

## **SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)**

(OMB Control No. 1205-0040)

### **A. ECONOMIC PROJECTIONS AND IMPACT**

#### **1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D)) (MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)**

The purpose of the SCSEP State Plan (henceforth referred to as “the Plan”) is to outline a four-year strategy for the provision of employment training and other authorized activities for eligible individuals; as well as provide a description of the planning and implementation process for SCSEP services. The Plan considers the distribution of eligible individuals and employment opportunities across the state.

The goal of this Plan is to explain how NYS, through NYSOFA, will administer and monitor SCSEP through long-term coordination among the various state SCSEP grantees and sub-grantees, and to facilitate the efforts of key stakeholders. This occurs through coordination with LWDBs and other WIOA partners. These partners’ efforts to work collaboratively to provide job seekers and businesses with seamless service across the WIOA System will assist in accomplishing the goals of SCSEP. There is an emphasis on the importance of strengthening partnerships between grantees and program providers and involvement in community initiatives. The grantees are expected to work collaboratively to provide employment training for SCSEP participants at agency host or training sites. The anticipated outcomes are to improve self-sufficiency among participants, provide meaningful civic engagement opportunities that help strengthen communities, and transition SCSEP participants into employment opportunities.

SCSEP is a community service and work-based training program for older workers authorized in Title V of the Older Americans Act (OAA) and administered by USDOL/ETA. SCSEP is the only federally sponsored employment and training program targeted specifically to low-income older individuals.

SCSEP provides subsidized, part-time, community service training for unemployed, low-income persons aged 55 or older who have poor employment prospects. Through this program, older workers have access to SCSEP services and employment training assistance through the One-Stop Career Center System. Program participants work an average of 20 hours a week and are paid the highest of the federal, state, or local minimum wage.

Service priority is given to individuals meeting one or more of the following criteria:

- Is a veteran or a spouse of a veteran;
- Is 65 years of age or older;
- Has a disability;
- Has limited English proficiency;
- Has low literacy skills;
- Resides in a rural area;
- Has low employment prospects;
- Has failed to find employment after utilizing services provided under Title I of WIOA;
- Is homeless or at risk for homelessness; or

- Are formerly incarcerated or on supervision from release from prison or jail within five years of the date of initial eligibility determination. (Effective March 25, 2021, the 2020 reauthorization of the Older Americans Act (OAA) added this tenth characteristic category that has priority of service over those individuals who meet only the basic eligibility criteria related to age, income, and employment.)

NYSOFA administers the state SCSEP grantee program in eight regions in NYS, contracting with four regional providers that provide SCSEP services locally (see Attachment A, available at <https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>).

- Associates for Training and Development, Inc. (A4TD);
- New York City Department for the Aging ((DFTA) also known as New York City - Aging);
- PathStone Corporation (PSC); and
- The Workplace, Inc. (TWP).

In addition, there are seven national SCSEP grantees also providing SCSEP services in NYS:

- A4TD;
- Easter Seals, Inc. (ES);
- Senior Service of America, Inc. (SSA);
- National Council on Aging, Inc (NCOA);
- National Urban League (NUL);
- TWP; and
- The National Asian Pacific Center on Aging (NAPCA).

Each organization was invited to contribute to the development of this Plan.

## **Economic Projections and Impact**

### ***Long Term Job Projections***

In the full Economic Analysis section of the Combined Plan, projections for jobs in NYS are detailed for in-demand and emerging industries and occupations. For all workers, including older workers, the industry sector of Health Care and Social Assistance is in highest demand with occupations including: Personal Care Aides, Home Health Aides, Social and Human Service Assistants, and Child Care Workers. Ambulatory health care services also provide opportunities for employment in clerical, administrative, and management staff. The retail trade industry provides occupations for older workers as salespersons, clerks, and order fillers. The leisure and hospitality sector provides the second highest rate of growth in NYS since 2010, presenting further employment opportunities for older workers in service-related occupations.

One of the objectives of the workforce development system is to encourage LWDBs to plan strategically and focus their resources on priority industries, and eventually on priority occupations within those industries. To assist in these efforts, the New York State Department of Labor, Division of Research and Statistics developed these reports to identify “significant industries” in each of the ten regions in New York State. Industries presented here are classified according to their North American Industry Classification System (NAICS) code.

Table 1 – Significant Industries: lists significant industries in the eight SCSEP regions based on several factors including employment levels, wage levels, job growth (both net and percent) over the 2015-2020 period and expected job growth based on industry employment projections through 2028. Priority industries that may have been designated by economic development or workforce development officials were also considered.

Table 1. NYS Significant Industries

<b>Significant Industries</b>	<b>Source</b>	<b>Significant Industries – A Report to The Workforce Development System – New York State Department of Labor Bureau of Labor Market Information Division of Research and Statistics</b>
<b>Region</b>	<b>Counties in Region</b>	<b>Significant Industries</b>
1	Bronx, Kings, New York, Queens, Richmond	Construction Trade; Transportation & Utilities; Information; Financial Activities; Professional & Business Services; Educational Services; Health & Social Assistance; and Leisure and Hospitality Services.
2	Rockland, Westchester	Construction; Manufacturing; Transportation & Warehousing; Information; Financial Activities; Professional & Business Services; Educational Services; Health Care and Social Assistance; Arts, Amusement & Recreation; and Accommodation & Food Services.
3	Albany, Fulton, Rensselaer, Saratoga, Schenectady	Construction; Manufacturing; Transportation & Warehousing; Finance & Insurance; Professional & Business Services; Health Care; Health Care and Social Assistance; Educational Services; and State Government.
4	Clinton, Essex, Franklin	Agriculture; Construction; Manufacturing; Professional & Business Services; Educational Services; Health Care & Social Assistance; Leisure & Hospitality; and Government.
5	Jefferson, Lewis, St. Lawrence	Agriculture; Construction; Manufacturing; Professional & Business Services; Educational Services; Health Care & Social Assistance; Leisure & Hospitality; and Government.
6	Tioga, Tompkins	Construction; Manufacturing; Transportation & Warehousing; Professional & Business Services; Educational Services; and Health & Social Assistance Services.
7	Genesee, Monroe, Seneca, Wayne, Yates	Construction; Manufacturing; Professional & Business Services; Educational Services; Health Care & Social Assistance; and Leisure & Hospitality.
8	Chautauqua, Erie	Construction; Manufacturing; Transportation & Warehousing; Professional & Business Services; Educational Services; Health & Social Assistance; and Leisure & Hospitality.

**2. DISCUSS HOW THE LONG-TERM JOB PROJECTIONS DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN RELATE TO THE TYPES OF UNSUBSIDIZED JOBS FOR WHICH SCSEP PARTICIPANTS WILL BE TRAINED AND THE TYPES OF SKILL TRAINING TO BE PROVIDED. (20 CFR 641.302(D))**

### ***Long Term Job Projections and Unsubsidized Employment***

All NYS SCSEP projects rely on collaboration with the local Career Centers for Labor Market Information (LMI) to identify in-demand businesses and to access training and participant skill development strategies for SCSEP participants that best match the demand of the local economy. In identifying key local businesses and potential job opportunities, SCSEP staff, in coordination with the SCSEP participant, develop an Individual Employment Plan (IEP). The IEP is the participant's plan based on the skills and talents assessment conducted by the appropriate SCSEP staff person, or a recent assessment or plan developed by another employment and training program, and a related service strategy. The community service assignment with a host agency is an important aspect of the IEP since it provides a work environment to obtain needed job skills. The goal of the IEP is to develop the participant's training plan that will lead to an appropriate employment objective.

Some SCSEP projects have built strong partnerships with the Home Health Care sector. The Home Health Care partners provide training and hire older workers. Also utilized are OJT partnerships in the Security Guard industry. SCSEP projects also provide ancillary services to in career development to assist host agencies in providing training opportunities for eligible participants. Some of the training opportunities fall under the following general categories:

- Business/financial clerk;
- Computer operator;
- Kitchen aide/food preparation;
- Clerical;
- Receptionist;
- Maintenance/custodial; and
- Classroom aide.

### **3. DISCUSS CURRENT AND PROJECTED EMPLOYMENT OPPORTUNITIES IN THE STATE (SUCH AS BY PROVIDING INFORMATION AVAILABLE UNDER §15 OF THE WAGNER-PEYSER ACT (29 U.S.C. 491-2) BY OCCUPATION), AND THE TYPES OF SKILLS POSSESSED BY ELIGIBLE INDIVIDUALS. (20 CFR 641.325(C))**

#### ***Current and Projected Employment Opportunities***

Table 2. New York State, Persons Ages 55 and Over, shows the number and percentage of persons age 55 and over by Industry. The greatest number of persons 55 and over in NYS are employed in:

- Educational Services, and Health Care and Social Assistance Industry;
- Professional, Scientific, and Management, and Administrative, and Waste Management Services;
- Retail Trade;
- Finance and Insurance, and Real Estate, and Rental and Leasing;
- Manufacturing; and
- Arts, Entertainment, and Recreation, and Accommodation and Food Service.

<b>Table 2. New York State, Persons Ages 55 and Over</b>			
<b>Industry</b>			
		<b>Frequency</b>	<b>Percent</b>
	NIU (Not in Universe)	3,696,080	60.50
	Agriculture, Forestry, Fishing, and Hunting, and Mining	15,438	0.25
	Construction	171,184	2.80
	Manufacturing	133,573	2.19
	Wholesale and Retail Trade	221,235	3.62
	Transportation and Utilities	169,816	2.78
	Information	34,698	0.57
	Financial Activities	151,122	2.47
	Professional and Business Service	349,690	5.72
	Educational Services, and Health Care and Social Assistance	694,143	11.36
	Leisure and Hospitality	190,279	3.11
	Other Services, Except Public Administration	154,172	2.52
	Public Administration	127,789	2.09
	<b>TOTAL</b>	<b>5,979,673</b>	<b>100.00</b>

Source: U.S. Census Bureau, Current Population Survey, 2022 March Supplement.

The industries listed below present the highest probability for unsubsidized employment for most SCSEP participants:

- Personal Care and Services
  - Home Health Aides;
  - Personal Care Aides; and
  - Physical Therapist Aides.
- Office and Administration
  - Administrative Assistant;
  - Medical Secretaries; and
  - Office Clerks.
- Retail
  - Sales Clerk;
  - Cashiers; and
  - Customer Service Reps.
- Food Preparation & Service Workers
  - Cooks; and
  - Food Aides.

SCSEP projects utilize O\*NET, developed under sponsorship of USDOL/ETA through a grant to the North Carolina Department of Commerce. The O\*NET database contains occupations covering the entire U.S. economy. The Interactive Content Model in O\*NET details the knowledge, skills, characteristics, and abilities needed for these occupations.

O\*NET provides a summary for each occupation that details the tasks, technological skills, knowledge, skills, abilities, work activities, education, work styles and values, and wage and employment trends associated with each occupation.

Additionally, O\*Net Online has been successfully integrated with My Next Move directly into the SCSEP participant's IEP by at least one grantee, A4TD. Prior to enrollment, the applicant, with the assistance of the A4TD and Host Agency Supervisor, will do a skills self-assessment for each item in the Abilities, Work Styles, Work Activities, and Tasks. This assessment provides a blueprint for the participant by determining what skills and training(s) need to be developed, what skills the Host Agency can address and what skills need to be developed outside of the community service assignment. Within the first 6 months of the participant's enrollment, an assessment with the participant, A4TD staff and the Host Agency Supervisor is performed to determine what skills the participant has become proficient in, and which skills need improvement. This process provides a training track to increase the participant's ability to achieve unsubsidized employment.

## **B. SERVICE DELIVERY AND COORDINATION**

**1. A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS. THIS MAY ALTERNATIVELY BE DISCUSSED IN THE STATE STRATEGIES SECTION OF THE STRATEGIC PLAN, BUT REGARDLESS OF PLACEMENT IN DOCUMENT, MUST INCLUDE:**

**A. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))**

### **Service Delivery and Coordination**

#### ***Coordination of SCSEP with Other Programs***

A complete detail of the development and activities of the NYS WIOA Interagency Team is included in this Combined Plan in the Workforce Development Activities and Implementation Strategies sections. NYSOFA, representing SCSEP, joined the team in late 2015.

#### **Coordination with WIOA Title I Programs**

The WIOA Interagency Team was originally formed to work together on the 2016 NYS Combined Plan. The Interagency Team continued to meet to develop strategies for the implementation of WIOA and coordination of services, referrals, and information sharing between partners, increasing awareness and understanding of the various Title I programs. The continued participation of the NYSOFA SCSEP staff on the team ensures that SCSEP eligible individuals are represented in the One-Stop Career Center System. WIOA mandates an MOU between all required partners with the LWDB and CEO(s). The MOU must detail the SCSEP project's involvement in the One-Stop Career Center System.

**B. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES BEING CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OLDER AMERICANS ACT (OAA). (20 CFR 641.302(H))**

### Coordination with Other Titles of the Older Americans Act

NYSOFA is the State unit on Aging and oversees the activities carried out statewide under the other titles of the OAA. Historically, NYSOFA's operation of SCSEP was performed through participating Area Agencies on Aging (AAA) and their contractors, throughout NYS. As of July 1, 2018, NYSOFA changed its SCSEP operation from funding through 29 County AAAs to 8 regional programs awarded through a competitively bid RFA. The result left one SCSEP region, New York City, still operated by the AAA and the remaining seven regions operated locally by three additional National Grantees; Associates for Training and Development (A4TD) which operates in five regions, PathStone, and The WorkPlace (TWP). While NYSOFA's SCSEP program is no longer operated through the AAAs, there is collaboration between the new regional SCSEP operators and the AAAs. NYSOFA will continue to foster the collaboration between the AAAs and their contractors and National Grantees in serving the employment needs of older workers. This will be achieved through in-person meetings and virtual meetings, conference calls, and other methods of communication.

As many of the community partners have returned to in-person operations, state projects will re-establish and form new community partnerships to assist in providing needed services to older adults. In New York City, MOUs for partnerships will be submitted to the Mayor's Office for People with Disabilities (MOPD), NYC Department of Veteran's Services, and the NYC Office of Emergency Management (OEM). NYC Department for the Aging (DFTA) will be making presentations to Re-Entry Citizens Network. Associates for Training and Development (A4TD) will utilize partner relationships and partner networks to access SCSEP applicants. The partners act as an extension of A4TD's Marketing Team by sharing their program materials, social media posts, and newsletters with their client base, and A4TD will reciprocate with their partner's program materials.

### **C. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH- BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))**

#### Coordination with Other Public and Private Entities

The supportive services SCSEP projects must ensure the best possibilities for the success of SCSEP participants who rely on coordination from both AAA delivered services and other private entities and programs providing services to older adults and those with special needs or disabilities. Each SCSEP project throughout the state accesses partners instrumental to SCSEP participant outreach, training, and placements. A cooperative relationship with NYSED/ACCES-VR enables state projects and National Grantees to access assistance for participants with disabilities. This partnership also provides vocational rehabilitation and training/job development alternatives for older clients. Other cooperative relationships that subgrantees have cultivated include: Literacy Volunteers, OCFS/NYSCB, local community colleges, SUNY, county DSS offices, regional museums, and local economic development agencies.

### **D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))**

#### Coordination with Labor Market and Training Initiatives

All of NYS's SCSEP projects rely on coordination with the local Career Centers for LMI, and job training and participant skill development. In addition, the collaboration with local community-based organizations, educational institutions, and governmental entities as host agencies continues to provide in-demand training and potential employment placements. Local SCSEP staff will continue to reach out to local businesses and other resources to expand those relationships to ensure that community service employment assignments are truly providing the skill training that meets the needs of both participants and businesses.

#### **E. ACTIONS TO ENSURE THAT SCSEP IS AN ACTIVE PARTNER IN THE ONE-STOP DELIVERY SYSTEM AND THE STEPS THE STATE WILL TAKE TO ENCOURAGE AND IMPROVE COORDINATION WITH THE ONE-STOP DELIVERY SYSTEM. (20 CFR 641.335)**

##### Coordination with One-Stop Career Center System

The continued participation of NYSOFA SCSEP staff on the WIOA Interagency Team represents SCSEP as an active partner in the One-Stop Career Center System and the goal of improving coordination of the system. SCSEP projects in NYS have close working relationships with the Career Centers. Many of the SCSEP program coordinators have an ongoing presence at the Career Centers and serve as the primary point of contact for older job seekers. SCSEP participants will be assigned to the local Career Centers to assist with administrative duties, providing valuable assistance to the Career Center while enhancing their training for unsubsidized employment. This coordination also assists with outreach, especially to rural areas of NYS. NYSOFA will encourage the continuation of these collaborative efforts, which will include using Career Centers for job orders, LMI, coordination on intensive services/training needed by specific participants, and other resources of value to SCSEP. In addition, NYSOFA will continue to encourage SCSEP projects and Career Centers to collaborate on joint training activities and job fairs, share job leads, and work together to engage the business community in Career Center and SCSEP initiatives that support local business interests.

#### **F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.**

##### Efforts Working with Rural Economic Development Offices

SCSEP operation, because of the limited nature of employment opportunities and transportation options, can present a challenge in rural areas. SCSEP efforts to work with local economic development offices are especially crucial in rural locations. In NYS, Regional Economic Development Councils (REDC) are a key component in a transformative approach to state investment and economic development. The Regional Councils have been guided by their regional strategic economic development plans, which emphasize each region's unique assets and provide strategies to harness local resources to stimulate regional economic development and create jobs statewide. These plans, initially adopted in 2011, continue to be implemented today, with annual updates to address emerging state and regional challenges and opportunities. The REDCs are public-private partnerships made up of local experts and stakeholders from business, academia, local government, and non-governmental organizations. The REDCs have redefined the way NYS invests in jobs and economic growth by putting in place a community-based, bottom-up approach and establishing a competitive process for state resources. Each REDC has implemented plans that will create jobs in the communities in each region and, except for

New York City, includes rural areas. This Plan will encourage each SCSEP sub-grantee to continue with its efforts to work with their local economic development office. NYSOFA will assist all sub-grantees, with a focus on rural areas, in reaching out to local economic development offices.

## **2. THE STATE'S LONG-TERM STRATEGY FOR ENGAGING EMPLOYERS TO DEVELOP AND PROMOTE OPPORTUNITIES FOR THE PLACEMENT OF SCSEP PARTICIPANTS IN UNSUBSIDIZED EMPLOYMENT. (20 CFR 641.302(E)) (MAY ALTERNATIVELY BE DISCUSSED IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN.)**

### ***Long Term Strategy for Engaging Businesses***

In the State Strategies section of the Combined Plan, several methods of business engagement are discussed to be utilized by the various WIOA partners. One of the WIOA Interagency Team's workgroups is dedicated to the development of a common system for agencies to track their engagements of businesses. It is the goal of each SCSEP project to provide the training needed for each participant to maximize their potential toward transition to unsubsidized employment. In order to achieve this goal, strategies for engaging and developing partnerships with businesses within industries and occupations most likely to employ SCSEP participants provide the best opportunities.

SCSEP projects continually seek out employment opportunities with businesses and industries located in their communities. They track business trends and employment opportunities through participation/membership in their LWDBs, workforce committees, and chambers of commerce. SCSEP projects utilize staff as job developers. Part of their job development responsibilities entail meeting with local and regional businesses to discuss involvement with SCSEP, listen to the businesses' needs, and offer the opportunity for SCSEP participants to meet the businesses' needs. These one-on-one contacts are the basis for developing training strategies with the business, developing on-the-job experience contracts, or directly filling jobs while establishing or maintaining partnerships.

SCSEP projects utilize online programs to access information about jobs in specific areas or counties, along with required skill levels. Once identified, staff can contact those businesses who fall into high demand or high growth areas. Frequent contact with local businesses allows SCSEP staff to provide participants with information on local job availability and the skills needed to obtain those jobs. Staff are also involved in business outreach activities such as visiting with employer representatives at job fairs, involvement of employers in Job Search/Job Club training, and any other networking activities that result in business relationship building. The pandemic necessitated staff develop virtual means of contact with potential employers consisting of virtual job fairs and assisting participants with virtual interviews. Staff welcome the opportunity to provide information on hiring, training, and retaining older workers through meetings, seminars, workshops, presentations, and any other venues where potential businesses may be present. Though not all attendees will be direct business contacts, these activities help spread the word about the value and availability of older workers, address older worker stereotypes, and introduce businesses to the ageless workforce concept.

## **3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))**

### ***Long Term Strategy for Serving Minority Older Individuals***

NYS is a leading recipient of immigrants and minorities from around the globe. Three of NYS's largest cities (New York City, Albany, and Buffalo) have populations nearly half comprised of minorities (59%, 52% and 46% respectively). In 2014 NYSOFA added the dedicated position of Advocacy Specialist to enhance the priority of services to those in greatest economic and social need, including but not limited to, services for rural residents, individuals with disabilities, Native Americans, individuals with limited English proficiency, and individuals at risk for institutional placement.

The Advocacy Specialist works with all programs serving older adults to increase the cultural competency and capacity to serve older minority individuals successfully, statewide. NYSOFA requires that all aging programs are compliant with the legal requirements as identified in the OAA, as well as the Elder Law, Civil and Human Rights legislation, including the NYS Human Rights law, Title VI of the Civil Rights Act and the Americans with Disabilities Act, Federal Executive Order 13166, and Section 504 of the Rehabilitation Act of 1973.

For some minority individuals with limited English proficiency, language access presents a potential barrier to employment. To mitigate this barrier, SCSEP projects make SCSEP enrollment and recruiting materials available in Spanish and other languages. Projects have access to telephone interpretation services, and some projects have bi-lingual program staff available to serve participants.

In addition to these efforts, the Plan's long-term strategy for serving minority older individuals under SCSEP will be the continued encouragement of the recruitment of minorities. Minorities, especially, those with poor employment prospects, will be emphasized over the duration of the Plan to be a priority of NYSOFA and the aging network in NYS. Local SCSEP projects will continue to be required to give increased attention to recruiting and training the most disadvantaged through cooperative recruitment efforts with local community service programs and minority agencies. Community agencies that serve low-income individuals and minorities will be called upon, where appropriate, to serve as SCSEP worksites. Outreach strategies will include senior employment fairs, local media articles, announcements in newspapers, newsletters, and flyers designed to reach diverse ethnic groups. Monitoring of participation by minorities will continue to be included in the NYSOFA sub-grantee monitoring tool. If a SCSEP project is identified as under-serving minorities, a corrective action plan will be required, and training will be provided. NYSOFA will provide ongoing technical assistance and training to projects with specific focus placed on minority recruitment for both the participant and/or host agency to rectify and address any barriers to unsubsidized employment.

SCSEP projects will continue to recruit veterans in collaboration with the Black Veterans for Social Justice and Veterans Rehabilitation and Employment (VRE) representatives at Career Centers. Recruitment material and presentations are made available throughout local well-established community service networks, including AAA and other service delivery systems for those 60 and older. Other outreach efforts have been made toward assisting under-represented populations by coordinating with agencies that target low-income priority older adults, such as English as a second language training programs and minority service agencies. DFTA's SCSEP program will continue to target lower income neighborhood centers, homeless shelters, food pantries, organizations that work with clients recently released from incarceration, and public housing. In addition, faith-based organizations, long known for their outreach to underserved individuals, will also be part of the strategy to ensure that minority populations are included in SCSEP. A new organization was recently added, the Council of

Peoples Organization, whose mission is to assist immigrant families, particularly individuals from South Asia and individuals who are Muslim.

**4. A LIST OF COMMUNITY SERVICES THAT ARE NEEDED AND THE PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)**

***Community Services Most In Need***

SCSEP projects were surveyed to identify the anticipated needs of SCSEP participants coupled with the locations of those community service groups working to meet those needs. The needs most identified for SCSEP participants include housing, nutrition, transportation, and an array of services designed to support self-sufficiency and independence. Additionally, many of the locations identified to meet those needs will also serve as host agency sites. Another need identified by the NYC DFTA will focus on SCSEP eligible individuals being released from prison. As mentioned previously, effective March 25, 2021, the 2020 reauthorization of the OAA added eligible individuals who have been incarcerated or are under supervision following release from prison or jail within the last five years as a priority population for enrollment and an additional category for most in need characteristics.

Below are samples of the organizations that responded to counties with SCSEP services.

**Region 1 (Bronx, Kings, New York, Queens, and Richmond Counties):**

- Release Aging People in Prison (RAPP);
- The Correctional Association of NY;
- NYC Department of Homeless Services;
- NYC Housing Authority;
- Andrew Jackson Senior Center;
- The Queens Center for Gay
- Asian Americans for Equality Center:
- Self-Help Benjamin Rosenthal Prince Street Senior Center;
- Sunnyside Older Adults Center Queens;
- NYC Department of Youth and Community Development (intergenerational initiative); and
- Chinese Chamber of Commerce.

**Region 2 (Rockland and Westchester Counties):**

- White Plains Veteran Center;
- Commission for the Blind;
- Lexington Center for Recovery;
- Westchester Community College;
- Hope Community Services of New Rochelle,
- City of Yonkers;
- Lifting Up Westchester.

Region 3 (Albany, Fulton, Rensselaer, Saratoga, and Schenectady Counties):

- Salvation Army of Saratoga;
- First Church of Albany;
- Boys and Girls Clubs;
- Troy Community Gardens;
- Emmanuel Baptist Church.

Regions 4 & 5 (Clinton, Essex, Franklin, Jefferson, Lewis, and St. Lawrence Counties):

- The ARC of St. Lawrence and Jefferson Counties;
- Ft. Drum Regional Health Planning Organization;
- Watertown Urban Mission;
- Child Advocacy Center of Northern NY;
- Association for the Blind and Visually Impaired of Northern NY;
- St. Lawrence County Agency on Aging;
- North Country Prenatal Council;
- CREST Center;
- Potsdam Library;
- St. Lawrence County Arts Council;
- St. Lawrence County Health Initiative;
- Community Health Center of the North Country; and
- Catholic Charities of the North Country.

Region 6 (Tioga and Tompkins Counties):

- Broome Tioga BOCES
- Tompkins County Workforce Center.

Region 7 (Genesee, Monroe, Seneca, Wayne, and Yates Counties):

- Attain Labs in Monroe County & Wyoming County;
- Rochester Educational Opportunity Center;
- Rochester Works;
- Action For a Better Community;
- Notre Dame Learning Center;
- Community Action of Wyoming County;
- Lifetime Assistance;
- Center for Disability Rights;
- Urban League of Rochester;
- Rochester Libraries.

Region 8 (Chautauqua and Erie Counties):

- Buffalo Employment and Training Center;
- Community Action Organization;

- Catholic Charities of Western New York;
- Rural Outreach Center;
- Friends of the Night People;
- Olmstead Center for Sight;
- Buffalo Goodwill Store and Donation Center;
- Buffalo City Mission;
- Genesis Center;
- Read to Succeed;
- UB Educational Opportunity Center;
- NYS Corrections and Community Supervision; and
- Northwest Mental Health Community.

**5. THE STATE'S LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEES AND PROGRAM OPERATORS TO BETTER ACHIEVE THE GOALS OF THE PROGRAM. THIS MAY INCLUDE RECOMMENDATIONS TO THE DEPARTMENT AS APPROPRIATE. (20 CFR 641.302(K))**

***Long Term Strategy to Improve State SCSEP Program***

With encouragement from USDOL/ETA, between 2016 and 2017 a NYSOFA exploratory committee examined the design of the program. As a result of the committee's analysis of the structure of SCSEP in NYS, it was determined that regionalizing NYSOFA's SCSEP program would maximize efficiencies and resources, resulting in the optimization of opportunities for unsubsidized employment for SCSEP participants.

NYSOFA's SCSEP program was operated through a network of 29 AAA sub-grantees, who either directly provided or contracted out the program. Some of the County projects had only 3 authorized positions; these positions are then modified due to NYS's higher minimum wage than the Federal minimum wage, resulting in programs having as few as two authorized positions. Due to the low number of authorized positions, staff overseeing these authorized positions are often responsible for other programs operated by the sponsoring agency, making it difficult for staff to become well-versed in the complex regulations and program requirements of SCSEP and giving the program complete attention. Regionalizing was intended to result in efficiencies at both the state and local level in the operation of the program. NYSOFA issued an RFA on January 25, 2018, that identified eight regions throughout NYS that contain State grantee authorized positions. Additionally, authorized positions were swapped with two different national grantees in order to create the regions. As a result of the RFA, beginning July 1, 2018, four SCSEP regional providers; A4TD, DFTA, PSC, and TWP were awarded 5-year contracts, to be renewed annually, to provide the state SCSEP service in eight regions. (Attachment B: Regional Map, available at <https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>).

Regionalization creates an economy of scale for the programs. By being responsible for more authorized positions, staff can devote more time to SCSEP, resulting in a better understanding of the program requirements. Additionally, there is more consistency across the state by having only 8 programs instead of 29. NYSOFA is able to provide an increased level of technical assistance and an

optimized level of attention to each sub-grantee. On-site monitoring and data validation will occur for all programs annually. NYSOFA anticipates that regionalization will not only improve administrative practices but will also result in a better experience for participants and an increase in placements into unsubsidized employment.

## **6. THE STATE'S STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP PARTICIPANTS' ENTRY INTO UNSUBSIDIZED EMPLOYMENT, AND TO ACHIEVE, AT A MINIMUM, THE LEVELS SPECIFIED IN OAA SECTION 513(A)(2)(E)(II). (20 CFR 641.302(F))**

### ***Continuous Performance Improvement***

The Plan's strategy over the next four years for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment will include a combination of ongoing technical assistance and training provided to sub-grantees. Given the continued impact the minimum wage has on the number of authorized positions available to SCSEP participants in NYS, projects will focus efforts on job development. This focus will facilitate the SCSEP participant's goal of obtaining unsubsidized employment and will provide authorized position openings for new participants.

Beginning in PY 2018, SCSEP grantees must follow the performance requirements from the Interim Final Rule (IFR) published on December 1, 2017, which revises the measures at 20 CFR 641.700, implementing the new performance requirements specified by the Older Americans Act (OAA) Reauthorization Act of 2016. On July 30, 2018, USDOL/ETA issued a Final Rule adopting the IFR as final without change. The implementation of these new performance goals and targets has renewed focus on these performance measures.

In the past and presently, NYS has met or exceeded its performance goals. Now that the new data system, SCSEP Grantee Performance Management System (GPMS) has made the transition from the former data system, SCSEP Performance and Results QPR (SPARQ) and is fully operational; performance goals will be easier to trust and track, allowing grantees to utilize quarterly performance measures as a gauge of continuous performance improvement.

Additionally, over the next four years sub-grantees will be encouraged to utilize all sources of training (SCSEP virtual modules and live trainings) provided through USDOL/ETA related to improving performance as well as other aspects of SCSEP.

## **C. LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION**

### **1. A DESCRIPTION OF THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))**

#### **Location and Population Served, including Equitable Distribution**

##### ***Locations and Populations Most In Need***

Attachment C, Population Figures and Percentage, available at <https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>, details the New Yorkers age

55 and older who earn 125% or less of federal Poverty Guidelines. There are approximately 1 million New Yorkers who are eligible for SCSEP. Of those:

- 57.9% are Women and 42.1% are Men;
- 59.9% White; 21.8% African American; 15.1% Asian; 1.4 % other; and 1.8% Two or more races.
- 77.7% non-Hispanic and 22.3% Hispanic.
- 72.8% Native born; 12.7% Naturalized; and 14.5 Non-Citizen.
- 26.8% did not complete High School; 40.6% High School/GED; 9.4 % some college, but no degree; 8.1 % associate degree; 9.7% bachelor's degree; and 5.4 % higher than a bachelor's degree;
- 44.5% with a disability, and
- 6.0 % are Veterans.

## 2. LIST THE CITIES AND COUNTIES WHERE THE PROJECT WILL BE CONDUCTED. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

### *Counties of SCSEP Projects*

Attachment D, located at <https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>, details the PY 2023 Geographic Areas to be Served – Areas Affected by Project. The number of assigned SCSEP authorized positions are based on USDOL/ETA's distribution factor, which serves as the foundation for equitable assignment of SCSEP positions. USDOL/ETA uses census data by county and annual program appropriations to calculate the allocation of authorized positions for each county in the state. The number of authorized positions is proportional to the number of eligible people in the county compared to the eligible state population.

Included in Attachment D, PY 2023, is the listing by county of the number of SCSEP authorized positions. There were incremental changes from PY 2022, however, there were changes from PY 2017 because of position swaps with national grantee, A4TD that were negotiated in order to construct the eight state SCSEP regions.

Table 4. details the Authorized Positions exchanged between NYS and A4TD to establish the eight NYS SCSEP Regions.

Table 4. Authorized Positions change between NYS and A4TD to make 8 State SCSEP Regions.

PY 17 AP			Swap Proposal			PY 17 Post Swap AP		
County	State	A4TD	County	State	A4TD	County	State	A4TD
St. Lawrence	3	13	St. Lawrence	13	-13	St. Lawrence	16	0
Jefferson	3	9	Jefferson	9	-9	Jefferson	12	0
Tompkins	3	5	Tompkins	5	-5	Tompkins	8	0
Seneca	0	5	Seneca	5	-5	Seneca	5	0
Onondaga	10	40	Onondaga	-10	10	Onondaga	0	50
Cortland	3	3	Cortland	-3	3	Cortland	0	6
Oneida	5	26	Oneida	-5	5	Oneida	0	31

Wyoming	3	2	Wyoming	-3	3	Wyoming	0	5
Niagara	4	24	Niagara	-4	4	Niagara	0	28
Ontario	3	7	Ontario	-3	3	Ontario	0	10
Sullivan	4	0	Sullivan	-4	4	Sullivan	0	4
<b>Total</b>	<b>41</b>	<b>134</b>	<b>Total</b>	<b>0</b>	<b>0</b>	<b>Total</b>	<b>41</b>	<b>134</b>
<b>64 NY slots swapped</b>								

### 3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

#### Current Slot Imbalances

Table 5. below contains data taken from USDOL/ETA's sponsored Grantee Performance Management System (GPMS) Equitable Distribution Reports section, which lists the authorized positions by County in the NYSOFA SCSEP project and compares the variance between modified positions (based on NYS's minimum wage) and enrolled positions as of December 31, 2023.

Table 5. Enrollment Variance (Program Year 2023 in the 1st Quarter July 1, 2023 – September 30, 2023)

New York County	Authorized Positions	Modified Positions	Enrolled Positions	Variance	Variance %
Albany	8	4	<del>12</del> 11	<del>8</del> 7	<del>200</del> 175.00 %
Bronx	73	34	<del>35</del> 3	<del>1</del>	<del>2.90</del> %
Chautauqua	4	2	0	-2	-100.00%
Clinton	9	5	3	-2	-40.00%
Erie	29	15	14	-1	-6.70%
Essex	5	3	2	-1	-33.30%
Franklin	7	4	3	-1	-25.00%
Fulton	3	2	1	-1	-50.00%
Genesee	3	2	0	-2	-100.00%
Jefferson	11	6	2	-4	-66.70%
Kings	107	50	54	4	8.00%
Lewis	3	2	<del>10</del>	<del>12</del>	<del>100</del> % <del>50.00</del> %
Monroe	17	9	12	3	33.30%
New York	66	31	<del>40</del> 36	<del>95</del>	<del>29.00</del> % <del>16</del> %
Queens	92	43	34	<del>9</del>	<del>20.93</del> %
Rensselaer	4	2	1	-1	-50.00%
Richmond	16	8	<del>76</del>	<del>12</del>	<del>12.50</del> % <del>25</del> %
Rockland	5	3	1	-2	-66.70%
St. Lawrence	14	7	8	1	14.30%
Saratoga	4	2	1	-1	-50.00%

Schenectady	4	2	2	0	0.00%
Seneca	4	2	0	-2	-100.00%
Tioga	7	4	1	-3	-75.00%
Tompkins	7	4	6	2	50.00%
Wayne	4	2	1	-1	-50.00%
Westchester	35	16	20	4	25.00%
Yates	3	2	1	-1	-50.00%
TOTAL	544	266	<del>262</del> 252	-14	-1.50%

NYS's minimum wage continues to present a challenge for all SCSEP projects in the state. The ongoing impact of the pandemic has presented some issues with both getting host agencies prepared to bring on SCSEP participants and the recruitment of new participants in some counties. It is also the goal of each program to bring any under enrollment in balance by the end of the PY. In some SCSEP projects that are over enrolled, adjustments in the number of community service hours were decreased in order to keep the project within equitably distributed funding.

#### **4. THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:**

##### **A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.**

##### ***Long Term State Strategy for Equitable Distribution of SCSEP Positions***

##### **Moving Positions from Over-Served to Underserved Locations**

NYSOFA plans to continue to work with all SCSEP National grantees operating in NYS on equitable distribution of SCSEP slots. This will provide an opportunity for any issues surrounding equitable distribution to be cooperatively resolved between both state and National grantees. Through continued review of slot distribution, NYSOFA, in consultation with NYS National grantees and the approval of USDOL/ETA, will determine if moving slots between sponsors and/or counties will be necessary.

##### **B. EQUITABLY SERVES RURAL AND URBAN AREAS.**

##### **Equitable Service in Urban and Rural Areas**

The Census Bureau identifies two types of urban areas:

- Urbanized Areas (UAs) of 50,000 or more people;
- Urban Clusters (UCs) of at least 2,500 and less than 50,000 people.

“Rural” encompasses all population, housing, and territory not included within an urban area.

NYS is a combination of highly populated counties (NYC – 100% urban) and sparsely populated counties (Hamilton County – 100% rural). The goal of equitable distribution is to ensure that all areas of the state are served in an equitable manner. NYS's regional sub-grantee approach

provides sub-grantees that have experience and expertise in providing SCSEP services in the counties they serve. Sub-grantees that are familiar with the area's labor market and how to effectively reach potential SCSEP participants in that area, provide the most equitable outcome opportunities for SCSEP participants and local business.

Table 6. below shows the rural population ages 55 and over and percentage of population for each county in NYS. The source is the U.S. Census Bureau, Decennial Census 2020, Demographic and Housing Characteristics, Table P12 and American Community Survey 2021 5-year Sample Table B01001

Table 6. NYS Rural Population Ages 55 and over by County

COUNTY NAME	TOTAL POP.	URBAN POP.	% URBAN	RURAL POP.	% RURAL
Albany	95,347	83,663	87.7	11,684	12.3
Allegany	15,589	2,011	12.9	13,578	87.1
Bronx	360,075	360,075	100.0	0	0.0
Broome	66,191	47,156	71.2	19,035	28.8
Cattaraugus	26,609	8,870	33.3	17,739	66.7
Cayuga	26,784	10,163	37.9	16,621	62.1
Chautauqua	45,336	23,503	51.8	21,833	48.2
Chemung	28,415	20,335	71.6	8,080	28.4
Chenango	17,401	2,166	12.4	15,235	87.6
Clinton	25,557	7,968	31.2	17,589	68.8
Columbia	25,285	3,600	14.2	21,685	85.8
Cortland	13,931	6,080	43.6	7,851	56.4
Delaware	18,566	1,540	8.0	17,026	92.0
Dutchess	97,859	61,651	63.0	36,208	37.0
Erie	308,106	296,604	87.5	38,502	12.5
Essex	15,233	2,071	13.6	13,162	86.4
Franklin	15,141	3,492	23.1	11,649	76.9
Fulton	18,710	8,006	42.8	10,704	57.2
Genesee	20,116	6,822	33.9	13,294	66.1
Greene	18,478	4,075	22.1	14,403	77.9
Hamilton	2,623	0	0.00	2,623	100.0
Herkimer	21,991	9,542	43.4	12,449	56.6
Jefferson	29,331	9,963	34.0	19,368	66.0
Kings	687,602	687,602	100.0	0	0.0
Lewis	9,294	0	0.0	9,294	100.0
Livingston	20,684	4,059	19.6	16,625	80.4
Madison	23,550	6,980	29.6	16,570	70.4
Monroe	237,182	213,758	90.1	23,424	9.9
Montgomery	16,190	8,199	50.6	7,992	49.4
Nassau	448,588	446,237	99.5	2,350	0.5
New York	473,064	473,064	100.0	0	0.0
Niagara	74,692	50,385	67.5	24,307	32.5

Oneida	76,222	46,948	61.6	29,274	38.4
Onondaga	148,824	121,133	81.5	27,494	18.5
Ontario	39,884	19,911	49.9	19,973	50.1
Orange	106,937	70,870	66.3	36,067	33.7
Orleans	13,841	3,679	26.6	10,162	73.4
Oswego	37,556	11,975	31.9	25,581	68.1
Otsego	21,297	3,867	18.2	17,430	81.8
Putnam	33,025	20,627	62.5	12,398	37.5
Queens	704,464	704,430	100.0	34	0.0
Rensselaer	51,105	31,651	61.9	19,454	38.1
Richmond	149,331	149,331	100.0	0	0.0
Rockland	92,981	92,519	99.5	462	0.5
St. Lawrence	34,312	8,663	25.2	25,649	74.8
Saratoga	77,994	54,520	69.9	23,474	30.1
Schenectady	48,774	43,318	88.8	5,456	11.2
Schoharie	11,421	1,559	13.7	9,862	86.3
Schuyler	6,844	0	0.0	6,844	100.0
Seneca	11,667	4,953	42.5	6,714	57.5
Steuben	32,643	12,170	37.3	20,473	62.7
Suffolk	484,504	472,375	97.5	12,129	2.5
Sullivan	26,509	4,948	18.7	21,561	81.3
Tioga	17,822	5,936	33.3	11,886	66.7
Tompkins	27,402	11,044	40.3	16,358	59.7
Ulster	64,655	25,392	39.3	39,263	60.7
Warren	25,436	15,765	62.0	9,671	38.0
Washington	21,722	4,330	19.9	17,389	80.1
Wayne	31,949	7,091	22.2	24,858	77.8
Westchester	308,714	291,996	94.9	16,718	5.4
Wyoming	13,567	829	6.1	12,738	93.9
Yates	8,915	2,925	32.8	5,990	67.2
TOTAL	6,033,837	5,087,595	84.3%	946,242	15.7%

### **C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)**

#### Individuals Afforded Priority of Service

The OAA sec. 518(b) requires that eligible individuals who meet the criteria in the chart below, shall have priority for community service employment and other authorized activities provided by SCSEP.

The chart below details those priority individuals who qualify based on one or more of the following criteria as well as the estimated number of older New Yorkers who meet the criteria.

*Population Groups*  
*Residents*

*New York*

Age 65 +	3,564,596*
Have a disability (65+)	1,125,145*
Have limited English proficiency or low literacy skills (55+)	517,340**
Below from 2020 Census: **	
Reside in rural areas (55+)	885,365
Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act (65+)	577,702
Have low employment prospects (55+)	210,455
Have failed to find employment after utilizing services provided under Title 1 of WIOA	Unknown
Are homeless or at risk for homelessness	Unknown
Are individuals formerly incarcerated	Unknown

\* Source: U.S. Census Bureau, American Community Survey, 2022 One Year Estimates

\*\*Source: U.S. Census Bureau, Census 2020

## **5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))**

For the ratio of eligible individuals in each service area to the total eligible population in the state, see:

- Attachment E: New York State Counties: Population Aged 55 and Over, 125% of Poverty, Minority and Rural (<https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>)
- Attachment F: New York State Counties: Population Aged 55 and Over by Race and Ethnicity (<https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>)

## **6. THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS (A-E):**

For the relative distribution of eligible individuals, see

- Attachment E: New York State Counties: Population Aged 55 and Over, 125% of Poverty, Minority and Rural (<https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>)
- Attachment F: New York State Counties: Population Aged 55 and Over by Race and Ethnicity (<https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>)

## **F. FORMERLY INCARCERATED INDIVIDUALS, AS DEFINED IN TEGL 17-20**

The reauthorization of the OAA of 2020 amended statutory requirements to provide priority of service and an additional category of individuals with barriers to employment for eligible individuals who have been incarcerated within the last 5 years. However, the

Individual Duration Limit (IDL) extension policy will not change to include those individuals.

(See current policy attached as Attachment I, 17-PI-11 located at <https://aging.ny.gov/new-york-state-workforce-innovation-and-opportunity-act-four-year-combined-state-plan>).

Service priority is given to individuals meeting one or more of the following criteria:

1. Is a veteran or a spouse of a veteran;
2. Is 65 years of age or older;
3. Has a disability;
4. Has limited English proficiency;
5. Has low literacy skills;
6. Resides in a rural area;
7. Has low employment prospects;
8. Has failed to find employment after utilizing services provided under Title I of WIOA;
9. Is homeless or at risk for homelessness; or
10. Are formerly incarcerated or on supervision from release from prison or jail within five years of the date of initial eligibility determination. (Effective March 25, 2021, the 2020 reauthorization of the Older Americans Act (OAA) added this tenth characteristic category that has priority of service over those individuals who meet only the basic eligibility criteria related to age, income, and employment.)

**7. A DESCRIPTION OF THE STEPS TAKEN TO AVOID DISRUPTIONS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOME AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))**

***Steps to Avoid Disruptions in Staffing***

NYS will allow for a gradual shift in positions as they become vacant to areas where there has been an increase in the eligible population. This does not mean that participants will be entitled to remain in subsidized community service positions indefinitely. All steps will be taken to promote transition to unsubsidized employment.

Grantees and sub-grantees will have to notify NYSOFA before any transfer of positions from one geographic area to another. If NYSOFA concurs with the transfer of positions, NYSOFA will then submit, in writing, the proposed changes in distribution that occur after submission of the equitable distribution report to SCSEP National and the Federal Project Officer for approval. All grantees are required to coordinate any proposed changes in position distribution with the national grantees that operate in the state, including the State Project Director, before submitting the proposed changes to SCSEP National and the Federal Project Officer for approval. The request to SCSEP National for approval will include the comments of the State project director.

## **SCSEP Assurances**

### ***State and Area Agencies on Aging***

The draft SCSEP Plan prepared by NYSOFA was forwarded to the 23 participating local AAAs and to all local SCSEP program directors via e-mail for comment. The draft plan was also posted on the NYSOFA public website for public comment.

### ***State and Local Boards under WIOA***

The draft plan was posted on NYSDOL's website. Additionally, NYSDOL provided State and LWDB members with an opportunity to review and comment on the draft Plan.

### ***Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the state***

All national grantees were contacted to comment and provide recommendations on the Plan.

### ***Social service organizations providing services to older individuals***

Many social service organizations in NYS are actively involved with SCSEP as host agencies. In transmitting the draft Plan, local program operators were directed to inform host agencies and other social service organizations that the Plan was available for comment on the NYSOFA website.

### ***Affected communities***

Both the NYSDOL and NYSOFA websites are designed to reach and inform the general public, in addition to the populations both agencies serve. Each website has general information about their relevant subject areas on employment and aging. This ensured an extensive review of the draft Plan by the general public in the grantee service areas.

### ***Unemployed older individuals***

NYSOFA and the national grantees network of SCSEP providers were encouraged to share the draft Plan with the organizations they contract with and to make the draft Plan accessible for trainees within their program.

### ***Community-based organizations serving older individuals***

All grantees were asked to share the draft Plan with community-based organizations that are or have been SCSEP host agencies. NYSOFA sub-grantees were encouraged to share the draft Plan with program participants and other community groups serving older adults.

### ***Business and Labor organizations***

Businesses, labor organizations, and the general population that NYSOFA or the grantees and sub-grantees have contact with were encouraged to comment on the Plan.