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## DWD Policy 2025-08: Senior Community Service Employment Program

**To:** Indiana's Workforce System  
**From:** Indiana Department of Workforce Development (DWD)  
**Date:** May 15, 2026

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### PURPOSE

The purpose of this policy is to establish clear guidelines for the administration and implementation of the Senior Community Service Employment Program (SCSEP)<sup>1</sup> in accordance with federal regulations.

Overarching policy goals include:

- Ensuring the DWD SCSEP operates efficiently to serve eligible older workers;
- Enhancing program outcomes and maximizing participant success; and
- Upholding operational accountability.

While this policy provides a high-level framework for DWD SCSEP operations, it is not an exhaustive list of all program requirements. Subgrantees are strictly responsible for adhering to all federal and state regulations and the specific terms of their grant award in addition to the guidelines provided herein.

### REFERENCES

See **Attachment A**.

### PROGRAM CONCEPTS<sup>2</sup>

**Authorized Positions<sup>3</sup>** are defined by statute as the number of positions or training opportunities the Congressional appropriation is designed to support. Authorized positions are also referred to as "seats".

- Authorized positions are derived by dividing the total amount of funds appropriated by Congress for a program year by the national average unit cost per participant for that program year. The average unit cost is based on the federal minimum wage.
- Authorized positions are adjusted each year by the Department of Labor based on the equitable distribution plan for each state and the Congressional appropriation.

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<sup>1</sup> As authorized by the Older Americans Act.

<sup>2</sup> 20 CFR 641.140.

<sup>3</sup> WorkforceGPS, *Equitable Distribution & the Senior Community Service Employment Program*.

**Community Service** is defined as:

- Social, health, welfare, and educational services (including literacy tutoring), legal and other counseling services and assistance, including tax counseling and assistance and financial counseling, and library, recreational, and other similar services;
- Conservation, maintenance, or restoration of natural resources;
- Community betterment or beautification;
- Antipollution and environmental quality efforts;
- Weatherization activities;
- Economic development; and
- Other such services essential and necessary to the community as the Secretary determines by rule to be appropriate.<sup>4</sup>

**Community Service Employment** is defined as part-time, temporary employment paid with grant funds in projects at host agencies (non-profit or public organizations) through which eligible individuals are engaged in community service and receive work experience and job skills that can lead to unsubsidized employment.<sup>5</sup> The term community service assignment is used interchangeably with community service employment.

**Formerly incarcerated individuals** are defined as:

- Individuals who were incarcerated at any point within the last 5 years; or
- Individuals who were under supervision at any point within the last 5 years, following release from prison or jail.
- The 5-year period specified in this definition refers to the 5 years preceding the date of first determination of program eligibility, as described in § 641.505, for initial enrollment into the program.

**Host agency**<sup>6</sup> means a public agency, or a private nonprofit organization exempt from taxation under § 501(c)(3) of the Internal Revenue Code of 1986 which provides a training work site and supervision for one or more [SCSEP] participants.<sup>7</sup>

**Poor/low employment prospects** are defined as the significant likelihood that an individual will not obtain employment without the assistance of SCSEP or another workforce development program. Persons with poor employment prospects have a significant barrier to employment; significant barriers to employment include but are not limited to lacking a substantial employment history, basic skills, and/or English-language proficiency; lacking a high school diploma or the equivalent; having a disability; being homeless; or residing in

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<sup>4</sup> OAA sec. 518(a)(1).

<sup>5</sup> OAA sec. 518(a)(2).

<sup>6</sup> 20 CFR 641.140.

<sup>7</sup> Political parties cannot be host agencies. A host agency may be a religious organization as long as the projects in which participants are being trained do not involve the construction, operation, or maintenance of any facility used or to be used as a place for sectarian religious instruction or worship.

socially and economically isolated rural or urban areas where employment opportunities are limited.<sup>8</sup>

**Subgrantee** is defined as the government or other legal entity to which a subgrant is awarded and which is accountable to the grantee for the use of the funds provided.<sup>9</sup> Subgrantees may also be referred to as “sub-recipients.”

**Supportive services** are defined as services, such as transportation, health and medical services, special job-related or personal counseling, incidentals (e.g. work shoes, badges, uniforms, eyeglasses, and tools), child and adult care, housing, including temporary shelter, follow-up services, and need-related payments, which are necessary to enable an individual to participate in activities authorized under the SCSEP.<sup>10</sup>

**Training services** are defined as those services authorized by the Workforce Innovation and Opportunity Act (WIOA) sec. 134(c)(3).

**Unemployed** is defined as an individual who is without a job and who wants and is available for work, including an individual who may have occasional employment that does not result in a constant source of income.<sup>11</sup>

## CONTENT

The Senior Community Service Employment Program (SCSEP) is a program that serves low-income people who are 55 years of age and older, and unemployed. The program provides training in part-time community service assignments and assists participants in developing skills and experience to facilitate a transition to unsubsidized employment.<sup>12</sup>

DWD strives to provide expansive, customized services and referrals to remove barriers to employment by developing wage-based on-the-job training experiences with 501(c)3 entities or organizations.

SCSEP is a required partner under the Workforce Innovation and Opportunity Act (WIOA). As such, it is a part of the One-Stop delivery system. When acting in their capacity as WIOA partners, SCSEP grantees and subgrantees are required to follow all applicable rules under WIOA and its regulations.<sup>13</sup>

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<sup>8</sup> See 20 CFR 641.140 for the definition of Limited English Proficiency, Disability, Homeless, and Rural.

<sup>9</sup> 29 CFR 97.3.

<sup>10</sup> OAA secs. 502(c)(6)(A)(iv) and 518(a)(8).

<sup>11</sup> OAA sec. 518(a)(9).

<sup>12</sup> 20 CFR 641.110.

<sup>13</sup> 20 CFR 641.200.

## Program Eligibility, Program Termination and Grievances, Priority Participation Requirements, Recruitment, and Equitable Distribution

### Eligibility<sup>14</sup>

Initial eligibility is determined at the time individuals apply to participate in the SCSEP. Once individuals become SCSEP participants, the subgrantee is responsible for verifying their continued eligibility at least once every 12 months. Subgrantees may also verify an individual's eligibility, as circumstances require, including instances when enrollment is delayed.<sup>15</sup>

An eligible participant is anyone who is:<sup>16</sup>

- At least 55 years old;<sup>17</sup>
- Unemployed;<sup>18</sup> and
- Who is a member of a family with an income that is not more than 125 percent of the family income levels prepared by the Department of Health and Human Services and approved by OMB (Federal poverty guidelines).<sup>19</sup>
  - An applicant's income is computed by calculating the includable income<sup>20</sup> received by the applicant during the 12-month period ending on the date an individual submits an application to participate in the SCSEP, or the annualized income for the 6-month period ending on the application date.<sup>21</sup>
  - Subgrantees are to use whichever method is more favorable to the individual.<sup>22</sup>
  - A person with a disability may be treated as a “family of one” for income eligibility determination purposes at the option of the applicant.

### Program Termination and Grievances<sup>23</sup>

Under certain circumstances, participation in SCSEP may be terminated. Please see DWD TA 2023-02, Change 1: *SCSEP Grievance Procedure* for more information.

### Priority Participation Selection<sup>24</sup>

In selecting individuals for program participation, priority must be given to eligible individuals who have one or more of the following characteristics:<sup>25</sup>

- Are 65 years of age or older;
- Have a disability;
- Have limited English proficiency or low literacy skills;

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<sup>14</sup> See **Attachment B** for eligibility documents.

<sup>15</sup> 20 CFR 641.505.

<sup>16</sup> 20 CFR 641.500.

<sup>17</sup> Per 20 CFR 641.580(i), subgrantees may not impose an upper age limit for participation in the SCSEP.

<sup>18</sup> See definition above.

<sup>19</sup> OAA sec. 518(a)(3), (9).

<sup>20</sup> See **Attachment C** for additional income guidance.

<sup>21</sup> 20 CFR 641.507.

<sup>22</sup> OAA 518(a)(4).

<sup>23</sup> 20 CFR 641.580, 20 CFR 641.910, DWD TA 2023-02, Change 1.

<sup>24</sup> 20 CFR 641.520.

<sup>25</sup> See **Attachment B** for documentation guidance.

- Reside in a rural area;
- Are veterans (or, in some cases, spouses of veterans);
- Section 2(a) of the Jobs for Veterans Act<sup>26</sup> creates a priority for service for veterans (and, in some cases, spouses of veterans) who otherwise meet the program eligibility criteria for the SCSEP. Priority is extended to veterans. Priority is also extended to the spouse of a veteran who died of a service-connected disability; the spouse of a member of the Armed Forces on active duty who has been listed for a total of more than 90 days as missing in action, captured in the line of duty by a hostile force, or forcibly detained by a foreign government or power; the spouse of any veteran who has a total disability resulting from a service-connected disability; and the spouse of any veteran who died while a disability so evaluated was in existence.
  - Have low employment prospects;
  - Have failed to find employment after using services provided under Title I of the Workforce Innovation and Opportunity Act (WIOA) through the one-stop delivery system;
  - Are homeless or are at risk for homelessness; or
  - Are formerly incarcerated individuals or on supervision from release from prison or jail within five years of the date of initial eligibility determination.<sup>27</sup>

Subgrantees must apply these priorities to SCSEP eligible individuals in the following order:<sup>28</sup>

- **First**, SCSEP-eligible individuals who qualify as a veteran or qualified spouse and who possess at least one of the other priority characteristics.
- **Second**, SCSEP-eligible individuals who qualify as a veteran or qualified spouse who do not possess any of the other priority characteristics.
- **Third**, SCSEP-eligible individuals who do not qualify as a veteran or qualified spouse and who possess at least one of the other priority characteristics.

### **Recruitment<sup>29</sup>**

The subgrantee must develop methods of recruitment and selection that ensure that the maximum number of eligible individuals have an opportunity to participate in the program. To the extent feasible, subgrantees should seek to enroll minority and Indian eligible individuals, eligible individuals with limited English proficiency, and eligible individuals with greatest economic need, at least in proportion to their numbers in the area, taking into consideration their rates of poverty and unemployment.

Subgrantees must use the One-Stop delivery system (WorkOne/AJC) as one method in the recruitment and selection of eligible individuals to ensure that the maximum number of eligible individuals have an opportunity to participate in the project.

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<sup>26</sup> 38 U.S.C. 4215(a).

<sup>27</sup> As defined in 20 CFR 641.140.

<sup>28</sup> Under the Jobs for Veterans Act, 38 U.S.C. 4215(a).

<sup>29</sup> 20 CFR 641.515.

### **Equitable Distribution<sup>30</sup>**

Equitable Distribution (ED) is a statutory requirement that ensures that all SCSEP-eligible individuals within a state have an equal chance of enrolling into the program. Within each state, the distribution of authorized positions to the counties is determined by each county's percentage of the SCSEP-eligible population in the state as determined by the Census. ED ensures that each county within the state is served, including rural and hard-to-serve areas.<sup>31</sup>

## **Program Participation Limitations**

### **Individual time limit<sup>32</sup>**

Eligible individuals may participate in the program for a maximum duration of 48 months in the aggregate from the date of the individual's enrollment in the program unless a request for an increased period of participation has been authorized.<sup>33</sup>

### **Host Site Time Limit<sup>34</sup>**

Subgrantees may establish limits on the amount of time that participants spend at a particular host site.

### **Community Service Assignment Hours Limit<sup>35</sup>**

While there is no specific limit on the number of hours that may be worked in a community service assignment, a community service assignment must be a part-time position, constituting no more than thirty (30) hours per week.

## **Program Services**

SCSEP resources may only be used to provide services that are authorized under the SCSEP to eligible individuals.<sup>36</sup> Subgrantees are responsible for:<sup>37</sup>

- Providing orientation to newly enrolled or transferred participants in the SCSEP, including information on project goals and objectives, community service assignments, training opportunities, available supportive services, the availability of a free physical examination, participant rights and responsibilities, and permitted and prohibited political activities;
- Assessing participants' 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;
- Performing an initial assessment, upon program entry, unless an assessment has already been performed. Subsequent assessments may be made as necessary,

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<sup>30</sup> See DWD's *SCSEP Equitable Distribution* technical assistance for additional information.

<sup>31</sup> WorkforceGPS, *Equitable Distribution & the Senior Community Service Employment Program*.

<sup>32</sup> 20 CFR 641.570.

<sup>33</sup> See 20 CFR 641.570(b)(1-6) for additional guidance on extending participation.

<sup>34</sup> 20 CFR 641.575

<sup>35</sup> 20 CFR 641.577.

<sup>36</sup> 20 CFR 641.220.

<sup>37</sup> 20 CFR 641.535.

- but must be made no less frequently than two times during a 12-month period (including the initial assessment);
- Using the information gathered during the initial assessment to develop an (Individual Employment Plan) IEP that includes an appropriate employment goal for each participant, except that if an assessment has already been performed and an IEP developed under title I of WIOA, the WIOA assessment and IEP will satisfy the requirement for a SCSEP assessment and IEP;<sup>38</sup>
  - The initial IEP must include an appropriate employment goal for each participant. Thereafter, if the grantee determines that the participant is not likely to obtain unsubsidized employment, the IEP must reflect on other approaches to help the participant achieve self-sufficiency, including the transition to other services or programs:
    - Updating the IEP, as necessary, to reflect information gathered during subsequent participant assessments;
    - Placing participants in appropriate community service assignments in the area in which they reside, or in a nearby area;
    - Providing or arranging for training identified in participants' IEPs and that is consistent with the SCSEP's goal of unsubsidized employment;
    - Assisting participants with obtaining any supportive services needed as identified in their IEPs;
    - Providing appropriate services for participants, and/or referring participants to appropriate services through the One-Stop delivery system established under WIOA;
    - Providing counseling on participants' progress in meeting the goals and objectives identified in their IEPs, and in meeting their supportive service needs;
    - Providing participants with wages and benefits for time spent in their community service assignment(s), orientation, and training;
    - Ensuring that participants have safe and healthy working conditions at their community service employment host sites; and
    - Assisting participants in obtaining unsubsidized employment, including providing or arranging for employment counseling in support of their IEPs.
  - Subgrantees are responsible for working with participants to ensure that the participants are receiving services and taking actions designed to help them obtain unsubsidized employment.
  - Subgrantees must:<sup>39</sup>
    - Contact private and public employers directly or through the One-Stop delivery system to develop or identify suitable unsubsidized employment opportunities.
    - Encourage host agencies to assist participants in their transition to unsubsidized employment, including unsubsidized employment with the host site.

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<sup>38</sup> 20 CFR 641.230, OAA sec. 502(b)(3) provides that an assessment or IEP completed by the SCSEP satisfies any condition for an assessment, service strategy, or IEP completed at the One-Stop and vice-versa.

<sup>39</sup> 20 CFR 641.550.

SCSEP funds may not be used for job ready individuals who only need job search assistance or job referral services. Grantees may provide job search assistance and job readiness, soft skills training activities to participants who are enrolled in SCSEP and are assigned to community service assignments.

### **Training Services<sup>40</sup>**

In addition to the training provided in a community service assignment:

- Subgrantees may arrange skill training provided that it:
  - Is realistic and consistent with participants' IEP;
  - Makes the most effective use of participant's skills and talents; and
  - Prepares participants for unsubsidized employment.
- Training may be provided before or during a community service assignment.
- Training may be in the form of lectures, seminars, classroom instruction, individual instruction, online instruction, and on-the-job experiences.
- Training may be provided by the subgrantee or through other arrangements, including but not limited to, arrangements with other workforce development programs such as WIOA.
- Subgrantees are encouraged to obtain training through locally available resources whenever possible, community based organizations at no cost or reduced cost to the SCSEP.
- Subgrantees may pay for participant training, including the payment of reasonable costs for instructors, classroom rental, training supplies, materials, equipment, and tuition.
- Participants must be paid wages while in training<sup>41</sup>
- Subgrantees may pay for costs associated with supportive services, such as transportation, necessary to participate in training.<sup>42</sup>

### **Supportive Services<sup>43</sup>**

Subgrantees are required to assess all participants' need for supportive services and to make every effort to assist participants in obtaining needed supportive services. Subgrantees may provide directly or arrange for supportive services that are necessary to enable an individual to successfully participate in a SCSEP project, including but not limited to:

- Payment of reasonable costs of transportation;
- Health and medical services;
- Special job-related or personal counseling; and
- Incidentals include but are not limited to:
  - Work shoes, badges, uniforms, eyeglasses, and tools; dependent care; housing, including temporary shelter; needs-related payments; and follow-up services.

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<sup>40</sup> 20 CFR 641.540.

<sup>41</sup> As described in 20 CFR 641.565(a).

<sup>42</sup> As provided in 20 CFR 641.545.

<sup>43</sup> 20 CFR 641.545.

To the extent practicable, the grantee or subgrantee should arrange for the payment of these expenses from other resources. Subgrantees are encouraged to contact participants throughout the first 12 months following placement to determine if they have the necessary supportive services to remain in the job and to provide or arrange to provide such services if feasible.

### **Subgrantee Supportive Services Policy Requirement**

The subgrantee is responsible for creating a supportive service policy. The subgrantee's supportive service policy must:

- Define a process for accessing supportive services that is unbiased and standardized for all program participants;
- Outline how the subgrantee will determine supportive service eligibility;
- Identify any maximum amount a participant may access, if applicable; and
- Describe how participants will be connected to supportive service funding.

All supportive services provided to program participants must be case noted in the participant's electronic record following appropriate programmatic supportive service policy and reported according to program reporting guidelines.<sup>44</sup>

## **Wages and Benefits**

### **Wages<sup>45</sup>**

Subgrantees must pay participants the highest applicable required wage for time spent in orientation, training, and community service assignments. Participants may be paid the highest applicable required wage while receiving WIOA career services. The highest applicable required wage is either the 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 persons employed in similar public occupations by the same employer.<sup>46</sup> See DWD TA 2025-09 *SCSEP Prevailing Wage* for additional guidance.

**NOTE:** Per 20 CFR 641.565(A)(3), subgrantees must make any adjustments to minimum wage rates payable to participants as may be required by Federal, State, or local statute during the grant term.

### **Required Benefits**

Subgrantees must:<sup>47</sup>

- Offer participants the opportunity to receive physical examinations annually.
  - Physical examinations are a benefit, and not an eligibility criterion. The examining physician must provide, to the participant only, a written report of the results of the examination.

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<sup>44</sup> See the *Reporting Requirements* section below for additional information regarding required reports.

<sup>45</sup> **NOTE:** Per 20 CFR 641.565(A)(3), subgrantees must make any adjustments to minimum wage rates payable to participants as may be required by Federal, State, or local statute during the grant term.

<sup>46</sup> 20 CFR 641.565.

<sup>47</sup> 20 CFR 641.565.

- Participants may choose not to accept the physical examination. In that case, subgrantees must document this refusal, through a signed statement, within 60 workdays after commencement of the community service assignment. Each year thereafter, subgrantees must offer the physical examination and document the offer and any participant's refusal.
- SCSEP funds may be used to pay the costs of physical examinations.
- When participants are not covered by the State workers' compensation law, the subgrantee must provide participants with workers' compensation benefits equal to those provided by law for covered employment.
- Subgrantees must provide unemployment compensation coverage for participants.
- Provide compensation for scheduled work hours during which a host site's business is closed for a federal holiday, which may be paid or in the form of rescheduled work time.
- Provide necessary sick leave that is not part of an accumulated sick leave program, which may be paid or in the form of rescheduled work time.

## Prohibited Activities and Fund<sup>48</sup> Use Limitations

### Faith-Based Host Sites<sup>49</sup>

SCSEP participants can be placed with any 501(c)(3) entity, including faith-based entities, except political parties. Faith-based organizations that participate in SCSEP may continue to carry out their missions and maintain their religious character. However, there are certain restrictions that apply to SCSEP participants conducting training with faith-based host sites that include, but are not, limited to, the following:

- Faith-based organizations hosting participants are prohibited from employing the participants to support or engage in any inherently religious activities, such as religious worship, instruction, or proselytizing.
  - Organizations that engage in inherently religious activities, such as religious worship, instruction, or proselytizing, must ensure that the religious activities are offered separately in time or location from Federally assisted activities, and that the participation of participants in such activities must be voluntary and not required.

In accordance with the SCSEP statute and regulations,<sup>50</sup> SCSEP participants also may not be employed to carry out the construction, operation, or maintenance of any facility used or to be used for religious instruction or religious worship.

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<sup>48</sup> See 20 CFR 641.800 for guidance on SCSEP uniform administrative requirements and 20 CFR 641.847 through 641.879 for guidance on uniform costs, allowable/ unallowable cost requirements, cost classifications/functions/activities/limitations, and financial and performance reporting requirements for SCSEP.

<sup>49</sup> TEGL 29-07 *Senior Community Service Employment Program (SCSEP) Participant Placement and Work with Faith-Based and Community Organizations*.

<sup>50</sup> 29 CFR Part 2, Subpart D.

Subgrantees are expected to be familiar with and adhere to the faith-based guidance provided in TEGL 29-07<sup>51</sup> when recruiting new host sites. Subgrantees must include the restrictions in the host site handbook. Subgrantees must also notify all participants of these restrictions. This is done through the inclusion of such restrictions in the participant handbook. Additionally, subgrantees must specifically discuss related restrictions with all participants that are placed with faith-based host agencies.

### **Political Activities<sup>52</sup>**

A subgrantee must not:

- Select, reject, promote, or terminate an individual based on political services provided by the individual or on the individual's political affiliations or beliefs.
- Certain subgrantees of SCSEP funds<sup>53</sup> are required to comply with WIOA nondiscrimination regulations.<sup>54</sup> These regulations prohibit discrimination on the basis of political affiliation or belief.
- Provide, or refuse to provide, funds to any subgrantee, host site, or other entity based on political affiliation.

SCSEP subgrantee must ensure that:

- No SCSEP participants or staff persons engage in partisan or nonpartisan political activities during hours for which they are being paid with SCSEP funds.
- No participants or staff persons engage in partisan political activities in which such participants or staff persons represent themselves as spokespersons for the SCSEP.
- No participants are employed or out stationed in the offices of a Member of Congress, a State or local legislator, or on the staff of any legislative committee.
- No participants are employed or out stationed in the immediate offices of any elected chief executive officer of a State or unit of general government.<sup>55</sup>
- No participants are assigned to perform political activities in the offices of other elected officials.<sup>56</sup>

### **Unions**

Subgrantee must ensure that SCSEP funds are not used in any way to assist, promote, or deter union organizing.<sup>57</sup>

### **Conflicts of Interest**

No SCSEP subgrantee may hire and no host site may serve as a worksite for a person who works in a SCSEP community service assignment if a member of that person's immediate

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<sup>51</sup> TEGL 29-07 *Senior Community Service Employment Program (SCSEP) Participant Placement and Work with Faith-Based and Community Organizations*.

<sup>52</sup> 20 CFR 641.833.

<sup>53</sup> 20 CFR § 641.827.

<sup>54</sup> 29 CFR part 38.

<sup>55</sup> See 20 CFR 641.836(d)(4)(i and ii) for exceptions.

<sup>56</sup> See 20 CFR 641.836(d)(5)(i and ii) for guidance when such placements are permissible.

<sup>57</sup> 20 CFR 641.839.

family<sup>58</sup> is engaged in a decision-making capacity (whether compensated or not) for that project, subproject, recipient, subgrantee, or host site.<sup>59</sup>

### Employee Displacement

A community service assignment for a participant must not:<sup>60</sup>

- Reduce the number of employment opportunities or vacancies that would otherwise be available to individuals not participating in the program;
- Displace currently employed workers (including partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits);
- Impair existing contracts or result in the substitution of Federal funds for other funds in connection with work that would otherwise be performed; and
- Employ or continue to employ any eligible individual to perform the same work or substantially the same work as that performed by any other individual who is on layoff.

### Performance Measures<sup>61</sup>

There are seven core performance measures. Core measures are subject to goal-setting and corrective action; that is, performance level goals for each core measure must be agreed upon between the United States Department of Labor (DOL) and each grantee, and if a grantee fails to meet the performance level goals for the core measures, that grantee is subject to corrective action.<sup>62</sup>

Section 513(b)(1) of the OAA establishes the following core measures of performance:<sup>63</sup>

- Hours (in the aggregate) of community service employment;
- The percentage of project participants who are in unsubsidized employment during the second quarter after exit from the project;
- The percentage of project participants who are in unsubsidized employment during the fourth quarter after exit from the project;
- The median earnings of project participants who are in unsubsidized employment during the second quarter after exit from the project;
- Indicators of effectiveness in serving employers, host agencies, and project participants;
- The number of eligible individuals served; and
- The number of most-in-need individuals served (the number of participating individuals).<sup>64</sup>

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<sup>58</sup> For purposes of nepotism, “immediate family” means wife, husband, son, daughter, mother, father, brother, sister, son-in-law, daughter-in-law, mother-in-law, father-in-law, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, or grandchild.

<sup>59</sup> 20 CFR 641.841.

<sup>60</sup> 20 CFR 641.844.

<sup>61</sup> See TEGL 14-18 and Attachment 9 for additional information.

<sup>62</sup> 20 CFR 641.700(a).

<sup>63</sup> See 20 CFR 641.710 for definitions of the seven core measures.

<sup>64</sup> As described in OAA sec. 518(a)(3)(B)(ii) or (b)(2).

**NOTE:** In addition to the core performance measures, the DWD and DOL negotiate a Service Level goal.

The core measures of performance and service goal are applicable to each subgrantee. All DWD subgrantees are required to meet Indiana's negotiated performance levels and are responsible for the collection and reporting of program data.<sup>65</sup>

**NOTE:** Subgrantees are also responsible for meeting all DWD-defined qualitative and quantitative metrics as identified in the subgrantee's contractual statement of work. DWD-defined metrics may be related to and include, but are not limited to, any of the following:

- New enrollments;
- New host agencies; and
- Outreach activities.

Subgrantees are also responsible for completing and submitting all performance and metrics related reports as identified in the subgrantee's contractual statement of work.

### Participant Protected Information

All workforce staff must access, maintain, and store participant information in a manner that ensures confidentiality in accordance with all federal and state guidance related to confidentiality and the handling of protected information.<sup>66</sup>

### Social Security Numbers

Unless the disclosure of a social security number (SSN) is required by Federal statute, it is unlawful for any Federal, state or local government site to deny any individual any right, benefit, or privilege provided by law because of such an individual's refusal to disclose his social security account number.<sup>67</sup>

Although program staff must request an SSN to support performance accountability, they must not deny access to services to any participant who refuses to provide a social security number.

**NOTE:** Claimants filing for unemployment insurance must provide an SSN.

### Work Authorization

An individual's eligibility to work in the United States must be validated for SCSEP participants. The participant's documentation must be maintained in DWD's case management system.<sup>68</sup>

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<sup>65</sup> 20 CFR 641.700(c).

<sup>66</sup> See DWD's *Safeguarding Protected Information and DWD User Accounts Management* for additional guidance.

<sup>67</sup> Section 7 of the Privacy Act (5 U.S.C. Section 552a).

<sup>68</sup> See **Attachment B** for additional guidance.

## Recording Participant Activities and Documentation Collection

### Recording Activities

The DOL manages the SCSEP Grantee Performance Management System (GPMS) which all grantees are required to use for the SCSEP program. Additionally, grantees are required to maintain a Client Relationship Manager (CRM).

**NOTE:** All subgrantees must provide DWD access to their CRM systems for monitoring processes.

### Delay in Program Funding Subgrantee Guidance

SCSEP funds are allocated by a formula provided in Section 506 of the Older Americans Act of 1965 (OAA), as amended,<sup>69</sup> and operate on a program year (PY) basis (from July 1<sup>st</sup> through the following June 30<sup>th</sup>).<sup>70</sup> As such, there may be a delay in available participant funding between the end of one PY and beginning of the next PY.

### Participants

Participants must be made aware of the potential loss of income in the event there is a delay in participant funding. This notification must be included in the subgrantee participant handbook and specifically discussed during intake. The discussion must be documented by the subgrantee when entering a case note in the participants' service record.

### Host Sites

Host sites must be made aware of the potential loss of participant staff in the event there is a delay in participant funding. This notification allows the site to plan for any such disruption to their daily business or service delivery.

This notification must be included in the subgrantee's host site handbook. Additionally, subgrantees are expected to maintain contact with the site to provide status updates and assist with developing and implementing any needed participant reengagement plans once funding resumes.

Subgrantees are to see **Attachment D** for additional delay in participant funding guidance.

## Subgrantee Requirements

### Staffing

Subgrantees must maintain sufficient program staffing levels to adequately serve individuals within their service area(s) and meet program metrics and federal program performance levels.

Subgrantees must submit a list of all DWD SCEP staff, along with their roles and responsibilities, that charge to the SCSEP grant program. The subgrantee is responsible for managing their staff but must report any changes in staffing levels and/or staff roles and responsibilities to Indiana DWD SCSEP program staff.

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<sup>69</sup> 42 USC 3056d.

<sup>70</sup> TEGL 16-24 and TEGL 16-24, Change 1.

## **Uniform Administrative Requirements<sup>71</sup>**

SCSEP subgrantees must follow the uniform administrative requirements and allowable cost requirements that apply to their type of organization.<sup>72</sup>

### *Incident Reporting Requirement*

The Inspector General Act of 1978,<sup>73</sup> as amended, authorizes the Office of Inspector General (OIG) to conduct audits and investigations related to the programs and operations of the Department of Labor (DOL), including audits and investigations related to alleged fraud, waste, abuse, misconduct, or other wrongdoing concerning such programs and operations.

All incidents of suspected fraud, waste and abuse must be reported to the OIG by completing the relevant fields of the [OIG Complaint Form](#).<sup>74</sup>

### *Record Retention*

All SCSEP records be retained for 3 years after submission of final financial and programmatic reports or until all litigation, claims, and/or findings have been resolved.<sup>75</sup>

## **Reporting Requirements**

DWD will require subgrantees to compile and submit reports. The subgrantee's contractual statement of work will describe specific reporting requirements and submission timeframes.

## **Engagement Expectations**

### *DWD*

Clear and consistent communication and collaboration between the DWD and subgrantee(s) is paramount to success of the program. Subgrantee(s) are to:

- Attend and engage in all DWD scheduled meetings:
- Provide timely notification of any of the following
  - Changes to staffing levels; and
  - Issues with meeting performance and/or DWD-defined metrics.
- Engage and collaborate with the DWD SCSEP Department of Labor (US DOL) to collect any information or documentation requested by the US Department of Labor within timeframes prescribed by US DOL and the DWD SCSEP Department.

### *Local Boards*

Communication and collaboration between the subgrantee(s) and the local Workforce Development Boards (WDBs) is critical to program participant success.

DWD encourages all subgrantees to work closely with their local WDBs to establish and maintain working relationships with the WorkOne/AJC and their staff for program referrals,

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<sup>71</sup> OAA 503(f)(2) and See 20 CFR 641.800.

<sup>72</sup> See 20 CFR 641.800 for additional information.

<sup>73</sup> <https://uscode.house.gov/view.xhtml?req=granuleid%3AUSC-1999-title5a-node20&edition=1999>.

<sup>74</sup> TEGL 15-23.

<sup>75</sup> 2 CFR 200.344.

job leads, potential placement(s), job readiness workshops, obtaining labor market information including the workforce needs of local businesses, and the sharing of resources.

Subgrantees should maintain communication with local boards and attend scheduled meetings as partner representatives.

#### *Host Sites and Business Needs*

Developing new and the continued engagement of host sites is key to the program's success and meeting all performance expectations. DWD SCSEP grantees should collaborate with local community-based/non-profit organizations, educational institutions, and governmental entities as potential places for community assignment and post-training employment.

### **DWD Program Review**

DWD uses data collected by DOL to monitor services and performance outcomes in Indiana.

DWD will conduct monthly programmatic and fiscal reviews and quarterly collaborative meetings with subgrantee(s) to discuss programmatic-related progress.

DWD or subgrantee(s) may request additional meetings to discuss program performance as needed.<sup>76</sup> Additional meetings will be scheduled and held in a timely manner to ensure potential program performance issues are addressed quickly.

### **ACTION**

All subgrantees must adhere to all federal and state policies and guidelines as established by DOL and DWD. All program policies and technical assistance are subject to routine DWD monitoring and review.

### **ATTACHMENTS**

**Attachment A** – References

**Attachment B** – Program Eligibility and Priority Participant Characteristic Documentation

**Attachment C** - Includable and Excludable Income for Purposes of SCSEP Applicant Eligibility

**Attachment D** – Delay in Participant Funding Subgrantee Guidance

### **EFFECTIVE DATE**

Immediately.

### **ENDING DATE**

Upon rescission.

### **ADDITIONAL INFORMATION**

Questions regarding the content of this publication should be directed to [policy@dwd.in.gov](mailto:policy@dwd.in.gov).

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<sup>76</sup> Subgrantees are to refer to the *Performance Measures* section of this policy.

## ATTACHMENT A REFERENCES

- Title V of the Older Americans Act (OAA)<sup>77</sup>
- Age Discrimination in Employment Act of 1975
- Section 7 of the Privacy Act (5 U.S.C. Section 552a)
- WIOA Sec. 134
- 2 CFR 200.344
- 20 CFR Part 641
- 20 CFR 678.500 through 678.510
- 29 CFR part 2 subpart D
- 29 CFR part 38
- 29 CFR parts 31, 32, and 38.
- 38 U.S.C. 4215
- Inspector General Act of 1978
- Office of Inspector General (OIG) Hotline<sup>78</sup>
- United States Department of Labor Employment and Training Administration's (DOL/ETA) *Senior Community Service Employment Program (SCSEP) Supplement to the Core Monitoring Guide*
- *WorkforceGPS, Equitable Distribution & the Senior Community Service Employment Program*<sup>79</sup>
- *TEGL 15-23: Employment and Training Administration Recipient Responsibilities for Reporting Instances of Suspected Fraud, Program Abuse, and Criminal Conduct*
- *TEGL 29-07: Senior Community Service Employment Program (SCSEP) Participant Placement and Work with Faith-Based and Community Organizations*
- *TEGL 23-19, Change 3: Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs*
- *TEGL 14-18: Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL)*
- *TEGL 12-06: Revised Income Inclusions and Exclusions and Procedures for Determining Senior Community Service Employment Program (SCSEP) Eligibility*
- *TEGL 05-08 Policy for Collection and Use of Workforce System Participants' Social Security Numbers*
- *TEGL 16-24 and TEGL 16-24, Change 1: Program Year 2025 Planning Instructions and Allotments for the Senior Community Service Employment Program State and Territorial Grantees*
- *DWD Technical Assistance 2023-02, Change 1: SCSEP Grievance Procedure*
- *DWD Technical Assistance 2021-07: Complaint Procedures for WIOA Nondiscrimination and Equal Opportunity Provisions*

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<sup>77</sup> 42 U.S.C. 3056 et seq., as amended.

<sup>78</sup> <https://www.oig.dol.gov/hotline.htm>.

<sup>79</sup> <https://www.workforcegps.org/events/2023/10/05/19/49/Equitable-Distribution-and-the-Senior-Community-Service-Employment-Program>.

- DWD Policy 2021-10, Change 3: *Safeguarding Protected Information and DWD User Accounts Management*
- DWD Policy 2023-05: *Maintaining Data Integrity in Workforce Programs*
- DWD Policy 2024-06: *Jobs for Veterans State Grants Staff Roles and Responsibilities and Coordination with Workforce Innovation and Opportunity Act Services to Veterans*
- DWD Policy 2021-03: *Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Worker Program Eligibility*
- DWD TA 2025-09: *SCSEP Prevailing Wage*
- DWD TA 2025-10: *SCSEP Equitable Distribution*

## ATTACHMENT B

### PROGRAM ELIGIBILITY AND PRIORITY PARTICIPANT CHARACTERISTIC DOCUMENTATION

Eligibility Requirement	Documentation
<b>At least 55 years old<sup>80</sup></b>	<ul style="list-style-type: none"> <li>• Driver's License; or</li> <li>• Baptismal Record; or</li> <li>• Birth Certificate; or</li> <li>• DD-214; or</li> <li>• Report of Transfer or Discharge Paper; or</li> <li>• Federal, State, Local or Tribal Identification Card; or</li> <li>• Passport; or</li> <li>• Hospital Record of Birth; or</li> <li>• Public Assistance/Social Service Records; or</li> <li>• School Records or ID Cards; or</li> <li>• Work Permit; or</li> <li>• Family Bible; or</li> <li>• Cross-Match with State Agency Records; or</li> <li>• Justice System Records; or</li> <li>• Selective Service Registration; or</li> <li>• Signed letter from a parent or guardian; or</li> <li>• Medical Records; or</li> <li>• Self-attestation.</li> </ul>
<b>Unemployed.<sup>81</sup></b>	<ul style="list-style-type: none"> <li>• Unemployment insurance printout; or</li> <li>• A layoff letter or resignation confirmation; or</li> <li>• Military discharge papers; or</li> <li>• Self-Attestation.</li> </ul>
<b>A member of a family with an income that is not more than 125 percent of the family income levels prepared by the Department of Health and Human Services and approved by OMB (Federal poverty guidelines).<sup>82</sup></b>	<ul style="list-style-type: none"> <li>• Award Letter from Veteran's Administration; or</li> <li>• Bank Statements; or</li> <li>• Pay Stubs; or</li> <li>• Compensation Award Letter; or</li> <li>• Court Award Letter; or</li> <li>• Pension Statement; or</li> <li>• Employer Statement/Contact; or</li> <li>• Family or Business Financial Records; or</li> <li>• Housing Authority Verification; or</li> <li>• Quarterly Estimated Tax for Self-Employed Persons; or</li> <li>• Social Security Benefits; or</li> <li>• UI Claim Documents; or</li> <li>• Copy of Authorization to Receive Cash Public Assistance; or</li> <li>• Copy of Public Assistance Check; or</li> <li>• Public Assistance Eligibility Verification; or</li> <li>• Cross-Match with Refugee Assistance Records; or</li> <li>• Cross-Match with Public Assistance Records; or</li> <li>• Cross-Match with UI Wage Records.</li> </ul>

<sup>80</sup> TEGL 23-19, Change 3.

<sup>81</sup> DWD defined.

<sup>82</sup> TEGL 23-19, Change 3.

Priority Participant Characteristic	Documentation
<b>Are 65 years of age (or older)</b>	<ul style="list-style-type: none"> <li>• See the "At least 55 years old" of the <b>Eligibility Requirement</b> table above.</li> </ul>
<b>Disability</b>	<ul style="list-style-type: none"> <li>• Letter from physician; or</li> <li>• Social Security Benefit statement; or</li> <li>• Assessment Test Results (if available); or</li> <li>• Self-attestation.</li> </ul>
<b>limited English proficiency or low literacy skills<sup>83</sup></b>	<ul style="list-style-type: none"> <li>• Assessment Test Results; or</li> <li>• Applicable Records from Education Institution (transcripts, academic assessments, or other school documentation); or</li> <li>• Case notes.</li> </ul>
<b>Reside in a rural area</b>	<ul style="list-style-type: none"> <li>• Proof of address/residence: <ul style="list-style-type: none"> <li>• Valid Indiana ID or driver's license; or</li> <li>• Computer-generated bill from a utility company, credit card company, doctor, or hospital, issued within 60 days of the date you visit a BMV branch, and containing your name and address of residence; or</li> <li>• Bank statement; or</li> <li>• Pre-printed pay stub with the participant's address; or</li> <li>• Medicaid or Medicare benefit statement.</li> </ul> </li> </ul> <p><b>NOTE:</b> Subgrantee staff are to use the residency information and <a href="#">the Indiana Judicial Branch's Map of Rural Indiana Counties website</a> to determine if the participant lives in a "rural area."</p>
<b>Veterans (or, in some cases, spouses of veterans)<sup>84</sup></b>	<ul style="list-style-type: none"> <li>• DD-214; or</li> <li>• A Letter from the Veterans' Administration; or</li> <li>• NGB- 22 documenting Title 10 federal active-duty service; or</li> <li>• Self-Attestation.</li> </ul>

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<sup>83</sup> TEGL 23-19, Change 3.

<sup>84</sup> TEGL 23-19, Change 3.

Priority Participant Characteristic	Documentation
<p><b>Low employment prospects (Persons with poor employment prospects have a significant barrier to employment.)<sup>85</sup></b></p>	<p>Significant barriers to employment include but are not limited to:<sup>86</sup></p> <ul style="list-style-type: none"> <li>• Lacking a substantial employment history; or</li> <li>• Basic skills, and/or English-language proficiency; <ul style="list-style-type: none"> <li>◦ See limited English proficiency or low literacy skills above; or</li> </ul> </li> <li>• Lacking a high school diploma or the equivalent;</li> <li>• Applicable records from education institution (GED certificate, diploma); or</li> <li>• Attendance record, transcripts, drop out letter, school documentation; or</li> <li>• Intake Application or Enrollment Form; or</li> <li>• Electronic Records; or</li> <li>• Case notes; or</li> <li>• Self- Attestation; or</li> <li>• Having a disability;</li> <li>• See Disability above.; or</li> <li>• Being homeless: <ul style="list-style-type: none"> <li>◦ See Are homeless or are at risk for homelessness below: or</li> </ul> </li> <li>• Residing in socially and economically isolated rural or urban areas where employment opportunities are limited: <ul style="list-style-type: none"> <li>◦ See Reside in a rural area above.</li> </ul> </li> </ul>
<p><b>Have failed to find employment after using services provided through the one-stop delivery system</b></p>	<ul style="list-style-type: none"> <li>• Referral from WIOA or similar partner or community program.</li> </ul>
<p><b>Are homeless or are at risk for homelessness<sup>87</sup></b></p>	<ul style="list-style-type: none"> <li>• Intake Application or Enrollment Form; or</li> <li>• Written Statement or Referral Transmittal from a Shelter or Social Service Agency;</li> <li>• Landlord or family member; or</li> <li>• Needs Assessment; or</li> <li>• Case notes; or</li> <li>• Individual Service Strategy; or</li> <li>• A letter from a case worker or support provider; or</li> <li>• Self-Attestation.</li> </ul>
<p><b>Formerly incarcerated individuals<sup>88</sup></b></p>	<ul style="list-style-type: none"> <li>• Direct Referral from Justice System; or</li> <li>• Verification from Justice System:</li> <li>• Release Records; or</li> <li>• Parole or Probation Officer; or</li> <li>• Case notes; or</li> <li>• Self-Attestation.</li> </ul>

<sup>85</sup> 20 CFR 641.140.

<sup>86</sup> TEGL 23-19, Change 3 as applicable.

<sup>87</sup> TEGL 23-19, Change 3.

<sup>88</sup> TEGL 23-19, Change 3.

<b>Priority Participant Characteristic</b>	<b>Documentation</b>
<b>Authorized to Work in the United States</b>	<p>The USCIS Form I-9 provides a list of acceptable documents that can be used to verify an individual's authorization to work in the United States.</p> <p><b>NOTE:</b> The form does not need to be completed.</p> <p>A copy of the valid documentation must be saved to the participant's electronic file.</p>

## **ATTACHMENT C**

### **INCLUDABLE AND EXCLUDABLE INCOME FOR PURPOSES OF SCSEP APPLICANT ELIGIBILITY<sup>89</sup>**

Annual family income for current family members refers to the sum of the amounts received from the income inclusions.<sup>90</sup>

#### **Includable Income**

- Earnings
- Benefits received under title II of the Social Security Act (of which seventy-five percent will be counted as includable income)
- Survivor benefits
- Pension or retirement income
- Interest income
- Dividends
- Rents, royalties, and estates and trusts
- Educational assistance
- Alimony
- Financial assistance from outside of the household
- Other income

#### **Excludable Income**

- Social Security Disability Insurance
- Unemployment Compensation
- Twenty-five percent of a benefit received under title II of the Social Security Act
- Payment made to or on behalf of veterans or former members of the Armed Forces under laws administered by the Secretary of Veterans Affairs
- Supplemental Security Income
- Public assistance
- Income from other employment and training programs
- Disability benefits
- All forms of child support
- Workers' compensation
- The first \$2,000 of certain per capita fund distributions that are made to Indians pursuant to the Indian Claims Act, P.L. 93-134 and P.L. 97-458.
- Any other income exception required by applicable Federal law-- e.g., stipends from programs funded by the Senior Corps of the Corporation
- for National and Community Service
- Capital gains people received (or losses they incur) from the sale of property, including stocks, bonds, a house, or a car (unless the person engaged in the business of selling

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<sup>89</sup> See TEGL 12-06, Attachment I *Income Definitions and Explanations* for income definitions.

<sup>90</sup> See TEGL 12-06, Attachment II *Procedures for Computing Annual Family Income to Determine Income Eligibility for SCSEP* for additional guidance.

such property, in which case the CPS counts the net proceeds as income from self-employment)

- Withdrawals of bank deposits
- Money borrowed
- Tax refunds
- Gifts
- Lump-sum inheritances, insurance payments, gambling and lottery earnings

## ATTACHMENT D

### DELAY IN PROGRAM FUNDING SUBGRANTEE GUIDANCE

In the event of a delay in funding, all DWD SCSEP subsidized paid training and or work experiences participants will be put on a Leave of Absence (LOA) status starting July<sup>91</sup> until funding becomes available. The DWD SCSEP sub-grantee are expected to conduct activities that align with the following program priorities and participant notification process as outlined below until such a time funding become available.

#### Priority Program Activities

Program funded staff are to engage in the following activities:

#### Participant Activities

- Notify all active participants of the delay in funding;
  - **NOTE:** This should NOT be the first time participants are made aware that this may occur.
  - Ideally, participants should be notified 60 days prior to the start of the new PY. However, if the delay is not known within this timeframe, the subgrantee will notify all active participants within 10 working days of receiving notification from the DWD SCSEP Department of the funding delay.
- Document the LOA in the participant's electronic record within USDOL's federal reporting system (GPMS) within five days of customer notification;
- Immediately notify the DWD SCSEP Department of the number of participants that have been placed on LOA;
- Conduct engagement activities with all LOA participants that include, but are limited to the following:
  - Provision of information on One-stop (WorkOne/AJC) and community partner programs as appropriate. This may include, but not limited to, programs such as:
    - The Workforce Innovation and Opportunity Act (WIOA) Title I Adult Program;<sup>92</sup>
    - The Jobs for Veterans State Grants (JVSG) program, as appropriate;<sup>93</sup> and
    - Vocational Rehabilitation.
  - Upon participant approval, actively encourage and assist with co-enrollment with appropriate programs.
- Work with participants to obtain unsubsidized employment;
- Provide follow-up services;
  - Follow-up services and related referrals must be documented in the participant's electronic record within GPMS.

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<sup>91</sup> Start of the new PY.

<sup>92</sup> See DWD's *Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Worker Program Eligibility* policy for eligibility information.

<sup>93</sup> See DWD's *Jobs for Veterans State Grants Staff Roles and Responsibilities and Coordination with Workforce Innovation and Opportunity Act Services to Veterans* for eligibility information.

- Job Club activities;
- Work-ready workshops; and
- Develop a participant waitlist;
  - **NOTE:** Waitlisted program eligible participants, meaning new participants that are not a LOA, must be served in alignment with the order of priority as identified in the *Priority Participation Selection* subsection above.

### Host Site Activities

- Notify all host sites of the delay immediately upon notification of a delay;
  - **NOTE:** This should NOT be the first time host sites are made aware that this may occur.
  - Ideally, host sites should be notified 60 days prior to the start of the new PY. However, if the delay is not known within this timeframe, the subgrantee will notify all active host sites within 10 working days of receiving notification from the DWD SCSEP Department of the funding delay.
- Keep host sites updated on funding status; and
- Continue to develop new host site training with 501(c)3 entities or organizations.

### Once Funding Resumes

- Notify participants and hosts sites of funding availability;
- Provide opportunity for host site refresher workshops on relevant program guidelines;
- Reengage host sites and assist with implementing any developed participant reengagement plans; and
- Remove the LOA in GPMS for participants that have resumed their training.