

WIOA Guidance Letter



DATE: September 26, 2019
State Senior Community Service
TO: Employment Program (SCSEP) Subgrantee
FROM: Mike Beene, Director Workforce Services
Workforce Services, Commerce Regulatory
CC: Compliance
RE: Recruitment Procedures for SCSEP

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Purpose: The purpose of this Guidance Letter is to transmit guidance to the sub-grantee operating the Senior Community Service Employment Program (SCSEP)

References: 20 CFR 641.515; Older Americans Act Sec. 502(b)

Background: In order to assure older Kansans are receiving intended services under the above referenced Act and regulations, Kansas Department of Commerce established the following guidance implementation by the SCSEP operator. The operator will be reviewed onsite by Commerce staff to document adherence to this guidance, regulations, and other guidance received by the US Department of Labor.

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Recruitment Guidance for Participants

Sub-grantees must describe in local policy the methods of recruitment and selection of participants that ensure the maximum number of eligible individuals have an opportunity to participate in the program. To the extent feasible, sub-grantees 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. (641.515(a) / OAA § 502(b)(1)(M)).

Sub-grantees must list all community service opportunities with the local **KANSASWORKS** workforce center and must use the **KANSASWORKS** system in the recruitment and selection of eligible individuals to ensure the maximum number of eligible individuals can participate in

SCSEP [641.515(b) / OAA § 502(b)(1)(h)]. Sub-grantees may choose to list community service opportunities with the local workforce center in a variety of ways including, but not limited to:

- Posting a job order in data management information system (i.e. **KANSASWORKS.com**);
- Posting an announcement on the community information board; or
- Giving a list of community service opportunities to **KANSASWORKS** workforce center manager.

Documentation of recruitment efforts must be maintained for monitoring purposes. The outreach and recruitment methods should occur on a continual basis in a wide range of venues that include but are not limited to the following:

- Presentations to community and civic groups;
- Public presentations and/or public service announcements;
- Brochures in supermarkets, libraries, community bulletin boards, or doctors' offices;
- Newspapers/newsletters;
- Flyers;
- Website postings or social media postings such as on Facebook;
- Recruitment at **KANSASWORKS** workforce centers;
- Attending community functions;
- Recruitment of veterans through local Veterans of Foreign Wars (VFW) halls, veterans' groups and the **KANSASWORKS** workforce center;
- Presentations to staff of Area Agencies on Aging and Councils on Aging for those 55 years of age and older;
- Presentations to chambers of commerce; and
- Presentations to vocational rehabilitation schools, local community colleges, and community action agencies.

Over-Enrollment and Waiting Lists

Should funding become available, SCSEP staff may over-enroll eligible individuals on a short-term basis. Over-enrollment levels may match the annual service level goal as determined by USDOL. SCSEP participants in the over-enrolled assignments must be informed in writing that the assignment is short-term. Temporary participants will:

- Acknowledge their temporary status in writing;
- Be enrolled at the regular rate of pay; and
- Be moved into regular enrollment positions if such positions become available.

When there is over-enrollment for any reason, USDOL recommends a gradual shift that encourages current participants in subsidized community service assignments to move into unsubsidized employment in order to make positions available for eligible individuals in the areas where there has been an increase in the eligible population.

Commerce requires SCSEP sub-grantees to maintain a “waiting list” of eligible participants, which must be entered in the grant performance management system (i.e., SPARQ). Participants are placed on the “waiting list” in SPARQ by selecting the appropriate box when answering enrollment questions. Sub-grantees may pull a copy of the “waiting list” participants by logging in to SPARQ and then selecting *Management Reports* followed by *Waiting List*. An individual has the absolute right to apply to the program, and any eligible applicant who is not assigned to a host agency within two weeks of being determined eligible must be placed on a waiting list in SPARQ. An applicant is entitled to remain on the waiting list if he/she is still interested in an assignment and meets the eligibility requirements. However, it is not beneficial to the program to let applicants remain on the waiting list for an excessive period. Applicants should be contacted periodically (e.g., every three months) to determine if they are still interested in the program and are still eligible and provided an update on when enrollment may begin. If there is no reasonable prospect of an opening, the participant might decide to withdraw or explore some other program.

SCSEP staff must enter a case note in the participant’s case file explaining the reason for removing an applicant from the waiting list, especially if the administrative reason involves fault on the part of the applicant, such as falsifying the eligibility information. Except in cases of falsification of eligibility information, SCSEP staff should generally provide 30 days written notice prior to removal from the waiting list. No notice is required when the applicant informs the sub-grantee that she/he is no longer interested in the program.

Recruitment Guidance for Host Agencies

Sub-grantees must describe in local policy the methods of recruitment and selection of host agencies to ensure the maximum number of placement opportunities for eligible individuals. Host agency sites should include, but are not limited to the following:

- Public agencies such as public health departments, school systems, social service departments/agencies (such as councils on aging, domestic abuse shelters, drug abuse treatment centers, and ethnic/cultural centers, museums, etc.) courts, police departments, housing authorities, child and youth services, adult services, adult education centers, general hospitals, community mental health centers, mental hospitals, recreation departments, community development/outreach services, employment services, vocational counseling rehabilitation services, local Federal agencies, extension services and local tribal government agencies; and

- Private non-profit organizations such as voluntary hospitals, neighborhood health centers, community and neighborhood centers, health and welfare council agencies, community action agencies and private schools.

Sub-grantees should consider the following tactics in the recruitment of host agencies:

- *Position your product* – Product position is usually based on either the benefits of the product (what will it do for me?) or removal of barriers (how difficult is it for me to do?). By talking with current host agencies, you can learn the benefits they value most and the barriers they foresee.
- *Build partnerships with key allies* – Build connections with key people and organizations that have the potential to bring attention and credibility to your program. Develop beneficial relationships with the reporters covering your issue at key media outlets; pitch stories to them with a fresh news angle, provide them with fact sheets, etc.
- *Develop a “Pro/Con List”* – Develop a list of all the benefits to and disadvantages of being a host agency from the host agency’s perspective.
- *Design an approach to recruit a new host agency* – This may include the following strategies:
 - Develop a letter;
 - Create talking points for a telephone conversation or meeting;
 - Design a feature article for the community page of the newspaper; or
 - Work in partnership with other service providers.

Sub-grantees should select host agency work-training sites that have the:

- Capability to provide a safe environment with adequate space and equipment for the participant;
- General responsiveness to the goals and objectives of SCSEP;
- Ability to comply with program requirements;
- Ability to provide work-training that supports the IEP goals and offers opportunities for the participant to enhance skills and be transitioned to unsubsidized employment;
- Capability to provide the participant with work-training that will develop marketable skills in all business sectors with emphasis on demand occupations;
- Capacity to supervise the participant on a day-to-day basis;
- Potential for employing the participant on a permanent basis;
- Ability to ensure the participant is given the same consideration and treatment as other staff members;
- Ability to prepare an appropriate work-based training description and to adjust the description as the participant develops additional skills;
- Ability to approve time for participants and the supervisor to attend SCSEP training meetings; and
- Appropriate work-based training for older workers.

For questions or additional technical assistance, please email to: workforcesvcs@ks.gov