

NEW YORK STATE OFFICE FOR THE AGING

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Andrew M. Cuomo, Governor

An Equal Opportunity Employer

Greg Olsen, Acting Director

PROGRAM INSTRUCTION

Number 16-PI-13

Supersedes

Expiration Date

DATE: June 29, 2016

TO: Area Agency on Aging (AAA) Directors

SUBJECT: Senior Community Service Employment Program (SCSEP)
Documentation and Record Retention Guidelines

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ACTION REQUESTED: All AAAs that administer the Senior Community Service Employment Program (SCSEP) must obtain documentation and retain records according to the SCSEP documentation and record retention guidelines outlined below. This pertains to all AAAs that administer SCSEP through NYSOFA funded slots, whether it is done directly or through a contract. If SCSEP is administered through a contract, it will be the responsibility of the AAA to ensure compliance with this PI. If the AAA or their contractor administers SCSEP through National grantee funded slots, please refer to that National grantee's program guidance. All programs should review their files to ensure that all required documentation is being obtained and retained in accordance with SCSEP documentation and record retention guidelines. If it is found that there is missing information, programs should take the necessary steps to obtain the missing information.

RESPONSE DUE DATE: All programs must obtain and retain required documentation in accordance with this PI immediately. Compliance with this PI will be verified during SCSEP monitoring visits.

PURPOSE: To transmit the SCSEP Documentation and Record Retention Guidelines.

BACKGROUND: SCSEP was authorized by Congress in Title V of OAA of 1965 to provide subsidized, part-time, community service training for unemployed, low-income

persons aged 55 or older who have low employment prospects. There are 29 SCSEP programs in NYS that are overseen by NYSOFA and operated by AAAs directly or contracted through other local entities.

All required documentation, both fiscal and programmatic, must be retained for three program years after the end of the program year in which the document was generated. For participants who enter unsubsidized employment after exiting the program, this means three program years after the end of the program year in which all follow-up activity is ended. Required documentation includes, but is not limited to:

- documentation of waivers of physical examinations by participant;
- documentation of the provision of complaint procedures to participants;
- documentation of eligibility determinations and recertifications;
- documentation of terminations and reasons for termination;
- records of grievances and outcomes;
- records required for data validation; and
- documentation of monitoring reports for sub-recipients and host agencies.

For complete information on what documentation is required to be collected as part of SCSEP, please see the “SCSEP Data Collection Handbook” produced by the United States Department of Labor Division of Adult Services in conjunction with The Charter Oak Group, LLC, which can be found on Charter Oak’s website:

<http://www.charteroakgroup.com/resources/scsep.shtml>.

All signed IEPs or waiver forms must be retained in the file for the specified retention period. If you are missing documentation, you must take reasonable steps to recreate it or you risk audit/monitoring problems. Only documents that are originated by SCSEP are able to be recreated and include, but are not limited to, case notes, IEPs, and assessments. Any supporting documents, such as proof of address or income, that are used for SCSEP eligibility need to be reobtained from the participant. If you are unsure if something is able to be recreated you should consult the NYSOFA Title V Coordinator. Additionally, if you do recreate documents, you must make case notes to document what you have done and indicate that the documents have been recreated.

In order to safeguard personal identifying information, all participant records must be securely stored in a locked filing cabinet with access limited to authorized personnel. Additionally, all participant medical records must be securely stored in a locked filing cabinet separately from all other participant records with access limited to authorized personnel for whom access is required as part of their job duties. Please see Topic 56 of the SCSEP Data Collection Handbook for more details on who has the right to access a participant’s medical records.

SCSEP programs will ensure that all required data is entered directly into the SPARQ system and done according to specified time schedules. All users must ensure compliance with the SPARQ access and security rules, which can be found on the SPARQ homepage (<https://www.sparq.doleta.gov/>). Safeguards should be in place to

prevent non-authorized users from accessing SPARQ. In the event of any potential security breach of personal identifying information, whether electronic files, paper files, or equipment are involved, the AAA shall notify NYSOFA immediately and follow any local procedures related to the breach of personal identifying information. The AAA may also want to consult their county attorney.

Please note that collecting data and entering it into the SPARQ system does not replace the need to retain documentation for the specified time frame. Data validation of the SPARQ system is conducted annually, and the original documentation will be used to verify the information found in the SPARQ system. For information on what documentation can be used to validate various data elements, please see the “SCSEP Data Validation Handbook” produced by the United States Department of Labor Division of Older Worker Programs, which can be found on the SCSEP Help website: <http://www.scsep-help.com/dotnetnuke/Documentation/DataValidation.aspx>.

If the sponsoring agency ceases to administer SCSEP, the agency is obligated to turn over complete data files in the specified electronic format, as well as hard copy case files, to NYSOFA.

Any newly operating SCSEP program must enter into SPARQ complete data related to any participants whom they acquire upon becoming the SCSEP sponsoring agency, including any participants who are still in the follow-up period. This also applies to any existing SCSEP program that takes over the service area that was previously administered by an agency that relinquishes sponsorship.

- PROGRAMS AFFECTED:**
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| <input type="checkbox"/> Title III-B | <input type="checkbox"/> Title III-C-1 | <input type="checkbox"/> Title III-C-2 |
| <input type="checkbox"/> Title III-D | <input type="checkbox"/> Title III-E | <input type="checkbox"/> CSE |
| <input type="checkbox"/> WIN | <input type="checkbox"/> Energy | |
| <input type="checkbox"/> EISEP | <input type="checkbox"/> NSIP | <input checked="" type="checkbox"/> Title V |
| <input type="checkbox"/> HIICAP | <input type="checkbox"/> LTCOP | |
| <input type="checkbox"/> Other: | | |

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