



Division of Aging Services

Review Guide

for

Senior Community Service Employment Program (Subproject Agency)

PSA/County: _____ **Site (if applicable):** _____

Reviewer: _____ **Date:** _____

Revised March 21, 2006

Reference Federal Register Final Rule of April 9, 2004 Pg. 19014 § 641.100			Requirement 1. The agency complies with Title V of the Older Americans Act Amendments of 2000, with the federal regulations governing Senior Community Service Employment Program operations set forth in Title 20, Code of Federal Regulations, Part 641, Public Laws 102-375, and SCSEP program administration materials provided to the grantee community as bulletins, or training and employment notices.	SOURCE
Yes	No	N/A	Compliance Indicators: The agency meets all requirements of this program.	<i>All other requirements of this instrument.</i>
Comments:				
Reference Federal Register Final Rule of April 9, 2004 Pg. 19067 § 641.821			Requirement 2. The agency cooperates and assists in any programmatic or fiscal monitoring, assessment or evaluation efforts undertaken by the Division of Aging Services or the U.S. Department of Labor.	SOURCE
Yes	No	N/A	Compliance Indicators:	
			If the Division of Aging Services or the U.S. Department of Labor has undertaken any programmatic or fiscal monitoring, assessment or evaluation efforts, has the agency cooperated?	<i>Interview DAS SCSEP Specialist; follow up with interviews and program records of the AAA and agency.</i>
Comments:				

Reference			Requirement	SOURCE
			3. The agency maintains records using the required SCSEP Data Collection Forms developed by The Charter Oak Group and submits reports in such form and containing such information as prescribed by the Division of Aging Services. The agency retains all records for a minimum of six (6) years after the close of the fiscal year.	
Yes	No	N/A	Compliance Indicators:	
			The agency will use the USDOL SCSEP Data Collection and Reporting System developed and implemented by The Charter Oak Group and Mathematica until the system is replaced by another system approved by USDOL and DAS.	
			1. The agency uses the SCSEP Data Collection Forms developed by The Charter Oak Group (Participant, Community Service, Exit and Unsubsidized Employment Forms).	
			2. After completing the Charter Oak Forms, the agency enters SCSEP participant data by the 10 th working day following the end of the reporting period into the Data Collections System provided by Mathematica.	
			3. The Division of Aging Services will receive the QPRs from Mathematica and will forward them to the Area Agency on Aging and subprojects. The AAAs and subprojects review the QPRs for accuracy and confirm such accuracy with DAS.	
Comments:				
Reference			Requirement	SOURCE
Federal Register Final Rule of April 9, 2004 Pg. 19035			4. The agency complies with all state and federal laws, rules and regulations and the Department of Human Resources policy on respecting confidentiality of an individual's records. SCSEP grantees would not be constrained by the requirements of HIPAA. Also, grantees are not HIPAA-covered entities.	
Yes	No	N/A	Compliance Indicators:	
			1. The agency has a policy concerning disclosure of information about, or obtained from, an individual in conjunction with the project to any unauthorized person without the individual's written consent.	<i>Agency policy manual</i>

			2. The agency follows its policy.	
			3. The agency keeps enrollee physical examination reports in a separate, confidential file.	
Performance Indicators:				
Have you ever encountered a request or a need to disclose information that you were unsure you could disclose? If so, what did you do?				
Have you encountered any other problems with this standard?				
Comments:				
Reference Federal Register Final Rule of April 9, 2004 Pg. 19054 § 641.500 § 641.10 § 641.505 § 641.120 § 641.510 § 641.520 § 641.535		Requirement 5. The agency complies with the U.S. DOL and Division of Aging Services policies and procedures for (1) determining and documenting eligibility of SCSEP applicants; (2) selecting eligible individuals for SCSEP enrollment; (3) annually recertifying participants for program eligibility (DAS recommends quarterly assessments and IEP updates; (4) conducting the initial assessment and re-assessing participants twice in every 12 month period thereafter; and (5) terminating enrollees found to be ineligible for continued enrollment.		SOURCE
Yes	No	N/A	Compliance Indicators:	
			1. All enrollees are at least 55 years old and are a member of a family with an income that is not more than 125% of the family income levels prepared by the Department of Health and Human Services and approved by the Office of Management and Budget (OMB). 100% of Social Security income (including SS Disability Income) is counted and the person has to be “unemployed” to be eligible for the program. A person may be counted as a “family of one” when he or she can document their disability.	
			2. The subproject uses the following priorities in selecting eligible individuals for participation: a. Veterans and qualified spouses at least 60 years old b. Other individuals at least 60 years old	

			<p>c. Veterans and qualified spouses aged 55-59 d. Other individuals aged 55-59</p>	
			3. All enrollees were residents of the PSA upon entry into the program.	
			4. All client enrollment information is signed and includes documentation of age, income, residence at time of original certification and at subsequent re-certifications.	
			5. In order to be enrolled in the SCSEP, a participant must have a community service assignment. Once the assignment is made, the participant may begin to receive program services and may be paid for participation in program activities. The participant does not have to be physically present at the worksite to have a community service assignment. After receiving a community service assignment, a participant may participate in training or may report to the worksite. Enrollees in temporary positions are notified that the positions are temporary.	
			6. The subproject must list all available community service opportunities with GDOL Career Centers and use the One-Stop System to recruit and select eligible older persons.	
			7. The agency has placed enrollees in social, health, welfare, educational, legal, recreational, or other similar community service activities with organizations holding IRS classification 501©3 or with government agencies.	<i>Review host agency applications.</i>
			8. Ineligible enrollees are given written notification of termination within 30 days from the date that ineligibility is determined; and the enrollee must be terminated 30 days after receiving the notice, which means that an enrollee could remain in the program for up to 60 days after the ineligibility is determined.	
Comments:				
Reference			Requirement	
			6. The agency provides each enrollee a formal orientation to the subproject.	
Yes	No	N/A	Compliance Indicators:	
			1. The orientation is timely.	

			2. the orientation includes at a minimum, orientation on: <ul style="list-style-type: none"> a. Information on project goals and objectives b. Community service assignments c. Training opportunities d. Wages e. Available supportive services f. Availability of a free physical examination g. Participant rights and responsibilities; host agency rights and responsibilities. h. Permitted and prohibited political activities 	<i>See participant handbook.</i>
Average number of days between enrollment and completion of orientation for all enrollees over the past year.				
Comments:				
Reference		Requirement		SOURCE
		7. The agency orients host agencies and agency staff who will supervise enrollees at worksites.		<i>Documentation of host agency orientation. Host agency handbook.</i>
Yes	No	N/A	Compliance Indicators:	
			1. The nature and objectives of the project.	
			2. The policies, processes and responsibilities of the project.	
			3. Available supportive services.	
			4. Participant and host agency responsibilities and rights	
			5. The objectives of the enrollee(s) assigned to the host agency, as developed by the enrollee and agency in partnership and reflected in the Individual Employment Plan.	

			6. The agency explains to the host agencies that they will be monitored to assure the enrollee is in a safe and healthy environment. The agency documents that staff makes periodic visits to determine that supervision is adequate, enrollee job duties and hours are consistent with approved job descriptions and state and federal requirements, enrollee work performance is satisfactory, and to assess enrollee potential for transition to unsubsidized employment.	
Performance Indicators:				
Number and proportion of participants who remain on the job 180 days.				
Number of host agencies remaining host agencies > 1 year				
Comments:				
Reference		Requirement		SOURCE
		8. The agency complies with the Division of Aging Services policies and procedures regarding enrollee job descriptions and individual employment plans.		
Yes	No	N/A	Compliance Indicators:	
			The agency submits job descriptions (new and modifications) to the Division of Aging Services and the AAA for approval.	
			1. Do job descriptions match the most recent IEP of enrollees? Specifically, match the employment goals and skills to be developed?	<i>Review job descriptions and IEPs.</i>
			2. Do job descriptions match actual job duties?	<i>Interview enrollees.</i>
Comments:				

Reference Federal Register Final Rule of April 9, 2004 § 641.535			Requirement 9. The agency assesses each enrollee to determine the most suitable community service assignment and to identify appropriate employment, training, and community service objectives for each individual and develops an individual employment plan in partnership with the enrollee based on the assessment.	<i>Review written assessments.</i>
Yes	No	N/A	Compliance Indicators: The Agency documents temporary assignments in positions.	
			1. The assessment is made in partnership with the enrollee no less frequently than two times during a twelve month period following the initial assessment. The assessment is consistent with the Americans With Disabilities Act of 1990. The Division of Aging recommends quarterly assessments and IEP updates.	
			2. Enrollees’ work history, skills and interests, talents, physical capabilities, aptitudes, needs for supportive services, occupational preferences, training needs, potential for performing community service assignments, and potential for transition to unsubsidized employment are assessed and documented no less frequently than two times during a twelve month period. The Division of Aging recommends quarterly assessments and Individual Employment Plan updates for each enrollee.	<i>Review written assessments. See dates.</i>
			3. The agency uses the assessment/reassessment as a basis for developing/amending an Individual Employment Plan (IEP), which is developed in partnership with the enrollee. <ul style="list-style-type: none"> a. The IEP follows the format approved by DAS. b. The IEP is signed by all affected parties. c. The subproject reviewed each enrollee at least twice in a twelve month period. d. The IEP defines the respective roles of the agency and host agencies, if applicable, in providing in-service and/or educational training for enrollees. e. The IEP describes the agency’s efforts to obtain training at no cost or reduced cost to the SCSEP. 	
			4. The enrollee’s job description is compatible with the assessment and the IEP.	<i>Review IEPs.</i>
Performance Indicators:				
1. How does the agency assure that its community service assignments are compatible with the assessments and IEP?				<i>Review assessment, IEP & job description.</i>

Comments:				
Reference			Requirement	SOURCE
			10. The agency provides or arranges for training specific to an enrollee’s community service assignment and employment goal.	
Yes	No	N/A	Compliance Indicators:	
			1. The agency provided or arranged for training.	
			2. Training matched the needs identified and plans set forth in the IEP.	
			3. Did the agency obtain training services through locally available resources, including host agencies?	
			4. Does the agency maintain documentation of the training received by each enrollee and the amount of time spent in training?	<i>Time cards or other documentation.</i>
			5. If the subproject agency provides training (other than during the community service assignment), the Division of Aging Services and the USDOL Division of Older Worker Programs must approve the training curriculum, benchmarks and time period.	<i>Documentation of approval.</i>
			6. If the participant is paid to attend training provided by a workforce partner or other organization, the Division of Aging Services must receive a copy of the curriculum, benchmarks and time period.	<i>Documentation of approval.</i>
			7. If a participant receives training in OJE (On-the-Job-Experience), the Division of Aging Services and the USDOL Division of Older Worker Programs must approve the OJE contract.	<i>See OJE contract.</i>
			8. All attendance at training must be documented by signed time sheets, just as community service assignment hours are documented.	
Performance Indicators:				
Documents training hours of each enrollee.				

Training hours are documented separately from community service hours.				
Does the agency keep records of enrollees’ evaluations of training sessions? If so, what level of satisfaction have the enrollees expressed?				
Comments:				
Reference Federal Register Final Rule of April 9, 2004 § 641.910		Requirement 10. The agency has established and uses grievance procedures consistent with federal regulations and Division of Aging policies and procedures.		SOURCE <i>Participant handbook, Participant’s signature on information from for grievances.</i>
Yes	No	N/A	Compliance Indicators:	
			1. The agency informs the enrollee or applicant that, if the complaint is not resolved, a review of the issue by the Area Agency on Aging and/or Division of Aging Services may be requested.	
			2. The agency must have written grievance procedures for resolving complaints arising between the subproject and applicants, employees or participants.	
			3. The agency informs the enrollee or applicant that, if allegations of violations of Federal law which are not resolved within 60 days under the subproject’s, AAA’s or the Division of Aging Services procedures, may be filed with the Chief, Division of Older Worker Programs, Employment & Training Administration, U. S. Department of Labor, 200 Constitution Avenue, NW., Washington, DC 20210. Allegations determined to be substantial and credible will be investigated and addressed.	
			4. The agency informs the enrollee or applicant that, if questions about, or complaints alleging a violation of the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 188 of the Workforce Investment Act of 1998 or their implementing regulations may be directed or mailed to the Director, Civil Rights Center, U.S. Department of Labor, Room N-4123, 200 Constitution Avenue, NW, Washington, DC 20210. In the alternative, complaints alleging violations of WIA section 188 may be filed initially with the Georgia DHR Division of Aging Services.	
Performance Indicators:				

Was there an occasion when an enrollee wished to dispute an adverse action taken against him or her or when an applicant for enrollment wished to dispute an unfavorable determination?			
Discuss any problems the agency or AAA has encountered in following these procedures.			
Comments:			
Reference Federal Register Final Rule of April 9, 2004 § 641.360		Requirement 11. The agency assures that equitable distribution of enrollee positions within the counties of each PSA is given priority in selecting/recruiting new host agencies.	SOURCE
Yes	No	N/A	Compliance Indicators:
			1. The agency collaborates with the AAA and Title V national sponsors in its PSA with the common goal of improving the equitable distribution of the Title V positions among counties.
			2. The agency meets at least annually with representatives of the AAA and the national SCSEP sponsors with positions in its PSA to develop and implement an action plan for equitable distribution of enrollee positions by county and to coordinate activities as appropriate.
			3. The agency demonstrates that it is moving towards equitable distribution of SCSEP positions in its area.
Performance Indicators:			
1. Which counties are underserved? Overserved? (To what extent)			
2. What problems has the agency encountered in reaching equity?			
Comments:			

Reference			Requirement	SOURCE
Federal Register Final Rule of April 9, 2004 § 641.853 § 641.856 § 641.859 § 641.864 § 641.879 § 641.821 § 641.809 § 641.850			12. The agency follows the new SCSEP regulations for financial management.	
Yes	No	N/A	Compliance Indicators:	
			1. The agency shows all subproject costs are classified as Program Costs; either as Program/Enrollee Wages & Benefits or Program/Other Costs. <ol style="list-style-type: none"> a. The agency documents enrollee work hours, including: <ul style="list-style-type: none"> • Certified records of community service hours and a separate record of training hours. • Leave and holidays. • System for tracking time (The Division of Aging Services has established no limits on the amount of time participants may spend at host agencies or in a particular community service assignment). Time in the program is determined by the IEP projected completion date. b. SCSEP accounting records must be kept on the accrual basis of accounting. The SCSEP subproject must develop accrual information through an analysis of the documentation. 	
			2. The Program/Enrollee Wages and Benefits must be at least 76% of the subproject’s Total Federal Budget. The agency administers fringe benefits uniformly to all enrollees.	
			3. Program/Other Costs (also known as Other Participant Costs) includes program services such as outreach, recruitment, selection, intake, orientation, assessment, training, job development, job placement assistance, supportive services, job-related counseling, child and adult care and incidentals such as eyeglasses, uniforms, work shoes and tools.	
			4. The agency will show match funding as Program or Program and Administration in the budget (at least 10% non-Federal funds). The AAA or subproject will enter match amounts in the AIMS budget and provide match expenditures in the AIMS-based Expenditure Report.	

			<p>5. The agency assures an annual audit which meets Federal and State requirements.</p> <ul style="list-style-type: none"> a. All nonprofit organization must follow the audit requirements of OMB Circular A-133. These requirements are codified at 29 CFR parts 96 and 99 and referenced in 29 CFR 95.26 for non profit organizations. b. Audit was conducted by outside agency. c. All audit exceptions have been resolved. 	<i>Review of most recent audit.</i>
			<p>6. There is an internal control system for tracking fiscal activities:</p> <ul style="list-style-type: none"> a. Staff time-time sheets b. Facilities-space usage c. Accounting services-# of transactions d. Equipment-usage or machine hours e. Cash disbursements 	<i>Review computerized internal financial control system.</i>
			<p>7. There is documentation to support non-federal contributions, including in-kind contributions of paid staff, equipment, supplies and space. Supervisor’s hours that are counted as a match should be compatible with percentage of time spent with enrollee as noted on job description form.</p>	<i>Review job description form.</i>

Comments:

<p>Reference Federal Register Final Rule of April 9, 2004 Pg. 19014</p>			<p>Requirement 13. The agency maintains cooperative relationships and working linkages with community service agencies and memorandums of agreement with other partners in the Cene(?) –Stop system..</p>	<p>SOURCE <i>Review MOUs.</i></p>
<p>Yes</p>	<p>No</p>	<p>N/A</p>	<p>Compliance Indicators:</p>	
			<p>1. The agency is a required partner under the Workforce Investment Act and as such, is a part of the One-Stop System. Each SCSEP Subproject must develop a MOU with the local WIB/One Stop Center. The MOU contains the following information:</p> <ul style="list-style-type: none"> a. An assessment or IEP completed by the SCSEP satisfies any condition for assessment, service strategy or IEP completed at the One-Stop and vice-versa (Reciprocal Assessments). b. The SCSEP subproject, host agency, WIA Program or another One-Stop partner may provide training. 	
			<p>2. The agency coordinates with agencies or institutions offering educational, training or rehabilitation services including: Vocational Technical Schools/Junior Colleges; Community Colleges/Private or State Colleges and Universities; DOL Division of</p>	<p><i>DOL – Rehabilitation services</i></p>

			Rehabilitation Services; Adult Education Programs; Literacy Programs; and other appropriate services.	
			3. The agency also coordinates with agencies, organizations, and/or other entities concerned with or experienced in aging-related services and issues.	

Comments:

Reference			Requirement	SOURCE
			14. The agency takes positive steps to assure that full enrollment levels are maintained throughout the project year.	
Yes	No	N/A	Compliance Indicators:	
			The subproject has maintained the level of enrollment proposed in its performance objectives in its proposal.	

Performance Indicators:

1. What difficulties has the agency experienced in maintaining full enrollment levels?				
2. What steps does the agency take to maintain full enrollment levels?				
3. Proportion of positions (slots) filled each quarter: _____ % Performance Objective _____ % First Quarter _____ % Second Quarter _____ % Third Quarter _____ % Fourth Quarter				

Comments:

Reference			Requirement	SOURCE
			15. Employee wages and fringe benefits conform to federal regulations.	
Yes	No	N/A	Compliance Indicators:	
			1. No enrollee receives less than the minimum wage under Section 6(a)(1) of the Fair Labor Standards Act o 1938; Or	

			2. An SCSEP participant may be paid a higher wage per hour than the minimum wage if their duties require a higher level of skill or responsibility or if there are other pertinent circumstances.	
			3. All participants are offered an annual physical examination as a fringe benefit. If a participant refuses the exam, they must sign a statement documenting the refusal within 60 workdays after the participant begins the community service assignment, or after the date of recertification.	
Comments:				
References			Requirement 16. The agency makes continuous efforts to place enrollees into private or other unsubsidized employment.	SOURCE
Yes	No	N/A	Compliance Indicators:	
			1. The agency actively provides job search assistance for enrollees.	
			2. The agency promotes the employment of the elderly through community education and public information efforts.	
			3. The agency must follow up on enrollees who are placed into unsubsidized employment during the first 6 months of placement to make sure they receive any services they need to retain their jobs and at the end of the 6-month period to verify that they are working. They do not have to be working on the same job. Follow up information must be documented and entered into the Mathematica system.	<i>Computer & QPR.</i>
			4. The agency develops and maintains a plan approved by the AAA and the Division of Aging Services for placement of enrollees into subsidized employment and for providing them supportive services.	
What has been the agency’s rate of placement into unsubsidized employment?				
Comments:				

References			Requirement	SOURCE
			17. The agency will meet the following performance measures for SCSEP.	
Yes	No	N/A	Compliance Indicators:	
			<p>a. SCSEP Placement Rate which is total number of exited participants who had 30 days of employment in the first 90 days within the reporting period divided by the total number of authorized community service positions allotted in that program year to that organization. The minimum Unsubsidized Placement Rate is 35% of the number of authorized positions..</p> <p>b. Service Level which is an unduplicated count of all participants who have been active at any time during the reporting period divided by the number of authorized community service positions allotted to the organization in the program year. The minimum Service Level (Total Enrollment Rate) is 175% of the authorized positions.</p> <p>c. Community Service Hours which is the total number of community service hours recorded for all participants during the reporting period. This number does not include training hours. The Community Service Hours Goal is 890 hours per authorized position per year.</p> <p>d. SCSEP Retention Rate is all exited participants with 30 days of unsubsidized employment within the first 90 days after exit, the number employed on the 180th day after the initial employment date divided by all the participants who exited and had 30 days of employment in the first 90 days after exit. The Retention Rate goal is 81%.</p> <p>e. Service to Most-in-Need is of those participants who are active or have exited during the reporting period, the number who are over the age of 60 and who meet one or more of the following conditions: an income at or below the poverty level; physical or mental disabilities, language barriers (LEP or literacy), cultural social or geographical isolation; poor employment history or prospects; or other social barriers divided by all participants active or having exited in the reporting period. The Service to Most-in-Need Rate is a minimum of 70% (Family income is at or below 100% if poverty.)</p> <p>f. Customer Satisfaction is based on the American Customer Satisfaction Index (ACSI) completed by employers, participants, and host agencies. The Customer Satisfaction Percentage Rate is 75%.</p> <p>g. Earnings Increase Rates are: (a) Earnings increase 1 (the difference in earnings from pre-program participation to post-program participation) shall be 25% higher; (b) Earnings increase 2 (the difference in earnings between the 1st and 3rd quarters after exit) shall be 2% higher.</p>	
Performance Indicators:				

What problems has the agency encountered in reaching the performance measure goals?					
Comments:					
References <ul style="list-style-type: none"> Standards 3.8 20 CFR 641.325 			Requirement 18. Employment of an enrollee funded under SCSEP grants is only <i>in addition to</i> budgeted employment which would otherwise be funded by the agency and/or the host agency without assistance under the Act.		SOURCE <i>See agreements signed by host agencies regarding MOE.</i>
Yes	No	N/A	Compliance Indicators:		
			1. A review of host agency records shows that the host agency did not reduce positions or work hours when a SCSEP enrollee became available.		
			2. Did participant complete training?		<i>Interview</i>
			3. Was unsubsidized placement related to training?		
Performance Indicators:					
Comments:					
References <ul style="list-style-type: none"> Standards 6.6 			Requirement 19. The agency manages reductions in funds and positions according to the standards of the program.		SOURCE
Yes	No	N/A	Compliance Indicators:		
			1. Has the Division reduced the number of slots allocated to this PSA? If “Yes”, complete the following indicators.		<i>DAS Employment Specialist</i>
			2. Reductions take place in a manner that will “hold harmless” or protect enrollees occupying the affected position(s).		<i>Enrollee files</i>

			3. The agency follows-up on enrollees placed into unsubsidized employment or transferred to national sponsor subprojects to assist in assuring a successful transition.	<i>Enrollee files</i>
			4. Did the agency coordinate with the Area Agency on Aging and Division of Aging Services to develop and follow a plan that adheres to the final rule of April 2004?	<i>Agency correspondence, written plan for reduction and other files.</i>
Performance Indicators:				
1. What strategies did the agency use to reduce enrollment while holding harmless the enrollees?				<i>Interview -compare with strategies listed in Standard 6.6.1</i>
2. What difficulties did the agency encounter in carrying out its reduction plan?				<i>Interview</i>
Comment:				
Recommendations:				