



January 19, 2011

Mr. Thomas Dowd, Administrator
Office of Policy Development and Research
U.S. Department of Labor
200 Constitution Avenue, N.W., Room N-5641

[Submitted Electronically]

Re: Notice of Proposed Rulemaking, Additional Indicator on Volunteer Work in the Senior Community Service Employment Program (RIN 1205-AB60)

Dear Mr. Dowd:

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am pleased to provide the following comments:

President
Irene B. Collins
Alabama

NASUAD represents the 56 officially designated state and territorial agencies on aging. Over two-thirds of NASUAD's members administer the Senior Community Service Employment Program (SCSEP). Since the inception of the SCSEP program, NASUAD has worked with states to build a quality program that supports senior employment and volunteerism and has worked both with the programs housed within state aging agencies and those housed within other state agencies.

Vice President
James Toews
Oregon

Treasurer
Charles D. Johnson
Illinois

NASUAD applauds the Department of Labor (DOL), Employment and Training Administration's (ETA) recognition of the dual goals of the SCSEP:

- finding participants unsubsidized employment; and
- promoting useful opportunities in community service.

Secretary
Carol Sala
Nevada

NASUAD members acknowledge the value of measuring participants' volunteer work as an activity of community service. Our membership recognizes that volunteer work is beneficial to a participant's community as well as to a participant's health and well-being and provides individuals with a meaningful means to remain involved with the community and continue to develop and maintain critical job-ready skills. Therefore, we believe that promoting volunteer work even when the participant is unable to secure an unsubsidized placement is a worthwhile cause.

Immediate Past President
Patricia A. Polansky
New Jersey

Past President
Kathy Leitch
Washington

Seeing the benefits of volunteer work for both the community and SCSEP participant and believing these benefits add to the overall value and success of the SCSEP program, NASUAD supports DOL's request for an additional indicator to measure the number of exiting participants who volunteer. While NASUAD is supportive of this additional

indicator, we would like to caution against imposing rigorous data collection requirements that will translate to a burden of paperwork and tracking for grantees and subgrantees.

In subpart G of the NPRM, DOL explained it, “intends for the new measure of ‘entered volunteer work’ to parallel the traditional ‘entered employment’ measure.” NASUAD is concerned that in an attempt to “parallel” the entered employment measure, resulting data collection requirements will be unnecessarily burdensome when implemented. A simple, efficient, and minimal data collection strategy for this additional indicator should be sufficient.

Thank you for the opportunity to comment on the *Additional Indicator for Volunteer Work in the SCSEP*. Should you have any questions, please contact Kelsey Walter or Deb Merrill at 202-898-2578.

Sincerely,

A handwritten signature in blue ink that reads "Martha A. Roherty". The signature is written in a cursive style.

Martha A. Roherty
Executive Director