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Transmittal Sheet

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Secretary of State

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For Office

Use Only:

Effective Date _____ Code Number _____

Name of Agency Department of Human Services

Department Division of Aging, Adult, and Behavioral Health Services

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April 18, 2018

Contact Person

E-mail Address

Date

CERTIFICATION OF AUTHORIZED OFFICER

I Hereby Certify That The Attached Rules Were Adopted
In Compliance with the Arkansas Administrative Act. (ACA 25-15-201 et. seq.)

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April 20, 2018

Date

502.000**Senior Community Service
Employment Program (SCSEP)****5-1-18**

The Senior Community Service Employment Program (SCSEP) provides useful part-time community service and work-based training for low-income individuals age 55 and older who have poor employment prospects while promoting transition to unsubsidized employment to foster individual economic self-sufficiency and to increase the number of older persons who may enjoy the benefits of unsubsidized employment in both the public and private sector. Eligible employees receive wages, skill enhancement opportunities, the offer of periodic physical exams, personal and employment counseling, and assistance in obtaining unsubsidized employment.

502.010 Purpose**6-1-97**

This policy is to establish and govern the administration and operations of the Title V Program and related funding.

502.011 Scope**6-1-97**

This policy applies to all grant recipients of the program and to any subgrantee or contractor that receives program funds and/or participates in the program.

502.12 General Authority**6-1-97**

Older Americans Act of 1965, as amended.

502.13 Definitions**6-1-97**

Enrollee - A person who is enrolled in the Title V program.

Host Agency - A public agency or a private nonprofit organization exempt from taxation under § 501(c)(3) of the Internal Revenue Code of 1986.

Subgrantee - The Agency who is the recipient of the Title V Grant that is administrated through the Division of Aging and Adult Services (DAAS).

SCSEP - Senior Community Service Employment Program

Title V - Title V of the Older Americans Act

502.20 Eligibility for SCSEP Enrollment**6-1-97**

- A. For initial enrollment, unemployed individuals must meet eligibility criteria for age, income, place of residence and no additional employment criteria. Continued enrollment in the program shall require the individual to meet the age, income, residency and no additional employment criteria. Eligibility is determined at the time the individual applies to participate in SCSEP and at least once every 12 months thereafter. Eligibility can also be verified, as circumstances require it.
1. Age: Individuals must be at least age 55. No upper age limit restriction shall be imposed.
 2. Income: The income of an individual or the family of which the individual is a member shall not exceed 125% of the family income levels established by the U.S. Department of Health and Human Services and approved by the Office of Management and Budget. In addition, a disabled person may be treated as a “family of one” for eligibility purposes. The grantee/subgrantee will go by the Department of Labor Employment and Training Administration’s Training and Employment Guidance Letters regarding income definitions and income inclusions and exclusions when determining SCSEP eligibility.

Computation of Income:

- a. Income received during the prior 12 month period, or
 - b. If more favorable to the applicant, the six month period annualized.
 - c. Ending on the date an eligible individual submits an application to participate in the program.
3. Place of Residence: Individuals shall have a place of residence in the State of Arkansas and no length of residency may be imposed.
 4. Unemployed: Participant must be unemployed at the time of enrollment. If they become employed either full or part time while enrolled in the program, they must exit the program. (This does not include casual, non-recurring labor such as occasional babysitting or shoveling a neighbor’s sidewalk.)

- B. No additional eligibility requirements shall be imposed by the project or subgrantee.

502.21 Enrollment Priorities**6-1-97**

When there are limited positions available, priority must be given in accordance with the Older Americans Act of 1965, as amended, and the Jobs for Veterans Act.

All applicants will be asked about veteran status. Veterans will be asked to provide a copy of their DD-214, which will be kept in the participant's files. As vacancies become available, staff will enroll applicants with the highest priority from the waiting list.

502.30 Division of Aging and Adult Services**6-1-97**

The Arkansas Department of Human Services, Division of Aging and Adult Services is responsible for all program activities as prescribed by the Older Americans Act of 1965, as amended, the grant agreement, and other U.S. Department of Labor guidance and regulations.

502.31 Grant Application Procedures**6-1-97**

DAAS shall plan, write and submit the annual grant application to the Department of Labor for Title V funds and positions to conduct the SCSEP through subgrants as follows:

- A. Public and/or private nonprofit organizations shall be requested to submit Request for Applications to DAAS for Title V funds and approved positions.
- B. Upon review and approval of the subgrant application by the State Agency, approved positions and funds will be allocated to the subgrantee.
- C. Subgrantee whose request for application is in compliance with all State and Federal requirements and who is chosen for a subgrant by DAAS shall be notified of subgrant approval.

502.32 SCSEP State Procedures**6-1-97**

The DAAS shall develop and disseminate procedures regarding the administration and management of the SCSEP Title V program in Arkansas to ensure subgrantee compliance with the following statutes and regulations:

Federal:

Older Americans Act of 1965, as amended

U.S. Department of Labor Training and Employment Guidance Letters

U.S. Department of Labor Older Worker Bulletins

502.33 Program Monitoring and Reporting

6-1-97

DAAS monitoring of subgrantees' performance and achievement of established program goals and objectives shall be ongoing during the program year and shall include, but not be limited to, the following:

- A. On-site monitoring of each subgrantee at a minimum of once each program year utilizing a SCSEP Assessment Tool to assure that the requirements of the Older Americans Act, other Federal regulations promulgated under the Act and DAAS regulations are followed and appropriate services are provided. The SCSEP Assessment Tool is provided to subgrantees prior to the assessment. A written report shall be provided to the subgrantee administrator with comments and program recommendations/corrective action. On site reviews shall include, but not be limited to, assessment of the following:
 - 1. Participant files for both active and terminated individuals;
 - 2. Host Agency Agreements and Memorandums of Understanding; and,
 - 3. Host agency assignments to include interviews of a participant's supervisor and the participant.
- B. Review of a subgrantee's Quarterly Progress Reports, Quarterly Data Quality Reports and review of compilation of cumulative data.
- C. Annual review of the distribution of authorized positions by county to be reported to the subgrantees and other SCSEP National Grantees operating SCSEP in Arkansas with over-served and under-served counties identified.
- D. Review of monthly requests for reimbursements from the subgrantee and compilation of a quarterly fiscal report. (This is done by the Department of Human Services, Office of Finance and Administration.)

502.34 Technical Assistance**6-1-97**

- A. DAAS shall provide ongoing technical assistance to subgrantees regarding Federal and State regulations pertaining to SCSEP and other applicable regulations, rules and policies initiated by the U.S. Department of Labor pertaining to federally funded grants and agreements.
- B. Special technical assistance, training and/or guidance shall be provided to each subgrantee as needs are identified as a result of periodic monitoring or when requested by the subgrantee administration (i.e., financial reporting). A subgrantee's national office provides and/or arranges for training of their staff
- C. DAAS shall provide technical assistance to other public and private agencies, private sector employers and other organizations concerned with the employment of older workers as requested and time and resources permit.
- D. DAAS communicates grant policy, data collection and performance developments and directives to staff and subgrantees and/or local project operators.
- E. DAAS ensures the subgrantee receives adequate resources to effectively operate local projects.

502.35 Coordination with Other Programs**6-1-97**

DAAS shall initiate and maintain cooperative relationships with agencies and organizations providing employment and training services and other services to the low income elderly. The objectives of the cooperative relationship shall be to provide joint planning, eliminate redundant services and provide a coordinated service delivery system to the elderly. Cooperative relationships that shall be developed include, but are not limited to, the agencies listed below:

- A. Other SCSEP National Grantees operating SCSEP in the State;
- B. Area Agencies on Aging;
- C. Department of Workforce Services;
- D. Other programs or agencies available to the low-income seniors;
- E. Transportation Organizations.

DAAS has a written plan in place for disaster response and recovery so the SCSEP may continue to operate and provide services to participants and community.

502.40 Subgrantee Responsibilities**6-1-97**

The subgrantee shall, by maintaining adequate staff and dedication of resources, assure fulfillment of the following responsibilities.

502.41 Participants' Recruitment and Selection**6-1-97**

- A. Vacant SCSEP slots must be listed with the State Workforce Agency and other appropriate local offices.
- B. Subgrantee will utilize their local Workforce Center's One-Stop Delivery System when recruiting and selecting eligible individuals.
- C. Subgrantee manages slot allotments within Equitable Distribution guidelines, to the extent feasible, so that potential participants have equal access for program participation.
- D. Selection of participants shall be according to the priorities established by the Department of Labor, the Older Americans Act of 1965, as amended, and the Jobs for Veterans Act.

502.42 Enrollment**6-1-97**

In order to document and verify the accuracy of information concerning an applicant's eligibility and to ensure compliance with related Federal and State regulations, the following procedure shall be followed by subgrantees.

- A. Certification for enrollment shall at a minimum consist of documentation of income, age, family size and residence. Documentation is also required if the SCSEP applicant is receiving enrollment preference as a veteran or spouse of a veteran or as a person with a disability.
- B. Participants are required to report any changes in family size and/or any increase in total family income as they occur.
- C. Recertification of eligibility of each participant for continued enrollment in the SCSEP must be at least once a year.

502.43 Health Screenings**6-1-97**

- A. Each individual selected for enrollment shall be offered a no-cost limited health screening or shall sign a waiver within 60 days from the time the participant is enrolled in the program. Participants may be required to take a health screening to ensure the safety of others or when a particular host agency assignment requires a physical examination. Participants are not required to supply a copy of the physical examination unless the assignment or subgrantee requires that a physical examination be taken.
- B. Additional limited health screenings or additional signed waivers shall be required annually during an individual's continued participation in SCSEP.
- C. Individuals terminated and subsequently re-enrolled shall not be required to take an additional exam or sign an additional waiver providing the time since the last exam or signed waiver does not exceed the 12-month requirement. Subsequent exams or waivers shall be scheduled within 12 months of the last action.
- D. Physical exams are regarded as a program benefit and shall not be used as a basis to deny enrollment to the individual unless the program activity would present a danger to the individual's health and safety.

502.44 Orientation**6-1-97**

- A. Subgrantees shall provide formal program orientation to the participants as soon as practicable. Program orientation shall include but not be limited to the following:
 - 1. SCSEP goals and objectives;
 - 2. Community service assignments;
 - 3. Available training through the program;
 - 4. Available supportive services;
 - 5. Responsibilities of the participants;
 - 6. Rights of the participants;
 - 7. Allowable and prohibited political activities;

8. Goal of transition to unsubsidized employment;
 9. Information regarding safe working conditions at the host agencies;
 10. Availability of no-cost health screening;
 11. Grievance procedures;
 12. Participants' rights and responsibilities; and
 13. Host agencies.
- B. Subgrantees shall provide orientation to the host agency prior to the participant's participation. Orientation shall include but not be limited to the following:
1. Supervision of the participant required under SCSEP;
 2. Responsibility of the host agency to transition the participant into unsubsidized employment;
 3. Goals and objectives of SCSEP;
 4. Required training of the participant specific to the participant's community service assignments;
 5. Hours of community service assignment for the participant;
 6. Requirement that the host agency provides adequate orientation and instruction regarding participant responsibilities and safety;
 7. Responsibility of the host agency to provide an adequate assignment description for the participant;
 8. Grantee and local project roles, policies and procedures;
 9. Evaluation of participant progress;
 10. Provision of a safe working environment;
 11. Documentation requirements;
 12. Termination policies; and

13. Grievance procedures.

502.45 Assessment and Individual Employment Plan**6-1-97**

- A. After an individual is found eligible for participation in SCSEP, an initial assessment shall be conducted and at least one other time during the first year, and two times during a 12-month period thereafter.
- B. The assessment will include the participant's work history, skills and interest, talents, physical capabilities, aptitudes, needs for supportive services, occupational preference, training needs, potential for performing community service assignments, and potential for transition to unsubsidized employment.
- C. Based on the participant's assessment, an Individual Employment Plan shall be completed and signed by both the participant and the subgrantee interviewer. The Individual Employment Plan is completed after each assessment, at the time of enrollment and at least one other time during the first year and two times during a 12-month period thereafter. The Individual Employment Plan shall include but not be limited to the following:
 - 1. Initial and long-range employment goals;
 - 2. Barriers to employment;
 - 3. Needed supportive services;
 - 4. Needed training; and,
 - 5. Steps and projected time frames to achieve employment goals.
- D. If an assessment has already been performed and an Individual Employment Plan developed under Title I of the Workforce Investment Act, it will satisfy the requirement for the SCSEP Assessment and Individual Employment Plan.
- E. The subgrantee shall seek to place the individual participant in community service assignment in the community where they reside and that will best utilize the individual's skills and aptitudes, and provide the best opportunity to obtain unsubsidized employment.

- F. Subgrantee may, as a result of the Individual Development Plan, determine that a change of community service employment assignment would better utilize the enrollee's skills and aptitudes and afford the individual more appropriate work experience and thereby increase the individual's potential for unsubsidized employment.
- G. Assessments and Individual Employment Plans with all updates shall be documented. Individual Employment Plans shall be signed by the participant and the subgrantee interviewer and maintained in the participant's permanent file.

502.46 Training**6-1-97**

- A. Training may be provided to new participants prior to and as preparation for their community service assignment.
- B. The training may be delivered through lectures, seminars, or classroom training. Whenever possible training should be delivered through the host agency at no cost or reduced cost to the program.
- C. Job related training has the primary purpose of providing or enhancing skills necessary for successful participation in community service assignment. Participants shall be paid either the federal or state minimum wage, whichever is higher during training.
- D. To the extent feasible, the subgrantee shall arrange skills training for the participant, which is realistic and consistent with the Individual Employment Plan.
- E. Subgrantee shall develop appropriate training opportunities through other employment and training programs or other sources at no cost or reduced cost to the program whenever possible.

502.47 Community Service Assignment**6-1-97**

- A. Participants shall be assigned to useful part-time community service assignments, as soon as possible after the orientation and any pre-assignment training, in accordance with the Individual Employment Plan.
- B. Though no longer a requirement, it is a "best practice" that hours spent training at the community service assignment by participants shall not exceed 1,300 hours per any 12 month program year.

- C. Participants' community service employment shall be during normal work hours unless otherwise agreed upon by the participant.
- D. Participants shall be assigned to community service assignments in or near the communities where they reside.
- E. Participants shall be placed at community service assignments that contribute to the general welfare of the community, such as social health, welfare, library, education, conservation, maintenance or restoration of natural resources, economic development and any other services essential and necessary to the community.
- F. A participant's community service assignment may be limited in duration at any one host agency depending upon a participant's Individual Employment Plan. Based upon a participant's assessment and Individual Employment Plan, once a participant has completed all training and on-the-job work experience at one host agency, they can be transferred to another host agency for further training and work experience.
- G. Participants placed in community service assignments funded under Title V are not considered Federal or State employees.
- H. Wages and Fringe Benefits
 - 1. The wages paid participants upon assignment to a host agency, which include orientation, any pre-assignment training and time spent doing community service assignment, shall be either the federal or state minimum wage, whichever is higher.
 - 2. Participant benefits shall be administered by the subgrantee uniformly to all enrollees including those in temporary positions. The subgrantee shall ensure that enrollees receive all benefits required by law:
 - a. Workers' Compensation coverage as covered by state law
 - b. Unemployment Insurance (where required)
 - c. Physical Exams
 - d. If a participant's host agency is closed due to a designated Federal holiday on a day the participant would normally be on site, the participant may take leave without pay or the

participant's assignment schedule may be adjusted by the host agency supervisor so the participant will be able to perform duties and accrue the number of hours authorized for the pay period.

- e. If a participant is off on necessary sick leave on a day the participant would normally be on site, the participant may take leave without pay. Thirty days of leave without pay is the maximum allowable time a participant may be absent during a year.
 - f. No grant funds may be used to pay pension benefits, annual leave, accumulated sick leave or bonuses.
- 3. Subgrantee makes all required payments for payroll and Workers' Compensation premiums on a timely basis.
 - 4. Subgrantee ensures that host agencies do not pay Workers' compensation for participants.
- I. Supportive services shall be provided to participants to assist in successful participation in community service employment and to assist in the transition to unsubsidized employment, and for up to six months in unsubsidized employment. To the extent feasible, the subgrantee should provide for supportive services from other sources or referrals. Supportive services provided to subgrantees may include but are not limited to the following:
- 1. Items such as, badges, uniforms, back supports
 - 2. Counseling, both job related and personal

Supportive service referrals may include but are not limited to the following:

- 1. Dental services
- 2. Housing assistance
- 3. Food assistance
- 4. Transportation assistance

5. Clothing assistance
 6. Assistive devices
 7. Health services
- J. Documentation
1. Subgrantee maintains documentation of waivers of physical examinations by participant.
 2. Subgrantee maintains documentation of the provision of complaint procedures to participants.
 3. Subgrantee maintains documentation of eligibility determinations and re-determinations.
 4. Subgrantee maintains documentations of terminations and the reasons for such terminations.
 5. Subgrantee maintains records of grievances and outcomes.

502.48 Host Agency Selection**6-1-97**

- A. Subgrantees shall develop community service assignments with state or Federal agencies that contribute to the general welfare of community and non-profit organizations that are exempt from taxation under the provisions of Section 501(c)(3) of the Internal Revenue Code, 1954.
1. Assignments cannot be made to host agencies that promote sectarian religious worship or instruction or involves the construction, operation or maintenance of a facility to be used as a place of religious worship or instruction.
 2. SCSEP participants cannot be given assignments to perform duties that involve political activities on behalf of either a partisan or nonpartisan group.
 3. Community service assignments cannot be made to a for-profit company. In some circumstances participants will receive on-the-job training with for-profit agencies to prepare them for employment after the training is completed.

- B. Each year, host agencies shall sign a host agency agreement with the subgrantee, which will become part of the permanent record. Host agency responsibilities shall include but not be limited to the following:
1. To provide the participant with supervision at least equal to supervision provided employees in similar positions;
 2. To provide adequate orientation and instruction regarding the participant's community service assignment, duties, and safety;
 3. To provide an environment that is sanitary and safe, and free from drugs and alcohol, and ensure that all laws governing workplace safety are followed.
 4. To work with participant and subgrantee staff in developing a participant's training and/or assignment description based on a participant's Individual Employment Plan. Any changes or revisions to the participant's assignments or training shall require notification of the subgrantee;
 5. To provide training that is assignment-related and which will enhance the individual's potential for unsubsidized employment and/or allow the time off to attend training during work hours as approved and required by the subgrantee;
 6. To give first consideration to the participant for an unsubsidized position within the host agency when a vacancy occurs for which the participant has the qualifications and required experience;
 7. To establish and maintain a written schedule, assure that the schedules comply with the number of hours authorized by the subgrantee and provide cooperation and access to participant records to the subgrantee and DAAS staff for the purposes of on-site monitoring of the host agency;
 8. To provide any tools, supplies, equipment and safety training necessary to perform the participant's assignment;
 9. To make assignments in accordance with medical limitations, make any accommodations required by the Americans with Disabilities Act, and adhere to the confidentiality requirements of the Act;
 10. To report any participant accidents to the subgrantee;

11. To provide the subgrantee with accurate and timely time sheets of participant hours signed by the participant and host agency supervisor;
 12. To assure that participants are not subject to discrimination based on age, race, color, religion, sex, national origin, disability, veteran status, political affiliation, or any other basis prohibited by law.
- C. Assignments provided at the host agency shall meet the maintenance of effort provisions required under Federal regulations that applies to the use of SCSEP funds as follows:
1. Employment of a participant funded under Title V of the Older Americans Act is permissible only in addition to employment that would otherwise be funded by the recipient and host agency without assistance under the Older Americans Act.
 2. Assignment shall result in an increase in employment opportunities over and above those already available;
 3. Assignment shall not result in the displacement of a current participant including partial displacement such as the reduction of regular hours, wages or employment benefits;
 4. Assignment shall not impair existing contracts for service or result in substitution of Federal funds for other funds in connection with work that would otherwise be performed;
 5. Assignment shall not substitute SCSEP funded positions for existing Federally assisted jobs;
 6. Shall not assign or continue to assign any eligible individual to perform work that is the same or substantially the same as that performed by any other person who is on layoff.
- D. No host agency may be a work site for a person in an administrative capacity, staff position, or community service assignment position under Title V, if a member of that person's immediate family works in an administrative capacity or a board member for the host agency.

Immediate family means wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law,

mother-in-law, father-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent and grandchild.

502.050 Participation in SCSEP Time Limit**5-1-18**

Effective July 1, 2007, an individual may remain in SCSEP for up to 48 lifetime months. Current participants will be informed about the new durational limitation on enrollment in the program which began July 1, 2007. For new participants, it will be their enrollment date after June 30, 2007.

Beginning July 1, 2007, Arkansas has an overall average participation cap of 27 months. In certain cases, a waiver may be requested that allows up to a 36-month average participation rate.

502.060 Unsubsidized Employment**6-1-97**

- A. Subgrantee shall provide assistance to each participant to obtain unsubsidized employment as soon as is practical in order to provide additional opportunities for other eligible individuals with the funds available.
- B. Subgrantee shall refer individuals who may be placed directly in unsubsidized employment to an employment provider or local one-stop for job placement under Workforce Investment Act.
- C. Subgrantee shall encourage host agencies to hire participants when a position becomes vacant for which the SCSEP participant would qualify for.
- D. Subgrantee shall encourage host agencies to assist participants in finding unsubsidized employment by referring those to job openings they know are available in the community, as well as providing those participants with references.
- E. Subgrantee shall follow up on each participant placed in unsubsidized employment as close to the beginning of the first quarter after the quarter the participant exited. The second follow-up should be scheduled for the first day of the fourth quarter after the quarter the participant exited to verify retention and earnings. The third follow up is conducted in the fourth quarter after the participant exited for all participants who had wages in the first quarter after the quarter of exit to verify retention in unsubsidized employment at one year.

502.070 Adverse Action and Appeals**6-1-97**

- A. Any adverse actions against a participant shall be issued to the participant in writing stating the reason(s) for the determination, the participant's right to appeal, and the procedures to follow in the appeal process.
- B. Subgrantee shall develop complaint procedures and an appeal process to resolve any issue arising between the host agency and a participant or applicant. A copy of these procedures is provided to applicants, participants and employees. Procedures shall, at a minimum, provide the following:
 - 1. The opportunity for an informal conference and immediate resolution at the lowest level possible;
 - 2. Formal procedures for filing a written complaint for review by the subgrantee.

502.80 Cooperative Relationships**6-1-97**

Subgrantee shall develop relationships with other employment and training programs providing services to the elderly and other agencies in the area in order to provide the most comprehensive employment and training services to eligible individuals.

- A. Subgrantee shall maintain cooperation with the Employment Security Division in their area for assistance in recruitment of eligible individuals, especially disadvantaged and minorities, and to assist in obtaining unsubsidized placements.
- B. Cooperation and coordination shall be initiated and maintained with local training programs to increase training and employment opportunities for eligible participants.
- C. Subgrantee shall develop and maintain relationships with the Area Agencies on Aging as a source of supportive services for the older worker.
- D. Subgrantee shall develop cooperation with all local, State and Federal agencies as potential host agency sites to provide a variety of work assignments for participants and produce a variety of services to the community that would otherwise not be available.

- E. Subgrantee shall initiate close cooperation with private employers in the area to determine their needs and educate them about the benefits of hiring the elderly that would increase opportunities for the elderly, and be an employment source for participants ready to assume unsubsidized employment.
- F. Subgrantee shall maintain close cooperation and communication with other SCSEP sponsors in the area to assure equitable distribution of available Title V slots in the subgrantee's service delivery area.
- G. Subgrantees shall have Memorandums of Understanding with local Workforce Investment Boards in the regions that they serve, work closely with the One-Stops in their regions and assure that participants sign up at their local One-Stop.

502.81 Non-Discrimination**6-1-97**

- A. No subgrantee or staff person of the subgrantee shall discriminate, exclude from participation, or deny benefits to eligible individuals because of the individual's race, color, religion, sex, national origin, handicap, political beliefs or age.
- B. Age shall be a valid consideration for participation in the program; the minimum age limit is 55 with no upper age limitations.

502.82 Reporting Requirements**6-1-97**

- A. Subgrantee shall provide the Department of Human Services with timely monthly invoices/reports. Refer to the Division of Aging and Adult Services Policy and Procedures Manual Section 208.000 Reporting.
- B. Subgrantee is obligated to enter all required data relating to participants served in the period covered by the subgrant.
- C. Subgrantee is obligated to enter complete data related to any participants they acquire upon becoming a subgrantee.
- D. Subgrantee is obligated to turn over complete hard copy files and complete data files (in the specified electronic format) to the grantee at the time the subgrantee ceases to administer the program.

- E. Subgrantee's participant files are to be maintained for three program years after the program in which all follow-up activity for a participant has been completed.
- F. Subgrantee shall submit any other data or information concerning the SCSEP required by the Department of Labor, Employment and Training Administration or DAAS.
- G. Participants' records are securely stored and access is limited to appropriate staff to safeguard identifying information.
- H. Safeguards are in place to preclude tampering with electronic media established (e.g., Personal Identification Numbers for record keeping).
- I. Subgrantee ensures that accurate data are submitted timely to SPARQ as required.
- J. Ensures that the SCSEP National Program Office at the Department of Labor is immediately notified in the event of any potential security breach of personal identifying information, whether electronic/paper files and/or equipment is involved.
- K. Complies with and ensures that authorized users under the grant comply with all SPARQ access and security rules.

502.83 Political Activities

6-1-97

SCSEP participants may participate freely in the political process with the following exceptions:

- A. No SCSEP participant or staff person may engage in partisan or non-partisan political activities while he or she is on the job.
- B. No SCSEP participant or staff person, at any time, may represent himself or herself as a spokesperson of the SCSEP and engage in partisan or non-partisan political activities.
- C. No SCSEP participant may be employed or out-stationed in the Office of Congress, in the office of a state or local legislator, or on the staff of a legislative committee.

- D. Some SCSEP participants who are employed by federal, state, and local governments on federally aided projects may have additional restrictions as a result of the Hatch Act.

502.84 Customer Satisfaction Surveys

6-1-97

- A. Employer Customer Satisfaction Surveys shall be delivered in accordance with the SCSEP Employer Survey Kit for subgrantees issued by the U.S. Department of Labor.

- B. Host Agency Customer Satisfaction Surveys

Upon direction from The Charter Oak Group and/or the Department of Labor, the subgrantee would notify host agencies that they would soon be receiving a Customer Satisfaction Survey from the Arkansas Department of Human Services, Division of Aging and Adult Services.

- C. Participant Customer Satisfaction Surveys

1. Upon direction from The Charter Oak Group and/or the Department of Labor, the subgrantee would notify SCSEP participants that they will be receiving a pre-survey letter advising them that they should be receiving a Customer Satisfaction Survey from the Arkansas Department of Human Services, Division of Aging and Adult Services.
2. After contacting the SCSEP participant and when directed by the U.S. Department of Labor or The Charter Oak Group, the subgrantee would mail SCSEP participants a pre-survey letter. The following steps should be followed when mailing the pre-survey letters:
 - a. Letter should be printed on subgrantee letterhead.
 - b. Internal address and salutation using Mr./Ms. based on column for gender.
 - c. The letter should be signed in blue by subgrantee director (or by the person most likely to be recognized and respected by the recipient.) The person signing the letter may cross out the formal salutation and write over it the participant's first name if they are on a first-name basis.

- d. Mailing envelope should have subgrantee's name and address as return address and, if possible, director's name.
- e. Must have live postage stamp.
- f. Must be mailed within specified dates.