

Commonwealth of Massachusetts
Executive Office of Elder Affairs



**Massachusetts' Senior Community Services
Employment Program (MA-SCSEP)**

PROGRAM MANUAL
For
PARTICIPANTS

June 2012

Foreword

This program Manual provides official guidance for the operation of the Commonwealth of Massachusetts' Senior Community Service Employment Program (MA-SCSEP) funded by the Executive Office of Elder Affairs (EXECUTIVE OFFICE OF ELDER AFFAIRS).

The manual is based on the following legislative and regulatory mandates:

- Title V of the Older Americans Act of 1965, as amended,
- 20 CFR Part 641 Senior Community Service Employment Program; Final Rule
- Department of Labor Older Worker Bulletins, and the
- EXECUTIVE OFFICE OF ELDER AFFAIRS Grant Agreement with the U.S. Department of Labor.

The operational policy, procedures, and standards outlined in this manual are to be followed and enforced by all participants. This manual is effective 2012. It supersedes any other editions and update memoranda. In case of any perceived discrepancy between this manual and other materials, EXECUTIVE OFFICE OF ELDER AFFAIRS staff should be consulted for clarification.

When legislative or policy changes require that the manual be updated, EXECUTIVE OFFICE OF ELDER AFFAIRS will send all SCSEP participants a memorandum announcing the change(s).



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Participant Introduction

The SCSEP (Senior Community Service Employment Program) is funded by the United States Department of Labor and is sponsored by the Commonwealth of Massachusetts' Executive Office of Elder Affairs. We are happy that you are able to participate in this work-training program. This handbook is designed to provide you with:

- An introduction to the organizations that are making it available to you
- An overview of the program
- A description of the processes and stages of this program
- Your responsibilities and benefits
- Other information you need to participate in this program
- Your Goals

Your goals in entering this program should include commitments to:

- Upgrade your job skills and work experience through “on the job” experience providing community service and attending training workshops and programs.
- Seek improved employment opportunities beyond this program.
- Improve your living situation through paid training while connecting with your community and preparing for work.
- Pursue additional skill improvement through related programs and develop a comprehensive plan to do so. (This plan is called the Individual Employment Plan, and we'll help you create it.)
- Find unsubsidized employment, meaning a job where you are on the employer's payroll directly.



Section 1

SCSEP Overview

The Senior Community Service Employment Program (SCSEP) is a federally funded employment and training program for individuals 55 years of age or older with an income no greater than 125% of the Federal Poverty Limit (FPL). The SCSEP is funded by the U.S. Department of Labor (DOL). The Executive Office of Elder Affairs operates the Massachusetts SCSEP program (MA-SCSEP) in all counties of the Commonwealth of Massachusetts except for Franklin, Nantucket, Barnstable and Dukes counties. There are also four (4) National SCSEP grantees operating programs in Massachusetts.

1.1 MA-SCSEP Sub-grantees

As of July, 2011, the three state regional SCSEP Sub-grantees are:

1. Citizens for Citizens, Fall River, MA, (CFC) serving Bristol, Hampden, Hampshire, Middlesex, Norfolk, and Plymouth Counties.
2. Elder Services of Berkshire County, Pittsfield, MA (ESBC), serving Berkshire County.
3. Operation Able of Greater Boston, Boston, MA, (ABLE), serving Essex, Middlesex, Suffolk and Worcester counties.

1.2 Eligibility Criteria

To be eligible for participation in the SCSEP, an individual must meet each of the following criteria for age, income, employment status, and place of residence.

- Age - Each individual must be 55 years of age or older. No upper age limit can be imposed for initial enrollment or continued enrollment.
- Income - The family income of an applicant or Participant must not exceed 125 percent of the federal poverty levels established and periodically updated in March of each year.
- Employment Status – Must be unemployed at the time of application, and while enrolled in the program.



- Residence - Each individual must reside in Massachusetts in the Sub-grantee's service area while enrolled in the program. (Residence means an individual's declared dwelling place or address. Local projects may not impose a length of residency prior to enrollment in SCSEP). Individuals that move out of the Sub-grantee's service area will be discharged from the program.

1.3 Goals of SCSEP

The goals of this program are to help you to:

Upgrade job skills for job placement

Find unsubsidized employment

Earn income during training

Get involved in his/her community

Provide the local program community with needed service

1.4 SCSEP History and Today

The Senior Community Service Employment Program has a long history.

History

During the 1960s, President Lyndon Baines Johnson announced the War on Poverty campaign. The Senior Community Service Employment Program (SCSEP), Title V of the Older Americans Act, was a product of this campaign. This program has been continually funded since then and addresses the same issues today. These issues include the understanding that many mature people continue to seek work with outdated skills and that economic changes may result in mature persons losing work or being forced into retirement before they are financially ready. Additionally, many older workers, mainly women, may find themselves seeking work for the first time (or returning after many years of homemaking) due to family changes and in need of gaining updated skills.

Today

SCSEP has been updated to take into account changes in the modern economy and to provide greater focus on the training aspects afforded to participants. Experience has shown that mature persons can improve their skill levels in a wide range of activities. By working closely with the Employment Specialist to create an Individual Employment Plan, participants can focus efforts



more effectively. The result is that participants can develop skills and behaviors that result in greater employability, facilitating their transition into unsubsidized employment.

Last, changes have been implemented to make use of additional programs and services to provide participants with more training and support. These additional services are designed to enhance not only job obtainment but also retention. Participants may find as they go through the initial assessments and development of an Individual Employment Plan (IEP) that barriers they are facing will be identified. Participants work with their SCSEP Employment Specialist to use the IEP to detail plans specifically designed to overcome those barriers whenever possible.

1.5 SCSEP Process

As a participant, it is very important that you have an understanding of the process that you are undertaking as well as the terms people will be using. This section presents a simple description of some of the steps and terms that you need to know.

1) Application, Acceptance, and Enrollment in the SCSEP program

This step makes sure you are eligible for the SCSEP and that the program has space open for you. Enrollment into this subsidized training program is based solely on SCSEP eligibility criteria and priorities, as set by the U. S. Department of Labor, and the applicant's qualifications for each given position. No person shall, on the grounds of race, creed, color, disability, national origin, gender, sexual orientation, political affiliation, religious beliefs, or participation in other government programs be subjected to discrimination under this program or any activity sponsored by the Executive Office of Elder Affairs. Much of the information you complete in this step will be reviewed annually to ensure you still meet income eligibility requirements. Funding from year to year is not guaranteed, and participation may be terminated due to no fault of your own but based on funding levels.



2) Other Enrollment Considerations

Participants must be capable of performing the tasks outlined in the Host Agency's Assignment Description and considered employable in non-subsidized employment at some point in the future. Every participant must also agree to actively cooperate in a job search.

Criminal Offender Record Information (CORI)

Participants must agree to have a [Criminal Offender Record Information](#) (CORI) check to ensure they are appropriate for serving in their community service assignment. The CORI check is performed for all new participants prior to assignment to a Host Agency. All CORI investigations that show findings of criminal records shall be reviewed immediately by a Sub-grantee staff member certified by the Criminal History Systems Board in Massachusetts to receive such information. The Criminal History Systems Board is the authority that disseminates CORI information to authorized persons. Said Sub-grantee staff must determine if CORI results can be a barrier to placement in some community service assignments, and must work to find an appropriate assignment.

The CHAPTER 6, 172C CORI REQUEST FORM is used to request the CORI information from the Criminal History Systems Board. A copy of this form and the results of the investigation must be kept in the separate locked file.

3) Orientation

This step consists of several smaller segments that may be conducted over time.

You will generally receive an orientation when this handbook is reviewed and a number of policies explained. Additionally, several important forms will be discussed and given out during your orientation session. These forms may include your acceptance and understanding of the requirements of this program and time sheets and other logistical forms. Staff members have a checklist to ensure your application, acceptance, and orientation is fully completed.

4) Assessment of Skills and Interests

This is one of the most important efforts you will undertake in this program. These assessments are designed to provide the foundation from which your Individual Employment Plan is created. Additionally, these assessments are used to identify other resources and training that you need to be successful in meeting your goals and the goals of this program. It is important that you be thoughtful in completion of this effort and asks all the questions you might have.



5) Individual Employment Plan

The Individual Employment Plan, or IEP, is the most important document that you will create in this program. You will create this plan in conjunction with SCSEP staff members. The IEP serves as your personal roadmap to success and is designed to specifically assist you in meeting your goals and those of this program. You should refer to your IEP often throughout your participation to ensure you are “on course.”

IMPORTANT: The IEP is an agreement similar to a contract. You are agreeing to participate in training and other activities, as well as setting goals for yourself. Your goals may stretch your current abilities, and that is very important and appropriate. Additionally, you should make sure your goals are SMART by working with your SCSEP representative. SMART goals are:

S: Specific; **M:** Measurable; **A:** Attainable; **R:** Realistic; and **T:** Timely.

You and your Employment Specialist may have to modify or improve your IEP as you complete different tasks or assignments or if your situation dramatically changes. Changes are not made to lower goals to your performance level but to take into account that situations beyond your control can change, and those changes may require re-assessment. Sometimes practical program reasons may require changes to your IEP (for example, a Host Agency becomes unavailable).

Only your SCSEP Employment Specialist has the authority to make changes. You should work with your SCSEP staff representative to bring any issues to his/her attention as soon as possible.

It is very important you meet the goals you set forth in your IEP. Failure to meet the responsibilities you agreed to in your IEP can have serious results, so the sooner problems or changes are addressed, the better your chances are for being successful in this program.

6) Training (Skills and Host Agency Assignment)

Gaining skills and experience can happen in more ways than one.

Skills Training

Skills training is the generic term for all training activities outside of the Job Assignment training effort. Skills training consists of both instructor-led group sessions and individual efforts. For example, your IEP may require vocational or computer training that requires attendance in a classroom environment where you may have workbooks, exercises, and reading assignments. Other skills training may require self-guided efforts such as reading books or attending sessions at a One-Stop Career Center.



Since SCSEP is an employment program, your Employment Specialist will work with you to ensure that within three (3) months of program enrollment you have:

- a current resume in both hard copy and electronic format;
- an e-mail address; and
- the ability to submit an on-line job application.

Host Agency Assignment

Host Agency assignment and the training there is the heart of SCSEP. By working at a government agency or a non-profit organization, you are building the skills and behaviors you need to obtain and keep a job. You can learn the skills required by the Host Agency position and receive feedback from your job Host Agency supervisor.

Host Agency assignment is for twelve (12) consecutive months at the same assignment. Upon completion of your assignment, your training and employment goals will be re-evaluated. You will then be transferred to a new Host Agency to help you learn new skills and improve your job potential.

7) Job Search Agreement

To continue participation in the SCSEP, you hold the responsibility to continually seek unsubsidized employment.

Participants must undertake / perform a minimum of 4 activities each month, 1 directly involving an employer such as mailing/faxing/submitting resumes with cover letters to employers or going on interviews. Other activity examples are attending job fairs, attending job counseling session/meeting and participating in training programs or classes. **The Job Search Agreement** must be signed by you and your Employment Specialist and kept in your personnel file.

8) Unsubsidized Job Placement

This step refers to participant's obtaining an unsubsidized job. This job may be with the Host Agency or another organization (profit or not-for-profit). Job placement is the goal of this program and should provide participants with increased income, benefits and personal satisfaction.



9) Follow-up

Helping the participant retain the job that he/she worked so hard to obtain is very important and is an important part of SCSEP. SCSEP staff members will contact you for up to 6 months to see how you are doing in your job. Additional resources may be made available to you (on a need and availability basis) to help you overcome problems that may threaten your continued employment.

10) Re-certification

Participant's income is re-certified annually. This recertification will be completed each May. You will be contacted by your Employment Specialist and an in-person appointment will be made. The income documents required for recertification are the same as those collected when you initially apply to the program.

Participants found ineligible because of income are given written notice of termination and terminated thirty (30) days after the notice. It is recommended that the terminated Participant work closely with the SCSEP Employment Specialist, the local One Stop Career Center and Temporary Placement Agencies in their search for employment.

11) Additional Descriptions

Below are some additional terms and facts that are useful to know about.

Employment Specialists and Job Developers

These important people facilitate the administration of SCSEP and work to ensure compliance with program regulations. You will have at least one staff member with whom you are in regular contact, and you will know who that is. In some cases, program participants serve in these roles and have received additional training to fulfill this role.

Host Agency Supervisor

The Host Agency supervisor plays an important role in preparing you for employment. The kind of training provided by supervisors helps you find work in the labor force and prepares you for interaction with your future manager. Host Agency supervisor expectations are documented and reviewed with you at your initial assignment.



Training Assignment

The SCSEP staff work together with the Host Agency to develop the Training Assignment Description, or TAD, for each position. Participants spend 20 hours per week involved in SCSEP activities. These hours include training time at the assigned site and other required program activities, as stated in the IEP and other agreements (if used). A TAD may be updated or the participant reassigned by SCSEP staff as needed to meet participant and program goals.

Orientation at the Host Agency

Orientation is required to be completed within 30 days of your assignment to a Host Agency. The orientation includes your site supervisor and will be conducted at the training location.

Quarterly Monitoring of Work Host Agencies

Your Employment Specialist will check in with you at least each quarter, most likely in a site visit to your training assignment. During this visit, he/she will meet with you as well as with your supervisor. The goal of these meetings is to evaluate the effectiveness of the assignment as well as evaluate your progress.

Evaluation

SCSEP is a training program. Honest and accurate evaluation is important to identify progress and satisfactory learning and identify what additional activity or resources are needed to help you successfully find unsubsidized employment.



Section 2

48 Month Durational Limit

Participants enrolled in the MA - SCSEP have a 48 month durational time limit to participate in the program and secure an unsubsidized job placement. The Sub-grantee Employment Specialist tracks and reports on the 48 month durational time limit for all participants. Executive Office of Elder Affairs will monitor the reports and will not approve any extensions over and above the 48 month limit.

This program participation durational limit is a requirement of the federally funded SCSEP grant and it is designed to assist the maximum number of individuals to participate in this subsidized training program and achieve their goal or securing unsubsidized employment.

You will be given a 30 days' written notice of your termination date. You must be informed that the termination is subject to appeal under the grantee's grievance policy. (See Section 5)



Section 3

What You Can Expect

Throughout your participation in SCSEP, you should expect people to be respectful.

The following list is not intended to be all-inclusive but rather to give you a flavor of how you can expect to be treated at your host agency and provides insight into the philosophy behind the services provided.

You can expect to:

- Be treated as a co-worker at a work-Host Agency, NOT as free help.
- Have a suitable work-training assignment that considers your personal preferences, temperament, life experience, and skills.
- Know about the Host Agency, its policies, people, and programs as well as what is expected of you.
- Have a training assignment description that accurately reflects the tasks and responsibilities of the training.
- Participate in updating the job description periodically to accommodate changes in tasks and/or added responsibilities.
- Obtain timely and effective skills training (for example, MS Word proficiency) that is appropriate for your IEP.
- Obtain additional training to support your ability to take on greater responsibilities at the Host Agency.
- Have a safe, orderly, and designated place at the work-Host Agency that is conducive to performance and learning.
- Have patient, respectful, and thoughtful guidance from your supervisor.
- Have diverse learning experiences that can lead to increased capability in finding unsubsidized employment. (This goal may require assignment to more than one Host Agency and will be documented in your IEP.)



Section 4

SCSEP Program Detail and Policies

There are things you must know about SCSEP policies and your benefits and responsibilities!

Obligation to Find Employment: Participants are obligated to find employment, and each IEP specifies the agreed-upon steps to be taken in this pursuit. Failure to meet the obligation to seek and find employment may result in the participant's termination from SCSEP. The following activities are required:

1. Attendance at meetings and trainings as required and agreed upon with your Employment Specialist.
2. Rotational assignments (work-Host Agencies).
3. Registration and participation in appropriate activities at a One-Stop Career Center.
4. Completing and submitting job-search logs with each bi-weekly timesheet.

By enrolling in SCSEP, you have made a commitment to seeking unsubsidized employment. Failure to comply with the above requirements may be grounds for termination from the program.

Additionally, some training may be required that is self-taught and/or self-paced through a computer lab or through a One-Stop Career Center or through group meetings and/or books. In all cases, the training must be documented in the IEP and must be agreed to with the Employment Specialist.

The IEP must be kept current as the SCSEP process document of record. If training cannot be accomplished due to factors such as funding, slot availability, or other factor, the IEP should reflect that or the goal should be removed or re-established using an available class/method.

Acceptance of Gifts

Favors, gifts, loans, free services, or other items of value cannot be accepted from anyone when they are intended to reward or influence official actions.



Attendance and Hours of Work

Regular attendance is essential to the operation of the Host Agency. If you are unable to attend or arrive at your scheduled time, you must call your supervisor at your Host Agency and your SCSEP Employment Specialist.

Good attendance is an important factor of the Individual Employment Plan and performance reviews. Excellent reviews are important for a reference when you seek unsubsidized employment.

Any Participant absent from duty for three consecutive assignment days without proper notification and authorization shall be considered to have resigned from the assignment, and this behavior may result in termination from the SCSEP program. Re-occurring tardiness or absences may result in removal from the SCSEP program.

The basic workweek for participants is 20 hours from Monday through Friday, although there may be some exceptions to this. This time allotment does not include the lunch or break period.

Participants are considered to be enrolled in a part-time training program, and if a lunch period is taken, the length of the unpaid lunch period should be based upon the Host Agency's personnel policies.

Change in Contact Information

Each Participant is responsible for notifying SCSEP staff of changes in Address, Telephone Number, Income, Household Size, or Emergency Contact Information.

Classroom and Educational Training Policy

Some participants may have typical, instructor-led training developed as part of their IEP.

Sometimes it is possible for participants to obtain partial or full funding for MA-SCSEP and attend classes while enrolled in the SCSEP program. For example, a participant may have a goal to become certified in Certified Nursing Aide, or Teachers Assistant.



Compensation

Compensation for SCSEP participants' training under the program shall not be less than the Massachusetts minimum wage currently \$8.00. SCSEP is fundamentally a training program and compensation is not subject to change based on individual performance. Compensation will not be provided for overtime hours worked by participants. Participants are not allowed to work over eight hours in any 24-hour period. Training work sites are not allowed to provide any form of additional compensation to SCSEP participants.

Computer Use

Computers at the Host Agency should be used for training purposes including research and Host Agency assignments. Computers should not be used for personal use or entertainment. Host Agency policies must be followed. Participants should also keep in mind that computer resources are owned by the Host Agency and can be searched at any time. When in doubt, consult your supervisor.

Confidentiality

Confidentiality of Host Agency information, procedures, staff, and clients is required. Confidentiality policies of the Host Agency will be explained and followed; however, sound judgment is also required. A breach in confidentiality could be grounds for removal from SCSEP.

Discrimination

Host Agency discrimination based on sex, religion, age, race, color, and national origin, veteran or military discharge status, disability or sexual orientation or marital status, as governed by all applicable State and Federal laws, is prohibited. Additionally, Host Agency sexual harassment is prohibited. Participants must report discrimination or harassment to SCSEP staff representatives.



Drug - Free Workplace Policy

The Executive Office of Elder Affairs absolutely prohibits the use, consumption or sale, purchase, transfer, or possession of any illegal or non-prescription drug by any enrollee during working hours, while representing SCSEP, while on the premises of or at Host Agencies.

In addition, participants are strictly prohibited from being under the influence of alcohol during working hours, while representing SCSEP, while on the premises of or at his/her Host Agencies.

Participants Assistance

SCSEP staff will work with participants, who suffer from drug or alcohol abuse or other personal/emotional problems, in receiving the necessary assistance.

Any participant seeking such assistance is encouraged to meet with his/her Employment Specialist to discuss the situation before problems begin to surface in the workplace. Any disclosures made by any participant will be treated as confidential, unless there is the risk of harm to persons or property.

The participant's decision to seek assistance will not be used as the basis for disciplinary action or used against the SCSEP participant in any disciplinary proceedings.

Disciplinary Action

Violation of this policy can result in disciplinary action, up to and including termination, even for a first offense.

Any Host Agency that knowingly permits the violation of this policy or who otherwise fails to ensure a workplace free of drugs, alcohol, and substance abuse shall risk the immediate loss of services from the SCSEP. (See Section 7)

Eating and Drinking

The policies of the SCSEP agency as well as the Host Agency must be followed. In general, do not eat or drink in computer labs or around expensive equipment. If you have any doubts, ask your supervisor.



Employment

SCSEP participants/Participants are not employees of the MA-SCSEP, an MA-SCSEP sub grantee, the Department of Labor, or the Host Agency. This handbook, associated procedures, forms, or other documentation do not constitute a work contract or a guarantee to obtain work.

Evaluations

Once the enrollee is placed at a Host Agency, the Host Agency supervisor assumes the responsibility of periodically evaluating the assigned participant. Each participant shall have an evaluation by the Host Agency supervisor every three months of enrollment in the program, and/or after transfer to a new Host Agency. An annual evaluation shall also be completed for each participant.

Holidays

The Participant must be paid for scheduled work hours during which a Host Agency is closed for a Federal holiday. Each Host Agency Supervisor has the responsibility of notifying (in writing) the SCSEP Employment Specialist and Participant as to the actual dates of recognized paid Federal holidays at their agency. Federal holidays include:

New Year's Day
Birthday of Martin Luther King, Jr.
Washington's Birthday
Memorial Day
Independence Day
Labor Day
Columbus Day
Veterans Day
Thanksgiving Day
Christmas Day



If the host agency is closed on additional holidays (e.g. the day after Thanksgiving), or inclement weather, the participant shall have the opportunity to make up those hours in the same pay period.

Optional Physical Examination

Each eligible program applicant has the option to have a physical examination prior to being assigned to a Host Agency and later on an annual basis. If the Participant makes the decision not to have a physical examination, the Participant is required to sign an examination waiver. The Sub-grantee must retain this form in the Participant's personnel file. The results of the health check-up are not shared with the Host Agency Supervisor or SCSEP Employment Specialist. The Participant may voluntarily disclose the results to assist the Employment Specialist in making appropriate placement assignments.

Leave Without Pay

A written request for leave without pay of **2 (two) weeks or less** should be granted to a participant when circumstances warrant it.

Approved Break Policy

Leave without pay, of no more than two weeks, will be granted to a participant if requested. The participant's community service assignment slot will be held open until their approved break ends. There is no guarantee that the participant will be placed back with the same host site agency.

The sub grantee will place an individual on the program waiting list if the break is longer than two weeks. Exceptions will be made for those providing proof of illness or care giving in accordance with the Family Medical Leave Act.

Sub-grantee staff will obtain appropriate return to work documentation prior to the participants return to the community service assignment if the break is due to illness. The documentation is to be part of the participant's permanent file and noted in case notes that it was receive.



Unallowable Benefits

The following benefits are not to be compensated with SCSEP funds:

- Retirement system or plan contributions
- Pension benefits
- Annual leave
- Accumulated sick leave
- Bonuses

Time sheets

Time sheets for the preceding weeks of work must be signed by both the Participant and the Host Agency Supervisor. It is the responsibility of the Participant to submit the time sheet to the Host Agency Supervisor at a previously identified time and date for each pay period.

Sick leave

Sick leave that is not part of an accumulated sick leave program. If the participant is to be out due to health reasons or other personal reasons for longer than 3 days, the Sub-grantee may place the participant on approved leave. If the participant is out for 3 days or longer, the sub grantees may require a doctor's note indicating that the participant is able to return to the Host Agency.

Jury Duty/Witness

Leave for jury duty shall be provided in accordance with State jury system and local laws. Participants shall receive regular pay for the first 3 days for service as a juror. The State will compensate the Participant from the fourth day on. A copy of the juror selection notification must be provided to the Employment Specialist prior to the first day of jury service.

Participants who are scheduled to serve as witnesses can make up the time. The Supervisor will notify the Employment Specialist of the approved make-up time arrangement.



Bereavement Leave

Participants shall be granted a leave of absence with pay for a maximum of four days upon evidence satisfactory to Sub-grantee of the death of a spouse, child, step-child, parent, step-parent, brother, sister, grandparent, grandchild, spouse's parent, a person for whom the participant is the legal guardian, a person for whom the participant is primarily responsible for making funeral arrangements or a person living in the employee's household. This leave may be used, at the option of the participant, within thirty (30) calendar days from said death. In extraordinary circumstances, at the discretion of the Sub-grantee, bereavement leave may be used after thirty (30) calendar days from the date of death.

Upon evidence satisfactory to the Sub-grantee, a participant shall be granted one (1) day of leave without loss of pay to attend the funeral of the brother, sister, grandparent or grandchild of the participant's spouse.



Section 5

Grievance Procedures

5.1 Requirements

The following policy must be fully adopted by all MA-SCSEP Sub-grantees. If this policy is not fully adopted by MA-SCSEP Sub-grantees, then the Sub-grantee must submit a policy implementing the same governing elements as provided below for the approval by the Executive Office of Elder Affairs.

MA-SCSEP Sub-grantees are required to give all MA-SCSEP participants a written copy of the Executive Office of Elder Affairs' SCSEP Grievance Procedures during the initial enrollment, along with a verbal explanation of the policy. This procedure must be applied fairly, consistently and uniformly. All grievances and rendered decisions must be kept on file. In notifying the complainant of a final decision, the Sub-grantee must advise the complainant of their right to further appeal.

Note: This policy does not cover allegations of discrimination which should be directed to the Office of Civil Rights, U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210. The complainant should file a written complaint within (90) days in the case of an alleged act of discrimination.

5.2 Grievance Procedures

MA-SCSEP Sub-grantees are committed to a safe training environment. Any SCSEP participant who believes that he/she has encountered differential, irregular or illegal action at a Host Agency must be directed to take specific actions and follow these steps:

Step 1. File the written complaint - The complainant should first file a written complaint with the MA-SCSEP Sub-grantee within thirty (30) days after the alleged act occurred.

- 1) The grievance should clearly explain the circumstances around the incident and the incident itself.
- 2) The grievance should be detailed, include date, time, location and names of people directly involved or witnessing the incident.



Step 2. Informal Hearing - After receiving a written grievance, the MA-SCSEP Sub-grantee shall make every effort possible to settle the problem, following these steps:

- MA-SCSEP Sub-grantee must document the receipt of the written grievance.
- MA-SCSEP Sub-grantee must conduct an interview with the parties concerned. During the interview the following information must be gathered and documented in writing:
 - Date of the incident or incidents and parties involved.
 - Description of the problem: action, decision or condition giving rise to the incident as seen by the complainant.
 - Other pertinent information that might be necessary to resolve the grievance.
- MA-SCSEP Sub-grantee shall render a written decision based on the information gathered during the above mentioned interviews within five business days from the date the initial interview was held. Such written decision shall include an account of all follow-up steps taken by the MA-SCSEP Sub-grantee to resolve the matter, and a list of advice or recommended solution(s) given to the parties involved regarding the merits of the complaint and how to remedy the situation.
- Inform the complainant that if he/she is not satisfied with the decision, he/she has the right to appeal it.
- If grievance can be resolved, the MA-SCSEP Sub-grantee shall document the resolution in writing and submit copies of the documentation to the parties involved. The parties must sign and date the agreement.
- If the complainant accepts this decision, the procedure is complete.
- If the complainant does not accept this decision, and files an appeal, then the grievance is brought up to the next level of review, which is described below, until it reaches the final steps in the process.

Step 3. Second hearing - If the first informal hearing does not resolve the issue, a second process shall be followed:

- All interested and involved parties shall present the grievance to the MA-SCSEP Sub-grantee in writing.
- Copies of all written grievances statements shall be made available to both sides.



- The SCSEP Sub-grantee shall form an ad hoc Complaint Resolution Committee with 3 members.
- Both parties shall be informed within five business days in writing when the committee will meet for the purpose of hearing the complaint, and the exact time and place of the hearing. At the hearing before the Complaint Resolution Committee, the complainant shall have the opportunity to present witnesses in his/her behalf, if appropriate, and shall have the opportunity to ask questions of the person or persons whose actions are alleged to have caused the complaint.
- The Complaint Resolution Committee shall consider the facts and make the decision within five days after the day of the hearing. The decision shall be made by a majority vote based on information in the file, written statements, and the testimony given at hearings. The decision shall be submitted in writing to the parties involved within five business days after a decision is made.
- Minutes shall be made of each hearing. The minutes, along with the written statements and other documentation presented at the hearing, shall be maintained in the Sub-grantee's files for at least three years after the final disposition of the grievance. If the complaint has not been resolved through the combined processes outlined above, the MA-SCSEP Sub-grantee shall inform the complainant of the process and procedure for appeal to the MA-SCSEP Sub-grantee – the Executive Office of Elder Affairs, 1 Ashburton Place, 5th Floor, and Boston, MA 02108.

5.3 Procedures for Appealing to the state office

- An appeal may be filed within five working days after a written decision is sent with the Executive Office of Elder Affairs' Office of the General Counsel, 1 Ashburton Place, 5th floor, Boston, MA 02108. The subject of the appeal can either be an alleged wrong decision (substance) or an inadequate compliance with hearing procedures (process).
- The MA-SCSEP Sub-grantee shall prepare for the Executive Office of Elder Affairs a report summarizing the complaint, the informal and formal investigation, and the disposition of the complaint and/or the written decision of the MA-SCSEP Sub-grantee's Complaint Resolution Committee.



- The Executive Office of Elder Affairs' Office of the General Counsel shall review the results of the complaint resolution procedure of the Sub-grantee. The General Counsel, or his/her designee, may seek or obtain additional information and shall affirm or amend the decision in writing within 15 business days. The decision of the Executive Office of Elder Affairs' Office of General Counsel is final. If the complainant alleges a violation of federal law (other than civil rights law) not resolved within 60 days they should follow the procedure listed below:

Violations of the Law and Discrimination:

- Complainants alleging violations of the law, other than those alleging discrimination, which are not resolved within 60 days as a result of the combined complaint resolution procedures of the MA-SCSEP Sub-grantee and the Executive Office of Elder Affairs, may file an appeal with: Division of Older Worker Programs, Employment and Training Administration; U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210. If the complaint alleges discrimination, it should be directed to the Office of Civil Rights, U.S. Department of Labor; 200 Constitution Avenue, NW; Washington, D.C. 20210.
- Once complete, the Executive Office of Elder Affairs maintains the complaint and decision in the files.
- If, in the course of the complaint resolution process, a participant is placed on approved break for administrative reason or removed from the payroll pending the results of the Complaint Resolution Committee or subsequent appeals process, and such determination is made in the participant's favor, the participant may extend their services to make up for lost hours during the appeal process and shall be restored to an active status.
- Harassment: Harassment will not be tolerated and is defined and controlled by the policies of the SCSEP agency and the Host Agency.



Section 6

Exiting SCSEP and Unsubsidized Employment Acquisition

6.1 Program Exit

EXECUTIVE OFFICE OF ELDER AFFAIRS requires Sub-grantees to work diligently to help job-ready participants to find jobs in the private and public sectors.

If you obtain an unsubsidized position, you must notify your Employment Specialist and the Host Agency Supervisor about it immediately.

An exit forms will be given to you and a number of follow up services will be provided after you leave the program.

6.2 Unsubsidized Employment Follow-Up

Follow-up services are required to ensure the success of the placement and to maintain high employment retention rates for the program. A member of the MA-SCSEP Sub-grantee staff must contact the former participant and his/her employer **30 days after placement**, again **at 180 days after program exit**, and again **after the end of the third quarter after program exit**. It is also strongly recommended that contact be made weekly or every 10 days during the first month to ensure there will be a placement after 30 days, and again at two or three months to ensure six months retention. If problems arise, they often occur during this time frame. Regular follow-up can identify problems and give staff an opportunity to initiate actions to deal with them before a former participant is terminated or leaves a job.

Follow-up contacts may be made by telephone, mail, or e-mail. During the follow-up contact, the SCSEP Employment Specialist will:

- **determine** if both the former participant and the employer are satisfied with the placement;
- **identify** any current or potential problems that could result in a termination of the former participant; and
- **offer** job counseling or referrals to community agencies, when appropriate, to resolve any issues.

The **SCSEP Participant Unsubsidized Placement Follow-Up form** generated by the SPARQ database should be used to document follow-up contacts.



6.3 Re-enrollment into MA-SCSEP

Former participants who lose their unsubsidized positions through no fault of their own or due to illness may be re-enrolled into SCSEP, provided that the re-enrollment occurs **within one year** of termination from the program, and that they meet **all required eligibility factors**.

Former participants who lose their unsubsidized positions through no fault of their own within 30 days of program exit should receive priority for reenrollment.



Section 7

Termination and Resignation from SCSEP

7.1 Termination Policy

MA-SCSEP Sub-grantees are required to give all MA-SCSEP participants a written copy of the Executive Office of Elder Affairs' SCSEP termination policy during initial enrollment, along with a verbal explanation of the policy. This policy must be applied fairly and consistently in terminating SCSEP enrollment for all participants. Participants cannot be terminated due to age, as there is no upper age limit for participation in SCSEP. Participants should only be terminated when it is clear that a program violation has occurred (see 12.2) and a record of the issue or incident is properly recorded in the participant's file.

All participants must receive a written SCSEP Termination Notice 30 days prior to the date of termination. All participants should be informed of their right to appeal any termination. The SCSEP Termination Notice must inform participants that the termination is subject to the EXECUTIVE OFFICE OF ELDER AFFAIRS's Termination Policy and Procedures, and a copy of the Complaint Resolution Committee and Grievance Procedures must be attached to the Sub-grantee's Termination Notice.

7.2 Termination Reasons

Listed below are reasons for termination and standard termination procedures for SCSEP participants:

1. Termination Due to provision of False Information.

If, at any time, the Sub-grantee determines that an individual was incorrectly declared eligible as a result of false information knowingly given by the participant, the Sub-grantee must give the participant immediate written notice with an explanation and must terminate the participant 30 days



after receipt of the notice. The participant will be removed immediately from the host agency and placed on leave without pay during the 30-day notice period.

2. Termination Due to Incorrect Initial Eligibility Determination.

If, at any time, the Sub-grantee determines that it incorrectly determined a participant to be eligible for the program through no fault of the participant, the Sub-grantee will give the participant immediate written notice explaining the reason(s) for termination and will terminate the participant's enrollment 30 days after it has provided the participant with written notice. The participant will be allowed to continue the host agency assignment with pay during the 30-day notice period.

3. Termination Due to Income Ineligibility Determined at Recertification.

If, at any time, the Sub-grantee finds a participant to be no longer eligible for enrollment, provider will give the participant written notice explaining the reason(s) for termination and will terminate the participant 30 days after it has provided the participant with written notice. The participant will be allowed to continue the host agency assignment with pay during the 30-day notice period.

4. Termination Due to achieving 48 Month Individual Durational Limit.

A participant will be terminated when he or she meets the 48 month maximum participation duration date. The Sub-grantee must send a notification of termination letter at least 30 days before the 48 month maximum participation date. The participant will be able to continue participating in the program until the date of exit.

5. Termination Due to Becoming Employed During Enrollment.

To qualify for enrollment in the SCSEP a participant must be unemployed. All participants are informed that they may not be employed while participating in the program and that they must notify the Sub-grantee immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the Sub-grantee of the employment will have their enrollment terminated immediately from the program. If this occurs, the participant will be



placed on Leave without Pay immediately. The Sub-grantee must send a 30 day letter of termination to the participant.

6. Termination for Cause

There are several reasons to terminate a participant “for-cause.” When warranted, a participant may be terminated for certain behaviors and/or conduct. The following are specific reasons; however, other similar reasons that demonstrate willful misconduct or an intentional disregard of program rules may cause involuntary termination. Examples of permitted reasons for termination include:

- Falsification of official records, such as timesheets
- Intentional disclosure of confidential or private information obtained from the host agency, grantee, or Sub-grantee
- Theft
- Physical violence or intentional destruction of property
- Obscene, abusive, harassing, or threatening language or behavior
- Sexual harassment of colleagues or others
- Causing an imminent threat to health or safety
- Non-compliance with drug and alcohol free policy, which prohibits participants while performing their host agency assignment or while carrying out objectives required by the IEP
- Frequent tardiness or absences exceeding 3 times during a 30 day period without good cause
- Failure to regularly attend or properly justify absence from the group training meetings or individual monitoring meetings conducted by the MA-SCSEP provider.

7.3 IEP related termination reasons

If a participant fails, without good cause, to cooperate fully with the Sub-grantee to accomplish the goals of his or her IEP strategy, an IEP-related termination “for-cause” may be in order. All IEP-related violations should be considered on a case-by-case basis. A Notice of Intent to Terminate must be submitted by Sub-grantee for approval to the SCSEP State Director prior to any IEP-related terminations. Examples of lack of compliance with the IEP without good cause include refusal to:

- Accept training opportunities outlined in the IEP



- Accept a new community service assignment to enhance skill development in support of IEP goals
- Accept supportive services that will enhance his/her ability to participate in a community service assignment consistent with the IEP
- Participate in sub-recipient offered services such as job search, skill training or resume writing

The IEP-related termination option should be used as a last resort. Before considering termination proceedings, the Sub-grantee should make every effort to find out why a participant is not cooperating to meet their employment and training goals. A participant must be given a chance to correct the offending action.

Written notice shall be given to the participant, citing a specific incident in which the participant did not fulfill his or her IEP responsibility. The notice should list the specific event, cite the jointly signed IEP agreement, and provide a period of 30 days to take corrective action.

7.4 Termination Procedures

Step one: Documented Verbal Warning. The Sub-grantee verbally warns the participant and documents the verbal warning in the participant file.

Step two: Written Warning. The Sub-grantee will complete a written warning and send it to the participant.

Step three: Corrective Action. The Sub-grantee will complete and send to the participant a 30-day Corrective Action Plan. The Corrective Action Plan must be discussed in person and signed by the Sub-grantee and the participant. To follow up on the Corrective Action Plan, the Sub-grantee will issue and request a weekly progress report from the participant.

Step four: Termination. If a participant fails to comply satisfactory with the 30-day Corrective Action Plan, the Sub-grantee will provide a MA-SCSEP Termination Notice to the participant informing him or her of the reason(s) for termination and the effective date, which must be a minimum of 30 days after the issuance of the notice. Inform the participant of his or her last day at the Host Agency, or inform the participant that he or she is being placed on a 30 day unpaid leave of



absence until the exit date. During this time SCSEP staff is available to assist the participant in job search activities.

7.5 SCSEP Termination Notice

A SCSEP Termination Notice is completed for each participant whose enrollment is ended. It must state the participant's right of appeal and a copy of the Complaint Resolution Committee and Grievance Procedures must be included with the SCSEP Termination Notice. The signature of the Sub-grantee program director or designee is required on each termination notice. A copy of the SCSEP Termination Notice shall be a part of the participant's record.

Sub-grantee must inform EXECUTIVE OFFICE OF ELDER AFFAIRS on all involuntary terminations for-cause.

7.6 Resigning from SCSEP

If a Participant decides to leave the program for any reason, two week's notice shall be given, and a written letter of resignation must be submitted to the Employment Specialist and copied to the Host Agency Supervisor. A copy of the Participant's resignation letter must be kept in the Participant's personnel file.



GLOSSARY

<i>Authorized position level</i>	The number of SCSEP enrollment opportunities established by Department of Labor and the Executive Office of Elder Affairs for a program year for each project.
<i>Community Service Assignment</i>	A part-time, temporary employment paid with grant funds in projects at host agencies through which eligible individuals are engaged in community service and receive work experience and job skills that can lead to unsubsidized employment.
<i>Disability</i>	A physical or mental impairment that results in substantial functional limitations in one or more major life activities. The individual must have a record of such impairment.
<i>DOL</i>	United States Department of Labor.
<i>Eligible individual</i>	Anyone who is at least 55 years old, unemployed, and who is a member of a family with an income that is not more than 125 percent of the family income levels, as established and periodically updated by the U.S. Department of Health and Human Services.
<i>Employment Specialist</i>	Primary staff assigned to help participants in their training, job search and match to potential employers.
<i>Executive Office Of Elder Affairs</i>	Massachusetts' Executive Office of Elder Affairs
<i>Grantee</i>	An entity receiving financial assistance directly from the Department of Labor to carry out SCSEP activities. The Executive Office of Elder Affairs is a state grantee.
<i>Host Agency</i>	A public agency or a private non-profit organization (501(c)(3) of the Internal Revenue Code of 1986) that provides a work site training duties and responsibilities, and supervision for a SCSEP participant.
<i>Individual Employment Plan (IEP)</i>	The SCSEP participant's training and employment plan. The IEP is jointly developed and agreed to by project staff, the participant and the host site. The IEP documents an employment goal, achievement objectives, and an appropriate sequence of services for the participant as determined by the comprehensive assessment.
<i>Job Developer</i>	Staff assigned to establish and maintain activities to develop, locate, and secure job openings for the participants.
<i>Low income</i>	A family income of no more than 125 percent of the poverty level established and periodically updated by the U.S. Department of Health and Human Services.
<i>OAA</i>	Older Americans Act of 1965, as amended (42 U.S.C. 3001 et seq.).



<i>Participant/ Enrollee</i>	An individual who is eligible for SCSEP, receives program services, and is paid wages for engaging in community service assignments under a project.
<i>Poor Employment Prospects</i>	Refers to individuals who are unlikely to find a job without the help of SCSEP or another employment and training program.
<i>Program Year</i>	The one-year period covered by the Sub grantee agreement, usually beginning on July 1 and ending on June 30.
<i>Project</i>	A sub-grantee that provides SCSEP services under a legal agreement with the Executive Office of Elder Affairs.
<i>Reassessment</i>	An annual evaluation that measures the progress a participant has made toward learning new skills, reaching personal development goals, and meeting his or her employment and training objectives under the individual development plan.
<i>Residence</i>	An applicant's or participant's declared dwelling place or address. Projects cannot require a length of residency for applicants prior to enrollment.
<i>SCSEP</i>	Senior Community Service Employment Program as authorized under Title V of the Older Americans Act.
<i>State Unit on Aging</i>	The sole agency designated to receive funding and carry out the requirements of the Older Americans Act in that state. The Executive Office of Elder Affairs is Massachusetts' State Unit on Aging
<i>Sub-grantee</i>	An organization that has entered into a binding legal agreement with the Executive Office of Elder Affairs to conduct SCSEP activities and to adhere to the legal, regulatory, and State policy requirements for MA-SCSEP.