



COUNTY OF LOS ANGELES WORKFORCE DEVELOPMENT, AGING AND COMMUNITY SERVICES



WORKFORCE DEVELOPMENT PROGRAMS DIRECTIVE

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Title V-Senior Community Service Employment Program (SCSEP) Durational Limit and Transition Planning Policy

EXECUTIVE SUMMARY

This directive provides guidance to the Los Angeles County America's Job Centers of California (AJCCs) operating the Title V-SCSEP for implementation of the SCSEP durational limit policy and transition planning policy in compliance with the California Department of Aging (CDA) policy as required by the Department of Labor (DOL).

REFERENCES

- Older Americans Act (OAA) Title V, Section 518 (a)(3)(B)(i)
- Title 20 CFR 641.570
- Title 20 CFR 641.535
- CDA PM 10-19(P) *Senior Community Service Employment Program. Durational Limits and Transition Planning Policy*
- SCSEP Data Collection Handbook, Revision 7 (March 2017)

BACKGROUND

The U.S. Department of Labor (DOL) required that California Department of Aging (CDA) establish a Durational Limits and Transition Planning Policy in compliance with DOL Employee and Training Administration regulations, 20 CFR 641.570 to be implemented for all California participants in the Senior Community Service Employment Program (SCSEP).

The reauthorization of the Older Americans Act (OAA) in 2006 included a requirement to limit the length of time an individual can participate in SCSEP to a total of 48 months in the aggregate per participant. DOL allowed each state to choose whether to include the option to grant waivers to extend the participation beyond the 48 month limit based on certain qualifiers in its durational limit policy. CDA elected to adopt a durational limit policy of 48 months *without the possibility of a waiver*.

POLICY AND PROCEDURES

The SCSEP Durational Limit and Transition Planning Policy addresses participant durational limit, transition planning process, and safety net planning. This Durational Limits and Transition Planning Policy shall be applied fairly and equitably to all participants.

DURATIONAL LIMIT POLICY

The durational limit for participation in the Title V SCSEP is **48 months (4 years)** in the aggregate with an emphasis on training site rotations throughout participation as needed to enhance the individual participant's acquisition of transferable skills and overall training experience. There is no waiver of the durational limit and a participant cannot exceed participation in SCSEP beyond a total of 48 months.

All participants must be informed of the durational limit policy at the time of enrollment and on an annual basis thereafter.

The goals of this policy include:

- Enable more participants to access services.
- Increase participants' marketable skills, by encouraging their rotation in training assignments.
- Provide host agencies with more access to a larger pool of participants to fill community service training positions.
- Encourage innovative practices to assist participants in the search for unsubsidized employment; and
- Motivate participants to focus on learning and increasing their individual skill set in order to improve participant marketability for unsubsidized employment opportunities.

Durational Limit Parameters:

- Participant durational limits are calculated from the date of initial enrollment.
- The durational limit is a lifetime limit and includes all periods of participation in any SCSEP program.
- The calculation for a durational limit excludes any time on an authorized break in participation.

- The individual durational limit date for participants with no authorized breaks in participation, no voluntary exits, or other delays will be the day before the date of initial assignment plus four years.
- Participants who have reached the individual durational limit must be exited in SCSEP Performance and Results QPR (SPARQ) database effective on the exact date on which the limit is reached.
 - A participant shall not remain enrolled beyond the participant's durational limit date.
 - Each participant's durational limit date is calculated and tracked in SPARQ.
- Each participant shall be given a 30-day written notice prior to his/her durational limit date along with a copy of the SCSEP Grievance Policy.
 - The date of the 30-day written notice must be inputted into SPARQ.
- Within 30 days of a participant's durational limit date, SCSEP Case Manager shall notify the host agency of the durational limit date and the participant's projected last day of training.
- SCSEP Case Manager shall coordinate with the host agency to assign another participant to fill the absence after a participant has exited due to reaching her/his durational limit.

Authorized Breaks in Participation:

- Authorized breaks in participation do not apply toward a participant's individual durational limit.
- The dates for all authorized breaks in participation must be inputted properly into SPARQ to ensure the accurate calculation of the durational limit date for each participant.
- If a participant takes an authorized break in participation after the initial 30-day notice of termination due to durational limit has been distributed to the participant, then a revised 30 day written notice of termination with the updated durational limit date should be provided to the participant at the end of the break in participation.
- Because of the break in participation effect on the durational limit, approval for breaks within the last 30 days of participation should be limited, i.e., based on good cause.

TRANSITION PLANNING POLICY

SCSEP Case Managers are to implement transition planning as part of the services provided to all participants reaching their durational limit dates.

Transition Planning Process:

The transition planning process shall begin one year before a participant's durational limit date. The transition plan shall be reflected in the participant Individual Employment Plan (IEPs). The process shall include:

- Maintain a monthly durational limit chart listing all the participants scheduled to reach his/her durational limit date within a period of one year.
- Review and update the participant's current IEP to include a transition plan.
- Inform all participants of their respective durational limit date and establish a timeline of transition related activities with each participant. The timeline may be documented in the IEP.
- Assess each participant's strengths and weaknesses with input from the host agency/training site supervisor.
- Review the annual Participant Performance Evaluations completed by the host agencies.
- Maintain detailed case notes to track participant progress.
- Provide a comprehensive transition plan based on the SCSEP Case Manager's placement of participants into one of these three groups:

1. Participants with unsubsidized job potential;
2. Participants with possible unsubsidized job potential; or
3. Participants unlikely to achieve unsubsidized placement.

1. Participants with unsubsidized job potential:

- a. Focus on job skills and placement, which includes host agency rotation, specialized training, on-the-job employment, and other escalated job development efforts.
- b. Provide job development services to participants (i.e., interviewing techniques, job search skills, job leads, employment workshops, etc.)
- c. Assist participants to update their resume to include their most current training and host agency assignment information.
- d. Assist participants in obtaining letters of recommendation from past or current employers, including host agencies.
- e. Increase the requested number of job search hours per month.
- f. Reassess participants' placement potential quarterly. If SCSEP Case Manager determines that a participant will not find employment

before reaching his/her durational limit date, the participant should transition to safety net planning as described below.

2. Participants with possible unsubsidized job potential:
 - a. Update the participant's IEP with refined, reasonable job goals.
 - b. Provide job development services (i.e., interviewing techniques, job search skills, job leads, employment workshops, job clubs, etc.).
 - c. Assist participants to update their resume to include their most current training and host agency assignment information.
 - d. Assist participants in obtaining letters of recommendation from past or current employers.
 - e. Discuss volunteer opportunities that may lead to unsubsidized employment.
 - f. If the participant does not obtain unsubsidized employment after six months, commence safety net planning as described below.

3. Participants unlikely to achieve unsubsidized placement:
 - a. Work one on one with the participant to continue to find unsubsidized employment
 - b. Discuss volunteer opportunities that may lead to unsubsidized employment.
 - c. Provide referrals to supportive services to address any barriers to unsubsidized employment
 - d. Provide job development services (i.e., interviewing techniques, job search skills, job leads, employment workshops, job clubs, etc.).
 - e. Incorporate safety net planning into their updated IEP.

Safety Net Planning Process:

SCSEP Case Managers shall provide safety net planning for participants nearing his/her durational limit if unsubsidized employment is not achieved prior to exiting the program.

Safety Net Planning includes the following methods:

- Assist each participant in establishing a personal budget that does not include SCSEP wages.
- Make referrals to appropriate community service and volunteer programs that can provide additional skill training opportunities.
- Ensure participant is enrolled in all appropriate social service programs for which she/he is eligible, including General Relief, CalFresh, etc.

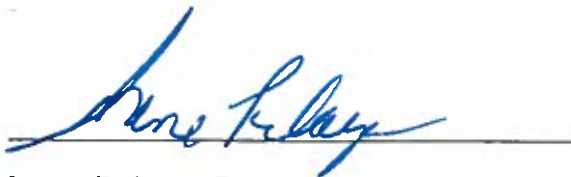
- Determine if the participant has a social support network and if possible, alert network to this participant's upcoming exit from SCSEP.
 - Note: First obtain permission from participant before contacting his/her support network. Document permission in detailed case notes.
- Provide participants with a list of services available in their area such as local health services organizations, senior centers, free senior meals and other organizations that serve the local area.
- Provide supportive services referrals as appropriate.
- Establish a schedule of IEP follow-ups to prepare participant for the reality of exiting SCSEP with the frequency based on the SCSEP Case Manager's determination of need.
- Offer participant refresher courses in skills such as basic education, ESL, typing, and basic Microsoft Word and Excel computer courses, if applicable.
- Refer participants to the local office of the California Department of Vocational Rehabilitation, when applicable.
- Any other services based on SCSEP Case Manager determination.

ACTION

Los Angeles County AJCCs operating SCSEP must ensure that the requirements described herein are communicated throughout operations.

INQUIRIES

Inquiries regarding this directive and the policies and procedures described herein should be directed to SCSEP@wdacs.lacounty.gov



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Workforce and Community Services Branch