

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION SCSEP
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 16-24

TO: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
GRANTEES
STATE AND TERRITORIAL WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS

FROM: LORI FRAZIER BEARDEN 
Acting Assistant Secretary

SUBJECT: Program Year 2025 Planning Instructions and Allotments for the Senior
Community Service Employment Program State and Territorial Grantees

1. **Purpose.** This Training and Employment Guidance Letter (TEGL) provides Senior Community Service Employment Program (SCSEP) state and territory grantees with Program Year (PY) 2025 SCSEP allotments and the application instructions for PY 2025 grant submissions.
2. **Action Requested.** To apply for PY 2025 grant funds, SCSEP state and territorial grantees must follow the instructions in this TEGL and submit all documents through [Grants.gov](https://www.dhs.gov/grants) and no later than 30 days after publication of this TEGL.
3. **Summary and Background.**
 - a. Summary – This TEGL provides grant planning guidance to SCSEP state and territorial grantees for PY 2025, including the number of authorized positions and associated allotments for the program year, as well as ETA’s requirements before obligating funding to grantees.
 - b. Background – SCSEP funds are allocated by a formula set forth in Sec. 506 of the Older Americans Act (OAA). Sec. 517 establishes that SCSEP operates on a program year basis from July 1 through June 30 of the following year. Under Division D, Title I, of the *Further Consolidated Appropriations Act, 2024*, Pub. L. 118-47, the Secretary of Labor may set aside up to 0.5 percent of each discretionary ETA appropriation for activities related to program integrity and 0.75 percent of most DOL appropriations for evaluations, and may transfer up to one percent to other programs, projects or activities funded by the Act. On March 15, 2025, the *Full-Year Continuing Appropriations and Extensions Act, 2025*, P.L. 119-4, was enacted (from this point forward, referred to as “the Act”). Section 1101 of the Act makes appropriations to the Department of Labor “under the authority

RESCISSIONS TEGL 13-23, Change 1	EXPIRATION DATE Continuing
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and conditions provided in” the Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act, 2024 (Division D of Public Law 118-47). The 2025 Act applies the provisions of the FY 2024 appropriations act at Public Law 118-47, Division D, Title I, secs. 102, 106(b) and 107, which allow the set-asides. In PY 2025, after reducing the appropriation for set-asides and transfers authorized by the Act and authorizing legislation, \$398,925,000 is available for SCSEP program activities. ETA will distribute any funds not used for these reserve activities by formula to state, territorial, and national grantees.

This TEGL covers the full year grant period for state and territorial grantees totaling \$85,869,039. DOL is still reviewing the remaining \$307,072,086 available for national grantees.

4. Application Instructions for Annual Allotments. This section provides detailed submission instructions for state and territory grantees.

Note that this TEGL is requesting state and territorial grantees to submit copies of their current Individual Durational Limit, Termination, and Grievance policies with their responses to this TEGL.

- a. **Application Requirements.** All grantees must submit the following documents through www.Grants.gov:
 - i. Electronically signed SF-424, *Application for Federal Assistance*
 - The organization’s name, Employment Identification Number (EIN), and Unique Entity Identification Number (UEI) listed on the SF-424 must match its [System for Award Management](#) registration.
 - Line 18b of the SF-424 must note the required non-Federal share of at least 10 percent of the total cost (OAA Sec. 502(c)(1)).
 - Item 14 of the SF-424 requires a list of the “Areas Affected by Project.” Grantees must list the states and counties the grant will serve and must use <https://scsepapply.org/> to validate that information. Grantees may export the data for the service area(s) to an Excel spreadsheet and attach the list as a separate document.
 - ii. SF-424A, *Budget Information Form – Non-Construction Programs*
 - iii. Budget Narrative that fully explains the projected costs reflected in each line item of the SF-424A. (See Attachment II for instructions pertaining to all grantees.)
 - iv. Project Narrative that includes the information outlined in Attachment III of this TEGL, including:

- Required - Services to minorities, per OAA Section 515 (Please note additional guidance for the Minority Report in Attachment III for instructions.)
- Required - Organizational structure, monitoring, and audits.
- Optional – State grantees may provide updates in relevant sections of the SCSEP portion of the WIOA Combined Plan Modification or their stand-alone SCSEP State Plan submitted last year. States may modify their plans at any time, as well.

v. Programmatic Assurances (See Attachment IV for complete instructions.)

- Grantees must review, sign, and submit the programmatic assurances in Attachment IV that outline program requirements based on the OAA and the SCSEP regulations at 20 CFR Part 641.
- Adobe digital signatures are acceptable.
- The signatory must be the same individual as the Authorized Representative listed in item 21 of the SF-424.

vi. Attachments, as applicable:

- Optional Requests (See Attachment V for complete instructions.)
- Optional Additional Training and Supportive Services – Grantees may submit one or more of the optional requests described in Attachment V. This TEGL provides updated instructions, renaming the request to use additional grant funds for training and supportive services activities (“OATSS” requests) to “Optional Additional Training and Supportive Services.” This clarifies that, while ETA encourages grantees to consider how incorporating such activities into their overall service strategy may help improve participant outcomes, it is an option and not a requirement. To facilitate the allotment review process, grantees may submit a copy of their OATSS to their FPO and National Office Liaison prior to the grant submission due date for review.
- Geographic Service Area Attachment – This attachment notes the states and counties included in the grantee’s service area. This attachment is required if the grantee chooses not to list the service area in the SF-424, as noted in item #1 above.
- NICRA/cost allocation plan – Grantees that have an indirect cost rate must also submit a copy of their negotiated indirect cost rate agreement (NICRA) or cost allocation plan (if applicable).

- b. **Grants.gov Submission Process.** Applicants must submit the application package through [Grants.gov](https://www.grants.gov). ETA encourages application submission as soon as possible; however, applications must be received by 11:59 PM EST no later than 30 days after publication of this TEGL. This submission process may, at times be complicated and time-consuming. As such, the Department strongly encourages applicants to initiate

the process as soon as possible to allow time to resolve unanticipated technical problems.

For technical issues encountered during application submission, applicants may call 800-518-4726 or 606-545-5035 to speak to a Customer Support Representative, or email support@grants.gov. The Contact Center is open 24 hours a day, seven days a week, but closes on federal holidays.

5. **Inquiries.** Questions regarding grant applications should be directed to scsep.ogm@dol.gov. Please direct all other questions to the appropriate Federal Project Officer.

6. **References.**

- Older Americans Act (42 USC 3056 et seq.), as amended through Public Law 116-131 (March 25, 2020);
- *Federal Poverty Guidelines*, 90 FR 5917 (January 17, 2025); or HHS website at <https://aspe.hhs.gov/poverty-guidelines> (effective January 15, 2025);
- Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4, March 15, 2025), available at <https://www.congress.gov/119/plaws/publ4/PLAW-119publ4.pdf>
- SCSEP Performance Data Collection Approval (Office of Management and Budget Control No. 1205-0040) See https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202401-1205-001 (expiration date July 31, 2027); and
- TEGL 05–24, October 8, 2024, *Implementation of the 2024 Revisions to the Office of Management and Budget (OMB) Guidance for Federal Financial Assistance* available at: <https://www.dol.gov/agencies/eta/advisories/tegl-05-24>,

7. **Attachments.**

Attachment I:	Funding Allocations and Authorized Positions
Attachment II:	Budget Narrative Instructions
Attachment III:	Program Narrative Instructions
Attachment IV:	Programmatic Assurances
Attachment V:	Optional Requests and Waivers

USDOL/ETA

**Senior Community Service Employment Program
PY 2025 Authorized Positions and Funding*
for State Agencies and Territories, by State**

States	Positions	Dollars
State Agencies		
Alabama	149	\$1,442,068
Alaska	172	1,664,413
Arizona	107	1,035,493
Arkansas	146	1,416,657
California	688	6,676,711
Colorado	81	787,738
Connecticut	88	851,264
Delaware	172	1,664,413
District of Col	47	451,044
Florida	474	4,593,018
Georgia	178	1,727,940
Hawaii	172	1,664,413
Idaho	43	414,386
Illinois	312	3,030,248
Indiana	210	2,039,224
Iowa	103	997,377
Kansas	82	794,090
Kentucky	153	1,480,185
Louisiana	136	1,315,014
Maine	50	482,807
Maryland	111	1,073,611
Massachusetts	175	1,696,177
Michigan	268	2,598,264
Minnesota	191	1,848,642
Mississippi	100	965,614
Missouri	198	1,924,875
Montana	50	489,160
Nebraska	62	597,156
Nevada	43	414,386
New Hampshire	43	414,386
New Jersey	227	2,198,042
New Mexico	45	438,338
New York	531	5,145,705
North Carolina	210	2,039,224
North Dakota	48	470,102
Ohio	350	3,398,706
Oklahoma	129	1,251,486
Oregon	118	1,143,490
Pennsylvania	430	4,167,385
Puerto Rico	110	1,067,257
Rhode Island	43	419,280
South Carolina	109	1,060,905
South Dakota	56	539,981
Tennessee	164	1,588,181
Texas	445	4,319,852
Utah	54	520,923
Vermont	45	431,986
Virginia	174	1,689,824
Washington	119	1,149,843
West Virginia	90	876,676
Wisconsin	206	1,994,755
Wyoming	43	414,386
State Agencies Total	8,550	\$82,877,101
Territories		
American Samoa	93	897,581
Guam	93	897,581
Northern Marianas	31	299,195
Virgin Islands	93	897,581
Territories Total	310	\$2,991,938

* Based on cost per position of \$9,698, with enacted minimum wage increase effective 7/24/09

U. S. Department of Labor
Employment and Training Administration (ETA)
Senior Community Service Employment Program (SCSEP)
Applicable Funding Restrictions and Budget Narrative Instructions

Funding Restriction: Administrative Cost Limitation

The administrative costs under this award are not to exceed 13.5 percent of the grant award. If necessary, certain exceptions can raise this limit to up to 15 percent of the grant amount, but only with prior written approval from the Grant Officer. Recipients must request prior approval to increase the administrative cost limitation each allotment year. It does not carry over from one program year to the next. To request an increase to the administrative cost limitation, recipients must address within the Budget Narrative document, ensuring to address the requirements outlined at [20 CFR 641.870](#).

Administrative costs do not need to be itemized separately from program costs on the SF-424A Budget Information Form and Budget Narrative; however, they must be tracked through the recipient's accounting system.

Administrative costs, as defined in Section 502(c)(4) of the Older Americans Act ([42 U.S.C. 3056\(c\)\(4\)](#)) and at [20 CFR 641.856](#), are the costs, both personnel-related and non-personnel-related and both direct and indirect, associated with the following:

- The costs of performing general administrative functions and providing for the coordination of functions, such as the costs of—accounting, budgeting, and financial and cash management; procurement and purchasing; property management; personnel management; payroll functions; coordinating the resolution of findings arising from audits, reviews, investigations, and incident reports; audits; general legal services; developing systems and procedures, including information systems, required for administrative functions; preparing administrative reports; and other activities necessary for the general administration of government funds and associated programs.
- The costs of performing oversight and monitoring responsibilities related to administrative functions.
- The costs of goods and services required for administrative functions of the project involved, including goods and services such as rental or purchase of equipment, utilities, office supplies, postage, and rental and maintenance of office space.
- The travel costs incurred for official business in carrying out administrative activities or overall management.

- The costs of information systems related to administrative functions (such as personnel, procurement, purchasing, property management, accounting, and payroll systems), including the purchase, systems development, and operating costs of such systems.
- The costs of technical assistance, professional organization membership dues, and evaluating results obtained by the project involved against stated objectives.

Funding Restriction: Use of Grant Funds for Participant Wages

Grant recipients must spend a minimum of 75 percent of their SCSEP Federal grant funds on participant wages and fringe benefits. Subject to Departmental approval, a recipient may use up to 10 percent of SCSEP Federal grant funds that would otherwise be devoted to wages and benefits to provide optional additional training and supportive services to participants (see [20 CFR 641.874](#)).

Recipients must pay participants the highest applicable required wage for time spent in orientation, training, and community service assignments. Participant wages are based on the highest applicable required wage, either the Federal minimum wage applicable under the Fair Labor Standards Act of 1938; the State or local minimum wage for the most nearly comparable covered employment; or the prevailing rate of pay for people employed in similar public occupations by the same employer (see [20 CFR 641.565](#)).

Funding Restriction: Non-Federal Cost Sharing for SCSEP Allotments

This award includes a non-Federal cost sharing requirement, per the [Older Americans Act](#), section 502(c)(1)–(2):

FEDERAL SHARE. The Secretary may pay a Federal share not to exceed 90 percent of the cost of any grant, except that the Secretary may pay all of such cost if such project is (A) an emergency or disaster project; or (B) a project located in an economically depressed area, as determined by the Secretary in consultation with the Secretary of Commerce and the Secretary of Health and Human Services.

NON-FEDERAL SHARE. The non-Federal share shall be in cash or in kind. In determining the amount of the non-Federal share, the Secretary may attribute fair market value to services and facilities contributed from non-Federal sources. The costs that the award recipient incurs in fulfilling its cost sharing requirement are subject to the same requirements, including the cost principles, that are applicable to the use of Federal funds. Such costs must be reasonable, allocable, and allowable to the program. In addition, those costs must adhere to the guidelines specified in [2 CFR 200.306](#) and be verifiable in the recipient's records with proof that prior approval, where required, was obtained. Cost sharing funds must be expended as required at [2 CFR Part 2900](#) before they can be recognized and reported as cost sharing on the ETA-9130 report. Whether in cash or in-kind, the non-Federal share is expected to adhere to the same cost limitations.

The cost-sharing requirement must be met at the time all such funds have been expended or the period of availability of such funds has expired, whichever comes first. If the required contribution is not met, award recipients will be responsible for reimbursing ETA the amount of unmet cost sharing contribution when the award is closed. Cost sharing must be reported on the quarterly ETA-9130 Federal financial report under the Recipient Share section. Cost sharing funds must be expended as required at [2 CFR Part 2900](#) before they can be recognized and reported as cost sharing.

The formula for calculation of SCSEP cost share is as follows:

$$[\text{Federal Expenditures} \div 0.90] - \text{Federal Expenditures} = \text{Required Cost Share}$$

Example: For a grant expending \$1,000,000: $[1,000,000 \div .90] - \$1,000,000 = \$111,111$.

Requirements for Explaining the SF-424A Line-Item Categories in the Budget Narrative (reflective of Uniform Guidance revisions effective October 1, 2024):

- **Personnel:** List all staff positions by title (including individuals hired by an employment contract) including the roles and responsibilities. For each position give the annual salary, the percentage of time devoted to the project, and the amount of each position's salary funded by the grant.
- **Fringe Benefits:** Provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement, etc.
- **Travel:** For grantee staff only specify the purpose, number of staff traveling, mileage, per diem, estimated number of in state and out-of-state trips, and other estimated costs for each type of travel.
- **Equipment:** Identify each item of equipment you expect to purchase that has an estimated acquisition cost of \$10,000 or more per unit (or if your capitalization level is less than \$10,000, use your capitalization level) and a useful lifetime of more than one year (see [2 CFR 200.1](#) for the definition of Equipment). List the item, quantity, and the unit cost per item. Items with a unit cost of less than \$10,000 are supplies, not "equipment." In general, we do not permit the purchase of equipment during the last funded year of the grant.
- **Supplies:** Identify the cost of supplies (e.g., general office supplies, desk/chairs, laptops/printers, other specialty items) in the detailed budget per category. Except for general office supplies, list the item, quantity, and the unit cost per item. Supplies include all tangible personal property other than "equipment" (see [2 CFR 200.1](#) for the definition of Supplies).
- **Contractual:** Under the Contractual line item, delineate contracts and subawards separately. Contracts are defined according to [2 CFR 200.1](#) as a legal instrument by which a non-federal entity purchases property or services needed to carry out the project or

program under a federal award. A subaward, defined by [2 CFR 200.1](#) means an award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of a Federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria in with [§ 200.331](#), including an agreement the pass-through entity considers a contract.

- **Construction:** Construction costs are not allowed, and this line must be left as zero. Minor alterations to adjust an existing space for grant activities (such as a classroom alteration) may be allowable. We do not consider this construction, and you must show the costs on other appropriate lines such as Contractual.
- **Other:** Provide clear and specific details, including costs, for each item so that we can determine whether the costs are necessary, reasonable, and allocable. List items, such as stipends or incentives, not covered elsewhere.
- **Indirect Costs:** If you include an amount for indirect costs (through a Negotiated Indirect Cost Rate Agreement or De Minimis) on the SF-424A budget form, then include one of the following:
 - a. If you have a Negotiated Indirect Cost Rate Agreement (NICRA), provide an explanation of how the indirect costs are calculated. This explanation should include which portion of each line item, along with the associated costs, are included in your cost allocation base. Also, provide a current version of the NICRA; or,
 - b. If you intend to claim indirect costs using the 15 percent de minimis rate of modified total direct costs (MTDC), please confirm that your organization meets the requirements as described in [2 CFR 200.414\(f\)](#). Clearly state that your organization does not have a current negotiated (including provisional) rate, and is not one described in [2 CFR Part 200, Appendix VII\(D\)\(1\)\(b\)](#).

Applicants choosing to claim indirect costs using the de minimis rate must use MTDC as their cost allocation base. Provide an explanation of which portion of each line item, along with the associated costs, are included in your cost allocation base. Note that there are various items not included in the calculation of MTDC. See the definition below to assist you in your calculation.

- **Modified Total Direct Cost (MTDC) Definition:** To avoid a serious inequity in the distribution of indirect costs, ETA defines MTDC as all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subaward or subcontract (regardless of the period of performance of the subawards and subcontracts under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward or subcontract in excess of \$50,000.

Please note participant support costs are not included in MTDC. As defined under [2 CFR 200.1](#) Participant Support Cost means direct costs that support participants and their involvement in a Federal award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants.

Additionally, the following link contains information regarding the negotiation of Indirect Cost Rates at DOL: <https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division>.

Indirect-type costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are recovered as part of charging the de minimis or NICRA rate. Do not show leveraged resources on the SF-424 and SF-424A. You should describe leveraged resources in the Budget Narrative.

Applicants must list the same requested federal grant amount on the SF-424, SF-424A, and Budget Narrative.

U. S. Department of Labor
Employment and Training Administration (ETA)
Senior Community Service Employment Program (SCSEP)
Program Narrative Instructions

State and Territorial SCSEP grantees must provide a Program Narrative that concisely covers the areas below. As approved in OMB Control Number 1205-0040 (expiration date 7/31/2027), state and territorial grantees may use this opportunity to update information that was provided in their PY 2024 State Plan submissions.

1. **Services to Minorities (OAA Title V, Section 515).** The minority report does not have participation and enrollment data for the three Pacific territories and the U.S. Virgin Islands; these four grantees will answer the questions in terms of outcomes only. All other grantees must describe efforts to serve individuals from minority populations, using the PY 2023 SCSEP Minority Report, as well as GPMS data for PY 2024. Grantees must describe the factors required in OAA Section 515(b):
 - a. An analysis of whether any changes in grantees have affected participation rates of minority individuals;
 - b. The factors that may have affected participation rates among minority individuals; and
 - c. Recommendations for increasing participation of minority individuals in the program.
2. **Organizational Structure, Monitoring, and Audits (Uniform Administrative Guidance (2 CFR part 200)).** Describe the structure of your SCSEP project and explain how you will effectively manage any subprojects. Ensure that these descriptions are consistent with the information in your Budget Narrative. Include:
 - a. A description of your SCSEP key staff, including experience implementing SCSEP, primary responsibilities, and the amount of time each individual is assigned to the grant. If you have sub-recipients or local affiliates, include a table with their names, locations, the number of authorized positions for which they are responsible, and their years of experience implementing SCSEP;
 - b. A SCSEP organizational chart (may be an attachment) that depicts key SCSEP staff and includes sub-recipients or local affiliates involved in implementing the grant (including host agencies);
 - c. A description of how you ensure that policies, procedures, and other important information are communicated and implemented throughout the program, and a description of how training will be provided to local staff, sub-recipients, or affiliates; and
 - d. A description of how you will monitor projects for program and financial compliance.

**Senior Community Service Employment Program (SCSEP) Programmatic Assurances
Program Year 2025**

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

You agree to:

Recruitment and Selection of Participants

- Develop and implement methods to recruit and select eligible participants to assure maximum participation in the program.
- Use income definitions and income inclusions and exclusions for SCSEP eligibility as described in TEGL No. 12-06 to determine and document participant eligibility.
- Develop and implement methods to recruit minority populations to ensure at least proportional representation in your assigned service area as listed in the latest Minority Report, as required at 20 CFR 641.515(a). “The Secretary shall annually prepare a report on the levels of participation and performance outcomes of minority individuals served by the program carried out under this title.”
- Develop and implement strategies to recruit applicants who have priority of service as defined in Older Americans Act section 518(b)(1)-(2) and by the VOW (Veterans Opportunity to Work) to Hire Heroes Act of 2011. Individuals with priority are those who:
 - Are covered persons in accordance with the VOW (covered persons who are SCSEP-eligible must receive services instead of or before all non-covered persons);
 - Are 65 years or older;
 - Have a disability;
 - Have limited English proficiency;
 - Have low literacy skills;
 - Reside in a rural area;
 - Have low employment prospects;
 - Have failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunity Act (WIOA);
 - Are homeless or are at risk for homelessness; or
 - Are formerly incarcerated or on supervision from release from prison or jail within five years of the date of initial eligibility determination.

Assessment

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

Individual Employment Plan (IEP)

- Establish an initial goal of unsubsidized employment for all participants.

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

Community Service Assignment

- Base the initial community service assignment on the assessment made at enrollment.
- Select only designated 501(c)(3) organizations or public agencies as host agencies.
- Put in place procedures to ensure adequate supervision of participants at host agencies.
- Ensure safe and healthy working conditions at the community service assignment through annual monitoring of the host agency site and annual safety consultation with the participant at the host agency site.

Recertification of Participants

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

Physical Examinations

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

Host Agencies

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

Orientation

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

Wages

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

Participant Benefits

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

Procedures for Payroll and Workers' Compensation

- Make all required payments for participant payroll and pay workers' compensation premiums on a timely basis.

- Ensure that host agencies do not pay workers' compensation costs for participants.

Durational Limits

Maximum Average Project Duration - 27 Months

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

Maximum Individual Participant Duration - 48 Months

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

Transition Services

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

Termination Policies

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

Equitable Distribution

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

participants.

Over-Enrollment

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

Administrative Systems

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

Collaboration and Leveraged Resources

- Collaborate with other organizations to maximize opportunities for participants to obtain workforce development, education, and supportive services to help them move into unsubsidized employment. These organizations may include but are not limited to: workforce development boards, American Job Centers, vocational rehabilitation providers, disability networks, basic education and literacy providers, and community colleges.

Supportive Services

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

Complaint Resolution

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

Maintenance of Files and Privacy Information

- Maintain participant files for three program years after the program year in which the participant received his/her final follow-up activity.
- Ensure that all participant records are securely stored by the grantee or sub-recipient and access is limited to appropriate staff in order to safeguard personal identifying information.
- Ensure that all participant medical records are securely stored by the grantee or sub-recipient separately from all other participant records and access is limited to authorized staff for authorized purposes.
- Establish safeguards to preclude tampering with electronic media (e.g., personal identification numbers and GPMS or other data system logins).
- Ensure that ETA is immediately notified in the event of any potential security breach of personal identifying information, whether electronic files, paper files, or equipment are involved.
- Comply with and ensure that authorized users under the grant comply with all GPMS and other data system access and security rules.

Documentation

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

Data Collection and Reporting

- Ensure the collection and reporting of all SCSEP required data according to specified time schedules.
- Ensure the use of the Office of Management and Budget-approved SCSEP data collection forms and the SCSEP Internet data collection and evaluation system, GPMS, or the successor data system as designated by ETA.
- Ensure at the grantee or sub-recipient level that those capturing and recording data are familiar with the latest instructions for data collection, including ETA administrative issuances (e.g., Training and Employment Guidance Letters, Data Collection and Data Validation Handbooks, and the Older Worker Community of Practice).

- Ensure data are entered directly into the GPMS, or the successor data system as designated by ETA.
- Legally obligate sub-recipients to turn over complete data files in the specified electronic format, as well as hard copy case files, to the grantee when sub-recipients cease to administer SCSEP.
- Legally obligate new sub-recipients to collect and enter complete data related to any participants whom they acquire upon becoming sub-recipients, including any participants who are still in the follow-up period.

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

The signature of the Authorized Representative on the SF-424 of this grant application also certifies that the organization agrees to adhere to the programmatic assurances listed above in this Attachment IV.

Signature of Authorized Representative

Date

U. S. Department of Labor
Employment and Training Administration (ETA)
Senior Community Service Employment Program (SCSEP)
Instructions for SCSEP Optional Requests

Grantees that wish to make optional requests or optional request amendments must submit each request in a separate, clearly-titled document. To receive Employment and Training Administration (ETA) approval, requests must adhere to the statute and regulations and provide a substantive rationale such as improved program management or better service to participants.

- 1. Change 48-Month Individual Durational Limit (IDL) (20 CFR 641.570(a)(3)).** *(This section is relevant **only** if you are requesting a change.)* To change your current IDL policy, you **must** request and receive ETA approval for one of the IDL policies listed below. If a grantee changes the current IDL policy to a more restrictive policy, it must have an effective date of at least 120 days **after** written approval from ETA.

If you propose to change the existing IDL policy, you must describe:

- a. Your current, ETA-approved IDL policy and procedure.
 - b. Which of the options below you propose to adopt:
 - i. *Option 1:* No extensions for any participants; all participants exit at 48 months.
 - ii. *Option 2:* Extensions to every participant who meets at least one of the seven waiver factors. *Indicate the length of the extension (e.g. one-time twelve-month only, unlimited, three times only).*
 - iii. *Option 3:* Extensions to every participant who meets a specific subset of the seven waiver factors. *Indicate the length of the extension (e.g. one-time twelve-month only, unlimited, three times only).*
 - c. A reasonable transition plan that addresses when and how you will notify participants of the change, and the planned activities to prepare participants for exit from the program.
- 2. Optional Additional Funds for Participant Training and Supportive Services (OATSS) (Older Americans Act (OAA), Section 502(c)(6)(C)).** *Note: In the past, OATSS requests were required with the grant document submission at the beginning of each new program year. To allow long-term strategic planning for use of OATSS funds, beginning in PY 2024, ETA encourages grantees to consider submitting OATSS requests that span the duration of the four-year cycle. Prepare your Budget Narrative so that it is consistent with your OATSS request. If ETA denies your request, you must resubmit a revised SF- 424A and Budget Narrative.*

The OAA permits ETA to grant an exception to the 75 percent minimum level of expenditures on participant wages and fringe benefits. This exception allows you to use no less than 65 percent of program funds for participant's wages and fringe benefits, so that up to an additional 10 percent of funds are available for training and supportive services that directly benefit participants.

OATSS requests can include participant training activities, supportive services, or a

combination of both. In general, ETA expects that proposed training components will provide training that prepares participants with skills relevant for employment in in-demand jobs in their community. Further, ETA expects that proposed supportive services components will supplement and enhance the supportive services provided through primary grant funds, enabling more participants to mitigate, and overcome financial and logistical barriers to SCSEP participation.

Instructions – For first-time requests

If you wish to request the use of additional funds for training and supportive services, you must provide a brief proposal according to the following instructions:

- a. **Identify the percentage of federal funds and the dollar amount** that will be dedicated to the training and/or supportive services (this is the "OATSS request" amount and must be less than or equal to 10% of your federal grant funds).
- b. **Describe the activities** for which you will spend the OATSS grant funds identified in item (a) above, and describe how the proposed activities will improve the effectiveness of your project, including, as applicable:
 - i) How the activities will better prepare participants for successful placement in unsubsidized employment in in-demand jobs, and how you estimate the activities will improve employment outcomes for individuals served; and/or
 - ii) How the activities will better support participants in overcoming barriers to participating in your SCSEP project.
- c. **Provide a proposed budget and work plan** for the activities identified in item (b) above, which must detail:
 - i) The additional training and/or supportive services that will be provided to SCSEP participants.
 - ii) The associated cost for each activity, and the number of participants who will benefit; and
 - iii) Note that, consistent with 20 CFR 641.874(a)(3), grantees must use OATSS funds to pay the wages for the hours that individual participants spend in training funded under the OATSS request.
- d. **Describe how you will allocate OATSS funds among sub-recipients** (if applicable). Grantees with approved requests may choose to apply the provision uniformly to all sub-recipients but need not provide this opportunity to every sub-recipient. If you choose not to apply the provision uniformly to all sub-recipients, identify the amount of OATSS funding that you will allocate to each sub-recipient.
- e. **Describe the impact of the OATSS request on overall service levels**, specifically:
 - i) Please state if there will be displacement of eligible individuals or elimination of positions for such individuals will occur; and
 - ii) Provide information on the number of such individuals to be displaced and of such positions to be eliminated.

Instructions – For amendments to PY 2024 requests:

- a. **Identify the percentage of PY 2025 federal funds and the dollar amount** that will be dedicated to the training and/or supportive services (this is the "OATSS request" amount and must be less than or equal to 10% of your federal grant funds).
- b. **Describe any adjustments to the activities** for which you will spend the OATSS grant

funds identified in item (a) above, and describe how the proposed activities have improved the effectiveness of your project, including, as applicable:

- i) How the activities improved participants' preparation for successful placement in unsubsidized employment in in-demand jobs, and how you estimate the activities will improve employment outcomes for individuals served for this program year; and/or
- ii) How the activities have and will better support participants in overcoming barriers to participating in your SCSEP project.

Important Considerations for OATSS Requests

Please note the following important considerations in submitting an OATSS request:

- *Include OATSS costs in your overall grant budget request:* In responding to the instructions in this TEGL for submitting your PY 2025 grant documents, prepare your SF-424A and Budget Narrative so that they are consistent with your OATSS request. Please ensure that items described in the work plan under item (c) above are also included in the Budget Narrative. In the event that ETA denies your OATSS request, you must resubmit a revised SF-424A and Budget Narrative.
- *Adhere to allowable training activities:* Participant training costs under an OATSS request may include, but are not limited to, the reasonable costs of instructors, classroom rental, training supplies, materials, equipment, tuition, grant staff salaries and wages that directly support the development, design, coordination, execution, and improvement of participant training, and other costs that are directly related to participant training. Such training may be provided on the job, in a classroom setting, in a virtual setting, or pursuant to other appropriate arrangements. Note that such costs do not include activities such as general staff development that relate to participant training only indirectly or tangentially.
- *Adhere to allowable supportive services:* Participant supportive services under an OATSS request may include, but are not limited to, the payment of reasonable costs of transportation, health 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, follow-up services, and grant staff salaries and wages that directly support the design, coordination, delivery, and improvement of supportive services.
- *Assurances regarding programmatic funds:* Through submission of an OATSS request, consistent with 20 CFR 641.874(a)(4), you agree that any remaining grant funds (i.e., funds *other than* those allocated for OATSS, participant wages and benefits, and administrative costs) will be used for participant training, job placement assistance, participant supportive services, and outreach, recruitment and selection, intake, orientation, and assessment. You also agree that no OATSS funds may be used to pay for any administrative costs, consistent with 20 CFR 641.874(a)(3).

3. **Increase in Administrative Cost Limitations (20 CFR 641.870).** *(Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option. Prepare your Budget Narrative so that it is consistent with your Administrative Cost Increase request. If ETA denies your request, you*

must resubmit a revised SF-424A and Budget Narrative.) ETA will consider requests to authorize an increase in the amount available for administrative costs from 13.5 percent to no more than 15 percent if we determine that it is necessary to carry out the project; and 2) you demonstrate *one* of the following conditions:

- a. Your project is incurring major administrative cost increases in necessary program components (e.g. liability insurance, payments for workers' compensation for staff, costs associated with achieving unsubsidized placement goals, or other operation requirements imposed by the Department of Labor);
- b. The number of community service assignment positions or eligible minority individuals participating in your project that will decline if the amount available for paying the cost of administrative costs is not increased; or
- c. The project size is so small that the amount of administrative expenses incurred to carry out the project necessarily exceeds 13.5 percent of the grant amount.

4. Extension of Average Project Duration (20 CFR 641.570(c)). (Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option.) Grantees must manage SCSEP projects in such a way that the average participation length for participants does not exceed 27 months. However, grantees may request permission from ETA to increase the allowable maximum average project duration to 36 months. The request must:

- a. State your current average duration and estimate the average duration for the coming program year.
- b. Describe your past, current, and planned efforts to achieve an average duration of 27 months.
- c. Describe the exceptional circumstances that warrant an extension to 36 months, as set forth in the regulations, including one or more of the following conditions:
 - i. High rates of unemployment, poverty, or participation in the program of block grants to states for temporary assistance for needy families established under part A of title IV of the Social Security Act, in the areas served by the grantee, relative to other areas of the state or nation.
 - ii. Significant downturns in the economy of an area served by the grantee or in the national economy.
 - iii. Significant numbers or proportions of participants with one or more barrier to employment (including "most-in-need" individuals as described in 20 CFR 641.710(g)) served by the grantee, relative to such numbers or proportions for grantees serving other areas of the state or nation.
 - iv. Changes in federal, state, or local minimum wage requirements; or
 - v. Limited economies of scale for the provision of community service employment and other authorized activities in the areas served by the grantee.

5. On-the-Job Experience (OJE) Training. (Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option.) If you wish to utilize OJE, you must address all of the requirements

stipulated in [Older Worker Bulletin 04-04](#) You must also provide a copy of your OJE policy and sample contracts to ETA for approval before you can exercise this option.

6. **Cross-Border Agreements (20 CFR 641.515(c))**. *(Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option.)* State grantees may enter into agreements to permit cross-border enrollment of eligible participants. These agreements must cover state grantee authorized positions only, and you must submit them to ETA for approval.
7. **Rotation Policy (20 CFR 641.575)**. *(Approvals for this option expire at the end of each program year--grantees must submit a new request for approval each year in order to exercise this option.)* You may establish a policy of rotating participants to a new host agency or a different assignment within the current host agency. Your policy must assure that you will make an individualized determination that a rotation is in the best interest of the participant, and that rotation will further the acquisition of skills listed in the participant's individual employment plan.