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May 8, 2018

**Re: OMB control number 1205-0040. Agency Information Collection Activities; Comment Request; Senior Community Service Employment Program (SCSEP)**

Rosemary Lahasky, Deputy Assistant Secretary  
for Employment and Training Administration  
Office of Workforce Investment  
Employment and Training Administration  
U.S. Department of Labor  
200 Constitution Avenue NW.  
Washington, DC 20210

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SUBMITTED ELECTRONICALLY VIA [SCSEPTransition@dol.gov](mailto:SCSEPTransition@dol.gov)

Dear Assistant Secretary Lahasky:

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am writing to you regarding the Department of Labor's (DOL) information collection request (ICR) released March 21, 2018. NASUAD is a nonpartisan association of state government agencies and represents the nation's 56 state and territorial agencies on aging and disabilities. We work to support visionary state leadership, the advancement of state systems innovation, and the development of national policies that support home and community-based services (HCBS) for older adults and persons with disabilities. Our members administer a wide range of services and supports programs for older adults and people with disabilities, including the Senior Community Service Employment Program (SCSEP) in many states. Together with our members, we work to design, improve, and sustain state systems delivering HCBS for people who are older or have a disability and for their caregivers.

**Background:**

On March 21, 2018, the U.S. Department of Labor (DOL) published an information collection request (ICR) in the Federal Register regarding the Senior Community Service Employment Program, commonly referred to as

SCSEP.<sup>1</sup> SCSEP is the only Federal job and training program aimed specially at older, unemployed low-income American workers. As noted in the ICR, the purpose of the comment request focuses on the following three areas:

1. To fulfill the Older Americans Act (OAA) Reauthorization Act of 2016, with particular regard for the new performance measures included in the reauthorization;
2. To move the SCSEP reporting system into the Employment and Training Administration's (ETA) reporting system—specifically, the Workforce Integrated Performance System (WIPS) and the ETA Case Management System (ETA-CMS);
3. To update data elements and code fields.

On December 1, 2017, DOL released an Interim Final Rule (IFR) to fulfill the intent of the 2016 OAA reauthorization of greater alignment between the WIOA and SCSEP programs, including revised performance measures. NASUAD provided a robust set of comments to the IFR regarding the new performance measures and the concerns of state SCSEP grantees.<sup>2</sup>

The bulk of NASUAD's comments for this ICR will focus on the second purpose of the ICR, which is the move of the SCSEP legacy reporting system—SPARQ—to ETA's reporting and case management system. Based off our conversations with state grantees, NASUAD submits the following comments for DOL's review:

### **Timeline**

As you know, the ICR proposes to implement the transition from the legacy SPARQ system to ETA's WIPS and case management system by July 1, 2018. In DOL's supporting statement, the agency notes that it projects completing the transition by September 30, 2018. The comment period for the current ICR does not close until May 21, 2018. This ambitious timeline poses potential challenges for grantees on a number of different fronts, notably:

- Given that the comment period for the ICR does not close until May 21, 2018, this gives DOL less than a month and a half to review and account for comments and concerns from SCSEP stakeholders.
- The truncated timeline offers little room for training, technical assistance, or piloting of the new systems for SCSEP grantees. The September 30, 2018, deadline for transition would result in a rushed rollout and inadequate time for technical assistance and other important stakeholder engagement efforts.

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<sup>1</sup> <https://www.federalregister.gov/documents/2018/03/21/2018-05743/agency-information-collection-activities-comment-request-senior-community-service-employment-program>

<sup>2</sup> [http://nasuad.org/sites/nasuad/files/SCSEP\\_IFR\\_Letter\\_FINAL.pdf](http://nasuad.org/sites/nasuad/files/SCSEP_IFR_Letter_FINAL.pdf)

- State grantees will have inadequate time to implement changes/new systems and training sub-recipients, which may cause additional issues down the road. A rushed process benefits neither DOL or SCSEP grantees.

*Recommendation:* DOL should implement the new WIPS and ETA-CMS systems no earlier than July 1, 2019. While NASUAD appreciates DOL's sentiment that SPARQ will continue to be utilized for program year 2018 (PY2018), the current timeline is unworkable and may result in deleterious program outcomes if pushed too quickly.

### **Goal and Benchmark Setting**

We recognize that the IFR is implementing statutory changes; however, we remain concerned that the new measures will drastically undercut the effectiveness of the SCSEP program particularly for state grantees. During a national webinar on April 6, 2018, DOL staff provided information on a simulation of the new reporting measures using prior year data and concluded that the performance measures would result in substantially lower outcomes than the prior measures in place. Staff also noted that the outcome of these measures was extremely sensitive to the sample size, which could result in drastic variations from year-to-year for smaller grantees. Given that state agencies often administer SCSEP in rural and frontier areas, which not only reduce the sample size but are also more acutely impacted by unemployment and economic factors.

*Recommendation:* We strongly encourage DOL to move forward with a model that recognizes these variations and accounts for data volatility and external factors.

### **Training and Technical Assistance**

NASUAD appreciates DOL's commitment to working with SCSEP grantees on a successful rollout of the new information collection systems. That said, we have concerns that the truncated timeline, coupled with the largest overhaul of the SCSEP reporting system since the implementation of the SPARQ system, will require significantly more stakeholder engagement, detailed training, and in-person technical assistance than has been accomplished – or proposed – to date. While webinars are an effective tool for reaching stakeholders, disseminating information, and taking feedback, they are not a realistic substitute for in-person, in-depth training. It is essential that the SCSEP grantees are trained as subject matter experts in the new reporting systems to ensure that they can effectively train their sub-recipients and sub-contractors. This is an area of concern that may be felt more acutely by state SCSEP grantees, as they are typically smaller and have less staff than the national grantees.

*Recommendation:* DOL should consider hosting a national conference or a series of regional trainings along with a train-the-trainer tool guide to execute a successful implementation of the WIPS and ETA-CMS reporting systems. Overhauling the SCSEP reporting system simultaneously with the rollout of new performance measures places

substantial pressure of SCSEP grantees whose resources are already stretched to capacity, and a robust technical assistance process is critical for successful implementation.

### **Applicability of WIPS and ETA-CMS Systems to SCSEP**

NASUAD acknowledges that many of the proposed changes that are affecting the SCSEP program are required under the 2016 Reauthorization of the OAA, and therefore cannot be changed aside from a legislative proposal. That said, we want to reiterate that fact that SCSEP is the only Federal jobs program that specifically assists older adults to attain employment. As such, there are a number of factors that should be taken into account when attempting to translate SCSEP measures to the broader WIOA system. For example, as we noted in our prior comments, the case management that would be required under the proposed changes to the SCSEP reporting measures and would likely be required under this new system is extensive and inappropriate for the service delivery model. We believe that there should be other alternatives considered for the case management data system.

*Recommendation:* We ask that DOL remain cognizant of the unique nature of the SCSEP program, and be mindful and deliberative in its processes moving forward to fully ensure that the new systems it is implementing work with the specific nature of the SCSEP program and the population it serves. We further recommend that DOL delay the transition of the case management system and establish a working group that includes states, national SCSEP grantees, and local providers to develop recommendations for how to establish an appropriate case management system.

Finally, we ask that DOL remain especially aware of states that submit standalone state plans, as these states are less likely to be fully integrated with their state WIOA programs, and therefore less likely to have data sharing agreements with WIOA partners.

NASUAD appreciates the opportunity to comment on this important topic. We look forward to working with DOL in the coming months on the implementation of the IFR. If you have any questions regarding this letter, please feel free to contact Adam Mosey of my staff at [amosey@nasuad.org](mailto:amosey@nasuad.org) or (202) 898-2578.

Sincerely,



Martha A. Roherty  
Executive Director  
NASUAD