



June 17, 2011

The Honorable Harold Rogers
Chairman
House Appropriations Committee
United States House of Representatives
Washington, DC 20515

The Honorable Norm Dicks
Ranking Member
House Appropriations Committee
United States House of Representatives
Washington, DC 20515

The Honorable Denny Rehberg
Chairman
House Appropriations Subcommittee on
Labor, HHS, Education and Related Agencies
United States House of Representatives
Washington, DC 20515

The Honorable Rosa DeLauro
Ranking Member
House Appropriations Subcommittee on
Labor, HHS, Education and Related Agencies
United States House of Representatives
Washington, DC 20515

Dear Representatives Rogers, Dicks, Rehberg, and DeLauro:

President
Irene B. Collins
Alabama

I write today on behalf of the National Association of States United for Aging and Disabilities (NASUAD), our members, and the seniors, family caregivers, and persons with disabilities they serve. NASUAD represents the 56 officially designated state and territorial agencies on aging. Each of our members oversees the implementation of the Older Americans Act (OAA), and many of our members serve as the operating agency in their states for Medicaid home and community based services (HCBS) waivers that serve older adults, and individuals with disabilities.

Vice President
James Toews
Oregon

Treasurer
Charles D. Johnson
Illinois

We urge you to include in the FY12 Labor, Health and Human Services, Education and Related Agencies Appropriations bill President Obama's proposal to transfer the Senior Community Services Employment Program (SCSEP) from the Department of Labor (DoL) to the Administration on Aging (AoA), as included in his FY12 budget request to Congress. Authorized by Title V of the OAA, SCSEP is the nation's only federal workforce initiative designed to train and employ low-income, unemployed individuals aged 55 or over. In order for SCSEP to operate most effectively, the program should be administered by AoA, which was established by the OAA to be the nation's only federal agency responsible for addressing the concerns and promoting the interests of older adults and their caregivers.

Secretary
Carol Sala
Nevada

Immediate Past President
Patricia A. Polansky
New Jersey

For your consideration, NASUAD offers the following comments in support of the President's proposal to place the SCSEP program within AoA:

Past President
Kathy Leitch
Washington

THE TRANSFER WOULD REFLECT THE RECIPROCAL RELATIONSHIP BETWEEN SCSEP AND AOA. SCSEP program participants are placed with a host agency, such as state or city governments, or nonprofit organizations, where they gain valuable experience and on-the-job training to facilitate their transition to unsubsidized employment, one of the goals of the program. Notably, many OAA programs act as host sites for the SCSEP program, and participants are commonly placed at work sites such as Senior Centers; Senior Nutrition Sites, Area Agencies on Aging (AAAs), Aging and Disability Resource Centers (ADRCs), Independent Living Centers, and

state agencies on aging. Thus, placement within an OAA program is often the mechanism through which SCSEP participants gain the skills to transition into unsubsidized employment, and the wages these individuals earn as a result of their participation in SCSEP allows them to remain independent and in their communities, a priority for AoA that is reflected throughout its programs. Given the reciprocal relationship between SCSEP and the programs currently operated by AoA, transferring SCSEP to AoA would strengthen this dynamic, to the mutual benefit all OAA programs, and the individuals they serve.

THE TRANSFER WOULD REFLECT THE OPERATION OF SCSEP AT THE LOCAL AND STATE LEVELS.

Currently, 75 percent of the OAA-designated state agencies on aging administer the SCSEP program within their state, and most of these state grantees sub grant SCSEP funds to local organizations, including AAAs, for actual program implementation. In addition to recruiting host agencies and placing SCSEP participants at community service-oriented work sites, the state and local operating agencies also help the participants overcome various social and programmatic barriers to employment by offering a variety of supportive services, including referrals to other entities within the aging network, such as ADRCs, caregiver support services, health and medical services, and legal assistance. Therefore, at the state and local levels, the aging network is currently utilizing its existing infrastructure to successfully administer the SCSEP program, and formally placing the program within AoA would accurately reflect the integration of SCSEP throughout the aging network, at the local, state, and national levels.

THE TRANSFER WOULD INCREASE THE PROGRAMMATIC EFFICIENCY OF SCSEP. Currently, AoA administers all OAA-funded programs, except for SCSEP. Originally funded in 1965, DoL has maintained administrative responsibility for SCSEP since 1967, even though the program has been tied to OAA funding since 1973. By uniting all OAA programs within a single implementing agency, SCSEP would be directly connected to the aging network and its existing resources, increasing programmatic efficiency and reducing the administrative and financial burdens that are currently associated with housing the program at DoL, separate from all other OAA-funded programs.

THE TRANSFER WOULD ENHANCE THE MUTUALLY BENEFICIAL RELATIONSHIP BETWEEN SCSEP AND THE COMMUNITY. The host site to which the SCSEP participant is assigned benefits from the community service work and talents of the participant, while the participant receives valuable training in preparation for unsubsidized employment. In 2010, more than 125,000 SCSEP participants contributed over 74 million hours of community service to programs through non-profit or public agencies, such as schools, libraries, and the American Red Cross. This mutually beneficial relationship is a basic tenet of the program's success, and formally aligning SCSEP under AoA would not disincentivize host sites, including those that exist outside of the aging network, from continuing to participate in the SCSEP program. Rather, because such a transfer would reduce programmatic barriers, allowing the program's resources to be more effectively utilized, placing SCSEP within AoA could lead to increased numbers of community service opportunities and participants obtaining unsubsidized employment, strengthening the mutually beneficial relationship between SCSEP and the community.

THE TRANSFER WOULD STRENGTHEN THE COMMITMENT TO COMMUNITY SERVICE, INDEPENDENCE, AND ECONOMIC SECURITY SHARED BY SCSEP AND AOA. Through OAA initiatives that foster independence and choice, such as civic engagement and caregiver initiatives, AoA supports a variety of diverse, intergenerational programs that enhance

individual economic security, community service, and independence. As a job training and placement program for low-income seniors, the SCSEP program is also designed to accomplish these goals, in part by promoting useful opportunities in community service, and by preparing program participants for unsubsidized employment. Through a shared commitment to greater independence, economic security, and community service, the SCSEP program and AoA's currently administered OAA programs seek to improve the lives of the individuals they serve. Aligning all of the OAA initiatives, including SCSEP, under AoA, would strengthen these programs and the commitments they share.

THE TRANSFER WOULD IMPROVE THE COORDINATION BETWEEN SCSEP AND ALL OTHER OAA PROGRAMS. In 2006, Congress added language to the OAA calling for coordination between Title V, which authorizes the SCSEP program, and all other titles of the OAA. Specifically, Section 503(b)(2) of the OAA directs the Secretary of Labor to “coordinate the administration of [Title V] with the administration of other titles of [the Older Americans Act] by the Assistant Secretary [on Aging], to increase the likelihood that eligible individuals for whom employment opportunities under [Title V] are available...receive such services.” The addition of this statutory language clearly indicates Congress's recognition that in order for the SCSEP program to best serve older, low-income workers, and their communities, its administration must be closely coordinated with that of all OAA programs. Since AoA currently oversees all OAA programs except SCSEP, transferring the program to AoA would facilitate this statutorily-required coordination by placing the administrative responsibilities of all OAA programs within a single federal agency.

THE TRANSFER WOULD IMPROVE THE COORDINATION OF SCSEP WITH OTHER COMMUNITY SERVICE PROGRAMS. Through the 2006 reauthorization process, Congress added language to the OAA requiring better coordination between the SCSEP program and other national and community service programs, specifically those within the U.S. Department of Health and Human Services (HHS). This new Section 505(b) calls on the Secretary of Labor to work with the Secretary of HHS, as well as other federal agency heads that administer programs related to SCSEP, “in order to achieve optimal coordination” among the programs. Through these statutory changes, Congress is again acknowledging the lack of coordination between SCSEP and similar initiatives, in part due to SCSEP's siloed placement within DoL. At DoL, SCSEP is an anomaly, resulting in few opportunities for administrative collaboration with related programs. If transferred to AoA, an operating division of HHS, SCSEP would have greater access to related community service initiatives, as well as a more unified relationship with all OAA programs. This reorganization would lead to a more integrated SCSEP program that would fulfill its statutory obligations and better serve older individuals, their caregivers, and their communities.

As you make decisions with regard to the FY12 Labor, Health and Human Services, Education and Related Agencies Appropriations bill, NASUAD strongly encourages you to recognize the importance of SCSEP by transferring the program to the federal agency most appropriate for its administration, AoA. Aligning SCSEP with all other OAA initiatives would position the program to most effectively meet its goals of fostering individual economic self-sufficiency and promoting useful opportunities in community service activities, which would increase the prospects of unsubsidized employment for unemployed, low-income, older adults, and benefit the community as a whole. Thank you for your consideration.

Sincerely,



Martha Roherty
Executive Director

CC:

The Honorable Nita Lowey
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The Honorable Jerry Lewis
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The Honorable Jesse Jackson
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The Honorable Rodney Alexander
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