled.
6. In the event a host agency cannot accommodate the participant's rescheduled holiday hours as described in this Section the sub-



recipient is to arrange for approved activities for the participant that are consistent with their IEP. These activities are to be added to the IEP and noted in case notes.

7. All holiday hours must be accounted for within the pay period for which the holiday takes place.
8. Sub-grantees will require each host agency to provide a list of federal holidays in which they are closed.

**E. Sick Leave**

1. Sub-grantees are to provide sick leave that is not part of an accumulated sick leave program. Sick leave is to be compensated uniformly to all participants.
  - a. For each day of sick leave, within the same pay-period, but not later than the following pay-period, the participant may reschedule their community service assignment with their host agency and/or other training time with the sub-grantee to accommodate the hours for which they would have been normally compensated.
  - b. In the event a host agency cannot accommodate the participant's rescheduled sick hours as described in this Section the sub-grantee may arrange for approved activities for the participant that are consistent with their IEP. These activities are to be added to the IEP and noted in case notes.
  - c. If the participant is to be out due to health reasons or other personal reasons for longer than 3 days, the sub-grantee will place the participant on approved leave in accordance with this Section. This leave must be entered in case notes and into the appropriate fields in GPMS.

**F. Prohibited Compensation with SCSEP Funds**

1. Retirement system or plan contributions.
2. Pension benefits.
3. Annual Leave.
4. Accumulated sick leave.
5. Bonuses.

**G. Leave Without Pay**

1. Approved Breaks, or Leave Without Pay, of no more than four weeks may be granted to a participant when circumstances warrant it.
2. Participants may take approved break for the following reasons:
  - a. Medical or health reasons for a duration of 3 or more days;
  - b. Jury duty;
  - c. Family obligations for a duration of 3 or more days; and
  - d. Administrative reasons determined by sub-grantee.
3. Written requests for breaks in participation must be submitted by the participant and approved by the sub-grantee. The approval must include an agreed upon date of return to the community service assignment.
4. Failure of the participant to return or be unwilling to return to the assignment on the agreed upon date may result in the participant's termination for cause, unless an extension is authorized by the sub-grantee and proper documentation received as defined by the situation.
5. Approved leave is to be documented in detail in the participant's file case notes and entered into their IEP and into GPMS.
6. Sub-grantee is to obtain appropriate return-to-work documentation prior to the participant returning to their community service assignment in the event of sickness or injury. The documentation is to remain a part of the participant's permanent file and noted in case notes that it was received.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 11: VOLUNTARY EXITS AND INVOLUNTARY TERMINATIONS

### I. Policy Statement

The voluntary exit and involuntary termination policies shall be applied fairly and equitably to all participants. A copy of this policy must be received by all individuals as part of the enrollment process in accordance with policy Chapter 14, Section V.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

Participants may be removed from host agencies in accordance with Chapter 9, Section V.D.

#### B. Sub-grantees

Only a sub-grantee may exit a participant from SCSEP pursuant to this policy.

#### C. Host Agency Supervisors

1. Host agency supervisors may not terminate participants from the program.
2. Host agency supervisors must receive a copy of this policy as part of the enrollment process.

### IV. Acronyms and Definitions

**A. Acronyms**

**B. Definitions**

**V. Standards**

**A. Voluntary Exits**

1. Unsubsidized Employment

a. The goal of SCSEP is to assist program participants to exit the program into unsubsidized employment.

b. Efforts to place the participant into unsubsidized placement should begin once the participant has been determined by documented assessment and the attainment of the skills identified in the IEP, to be job ready. Placement shall be documented on the Unsubsidized Employment Form and entered into GPMS. Documented efforts entered into case notes are to include, but not be limited to:

i. Coordinating with local ARIZONA@WORK One-Stop to register the participant in the state's active job registry; to identify suitable, unsubsidized employment opportunities and identify other forms of job-related assistance.

ii. Encourage host agencies to hire qualified participants.

iii. Providing guidance to and assisting participants to contact public and private employers to identify suitable employment opportunities and arrange for interviews.

2. Voluntary Termination

a. Sub-grantees should request a written notification from the participant indicating their desire to exit the program voluntarily and include the effective date of exit (last day of participation). This written notification shall be retained in the participants program file.

3. Moved from the Area

- a. Sub-grantees should request a written notification from the participant indicating their plans to exit the program due to moving from the area. This notice is to include the effective date of exit (last day of participation). This written notification shall be retained in the participant's program file.

**B. Voluntary Exit Exclusions**

1. The following Voluntary Exit reasons are excluded from the DOL/ETA performance measures and only with acceptable documentation as found in Chapter 11, Sections V.D through V.F or the Data Validation Handbook, as amended:
  - a. Health/Medical;
  - b. Family care;
  - c. Institutionalization; and
  - d. Death.
2. Specific documentation is required for a participant's exit to be excluded from DOL/ETA performance measures for reasons listed in Chapter 11, Section V is subject to data validation and fails if this documentation is not included in the participant file.

**C. Participant Medical Exclusion**

1. The following are considered official medical records or other official records, including but not limited to:
  - a. Actual medical records;
  - b. Physicians statement or other certification from a medical professional;
  - c. Letter from official at medical facility or institution;
  - d. Psychologists' diagnosis;
  - e. Rehabilitation evaluation;
  - f. Disability records;
  - g. Veteran's medical records;
  - h. Vocational rehabilitation letter; or
  - i. Worker's compensation record.
2. Signed attestations: A participant signed self-attestation or signed attestation from a knowledgeable third-party is acceptable only if

the attestation contains all the required elements. Self-attestation forms may be found in the SCSEP Data Validation Handbook or created internally by sub-grantees, as outlined in Chapter 1, Section V.B.

3. Case notes will NOT be acceptable for validation of the participant medical exclusion from performance measures.

**D. Participant Family Care – Health and Medical Exclusion**

1. Official medical records or other official records, as stated in Section V.C.1 of this Chapter.
2. Signed attestations, as stated in Section V.C.2 of this Chapter.
3. Case notes will NOT be acceptable for validation of the participant family care - health/medical exclusion.

**E. Institutionalization Exclusions**

1. Official medical records or other official records, as stated in Section V.C.1 of this Chapter.
2. Signed attestations, as stated in Section V.C.2 of this Chapter.
3. Case notes that contain the required elements as found in the data validation handbook, as well as, detail that the participant is receiving 24- hour care in a facility like a prison or hospital and is expected to remain there for at least 90 days.
4. A disabled person residing in a facility is not considered institutionalized.

**F. Deceased Exclusion**

1. An official government record or other official record is acceptable, including but not limited to:
  - a. Death record or certificate; or
  - b. Death notice published through the Internet, in newspaper, or local funeral home.
2. Signed attestation: A signed attestation from a knowledgeable third party is acceptable. Self-attestation forms may be found in the SCSEP Data Validation Handbook or created internally by sub-grantees, as outlined in Chapter 1, Section V.B.

3. Case notes that contain the required elements as found in the data validation handbook are also permitted to establish an exclusion for deceased

**G. Prohibited Reasons for Exit**

1. It is unacceptable to terminate/exit a participant for the following reasons:
  - a. Participant has reached what the sub-grantee thinks is maximum improvement under the IEP and has not been able to obtain unsubsidized employment.
  - b. Participant is unable to carry out the duties of the community service assignment.
  - c. Participant incompetence.
  - d. Imposing an upper age limit for participation in SCSEP.
2. Participants who disagree with terminations described in Section V.G.1 of this Chapter may grieve the termination as described in Chapter 11, Section V. When participants are terminated for “Cause” the sub-grantee SCSEP program coordinator shall inform the participant in writing of the reasons for termination and of the right to grieve in accordance with required procedures described in Chapter 11, Section V of this document. Notification shall be placed in the participant’s permanent file.

**H. Termination Process**

1. When feasible, participants terminated from the SCSEP should be referred to other potential sources for assistance.
2. Participants will be given an opportunity to correct his or her behavior or conduct, or his or her failure to comply with the IEP requirements, except in cases involving serious harm or imminent threat to health, safety, property, etc. At any point, if a participant makes positive efforts or the participant’s lack of action is justified, corrective action will be discontinued. The following steps for corrective action will be taken.
3. Termination Steps
  - a. Step 1 – *First Formal Warning*: If a participant displays behavior or conduct outlined in the reasons for “for-cause” terminations or refuses to comply with the IEP requirements, the participant will be given a verbal warning and counseled to correct his or her actions. Absent extenuating

circumstances, the participant will be informed in writing by the sub-grantee program coordinator of the requirement to correct his or her behavior conduct. The warning will be documented in participant's file.

- b. Step 2 – *Second Formal Warning*: When a participant for a second time displays behaviors or conduct outlined in the reasons for “for-cause” terminations or refuses to comply with the IEP requirements, the participant will be verbally warned and counseled to correct his or her actions. Absent extenuating circumstances, the sub-recipient SCSEP coordinator will send the participant a follow-up written warning that he or she has 30 days from the date of the letter to correct his or her behavior or conduct. In the case of an IEP violation, the participant may be directed to complete specific IEP related tasks. The written warning will include a statement that failure to make improvement or complete the IEP related tasks will result in termination from the program.
  - c. Step 3 – *Termination*: When a participant does not make improvement in his or her actions or for a third time displays behavior or conduct outlined in the reasons for “for-cause” terminations, a letter will be sent notifying the participant that he or she will be exited 30 days from the date of the letter.
  - d. Step 4 – *Removal from host-agency*: Depending on the seriousness of the offense, the participant may be permitted to continue on in the host agency assignment until the 30 days expire. If the participant cannot remain in the host agency for the 30 days, they are to be placed on approved break, instructed not to report back to the host agency and exited from the program officially on the date indicated in the termination letter.
4. Participant termination must be documented to include details in case notes explaining the cause and justification of the termination. Case notes are to be maintained in the participant file. The termination is to be reported on the SCSEP Exit Form and entered into GPMS.

**I. Reasons for Involuntary Terminations**

- 1. **Ineligibility Due to Income**
  - a. *Participants incorrectly declared eligible as a result of false information knowingly given by that individual.* Individuals



who are to be exited for this reason are to be given immediate written notification explaining the reasons for termination and may exit the participant 30 days after it has been provided to the participant with written notice. The sub-grantee is to determine if Chapter 11, Section V.H applies on a case by case basis.

- b. *Participants found to be ineligible during recertification* are to be given written notification explaining the reason for termination and exited from the program no later than 30 days from the date of ineligibility determination. The participant is eligible to remain in their community service assignment during the 30-day period but not beyond the required termination date.
- c. *Incorrectly determined eligible through no fault of the participant.* A participant may be enrolled or deemed eligible for continued enrollment based on an error in determining program eligibility, e.g., income may be recorded or calculated incorrectly. When this occurs, the participant will be notified regarding the error and immediately sent a 30-day notification of termination letter. The participant will be able to continue participating in the program until the date of exit as noted in the letter.

2. **Durational Limit:** Terminations due to participants meeting their durational limit for SCEP must be exited in accordance with policy Chapter 12, Section V. No waivers shall be granted to extend the durational limit of participants. A 30-day written notice of termination before exit must be issued to the participant 30 days before the 48-month maximum participation date. The participant will be able to continue participating in the program until the date of exit as noted in the exit letter.

3. **Becoming Employed During Enrollment:** To qualify for enrollment in SCSEP, a participant must be unemployed. All participants are informed that they may not be employed while participating in the program and that they must notify the sub-grantee program coordinator immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the program of the employment will be terminated from the program. The participant will be placed on leave without pay immediately and a 30-day written notification of termination will be sent to the participant. The participant will be exited from program in 30 days.

4. **For Cause:** Terminations for Cause are proven willful acts of misconduct and not a result of mere negligence, inadvertence, incapacity or incompetence. Sub-grantees must give the participant written notice explaining the reason(s) for termination and may terminate the participant 30 days after it has provided the participant with the written notice. A copy of the grievance procedures (Chapter 12, Section V of this policy) must be provided to the participant.
- a. Participants may be placed on approved unpaid leave for situations involving fraud or serious misconduct that prohibits the participant from continuing their community service assignment.
  - b. For cause reasons for termination may include, but are not limited to the following:
    - i. Refusal to cooperate in recertifying eligibility – including intentional delays in providing required documentation during the specified recertification timeframe. (30-day written notice before termination with documented attempts by the sub-grantee to identify and resolve any issues pertaining to the participants’ refusal.)
    - ii. Unwillingness to comply with assigned training tasks as outlined in their IEP without good cause. (30-day written notice before termination with documented attempts by the sub-grantee to identify and resolve any issues pertaining to the participant’s refusal.)
    - iii. Refusal to accept training opportunities outlined in the IEP.
    - iv. Refusal to accepting a new community service assignment to enhance skill development in support of IEP goals.
    - v. Refusal to accept supportive services that will enhance the participant’s ability to participate in a community service assignment consistent with the IEP.
    - vi. Refusal to participate in sub-grantee offered services such as, but not limited to job search or resume writing.

- vii. Refusal to participate in scheduled assessments or other IEP related processes.
- viii. Refusal to accept a suitable community service assignment that is consistent with the participant's IEP. (30-day written notice before termination with documented attempts by the sub-grantee to identify and resolve any issues pertaining to the participant's refusal.)
- ix. Refusal to accept three (3) job offers or referrals to unsubsidized employment consistent with the SCSEP IEP employment goal. Documentation must be included in case notes indicating employment counseling occurred addressing why job offers or referrals were refused. Extenuating circumstances that would hinder the participant from accepting unsubsidized employment must be documented in case notes. (30-day written notice before termination with documented attempts by the sub-grantee to identify and resolve any issues pertaining to the participant's refusal.)
- x. Frequent tardiness. Documentation indicating specific instances of tardiness and attempted resolution from the host agency supervisor must be included in case notes and the participant's file. Accumulation of three (3) consecutive absences without notice to a designated supervisor is considered resignation from the program. (30-day written notice before termination with documented attempts by the sub-grantee to identify and resolve any issues.)
- xi. Falsification by the participant of time sheets or other official records including but not limited to applications related to program eligibility and enrollment. (30-day written notice before termination with detailed documentation.)
- xii. Insubordination including but not limited to documented instances of the unwillingness of a participant to carry out a directive from a manager or supervisor such as a verbal refuse, a nonverbal refusal or an unreasonable delay in completing work, disrespectful behavior toward a manager or

supervisor including cursing at a supervisor, verbally or physically intimidating a manager or supervisor , or speaking loudly or argumentatively to or about a supervisor (30 day written notice before termination with detailed documentation).

- xiii. Obscene/abusive language or behavior including sexual harassment (30-day written notice before termination with detailed documentation).
  - xiv. Dispensing, possession or use of a controlled substance or alcohol while in the conduct of a community service assignment (30-day written notice before termination with detailed documentation).
  - xv. Intention disclosure of confidential or private information obtained from the host agency, grantee or sub-grantee (30-day written notice before termination with detailed documentation).
  - xvi. Physical violence or intentional destruction of property. (30-day written notice before termination with detailed documentation.)
  - xvii. Causing or threatening to cause an imminent threat to the health or safety of themselves or others (30-day written notice before termination with detailed documentation).
  - xviii. Violation of holiday, sick leave or approved break policy including failure to return from an approved break by the required date without due notice or good cause (30-day written notice before termination with detailed documentation).
  - xix. Willfully withholding the obtainment of unsubsidized employment while simultaneously participating in SCSEP.
- c. In those cases where participants must be removed immediately from host agency due to reasons related to cause, they will be placed on approved break until the 30 days have expired to exit them from the program.

**ARIZONA DEPARTMENT OF ECONOMIC SECURITY**  
Senior Community Services Employment Program  
Effective Date: January XX, 2021  
**CHAPTER 12: DURATIONAL LIMITS AND FOLLOW-UPS**

**I. Policy Statement**

Eligible individuals may participate in SCSEP for a period not to exceed 48 months from date of enrollment.

**II. Authority**

**A. Federal Authority**

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

**B. State Authority**

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

**III. Applicability**

**A. Participants**

1. For participants who have a durational limit date of November 1, 2011 or later, there will be no waiver of durational limit. These participants must be exited from the program per Chapter 12, Section V of this policy.
2. All current and incoming participants must be informed in writing of the individual durational limit policy.

**B. Sub-grantees**

1. Sub-grantees are required to conduct, and document two participant follow-ups after a participant enters unsubsidized employment.

**IV. Acronyms and Definitions**

**A. Acronyms**

SSI                      Supplemental Security Income

**B. Definitions**

**V. Standards**

**A. Durational Limit Planning**

1. Appropriate transition IEPs will be developed for each participant affected by a durational limit and will be implemented in a timely manner to ensure the best possible outcome for each participant.
2. When a participant is expected to be exited due to reaching their time limit, a written notice of termination must be sent to the participant at the following intervals:
  - a. One year to inform participant of their expected exit date due to reaching their durational limit in the program and the development and implementation of a transitional IEP;
  - b. Six months to remind the participant of their expected exit date, review of their progress toward unsubsidized employment or exit; and
  - c. 30 days to officially notify the participant of their last day of participation in the program.

**B. Exit Transition IEP**

1. If a participant has not attained employment before 36 months of SCSEP participation, the sub-grantee and participant will develop an exit transition IEP that will plot the participant's exit strategy.
2. The exit strategy should include the following:
  - a. Identification of sources for assistance with resumes, interview skills, referral to job openings and job fairs and the utilization of learning centers to assist participants in job searches and the use of one-stop job centers.
  - b. Identification of supportive services to aid participant in their transition out of SCSEP i.e., energy assistance, food stamps, SSI etc.
  - c. Referrals to appropriate ARIZONA@WORK One-Stop Career Centers and other WIOA partners that will help them maintain connectivity to the community.

**C. SCSEP Follow-ups**

1. Participant follow-ups are required in order to obtain information needed for performance measures, to provide case management to the newly placed participant, to establish or maintain contact with employer and for the delivery of the customer service survey to the employer.
2. Results of the follow-ups are to be recorded in the approved DOL/ETA grant management software. Each follow up must be completed for the identified for the quarter and in timeframe as outline in the approved DOL/ETA grant management software.
3. Follow ups shall include, but not limited to the following:
  - a. Determine if the job placement is an appropriate match for the participant and the employer and how satisfactory the job placement is to the participant and the employer. Should a problem be identified with the job placement, sub-grantee staff should work with the participant and the employer to resolve the problem. This may be accomplished through the utilization of participant services described in Chapter 8, Section V.A.
  - b. Identify potential SCSEP support services that may be required by the participant and/or employer as described in this section.
  - c. Maintain contact with the participant and their employer at least quarterly for 12 months after placement. Each follow-up shall be documented on the Unsubsidized Employment Form and in case notes.
  - d. Specific timeframes for follow-up will be determined through GPMS.
  - e. Failure to complete and obtain follow-up information will negatively affect sub-grantee performance measures.

**D. Follow-up Documentation**

1. Follow-up activities must be properly documented in the participant's file.
2. Documentation on actual earnings is required for every pay period claimed. Proof of a single pay period cannot be multiplied by 13 weeks in order to obtain earnings for an entire quarter.
3. Either of the following options may be used to determine earnings information:

- a. Official records that establish the earnings in required quarters, after the quarter of exit. A written statement of earnings from employer or paystubs issued to the participant. The written documentation of the amount of all earnings claimed must come directly from the employer.
  - b. Detailed case notes. In addition to the standard requirements for all case notes, the notes must also detail actual earnings for each increment claimed. The information must come from the employer. For example, a call to employer documented by a detailed case note is acceptable.
4. Participant's may sign a self-attestation form ONLY if employer has not provided information on wages after reasonable efforts (e.g. 3 unanswered calls or messages) were made by sub-grantee to obtain this information.
5. If a participant signed self-attestation is used, case notes must also document the sub-grantee's efforts to obtain the required information from the employer.



# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 13: REQUIRED PARTNERSHIPS AND PROGRAMMATIC SURVEYING

### I. Policy Statement

The SCSEP program a required partner under WIOA. Additionally, SCSEP participants, host agencies and unsubsidized employers will be surveyed to determine customer performance.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

1. Sub-grantees will, at the direction of the state grantee, send pre-survey letters to all participants to encourage participants to participate in the survey process.

#### B. Sub-grantees

1. The state grantee and Sub-grantees are WIOA partners under the terms of WIOA

#### C. Employers and Host Agencies

1. Sub-grantees are required to inform all active host agencies and employers of the possibility of being surveyed by DOL/ETA.

### IV. Acronyms and Definitions

#### A. Acronyms

**B. Definitions**

**V. Standards**

**A. Required Partnerships**

1. WIOA Partners are required to coordinate activities at a minimum by:
  - a. Providing both eligible and ineligible individuals with access to other activities and programs carried out by ARIZONA@WORK Centers and other public workforce system partners;
  - b. Receive referrals from ARIZONA@WORK's One-Stop delivery system for potential SCSEP participants;
  - c. Ensure that all current SCSEP participants are signed up and active job applicants with the ARIZONA@WORK delivery system or employment services;
  - d. Accept and use the WIOA participant assessments and Individual Employment Plans that may be developed by ARIZONA@WORK; and
  - e. Utilize ARIZONA@WORK training and employment services for training and job search assistance.

**B. Programmatic Surveying**

The results from programmatic surveys are tabulated by DOL/ETA and used to identify the strengths and weaknesses of the program and to develop appropriate strategies for improving the service and meeting the specific needs of the customer groups.

**C. Participant Surveys**

1. Sub-grantees will prepare participants for surveying by conveying the following information:
  - a. SCSEP staff will inform participants agencies to that they may be surveyed by DOL/ETA and asked to complete the short, confidential survey to tell about their experiences with SCSEP;
  - b. The survey will be sent out by the US Department of Labor;
  - c. SCSEP is very interested in the evaluation of their services;

- d. The survey information will be used to improve services to customers; and
  - e. Participants should be encouraged to respond to the survey when they receive it.
2. Instructions and templates will be supplied by the state grantee to sub-grantee as directed by DOL/ETA.

**D. Host Agency Surveys**

1. DOL/ETA does not inform SCSEP grantees/sub-grantees which host agency supervisors it has selected to receive surveys.
2. Sub-grantees will prepare host-agencies for surveying by conveying the following information:
  - a. SCSEP staff will inform host agencies that they may be surveyed by DOL/ETA and asked to complete the short, confidential survey to tell about their experiences with SCSEP;
  - b. The survey will be sent out by the US Department of Labor;
  - c. SCSEP is very interested in the evaluation of their services;
  - d. The survey information will be used to improve services to customers;
  - e. Host agencies should be encouraged to respond to the survey when they receive it.
3. Instructions and templates will be supplied by the state grantee to sub-grantee as directed by the DOL/ETA.

**E. Employer Surveys**

1. The administrating of employer surveys will be completed by the state grantee. Sub-grantees will assist with the survey process in the following manner:
  - a. Reviewing Employer Survey Tracking Spreadsheet when received from state grantee to determine employers requiring follow up.
  - b. Contacting identified employers and encouraging them to participate in the survey process.

- c. If the employer does not respond after three (3) weeks, another survey will be issued, and sub-grantees will repeat steps a and b.
- d. Sub-grantees will document efforts and responses in participant case notes.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 14: COMPLAINTS AND GRIEVANCES

### I. Policy Statement

SCSEP Participants may formally grieve for the following reasons: service denial and termination. Complaints of alleged discrimination are to be addressed as provided in this chapter.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).
2. A.R.S. Title 41, Chapter 6, Article 10

### III. Applicability

#### A. Participants

1. A copy of the grievance procedures is to be given to new participants as part of orientation described in Chapter 6, Section V and to applicants found to be ineligible for services.

#### B. Sub-grantees

1. Sub-grantees must attempt and encourage informal resolutions to informal complaints.

#### C. Applicants

1. Applicants who have been found ineligible may follow the same process as participants enrolled in the program.

### IV. Acronyms and Definitions

**A. Acronyms**

AAC Arizona Administrative Code

**B. Definitions**

**V. Standards**

**A. Initial Complaint**

1. A participant who has a complaint should be instructed to take the following actions:
  - a. Discuss the issue with appropriate personnel at the lowest level at which the complaint occurred. The sub-grantee program coordinator is to be immediately notified of all complaints by the host agency supervisor.
  - b. Sub-grantee personnel responding to an informal complaint should take the following action(s):
    - i. Encourage an informal resolution.
    - ii. If the participant is dissatisfied with the informal resolution, the sub-recipient must inform the participant of their right to file a formal grievance.
    - iii. Regardless of the outcome of the informal complaint, the sub-recipient is to document the outcome in writing and retain a copy in the participant's file.
2. If the complaint cannot be resolved as outlined in Section A.1 of this Chapter, the participant shall be advised to put the complaint in writing as a formal grievance. E-mails are to be considered an acceptable form of submittal of a grievance. The following Sections of the formal grievance procedure must be followed, and the timeframes adhered to.

**B. Written Formal Grievance**

1. The written formal grievance shall first be presented to the sub-grantee SCSEP Coordinator. The program coordinator shall schedule an informal meeting(s) with the participant **within 14 calendar days of the grievance**.
2. If the grievance can be resolved during this meeting, the sub-grantee SCSEP program coordinator shall provide written

documentation of the resolution, submit the documentation to the participant and enter into the participant file.

3. If the grievance cannot be resolved during the meeting, the SCSEP program coordinator shall schedule a meeting with the sub-grantees Director or designee **within 14 days** with the SCSEP Staff Supervisor and participant.

**C. Formal Grievance Meeting**

1. The formal grievance meeting shall consist of the following process to resolve the issue(s) during the meeting with the sub-grantee Director or designee, SCSEP program coordinator and participant:
  - a. The SCSEP sub-grantee Director or designee shall facilitate the meeting and render a decision in writing to the participant within 10 calendar days following the scheduled meeting mentioned in this Chapter. The decision, including the justification for the decision shall be maintained in the participant file.

**D. Administrative Review**

1. The participant has the right to request an administrative review of the SCSEP sub-grantee Director's decision by DERS Assistant Director or designee in accordance with Section 1400 of the WIOA Policies and Procedures Manual.
2. A request for administrative review must be filed in writing **within 30 days** of receipt of the notice of an adverse action. The request shall be signed by the grievant or an authorized representative of the grievant and directed to:

Assistant Director  
Arizona Department of Economic Security  
Division of Employment and Rehabilitation Services  
1789 W. Jefferson Street  
Phoenix, Arizona 85007

3. The Assistant Director or designee shall schedule an administrative review conference to meet with the grievant or a representative of the grievant. At the administrative review conference, the grievant or the grievant's representative may review pertinent evidence on which the action was based.
4. The Arizona Department of Economic Security/Division of Employment and Rehabilitation Services Assistant Director shall

issue a final decision in writing **within 60 days** of the filing of the request for administrative review.

5. The Arizona Department of Economic Security/Division of Employment and Rehabilitation Services decision is final. The final written determination and related documentation will be maintained by the Arizona Department of Economic Security/Division of Employment and Rehabilitation Services in accordance with the SCSEP record retention policy.

**E. Participant Right of Appeal**

1. The participant has the right to appeal to the Arizona Department of Economic Security/Division of Employment and Rehabilitation Services final determination to the U.S. Department of Labor.
2. The following language will be included as part of the Division's written decision:

- a. If you are not satisfied with this final determination of your grievance by the Arizona Department of Economic Security / Division of Employment and Rehabilitation Services, you may appeal to the DOL/ETA within 30 calendar days from the date of this determination. However, DOL/ETA's only authority is to determine whether the Arizona Department of Economic Security / Division of Employment and Rehabilitation Services grievance procedures were followed correctly, or if there were any allegations of violations of Federal law (other than civil rights laws) that have not been resolved within 60 days under the Arizona Department of Economic Security / Division of Employment and Rehabilitation Services procedures.

- b. If you intend to file an appeal to DOL/ETA, send a copy of this final determination, your statement of appeal, and any supporting documentation within 30 calendar days to:

Division Chief, Division of National Programs  
Tools and Technical Assistance  
Employment & Training Administration, Office of Workforce Investment  
United States Department of Labor  
200 Constitution Avenue NW Room C4510  
Washington, DC 20210

- c. Questions about, or complaints alleging a violation of, the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964, §504 of the Rehabilitation Act of 1973, §188 of the Workforce Innovation and Opportunity Act of 2014



(WIOA), or their implementing regulations, must be directed or mailed to:

Director, Civil Rights Center, U.S.  
United States Department of Labor, Room N-4123  
200 Constitution Avenue, NW  
Washington, DC 20210

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 15: FILE MAINTENANCE, CONFIDENTIAL INFORMATION AND RECORD RETENTION

### I. Policy Statement

Personnel records must be kept current and remain confidential.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5
4. [TEGL 39-11](#); Guidance on the Handling and Protection of Personally Identifiable Information (PII)

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Participants

1. Each participant has the right to review any and all documentation that constitutes his or her personnel record.

#### B. Sub-grantees

1. Sub-grantees must keep permanent records for each participant.

### IV. Acronyms and Definitions

#### A. Acronyms

PII                      Personal Identifiable Information

#### B. Definitions

## **V. Standards**

### **A. Participant Records Location**

All participant records should be kept in one location, with the exception of the participants I-9 Employment Eligibility Verification form and any medical records which should be kept separately from the other participant files. See Subsections F through I of this Chapter for requirements for maintaining confidentiality of participant files.

### **B. Required Documentation**

1. Each participant's personnel record must consist of at a minimum the following documents:
  - a. Completed income worksheets that correspond to each participant's initial enrollment, re-enrollment and recertifications and supporting documentation;
  - b. Completed and signed copy of the Physical Examination offer or waiver, for all years participating in SCSEP;
  - c. Completed and signed copy of signed record of the Participant's participation in orientation, including the acknowledgement of receipt of participant policies and procedures handbook;
  - d. Completed and signed Initial Assessment, Re-assessments and Individual Employment Plan and all subsequent revisions;
  - e. Signed copy of the written community service assignment description
  - f. Completed participant training records;
  - g. Supportive Services records and supporting documentation;
  - h. Completed copy of the Release of Employer Information Form to facilitate obtaining follow-up information;
  - i. Completed and detailed Case Notes prepared in accordance with the Data Validation Handbook. See Subsection C of this Chapter; and
  - j. Completed Participant Form, Community Assignment Form, Exit Form and as applicable, the Unsubsidized Exit Form as provided by DOL/ETA or internally created forms in accordance with Chapter 1, Section V.B.

2. In addition to case notes and eligibility determination documentation as outlined in Chapter 3, Section V. The following documentation must be maintained in each participant's file:
  - a. SCSEP Participant Form;
  - b. Attestation Forms;
  - c. Applicant's Confidential Statement of Income;
  - d. I-9 Employment Eligibility Verification Form;
  - e. SCSEP Participant Handbook Acknowledgement;
  - f. Physical Examination Statement;
  - g. SCSEP Assessment;
  - h. Individual Employment Plan;
  - i. Community Service Assignment Form;
  - j. Work schedules and time sheets;
  - k. SCSEP Community Service Assignment Description;
  - l. Participant Evaluations;
  - m. Host Agency Supervisor Evaluations;
  - n. Unsubsidized Employment Form, if applicable;
  - o. SCSEP Exit Form, as applicable;
  - p. Participant OJE Training Plan, if applicable;
  - q. Employer OJE Agreement (Direct Pay or Reimbursement), if applicable.

**C. Case Notes**

1. Case notes are required to be maintained in the participant's case file by the sub-grantee staff. Information may be based on information derived in person or by telephone or virtually.
2. In **every** case where case notes are used to validate data, they must include the following three elements:
  - a. Case notes must include the name of the person who is the source of the information, his or her telephone number, and the person's organization and title or relationship to the participant, whichever is appropriate;

- b. The name or initials of the person making the note;
- c. Relevant dates:
  - i. The date on which the event occurred, where applicable,
  - ii. The date on which the information was obtained, and
  - iii. The date on which it was recorded, if different.
- 3. The term “detailed” does not correlate to length or amount of information, but instead recognizes that the case notes need to provide sufficient information so that a reasonable person could make a determination as to specific events or decisions.
- 4. At a minimum, case notes must be updated every 30 calendar days or as needed.

**D. Electronic Format Storage**

- 1. Participant files may be maintained in electronic format, with prior approval from state grantee coordinator.
- 2. Sub-grantee will be permitted to utilize electronic storage formats that assure all the following compliance elements:
  - a. Hardcopy documents can be scanned and stored into software storage format, ensuring all documents are as legible as the original.
  - b. Scanned documentation will comply with the certification requirements for eligibility and performance measures and data validation.
  - c. Scanned documents will be maintained in a uniform manner and arranged in way that participant document is easily retrievable and accessible for review and use.
  - d. Software storage format will be backed up in a manner that assures no loss of participant information.
  - e. Software storage will have controlled access and maintained to ensure that participant information remains confidential and personal information is not compromised.
  - f. Software storage format that is easily and fully transferrable to other computer systems in the event of a transfer to another sub-grantee.

**E. Case File Maintenance**

1. Participant case files must be maintained in an orderly and uniform manner in order to facilitate the retrieval of documentation for sub-grantee daily administration, participant review and state grantee data validation.
2. Failure to maintain files in an orderly and uniform manner may result in data validation failure if records cannot be located in a timely manner.

**F. Information Confidentiality**

1. SCSEP participant names are considered public information, however, sub-grantees shall maintain the confidentiality of all other information regarding applicants, participants, and their families that may be obtained through application forms, assessments, interviews, tests and evaluations.
2. Without the permission of the applicant or participant, confidential information should only be shared as necessary for purposes related to SCSEP participation or evaluation and **only** to persons having official responsibilities in connection with the program to the extent required for the proper administration of SCSEP services.

**G. Confidentiality Requirements**

1. All information regarding the individual and their families obtained through program forms, interviews, assessments, evaluations, and other related activities is confidential.
2. The sub-grantee and host agencies shall ensure the confidentiality of participant information. Confidential information shall be maintained in locked files.
3. If electronic records are utilized confidential information must be secured. (See Subsection C of this Chapter).
4. Confidential information may not be revealed without the permission of the program participant.
5. Such information should only be divulged as necessary for purposes related to the performance or evaluation of the project and only to persons having official responsibilities to the extent necessary for proper administration of the program (i.e. host agency supervisors and training related IEP information).

**H. Participant File Retention**

1. All required documentation, both fiscal and programmatic, must be retained for three program years after the end of the program year in which the document was generated or last transaction occurred.
2. For participants who entered unsubsidized employment after exiting the program, records must be kept for three program years after the end of the program year in which the follow-up activity is ended.
3. If documentation is missing, reasonable steps must be taken to recreate the required information. If documents are recreated, case notes should be documented in detail in accordance with Chapter 15, Section V.C to identify action taken.

**I. Storage of Participant Medical Information**

Sub-grantees have no requirement to collect medical information unless used to document disability. All participant medical information may not be kept in the participant's case file. Medical information must be maintained in a separate location and not be accessible any persons not directly associated with the participant or without a need to know.

**J. Use of Electronic Storage Software**

1. When transmitting information electronically that contains participant Personal Identifiable Information (PII), such as name, address, phone number, or timesheets, etc., the sender is to take precautions to ensure confidentiality is maintained.
2. All such transmissions are to be made using one of the following methods:
  - a. Encrypted e-mail;
  - b. Password-protected files;
  - c. Using PID number in place of participant name; or
  - d. Redacting PII, whenever possible.

**K. Access to Grant Performance Management Software (GPMS)**

1. Only those sub-grantee personnel requiring access to SCSEP records will be granted access to the GPMS. All users requiring access to GPMS will follow all rules and regulations for the use of the system as outlined by DOL/ETA.
2. It is a violation of the GPMS security policy to share login information with anyone other than for individual login credentials are assigned. Violation of the GPMS security policy may result in the loss of GPMS access.

# ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Senior Community Services Employment Program

Effective Date: January XX, 2021

## CHAPTER 16: PROGRAMMATIC REPORTING, DATA COLLECTION AND DATA ACCURACY

### I. Policy Statement

SCSEP sub-grantees are required to collect a variety of participant demographic data and performance measures data. This data must be entered into GPMS. SCSEP data validation will begin each year after the program year data is entered and calculations are finalized for each sub-grantee.

### II. Authority

#### A. Federal Authority

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5
4. [TEGL 23-19](#); Guidance for Validating Required Performance Data Submitted by Grant Recipients

#### B. State Authority

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

### III. Applicability

#### A. Sub-grantees

1. Sub-grantees will collect participant data in accordance with all DOL/ETA guidance and regulations.
2. Sub-grantees may use DOL/ETA authorized forms or create and utilize internally created program forms and documents, in accordance with Chapter 1, Section V.B of this policy.

### IV. Acronyms and Definitions

#### A. Acronyms



ADM Administration

**B. Definitions**

Reference the glossary for definition of **Service area**.

**V. Standards**

**A. Types of Sources Used for Data Collection**

1. **Official Documents or Business Records.** Examples include government records, medical records, sub-grantee or host agency business records, other third-party business records.
2. **Detailed Case Notes.** Detailed case notes consist of the case worker's own documentation of his or her activities. Case notes can be based on information derived in person or by telephone or virtually. Every case note used must include the following foundation elements:
  - a. Name of person who is the source of the information;
  - b. His or her telephone number;
  - c. His or her organization and title/or relationship to the participant; and
  - d. Relevant dates.
    - i. Date on which action occurred;
    - ii. Date on which the information was obtained;
    - iii. Date on which information was recorded, if different.
3. **Participant or Third-Party Attestations.** Attestations are used when information is obtained directly from the participant or when appropriate, a knowledgeable third-party.
4. Except where specifically stated, when more than one category of source documentation rudiment is listed for a data element, sub-grantees only have to provide a source document from one category. In addition, sub-grantees do not have to provide all the specific documents listed under the official documents and business records category, Instead sub-grantees should provide the documents necessary to establish that the program requirements for the data element have been met; in some cases, one document will be sufficient, in other cases, more than one document may be needed.

**B. Data Accuracy**

1. All data must be accurately entered in the GPMS to ensure timely calculation and production on quarterly processing deadlines established by DOL/ETA.
2. Sub-grantees will ensure data accuracy within GPMS by:
  - a. Sub-grantee will any rejected records prior to any DOL/ETA shutdowns for quarterly processing.
  - b. Sub-grantee will correct user quality entry problems at the data entry level or on managerial reports before exiting participant record. In the event, a sub-grantee is unable to correct errors or warnings within the GPMS, they will contact state grantee for technical assistance.
  - c. Sub-grantee will ensure that all data quality reports reflect zero rejected records as necessary or instructed by the state grantee program coordinator. Failure to comply with this requirement could lead to the implementation of a corrective action.
  - d. Sub-grantee will ensure will correct or request technical assistance for all rejected records and inquiries from the state grantee within seven (7) days of request.
  - e. Sub-grantee will ensure all data entry GPMS users are properly trained in the collection and input of all participant and host agency information.
  - f. Sub-grantee will ensure that all data is accurately entered into GPMS and in accordance with data validation requirements.

**C. Data Validation**

1. SCSEP data validation assesses the accuracy of key data elements in the authorized DOL/ETA grant performance management system used to calculate the quarterly progress reports by examining a sample of participant records. When a participant record is selected for validation, state grantee staff compare specified data elements in GPMS to source documentation located in case files for that participant.
2. Sub-grantees are responsible for ensuring that all elements and source documentation are accurately reflected in GPMS, properly

contained within participant files and made available to validation staff during the data validation process.

3. Sub-grantees are to access and utilize resources found in the most current version of the Data Validation Handbook. The handbook can be found at <http://scsep-help.com/dotnetnuke/Documentation/DataValidation.aspx> to ensure compliance with data validation requirements.
4. Sub-grantees will comply with all requests for case files and documentation during annual on-site data validation by state grantee staff.
5. Participant files will be maintained in an orderly and uniform manner. Failure to do so, may result in data validation failure if records cannot be located in a timely manner. See Chapter 15, Section V.C of this policy.
6. Data validation will be held annually in conjunction with SCSEP on-site programmatic monitoring.

**D. Programmatic Reporting**

1. The sub-grantee staff shall ensure data is collected for SCSEP services for its respective service area and submitted to the state grantee by the 15th of each month covering the previous month.
2. Sub-grantees will utilize the state grantee format. The State grantee may amend the format as needed.

**E. Accrual and Cost Reporting**

1. Sub-grantees will be required to submit quarterly accrual reports of their SCSEP expenditures to the state grantee no later than 15 calendar days after the close of each quarter. SCSEP expenditure reporting will be specific to: Enrollee Wages/Fringe Benefits: (EWF), Other Participant Costs: (OPC), and Administration: (ADM). Sub-grantees will ensure that not less than 75 percent (75%) of the SCSEP funds expended are used to pay for the wages and fringe benefits of participants.
2. At least ten percent (10%) of the total cost of SCSEP activities consists of allowable costs paid for with non-federal funds. There are two types of match:
  - a. **Non-federal Cash.** In general, costs incurred by the contracted provider and cash contributions of any and all third parties involved in the project, including sub-grantees,

contractors and consultants, are considered cash matching funds.

b. **Non-federal Non-Cash (i.e., In-kind).** In general, most contributions from third parties will be non-cash (i.e., in-kind) matching funds. Examples of non-cash (in-kind) match include: supervisory time from non-federal, non-cash funding and use of facilities to hold meetings or conduct project activities.

c. The formula for calculating match is:

$$\frac{\text{Federal Funds Received} \times \text{Match Rate (10\%)}}{\text{Federal Rate (90\%)}} = \text{Match Amount}$$

**ARIZONA DEPARTMENT OF ECONOMIC SECURITY**  
Senior Community Services Employment Program  
Effective Date: January XX, 2021  
**CHAPTER 17: PROGRAMMATIC MONITORING AND PERFORMANCE**  
**ACCOUNTABILITY**

**I. Policy Statement**

State Grantee Programmatic Monitoring guidelines will be in accordance with the Older Americans Act; SCSEP Federal regulations, ADES Policies and procedures, this Policy Manual and ADES Scope of Work utilizing a core monitoring guide.

**II. Authority**

**A. Federal Authority**

1. Older Americans Act (OAA) of 1965, as amended, P.L. 109-365, Title V
2. Workforce Innovation and Opportunity Act of 2014, as amended P.L. 113-128
3. 38 U.S.C. §4106.5

**B. State Authority**

1. A.R.S. § 41-1954(A)(1)(b) and (c), (A)(3), and (E).

**III. Applicability**

**A. Sub-grantees**

1. In all monitoring activities the state grantee will review sub-grantee activities for compliance with the Scope of Work and DOL/ETA programmatic assurances.

**B. Host Agencies**

1. Sub-grantees must monitor host agencies every six months.

**IV. Acronyms and Definitions**

**A. Acronyms**

**B. Definitions**

Reference the glossary for definition of **Core measures**.

**V. Standards**

**A. Programmatic Monitoring of Sub-grantees**

1. Annual Monitoring: On-site program review – in conjunction with data validation activities as outlined in this Chapter. Monitoring will consist at a minimum the following activities:
  - a. Review participant and host agency files and programmatic documentation, in addition to those items reviewed for data validation;
  - b. Co-ordinate interviews with sub-grantee staff and participants;
  - c. Conduct randomly selected on-site host agency visits;
  - d. Participate in other activities that may be identified through desktop or GPMS review prior to on-site visit.
2. On-going Monitoring: Desk top review of sub-grantee activities. This review may include, but is not limited to:
  - a. The review of sub-grantee participant data collection and documentation in GPMS;
  - b. The review of sub-grantee expenditures in accordance with grant requirements;
  - c. The review of proper spending levels in accordance with grant requirements;
  - d. In response to sub-grantee inquiries to access the need for technical assistance; and
  - e. The review of data accuracy relative to performance reporting.
3. Weekly Monitoring: Database review for data input accuracy and performance alignment.
4. Weekly/Monthly Monitoring: The review of invoices and supporting documentation for the approval of expenditures and spending levels in accordance with grant regulations, prior to payment to sub-grantee.
5. The state grantee program coordinator will also proactively conduct monitoring as needed throughout the program year to ensure programmatic compliance and performance of sub-grantees.

**B. Monitoring Findings and Recommendations**

1. Monitoring findings or recommendations will be conveyed and addressed with sub-grantees for correction and improvement by one of the following methods:
  - a. Formal written finding or recommendation with request for corrective action;
  - b. Email, identifying a concern, issue or question, which may or may not require a formal corrective action;
  - c. Telephone call, identifying concern, issue or question, which may or may not require a formal corrective action.
  - d. Personal visit to sub-grantee location.
2. Sub-grantees will be informed by one of the methods identified in this subsection of concerns, issues or findings. Sub-grantees will be responsible for responding to the notification as soon as practicable or as directed by the state grantee. Failure to respond or take necessary action may result in corrective action.

**C. Sub-grantee Technical Assistance**

1. Sub-grantees will receive technical assistance as identified or requested as a result of monitoring.
2. Technical assistance may be provided by state grantee staff and/or by DOL/ETA or its contractors through coordination with state grantee staff.
3. Sub-grantees will receive technical assistance through various mediums, to include but not limited to:
  - a. Monthly all sub-grantee conference calls;
  - b. Dissemination by state grantee staff of DOL/ETA guidance;
  - c. Webinars by DOL/ETA or its contractors; and/or
  - d. Individual or group training sessions based on subject specific issues as identified through:
    - i. Monitoring;
    - ii. Observation/analysis;
    - iii. Changes or updates in requirements; or
    - iv. As requested by sub-grantee.

4. Technical assistance will be provided to sub-grantees on the following schedule:
  - a. When changes or updates in requirements are released by DOL/ETA;
  - b. When annual regular monitoring activities identify sub-grantee has a misunderstanding or misinterpretation of SCSEP regulations;
  - c. When program performance metrics trends indicate deficiencies and analysis identifies the proper technical assistance needed to correct the performance failing trend;
  - d. Upon request by sub-grantee staff; and/or
  - e. As a refresher of program requirements as determined by state grantee.

**D. Host Agency Monitoring**

1. Staff should discuss the following items with host agency during monitoring visits:
  - a. Participant's duties: review the training description as outlined in IEP and compare the tasks the participant is actually doing;
  - b. Supervision: Evaluate the supervision the participant receives to determine if it is appropriate considering the participant's abilities and assigned tasks;
  - c. Participant development: review the progress the participant has made on the IEP action steps;
  - d. Training: review the training the participant has received since the last visit and identify additional training needs;
  - e. Safety factors: review the steps taken to ensure participant safety;
  - f. Supportive services: identify and/or review any supportive services the participant needs or receives;
  - g. Additional Factors: identify any issues that have arisen for the participant or the supervisor since the last monitoring visit;
2. The following should be retained in the host agency file:



- a. Host agency agreement;
- b. The organization's 501(c)(3) IRS determination letter;
- c. Documentation of the Federal Employer Identification Number (FEIN);
- d. Completed copies of host agency monitoring documentation;
- e. Completed host agency safety checklists; and
- f. Copies of each participant's community service assignment description.

**E. Performance Accountability**

1. The state grantee is responsible for attaining the aggregate level of performance with respect to core performance measures as determined by the Department of Labor.
2. Sub-grantees will be expected to meet the same level of performance for their service delivery area each program year as determined by the Department of Labor. Failure to meet the minimum requirements will result in written reprimand and a corrective action to Sub-grantee.
3. Performance measures will be provided to sub-grantees annually as part of the ADES ALERT process.
4. The state grantee will review determinants for sub-grantee lack of performance to determine the technical assistance necessary, corrective actions and/or other actions as necessary.
5. Sub-grantee performance will be monitored in accordance with the monitoring schedule as found in this policy
6. Sub-grantees will have adequate administrative and accounting controls, personnel standards, evaluation programs and other policies as may be necessary to promote the effective use of SCSEP funds and will comply with Title V, SCSEP regulations, as amended.

**ARIZONA DEPARTMENT OF ECONOMIC SECURITY**

Senior Community Services Employment Program

Effective Date: January XX, 2021

**CHAPTER 18: GLOSSARY**

This chapter contains definitions used throughout the *Senior Community Services Employment Program Policy Manual*.

<b>At risk for homelessness</b>	An individual is likely to become homeless and the individual lacks the resources and support networks needed to obtain housing.
<b>Career services</b>	Those services described in Section 134(c)(2) of the Workforce Innovation and Opportunity Act (WIOA).
<b>Co-enrollment</b>	Applies to any individual who meets the qualifications for SCSEP participation and is also enrolled as a participant in WIOA or another employment training program, as provided in the Individual Employment Plan (IEP).
<b>Community service</b>	Can constitute any of the following activities: <ul style="list-style-type: none"><li>• Social, health, welfare and educational services (including literacy tutoring), legal and other counseling services and assistance, including tax counseling and assistance and financial counseling, and library, recreational and other similar services.</li><li>• Conservation, maintenance or restoration of natural resources;</li><li>• Community betterment or beautification;</li><li>• Antipollution and environmental quality efforts;</li><li>• Weatherization activities;</li><li>• Economic Development; and</li><li>• Other such services essential and necessary to the community as the Secretary determines by rule to be appropriate.</li></ul>
<b>Community Service Assignment or Community Service Employment</b>	Part-time, temporary employment paid with grant funds in projects at host agencies through which eligible individuals are engaged in community service and receive work experience and

	job skills that can lead to unsubsidized employment. These terms are used interchangeably.
<b>Core measures</b>	Hours in aggregate of community service employment; the percentage of project participants who are in unsubsidized employment during the second quarter after exit from the project; the percentage of project participants who are in unsubsidized employment during the fourth quarter after exit from the project; the median earnings of project participants who are in unsubsidized employment during the second quarter after exit from the project; indicators of effectiveness in serving employers, host agencies, and project participants; the number of eligible individuals served; and most-in-need.
<b>Covered Person</b>	A veteran or eligible spouse.
<b>Disability</b>	A disability attributable to a mental or physical impairment, or a combination of mental and physical impairments, that result in substantial functional limitations in one or more of the following areas of major life activity: <ul style="list-style-type: none"> <li>• Self-care;</li> <li>• Receptive and expressive language;</li> <li>• Learning;</li> <li>• Mobility;</li> <li>• Self-direction;</li> <li>• Capacity for independent living;</li> <li>• Economic self-sufficiency;</li> <li>• Cognitive functioning; and</li> <li>• Emotional adjustment.</li> </ul>
<b>Eligible Spouse</b>	A spouse that meets any of the following: <ul style="list-style-type: none"> <li>• Any veteran who died of a service-connected disability;</li> <li>• Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:</li> </ul>

	<ul style="list-style-type: none"> <li>○ Missing in action</li> <li>○ Captured in line of duty by a hostile force; or</li> <li>○ Forcibly detained or interned in line of duty by a foreign government or power.</li> <li>● Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs;</li> <li>● Any veteran who died while a disability, as indicated in paragraph (C) of this section, was in existence.</li> </ul>
<b>Equitable Distribution (ED) Report</b>	A report based on the latest U.S. Census or other reliable data, which lists the optimum number of participant positions in each designated area in the State, and the number of authorized participant positions each grantee serves in that area, taking into account the needs of underserved counties and incorporated cities as necessary. This report provides a basis for improving the distribution of SCSEP positions.
<b>Federal Employer Identification Number (FEIN)</b>	A nine-digit number the Internal Revenue Service (IRS) assigns to business entities. These numbers are used by employers, sole proprietors, corporations, partnerships, non-profit organizations, trusts and estates, government agencies and certain individuals and other business entities.
<b>Frail</b>	An individual 55 years of age or older who is determined to be functionally impaired because the individual is: <ul style="list-style-type: none"> <li>● Unable to perform at least two activities of daily living without substantial human assistance, including verbal reminding, physical cueing, or supervision; or</li> <li>● At the option of the State, unable to perform at least three such</li> </ul>

	<p>activities without such assistance; or</p> <ul style="list-style-type: none"> <li>• Due to cognitive or other mental impairment, requires substantial supervision because the individual behaves in a manner that poses a serious health or safety hazard to the individual or to another individual.</li> </ul>
<b>Grant Period</b>	The time period between the effective date of the grant award and the ending date of the award, which includes any modifications extending the period of performance.
<b>Grant Performance Management System (GPMS)</b>	DOL/ETA authorized and approved grant performance management software used for SCSEP. System tracks participant information, reports and other information relative to the analysis of program performance.
<b>Grantee or State Grantee</b>	Any entity receiving financial assistance directly from the DOL/ETA to carry out SCSEP activities. The grantee is the legal entity that receives the award and legally responsible for carrying out SCSEP, even if only a component of the entity is designated in the grant award document.
<b>Greatest economic need</b>	The need resulting from an income level at or below the poverty guidelines established by the Department of Health and Human Services and approved by the Office of Management and Budget.
<b>Greatest social need</b>	The need caused by non-economic factors, which include: physical and mental disabilities; language barriers; and cultural, social or geographical isolation, including isolation caused by racial or ethnic status, which restricts the ability of an individual to perform normal daily tasks or threatens the capacity of the individual to live independently.
<b>Homeless</b>	An individual who lacks a fixed, regular, and adequate nighttime residence, and who has a primary nighttime residence that is:

	<ul style="list-style-type: none"> <li>• A supervised, public or privately-operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);</li> <li>• An institution that provides a temporary residence for individuals intended to be institutionalized; or</li> <li>• A public or private place not designated for, or ordinarily used as, regular sleeping accommodations for human beings.</li> </ul>
<b>Host Agency</b>	A public agency or a private non-profit organization exempt from taxation under §501(c)(3) of the Internal Revenue Code of 1986 which provides a training work site and supervision for one or more participants. Political parties cannot be host agencies. A host agency may be a religious organization if the projects in which the participants are being trained do not involved the construction, operation, or maintenance of any facility used or to be used as a place for sectarian religious instruction or worship.
<b>Indian</b>	A person who is a member of an Indian tribe.
<b>Indian Tribe</b>	Any tribe, band, nation or other organized group or community of Indians (including Alaska Native village or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act) which is: <ul style="list-style-type: none"> <li>• Recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians; or</li> <li>• Located on, or in proximity to, a Federal or State reservation or Rancheria.</li> </ul>

<b>Individual Employment Plan (IEP)</b>	A plan for a participant that is based on an assessment of that participant conducted by the grantee, sub-grantee or a recent assessment or plan developed by another employment and training program, and a related service strategy. The IEP must include an appropriate employment goal (except that after the first IEP, subsequent IEPs need not contain an employment goal if such a goal is not feasible), objectives that lead to the goal, a timeline for achievement of the objectives; and be jointly agreed upon with the participant.
<b>Jobs for Veterans Act</b>	Public Law 107-288 (2002), Section 2(a) of the Jobs for Veterans Act, codified at 38 USC 4215(a) which provides priority of service for Department of Labor employment and training programs for veterans and certain spouses of veterans who otherwise meet the eligibility requirements for participation.
<b>Job ready</b>	Individuals who do not require further education or training to perform work that is available in their labor market.
<b>Limited English Proficiency (LEP)</b>	Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.
<b>Local Board</b>	Local Workforce Development Board established under Section 107 of the Workforce Innovation and Investment Act.
<b>Low employment prospects</b>	The likelihood that an individual will not obtain employment without the assistance of the SCSEP or another workforce development program. Persons with low employment prospects have a significant barrier to employment.
<b>Low literacy skills</b>	An individual computes or solves problems, reads, writes or speaks at or below the 8th grade level or is unable to compute or solve problems, read, write or speak at a level necessary to function on the job, in the individual's family or society.

<b>Most-in-need</b>	<p>Participants with one or more of the following characteristics are or have:</p> <ul style="list-style-type: none"> <li>• A severe disability;</li> <li>• Frail;</li> <li>• Aged 75 years or older;</li> <li>• Age-eligible but not receiving benefits under Title II of the Social Security Act;</li> <li>• Residing in an area with persistent unemployment;</li> <li>• Low literacy skills;</li> <li>• A disability;</li> <li>• Residing in a rural area;</li> <li>• Veterans;</li> <li>• Low employment prospects;</li> <li>• Failed to find employment after using services provided under Title I of the WIOA; or</li> <li>• Homeless or at risk of homelessness.</li> </ul>
<b>Older Americans Act</b>	<p>Authorizes grants to States for community planning and service programs as well as for research, demonstration and training projects in the field of aging.</p>
<b>One-Stop Center</b>	<p>The One-Stop Center system in a WIOA local area, which must include a comprehensive One-Stop Center through which One-Stop partners provide applicable career services and which provides access to other programs and services carried out by the One-Stop partners.</p>
<b>One-Stop delivery system</b>	<p>A system under which employment and training programs, services, and activities are available through a network of eligible One-Stop partners, which assures that information about and access to career series are available regardless of where the individuals initially enter the workforce development system.</p>
<b>Other Participant or Enrollee Costs (OPC)</b>	<p>The costs of participant training, including the payment of reasonable costs to instructors, classroom rental, training supplies, materials, equipment and</p>



	<p>tuition, and which may be provided before or during a community service assignment, in a classroom setting, or under the appropriate arrangements; job placement assistance, including job development and job search assistance, participant supportive services to enable a participant to successfully participate in a project, including the payment of reasonable costs of transportation, healthcare and medical services, special job-related or personal counseling, incidentals (such as work shoes, badges, uniforms, eyeglasses, and tools), child and adult care, temporary shelter, and follow-up services, and outreach, recruitment and selection, intake orientation, and assessments.</p>
<b>Participant</b>	<p>An individual who is determined to be eligible for SCSEP, is given a community service assignment, and is receiving any service funding by the program as outlined in 20 CFR §641.500.</p>
<b>Persistent unemployment prospects</b>	<p>The significant likelihood that an individual will not obtain employment without the assistance of the SCSEP or another workforce development program. Persons with poor prospects have a significant barrier to employment.</p>
<b>Program Year</b>	<p>The one-year period beginning July 1 and ending on June 30.</p>
<b>Residence</b>	<p>An individual's declared dwelling place or address as demonstrated by appropriate documentation.</p>
<b>Rural</b>	<p>An area not designated as a metropolitan statistical area by the U.S. Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Community Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have population density of less than 30 people per square mile.</p>

<b>Service Area</b>	The geographic area served by a local SCSEP project in accordance with a grant agreement.
<b>Severe disability</b>	A severe, chronic disability attributable to mental or physical impairment or a combination of mental and physical impairments that: <ul style="list-style-type: none"> <li>• Self-care;</li> <li>• Receptive and expressive language;</li> <li>• Learning;</li> <li>• Mobility;</li> <li>• Self-direction;</li> <li>• Capacity for independent living; or</li> <li>• Economic self-sufficiency.</li> </ul>
<b>Severe limited employment prospects</b>	The substantial likelihood that an individual will not obtain employment without the assistance of SCSEP or another workforce development program. Persons with severely limited employment prospects have more than one significant barrier to employment. Significant barriers may include but are not limited to: <ul style="list-style-type: none"> <li>• Lacking a substantial employment history;</li> <li>• Basic skills;</li> <li>• English language proficiency;</li> <li>• Lacking a high school diploma or the equivalent;</li> <li>• Having a disability;</li> <li>• Being homeless; or</li> <li>• Residing in a socially and economically isolated rural or urban area where employment opportunities are limited.</li> </ul>
<b>Sub-recipient or Sub-grantee</b>	The legal entity to which a sub-award of financial assistance is made by the grantee, and that is accountable to the grantee for the use of the funds provided.
<b>Supportive Services</b>	Services, such as transportation, health and medical services, special job-related or personal counseling, incidentals (such as work shoes, eyeglasses, badges, uniforms, and tools), child or adult care,

	housing, including temporary shelter, follow-up services, and needs-related payments, which are necessary to enable an individual to participate in activities authorized under SCSEP.
<b>Title V of the OAA</b>	42 USC §3056 et. seq. as amended authorizing SCSEP.
<b>Unemployed</b>	An individual who is without a job and who wants and is available for work, including an individual who may have occasional employment that does not result in a constant source of income.
<b>Veteran</b>	A person who served in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time duty in the National Guard or a Reserve component, other than full-time duty for training purposes.