



COUNTY OF LOS ANGELES  
WORKFORCE DEVELOPMENT, AGING  
AND COMMUNITY SERVICES



WORKFORCE DEVELOPMENT  
PROGRAMS DIRECTIVE

DATE: December 30, 2021

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## Title V Senior Community Service Employment Program (SCSEP) Guidance for Returning to In-Person Service Delivery

### EXECUTIVE SUMMARY

This directive provides guidance and establishes procedures for the Los Angeles County America's Job Centers of California (AJCCs) providing SCSEP services for returning SCSEP participants to in-person service delivery, specifically related to the lifting of the statewide COVID-19 restrictions and ending Emergency Paid Sick Leave for SCSEP participants. This policy is designed to provide guidance for resuming in-person service delivery for current and new SCSEP participants.

**This Directive *supersedes* WDP D19-28 Title V Senior Community Service Employment Program (SCSEP) Emergency Paid Sick Leave Policy and Procedures and is effective on January 7, 2022.**

### REFERENCES

- Older American Act (OAA) 2006 Amendments – Title V
- SCSEP Data Collection Handbook, Revision 7 (March 2017)
- SCSEP Data Validation Handbook, Revision 15 (November 2021)
- California Department of Aging, PM 21-25 Guidance for Returning to In-Person Service Delivery for Title V/SCSEP
- State of California Executive Order N-60-20
- WDP D21-10 Title V SCSEP Remote Assignment Policy and Procedures Directive
- WDP D19-28 Title V SCSEP Emergency Paid Sick Leave Policy and Procedures Directive
- WDP D18-09 Title V SCSEP Authorized Break in Participation Policy Revised Directive
- WDP D18-01 Title V SCSEP Participant Termination Policy Directive

### BACKGROUND

In response to the COVID-19 pandemic, on March 15, 2020, the Governor of California ordered adults 65 years of age and older and those with underlying conditions to self-isolate. On March 19, 2020, Los Angeles County Board of Supervisors announced the Safer at Home Order widening the impact of the Governor's directive. In response, WDACS issued the Emergency

Paid Sick Leave (EPSL) policy effective March 15, 2020, with the purpose of protecting our communities and the older adults we serve by limiting the risk to SCSEP participants' health and safety while simultaneously minimizing disruption to their pay.

On June 15, 2021, the State ended the executive orders that enacted the Stay Home Order and Blueprint for a Safer Economy. This phased out most executive actions put in place since March 2020 as part of the pandemic response, leaving a subset of provisions that facilitate the ongoing recovery.

US Department of Labor recognizes that the pandemic represents an ongoing threat to the health and safety of SCSEP participants, however, SCSEP providers have had significant time to identify and commit to solutions to address the inability of many participants to be on-site for Community Service Assignments (CSAs) or training. At this point, California Department of Aging (CDA) expects all providers to make every effort to move away from a reliance on paid sick leave and actively shift toward the provision of training and CSA conducted remotely or, where feasible and consistent with state and local laws and public health orders, in-person.

## **POLICY**

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By January 10, 2022, LA County SCSEP AJCCs must resume the provision of Community Service Assignments (CSA) and training conducted in-person, where feasible and consistent with state and local laws and public health orders. All currently active SCSEP participants, who are not on an approved or administrative break in service, will no longer have the option to be paid through Emergency Paid Sick Leave (EPSL), effective **January 10, 2022**. All participants must be transitioned off EPSL and resume in-person or remote Community Service Assignments no later than **January 7, 2022**.

In delivering in-person services, AJCCs should determine participant assignments on a case-by-case basis that takes into consideration the risk factors of each participant and ensures adherence to Centers for Disease Control and Prevention (CDC) and LA County Department of Public Health (LACDPH) guidelines, including adequate provision of Personal Protective Equipment (PPE) and the use of social distancing.

### **Exclusions for continued EPSL**

Exclusions to the return to in-person CSA may only be made under the following circumstances for participants that are unable to complete CSA hours in-person or remotely due to any one of the following reasons:

- The SCSEP participant is subject to a quarantine or isolation period related to COVID-19 exposure (see note below) or is experiencing symptoms of COVID-19 and seeking a medical diagnosis or has an active case of COVID-19 and must isolate.
- The SCSEP participant is the caregiver for a family member who is either subject to a quarantine or isolation period related to COVID-19 (see note below) or has been advised by a healthcare provider to quarantine due to COVID-19, or the participant is the primary caregiver for a child whose school or place of care is closed or unavailable due to COVID-19 on the premises.

- The participant is attending a vaccine appointment or cannot train in-person or remotely due to vaccine-related side effects.

Participants who meet these criteria may receive EPSL until cleared by a medical professional or once the quarantine or isolation period is complete. Participants must provide documentation to validate the need for EPSL. All medical documentation must be kept separately from participant records in a confidential medical file.

If a participant is quarantining or isolating but can complete remote work, online training, or at home paper-based training during this time, please elect to use CSA or training hours over EPSL.

NOTE: The quarantine or isolation period related to COVID-19 is the period defined by an order or guidelines of the California Department of Public Health, the CDC, or LA County Department of Public Health (LACDPH).

### **Temporary Host Agencies and Alternate Training**

CDA allows SCSEP providers the flexibility to assign participants, including new participants, to temporary Host Agencies on an as needed basis until a suitable primary Host Agency is assigned. Temporary alternate virtual training and/or paper-based trainings, instead of Host Agency assignments, can be provided to participants who meet either of the following criteria:

- Their former Host Agency has closed and/or no Host Agency options exist at this time; or
- A participant is unable to train in-person at a Host Agency due to an underlying medical condition that increases their risk of severe illness from COVID-19 and the participant provides current documentation from a medical professional as confirmation.

Under these circumstances, the participant and AJCC SCSEP staff will jointly develop a training that incorporates components that can be completed at home or in another location:

- The training must be in alignment with the participant's Individual Employment Plan (IEP).
- This training can include obtaining a credential or certification, community college course, GED/ESL course, ServSafe, and other specialized trainings.
- A participant who is within one year of reaching their Individual Durational Limit (IDL) or is considered job-ready may conduct intensive job search and must provide verification of job search and application activities.
- The participant can be assigned to the SCSEP AJCC as the Host Agency (assignment must also be entered in SPARQ).
- Timesheets must be completed with the training hours included and the hours must be verified by SCSEP staff or a designated person at the training location.
- Documented case notes and the IEP need to include information about this training.
- At home paper-based training may be appropriate and provided in rare circumstances, where remote training using technology is not feasible and the AJCC is able to provide

written materials that can be used to participate in training at home. The materials can be mailed to the participant, or the participant can opt to pick up and drop off work.

The length of time a participant may continue in temporary assignments or be provided virtual and at home paper-based trainings must be reviewed by AJCC SCSEP staff each pay period. SCSEP AJCCs implementing temporary or alternative assignments must ensure that participants are served equitably, by notifying them that these options are available if an in-person CSA cannot be arranged for medical or administrative purposes.

### **Remote CSAs**

CDA will continue to allow participants who have transitioned to remote CSAs to engage in remote training for as long as it is feasible for all parties or until future notice from WDACS. Please make sure to follow LA County's *WDP D21-10 Title V SCSEP Remote Assignment Policy and Procedures Directive* for developing remote CSAs.

Examples of remote activities may include assignments in temporary host agencies and/or online training opportunities. Such activities may also include CSAs performed via remote or telework methods, if SCSEP AJCCs continue to ensure and promote:

1. Adequate supervision;
2. The development of soft skills;
3. Training aligned to participants' Individual Employment Plans; and
4. Access to any hardware or connectivity necessary for the work assigned.

### **Combination of In-Person CSA Hours and Virtual or At Home Paper-based Training**

SCSEP is best equipped to provide on-site CSAs, and this is the preferred method of service provision. However, if a Host Agency has reopened but is temporarily unable to satisfy the full number of hours of participant training and supervision per week, the participant can temporarily engage in at home training assignments to make up the difference.

### **Authorized Breaks in Participation and Termination**

Leading up to the transition back to in-person or remote CSAs, all SCSEP participants are required to:

- Remain in contact (bi-weekly or more frequent) with AJCC SCSEP staff.
- Participate in case management activities, including reassessments, IEP updates and recertifications.

If a participant fails to comply with these requirements, they should be placed on an unpaid administrative Authorized Break in Participation and a determination made that termination criteria have been met following the LA County WDACS *WDP D18-09 Title V SCSEP Participant Termination Policy Directive*.

Once all SCSEP AJCCs transition back to in-person service provision on January 10, 2022, LA County WDACS will allow AJCCs the flexibility to place participants on a voluntary Authorized Break in Participation, remote CSA, or temporary alternate at home training, if they are not ready to resume in-person training for health reasons. SCSEP AJCC may:

- Place participant on voluntary Authorized Break in Participation.
  - This unpaid break in service can last for 60 days, with the possibility of an additional 30-day extension, upon request to CDA. All AJCCs must follow the LA County WDACS *WDP D18-09 Title V SCSEP Authorized Break in Participation Policy Revised Directive*.
- Attempt to reassign the participant to a new Host Agency.
  - The participant can be provided with alternate virtual or at home paper-based training while the reassignment takes place.
  - If it is not feasible for the AJCC to coordinate virtual or at home paper-based training, the participant can be placed on an Administrative Break in Participation (without pay) while a new Host Agency is secured.

If the participant refuses to return at the end of the Authorized Break in Participation, they may be terminated from SCSEP following the LA County WDACS *WDP D18-09 Title V SCSEP Participant Termination Policy Directive*.

### **Voluntary Exit from SCSEP**

If the participant refuses to resume their CSA, regardless of the Host Agency placement, the participant may elect to voluntarily exit the SCSEP. Time left on their durational limit will remain and they can be encouraged to attempt to re-enroll in the future.

### **Host Agency Recruitment**

COVID-19 has resulted in adverse impacts for many SCSEP Host Agencies. SCSEP AJCCs should target new Host Agencies using their knowledge of the area and organizations, reputations in the community, and the quality of an organization's training and supervision. AJCC SCSEP staff should network within the community to identify potential new Host Agencies and utilize other resources such as community directories, social service organizations, and internet sites that provide listings of community governmental agencies and nonprofits.

### **Host Agency and SCSEP AJCC COVID-19 Re-Opening Requirements**

Prior to resuming in-person SCSEP services, SCSEP AJCCs, and Host Agencies must establish the following COVID-19 protocols for all in-person services:

- Ensure that a protocol for facial coverings/masks for staff and participants has been developed for control of COVID-19 pandemic issued by the County of Los Angeles Department of Public Health (LACDPH).

- Ensure that protocols have been developed for ensuring PPE, including masks and hand sanitizer or gloves (where hand washing is not available) are available at each SCSEP AJCC and Host Agencies.
- Ensure that risk reduction measures have been developed and implemented when in-person group programs and activities are resumed, including masking, handwashing, and physical distancing. Participants who have not received vaccinations should be referred to vaccination sites. Vaccine information can be found at [LA County's Department of Public Health's website](#).
- Ensure that COVID-19 risk reduction trainings have been developed and provided for AJCC staff and participants. Refer to the [Symptom Screener](#) provided by the Center for Disease Control (CDC).
- Ensure that there's a commitment to adherence to CDC and LACDPH guidelines, including adequate supervision of PPE and the use of social distancing in all SCSEP locations, including Host Agencies. Guidance on PPE and social distancing can be found at [LA County's Department of Public Health's website](#).
- Ensure that an in-person training site safety inspection has been completed.

## PROCEDURES

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Prior to resuming in-person SCSEP services, Title V SCSEP AJCCs must:

1. Provide all current participants ample notice of no less than (14) days, of the transition out of EPSL. A template is provided for your convenience as **Attachment I: SCSEP Notice for Returning to In-Person Community Service Assignment (CSA)**.
2. Assess all current and new participants for return to in-person service delivery and document the outcome of their status in a case note. Assign each participant to a Community Service Assignment (CSA) based on their IEP and establish which participants will be assigned remotely, or in-person. All participant IEPs must be updated to reflect these changes. (Please refer to the SCSEP Data Collection Handbook, CSA Form, pg. 29, Topic 43 revised).
3. Ensure that a mechanism has been put in place to track, verify, and report the number of in-person/remote CSA, training, and sick leave hours paid to each participant within the parameters set forth in the guidance below utilizing **Attachment II: SCSEP Participant Hours Paid Report**. The report must be submitted to WDACS each pay period at [SCSEP@wdacs.lacounty.gov](mailto:SCSEP@wdacs.lacounty.gov).
4. Assess all current and new Host Agencies (HA) and Community Service Assignments (CSA) to determine the readiness to resume in-person service, utilizing **Attachment III: SCSEP Host Agency Re-Opening Assessment Form**.

5. For HAs and CSAs needing in-person delivery, **Attachment IV: SCSEP Host Agency COVID-19 Safety Protocol Checklist Form must be signed** to ensure that there is a commitment to adherence with state and local laws and public health orders. For HAs and CSAs requesting remote delivery, please utilize the forms and guidance provided in the WDP D21-10 Title V SCSEP Remote Assignment Policy and Procedures Directive.
6. Complete an updated **Attachment V: SCSEP Host Agency Training Order Request Form** to establish an official assignment start date and other parameters of the assignment between the participant, Host Agency, and SCSEP AJCC.

### **Attachment I: SCSEP Notice for Returning to In-Person Community Service Assignment (CSA) Instructions**

The “SCSEP Notice for Returning to In-Person CSA” letter template must be used to document receipt of notice being sent to participants via certified mail. SCSEP AJCCs must modify this notice template with their own AJCC letterhead and contact information. Please note that the highlighted sections of this template are where modifications must be made.

#### **Assessment of Current and New Participants**

AJCCs must contact their participants via phone or in-person to assess the status of resuming in-person service delivery and document their status in a case note. Once their status has been established, the SCSEP Case Manager must complete a new reassessment and IEP to reflect their assignment to new or current CSA.

During the transition to in-person SCSEP services, temporary remote accommodations are permitted, such as:

- Virtual reassessments and recertifications for active participants, when feasible.
- Virtual enrollment activities for new participants, when feasible.

### **Attachment II: Participant Hours Paid Report Instructions**

AJCCs must maintain a live “SCSEP Participant Hours Paid Report,” which must be completed for each payroll period. AJCCs must adhere to the record retention policies for SCSEP, and documentation must be provided to auditors upon request (Please refer to the SCSEP Data Collection Handbook, Participant form pg. 33, Topic 64 Revised). Participant status, hours paid, and Host Agency assignment must be recorded on this report.

#### **Reporting**

SCSEP AJCCs must submit a full payroll report and the “Participant Hours Paid Report,” to WDACS at the end of each pay period. The reports must be submitted no later than 5 business days after the date of payment being issued.

These reports should be submitted to [SCSEP@wdacs.lacounty.gov](mailto:SCSEP@wdacs.lacounty.gov).

## Timesheets

- Timesheets for CSA hours must be completed and submitted by either the Host Agency supervisor or participant with both signatures required.
- The SCSEP AJCC Case Manager is responsible for completing a timesheet for each participant who is out on leave (BIP, sick leave or EPSL) and is required to provide a confirmation of the participant's status to the Host Agency supervisor.
- Timesheets for alternate training assignments must be completed with the training hours included and the hours must be verified by SCSEP staff or a designated person at the training location.

The SCSEP AJCC Case Manager will be responsible for signing the participant's timesheet and Break in Participation (BIP) form for final approval. To record unique circumstances of the incomplete timesheet for future Data Validation purposes, a notation should be made. All timesheets must be saved in the participant file.

## Total Hours Paid in Quarter

The CSA, training, and sick leave (including EPSL) hours must be counted and reported as part of total quarterly paid hours for each participant in the SPARQ system. If the participant has been assigned to more than one Host Agency during the same quarter, paid hours must be reported for each Host Agency they were assigned to separately.

## **Attachment III: SCSEP Host Agency Re-Opening Assessment Form Instructions**

The health, safety, and financial security of our participants are priorities of CDA and WDACS during the evolving situation with COVID-19. In preparation for resuming in-person service, previous Host Agencies must be contacted to discern their ability to provide safe and supervised training, the types of training that will be provided, and the proposed start date of the training.

The "SCSEP Host Agency Re-Opening Assessment Form" must be used to assess the Host Agencies' availability and accommodations to resume in-person service delivery. The Host Agency supervisor and AJCC SCSEP representative must review and complete all questions in the form. Based on this assessment the SCSEP AJCC shall determine whether criteria for resuming in-person activity have been met and the participant may return to the Host Agency.

## **Attachment IV: SCSEP Host Agency COVID-19 Safety Protocol Checklist Instructions**

To reduce the impact of the COVID-19 outbreak on businesses, employers, employees, participants and customers, Host Agencies must exercise safe practices following all local, state, and federal mandates. SCSEP AJCCs must review and verify that the Host Agency training site is currently adhering to these recommendations and guidelines. Host Agency supervisor must initial next to each item on the "SCSEP Host Agency COVID-19 Safety



Protocol Checklist.” By signing this form, Host Agencies commit to assisting in identifying risk areas in the workplace and implementing appropriate control measures.

### **Attachment V: SCSEP Host Agency Training Order Request Form Instructions**

Before returning or assigning a participant to in-person CSA, AJCCs must complete an updated “SCSEP Host Agency Training Order Request Form” to establish an official assignment start date and other parameters between the participant, Host Agency, and SCSEP AJCC before updating and documenting the CSA in SPARQ.

### **ACTION**

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Upon release of this directive, Los Angeles County AJCCs operating SCSEP must ensure that the requirements described herein are communicated throughout the operations, management, and partnership governance structure of the AJCC organization to adhere to this directive until further notice.

### **INQUIRIES**

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Inquiries regarding this directive and the policies and procedures described herein should be directed to [SCSEP@wdacs.lacounty.gov](mailto:SCSEP@wdacs.lacounty.gov).

*Irene Pelayo*

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**Irene Pelayo, Program Manager  
Workforce Development**

[Attachment I: SCSEP Notice for Returning to In-Person Community Service Assignment \(CSA\)](#)

[Attachment II: SCSEP Participant Hours Paid Report](#)

[Attachment III: SCSEP Host Agency Re-Opening Assessment Form](#)

[Attachment IV: SCSEP Host Agency COVID-19 Safety Protocol Checklist Form](#)

[Attachment V: SCSEP Host Agency Training Order Request Form](#)