

# Oklahoma Employment Security Commission



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## Oklahoma Employment & Training Issuance #1-2008

**TO:** SCSEP Grantees

**FROM:** Richard J. Gilbertson, Director  
Workforce Integrated Programs

**DATE:** January 9, 2008

**SUBJECT:** To inform SCSEP grantees of the new requirements for the development of SCSEP Local Plans that includes a four-year strategy for the local provision of community services.

**PURPOSE:** On December 31, 2007, USDOL issued TEGL #16-07 informing SCSEP Grantees about the new requirements for the State Plan (formerly known as the State Senior Employment Services Coordination Plan) occasioned by the enactment of the 2006 Older Americans Act (OAA) Amendments. As a result, OESC is requiring the submission of SCSEP Local Plans in order to meet the requirements of TEGL #16-07.

**BACKGROUND:** Section 503 of the 2006 OAA Amendments mandates significant changes to the former State Plan. In order to receive SCSEP funds, the law now requires the Governor or his/her designee to submit a State Plan that includes a four-year strategy for the statewide provision of community services and other authorized activities for eligible individuals under the SCSEP. In addition, the new law maintains the State Plan requirements in the current SCSEP Final Rule. Accordingly, **OESC must describe** the planning and implementation process for SCSEP services in the State, taking into account the current relative distribution of eligible individuals and employment opportunities within the State.

The new SCSEP Local Plans are intended to foster both short-term and long-term coordination among the various national and local SCSEP grantees operating within the State and to facilitate the efforts of key stakeholders, including State and Local Boards under the Workforce Investment Act (WIA), to work collaboratively through a participatory process to accomplish the SCSEP's goals. In addition, the new SCSEP Local Plan requirements emphasize the importance of increasing partnerships among grantees with other programs, initiatives and entities operating within the State. The SCSEP Local Plan is also intended to focus program resources where there is the greatest need relative to participants, host agencies and geographic areas.

## **SCSEP Local Plan Requirements**

The SCSEP Local Plan must include a four-year strategy for the local Grantee's provision of community service employment and other authorized activities for eligible individuals under the SCSEP. The four-year strategy requirement mandates that grantees take a longer-term view of the SCSEP program than in prior State Plans, which were intended to reflect local strategies for a single year only. Beginning with PY 2008, the four-year strategy will cover Program Years 2008-2011.

The four-year strategy must address the following particulars:

- The role of the SCSEP relative to other workforce development programs and initiatives in the Local Workforce Investment Area (LWIA) as well as other programs and partners serving older workers;
- How SCSEP grantees can coordinate with these other programs to maximize the services available to the SCSEP-eligible population;
- Projected changes in the local demographics (particularly the number of older workers), economy and labor market;
- How the Grantee plans to prepare participants for projected employment opportunities;
- How the Grantee plans to increase participant placements in unsubsidized employment;
- How the Grantee plans to improve SCSEP services in general;
- The basic distribution of SCSEP positions within the LWIA;
- Plans for recruitment of and service to certain special populations within the LWIA , i.e., those eligible older individuals who are most at-risk;
- Types of skills that eligible individuals need to develop to be employable in the LWIA;
- Employer outreach activities;
- Community service needs; and
- Avoidance of disruptions in the provision of services relating to shifts in the location of eligible individuals within the LWIA.

A complete outline of SCSEP Local Plan requirements is provided in Attachment I.

## **Solicitation and Collection of Public Comments**

Grantees will adhere to the following procedures and timeline for ensuring an open and inclusive planning process to provide a meaningful opportunity for public comment

- Email representatives of a diverse group of public and private agencies giving notification of the availability and time period for public comment;
- Place a draft copy of the SCSEP Local Plan on the WIA Board's website for a 2-week period;
- The SCSEP Local Plan may be submitted to OESC and posted on the WIA Board's website for comment at the same time;
- The Grantee must notify OESC by e-mail if any public comments **were received or not** and forward any comments to OESC **no later than February 22, 2008**.

## **Requirements for Modification SCSEP Local Plan**

Modifications to the SCSEP Local Plan are required at any time when:

- There are changes in Federal or State law or policy that substantially change the assumptions upon which the SCSEP Local Plan is based (except that the 2006 OAA Amendments are not applicable as a cause for modification as described in TEGL 25-06);
- There are changes in the Grantee’s vision, strategies, policies, performance goals, or organizational responsibilities;
- Grantees have failed to meet their performance goals and must submit a corrective action plan;
- There is a change in a grantee or grantees; or
- There are substantial changes in the status of Memoranda of Understanding (MOU) between grantees and their Local Workforce Investment Boards, including:
  - Establishment of a new MOU;
  - New grantees have been added to an existing MOU; and
  - An existing MOU has been changed from “single” to “blanket” or vice versa.

**Frequency of Submission**

At least every two years, the Grantee must review the SCSEP Local Plan and submit an update to the OESC for consideration and approval. Grantees are encouraged to review their SCSEP Local Plan more frequently than every two years, making adjustments and submitting updates as circumstances warrant. The SCSEP Local Plan is designed to be a “living” document that will guide the strategic and ongoing operations of the SCSEP within the LWIA.

**Schedule**

Grantees must provide the PY 2008-2011 SCSEP Local Plan requirements to the OESC by **January 31, 2008**. The postmark or other certificate of mailing will establish the date of the submission. An original must be sent by overnight mail to:

John Cole, Program Administrator  
 OESC, Workforce Integrated Programs  
 2401 N. Lincoln Blvd.  
 Oklahoma City, OK 73152

Also, OESC requests a copy of the SCSEP Local Plan be e-mailed to John Cole at [John.Cole@oesc.state.ok.us](mailto:John.Cole@oesc.state.ok.us).

**Action Required:** SCSEP grantees should begin work on the PY 2008-2011 SCSEP Local Plan upon receipt of this issuance, and submit it in accordance with the requirements as described above.

**Inquiries:** If you have any questions please contact John Cole at 405/557-5344.

**Attachment:** Outline for the Development Process and Content of the SCSEP Local Plan

**ATTACHMENT 1**  
**Outline For Development Process**  
**And Content Of The SCSEP Local Plan**

**Section 1. Purpose of the SCSEP Local Plan.** The OESC considers the SCSEP Local Plan as an opportunity for you to take a longer term, strategic view of the SCSEP in the LWIA, including SCSEP's role in workforce development, given projected changes in the demographics, economy and labor market in the LWIA. In developing the SCSEP Local Plan, the Grantee should address the role of SCSEP relative to other workforce programs and initiatives as well as other programs serving older workers, and should articulate how all the grantees operating in the LWIA examine and as appropriate, plan longer-term changes to the design of the program within the LWIA so as to better achieve the goals of the program.

**Section 2. Involvement of Organizations and Individuals.** The SCSEP Local Plan must describe the Grantee's process for ensuring the involvement and seeking the advice and recommendations of representatives from:

- The Local Boards under the Workforce Investment Act (WIA)
- Public and private nonprofit agencies and organizations providing employment services within the LWIA except national grantees serving older American Indians or Pacific Island Asian Americans
- Affected communities (i.e., grantee service areas)
- Unemployed older individuals
- Community-based organizations serving older individuals
- Business organizations
- Labor organizations

In support of the mandates of the statute relating to the involvement of specific organizations and individuals, the **OESC requires** grantees to include an appendix containing letters from all required parties attesting to their participation in the development of the plan. **OESC requests** that no more than three letters representing each of the above entities be submitted.

**Section 3. Solicitation and Collection of Public Comments.** The SCSEP Local Plan must include a description of the Grantee's procedures and schedule for ensuring an open and inclusive planning process that provides meaningful opportunity for public comment. Any individual or organization may comment on the SCSEP Local Plan.

**Section 4. Basic Distribution of SCSEP Positions within the LWIA.**

- a. **Location of Positions.** SCSEP Local Plans must provide information on the ratio of eligible individuals in each service area to the total eligible population within your geographic area. Reference should be made to the Equitable Distribution (ED) Report, which is required by Section 508 of the 2006 OAA Amendments. The SCSEP Local Plan must build on the ED Report in addressing the requirement to describe the basic distribution of SCSEP positions within the LWIA. This report provides the information needed to assess the location of the eligible population and the current distribution of people being served. The report may be

summarized to identify the areas, if any, that are significantly under-served or over-served. The Local SCSEP Plan must identify where slots need to be moved from over-to-under-served areas and outline the procedures to accomplish this task cooperatively without disruption to participants. The SCSEP Local Plan must also include timelines specifying when this slot movement will be accomplished. The most recent ED Report must be attached as an appendix to the Local SCSEP Plan.

Grantees are expected to move positions from over-served to underserved locations. All grantees operating within a LWIA must consult with the state agency responsible for preparing the State Plan and the ED Report before moving slots from one geographic area to another. Grantees must receive final approval from the OESC and the Department before moving slots.

- b. Specific Population Groups.** SCSEP Local Plans must provide information about the relative distribution of those eligible individuals who must be afforded priority for service as provided at OAA sec. 518(b) and certain other population groups cited in the statute as listed below. All grantees must describe the recruitment and selection techniques they are currently utilizing in developing this section.

OAA sec. 518(b) defines priority individuals as those who qualify based on one or more of the following criteria:

- Are aged 65 years or older; or
- Have a disability;
- Have limited English proficiency or low literacy skills;
- Reside in a rural area;
- Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act, 38 U.S.C. sec. 4215(a)(1);
- Have low employment prospects;
- Have failed to find employment after utilizing services provided under Title I of WIA; or
- Are homeless or at risk for homelessness.

Other populations identified in the statute are defined at OAA sec, 503(a)(4)(C)(i)-(iv) as:

- Eligible individuals with the “greatest economic need” (as defined in 20 CFR 641.140);
- Eligible individuals who are minority individuals; and
- Eligible individuals who are individuals with “greatest social need” (as defined in 20 CFR 641.140).

**Note:** The statute also identifies eligible individuals who are limited English proficient in this section, but OESC does not include them in this list because they are already identified in the list of priority individuals.

**Section 5. Supporting Employment Opportunities for Participants.** Grantees must identify employment projections for high growth industries and occupations in the LWIA as well as other industries and occupations which provide substantial employment opportunities but are not

considered to be high growth. Grantees must identify which of these industries and occupations provide substantial employment opportunities for SCSEP participants. Grantees must also describe the employment histories and the types of skills possessed by eligible individuals in the LWIA.

The current and projected employment opportunities in the LWIA and the types of skills available among the eligible populations have direct implications for the host agencies that grantees recruit to participate in the program; the types of training positions available at the host agencies; skill training offerings that grantees locate or develop; and training linkages that grantees negotiate and establish with the One-Stop. The SCSEP Local Plan **must discuss** how you will collaboratively address those issues to ensure that community service employment assignments are truly providing skill training that meets the needs of both participants and employers.

**Section 6. Increasing Participant Placement in Unsubsidized Employment and Employer Outreach.** This section must describe your overall goals and strategies related to placing participants in unsubsidized employment. This includes goals and strategies in each of the following areas: engaging and developing partnerships with employers; identifying employment opportunities with established career ladders; placing individuals in high growth industries and occupations as well as other industries and occupations that provide substantial employment opportunities for participants; and retention activities once participants enter the workforce.

The SCSEP Local Plan must also identify your strategy for increasing your level of performance for placing participants into unsubsidized employment including your plans for providing training in addition to the training provided as part of a community service employment assignment. Such training may include lectures, seminars, classroom instruction, individual instruction, online instruction, private sector on-the-job experiences, work experience or other arrangements (OAA sec. 502(c)(6)(A)(ii)).

The SCSEP Local Plan must also specify what you will do to ensure that you are meeting your performance measures.

**Section 7. Community Service Needs.** The SCSEP Local Plan must identify the localities and populations for which community service projects of the type authorized by SCSEP are most needed. Once unmet community service needs are identified, it is the responsibility of each Grantee to work toward meeting those needs through recruitment of appropriate host agencies. The SCSEP Local Plan must discuss the process that you will employ to identify community service needs and the timeline for identifying and recruiting appropriate host agencies to meet those needs.

**Section 8. Local Coordination with Other Programs, Initiatives and Entities.** The SCSEP Local Plan must describe overall goals and strategies for coordinating SCSEP activities with other entities. This description should describe your overall goals and strategies relating to:

- Coordination of activities with the state's Title I WIA activities. The SCSEP Local Plan must describe the steps you are taking to ensure that the SCSEP is an active partner in each One-

Stop delivery system, and the actions you will take to encourage and further improve coordination with the One-Stop delivery system;

- Activities being carried out in the LWIA under other titles of the OAA;
- Collaboration with other public and private entities and programs that provide services to older Americans, such as community-based organizations, transportation programs, and programs for those with special needs or disabilities;
- Collaboration with other partners—e.g., state vocational rehabilitation agencies, adult education and literacy providers, and education and training providers such as community colleges;
- Collaboration with other labor market and job training initiatives—e.g., the President’s High Growth Job Training Initiative, Community-Based Job Training Grants, and the Workforce Innovation in Regional Economic Development (also known as “WIRED”) Initiative grantees; and
- Leveraging resources from other key partners in the LWIA to support SCSEP activities. Organizations providing leveraged resources could include state and local government agencies, foundations, employers, community-based organizations and other entities.

**Section 9. Avoidance of Disruptions in Service.** The SCSEP Local Plan must describe the steps you are taking to comply with the statutory requirement to avoid disruptions to participants. When there is new Census data indicating that there has been a shift in the location of the eligible population or when there is over-enrollment for any other reason, the USDOL recommends a gradual shift that encourages current participants in subsidized community service assignments to move into unsubsidized employment to make positions available for eligible individuals in the areas where there has been an increase in the eligible population. (This does not mean that participants are entitled to remain in a subsidized community service position indefinitely.) As provided for in Oklahoma’s PY07 Grant Application, Oklahoma has imposed a time-limit of 27 months on community service assignment, thus promoting transition to unsubsidized employment.

**Section 10. Appendices.** The SCSEP Plan must have two appendices:

- Copies of the public comments; and
- Letters of attestation of participation in development of the SCSEP Local Plan from all required parties.