Testimony of

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Of

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Regarding Low-Income Seniors' Employment
and Community Service

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Mr. Chairman and Members of the Committee:

My name is Carol Salter and I serve as the National Director for Easter Seals' Senior Community Service Employment Program. On behalf of Easter Seals, I am please to have the opportunity to testify before you today to discuss the implementation of the amendments to Title V of the Older Americans Act made during the Act's most recent reauthorization. It is my hope that this testimony will prove useful as you and your fellow colleagues enter into new reauthorization discussions for the Older Americans Act.

For 85 years, Easter Seals has been providing services that help children and adults with disabilities gain greater independence. Our primary services - medical rehabilitation, job training and employment, child care, adult day services, and camping and recreation - provided through a network of 88 independent 501(c)3 affiliate organizations with more than 500 centers nationwide benefit more than one million individuals with disabilities and their families each year. In 2005 Easter Seals provided employment and training services to over 37,000 individuals with barriers to employment through partnerships with a number of federal programs, including our participation as a Senior Community Service Employment Program (SCSEP) national grantee.

When the Department of Labor (DOL) announced its intentions to hold a national competition for SCSEP program operation in 2003, Easter Seals saw a unique opportunity to leverage our expertise providing supportive services to seniors and our history providing workforce development services for people with disabilities. As the nation's largest provider of adult day services, Easter Seals has a rich history of meeting the needs of seniors. Given the prevalence of disability among the senior population, we envisioned a service model that would tap our array of disability-related services in "wrap around" fashion, thus enhancing our ability to achieve program expectations. Consequently, we were awarded $16 million to operate SCSEP in 9 states. We currently subcontract with Easter Seals affiliates to provide these services in Alabama, Arizona, Connecticut, Georgia, Kentucky, Illinois, New Jersey, New York, and Utah, serving over 3,000 seniors annually.

Three years later, we are pleased to say that our hypothesis has proven true – the goals of SCSEP and the mission of Easter Seals are congruent. That is not to say that being new to the SCSEP world has not presented its own unique challenges, but overall, we feel that SCSEP fills an important role for low-income seniors and offers a valuable service to program participants, community-based host agencies, and private sector employers alike. Further, we feel that the current program construct achieves the vision laid out for SCSEP by Congress in the 2000 Title V amendments – seniors are engaging in valuable community service across this nation as well as using SCSEP as a bridge to employment opportunities that may have been thought impossible to achieve prior to program participation.

Easter Seals' Experience as a New Grantee

In July of 2003, Easter Seals had over a year's worth of work ahead to become established as a quality provider of employment services to low-income seniors. While all grantees experienced substantial changes during the time when the grant was competed and restructured, Easter Seals, as a new grantee, had a much greater challenge. Within the first few months, we had to:
- hire staff at the national and local levels,
- transition participants from their former grantee to our program,
- create paperwork for determining eligibility and enrolling participants,

- establish relationships with existing participants and host agencies,
- write procedures to guide staff in performing day-to-day tasks,
- establish means to collect participant data that was required to be reported quarterly to DOL, and
- develop/strengthen ties to the aging and workforce communities in our assigned counties.

All of this activity had to happen *before* we could get to our primary task as a Title V grantee of recruiting and training participants and helping them acquire jobs.

To prepare ourselves for the task, we relied on the support of other grantees to help us know what to do and how to go about doing it. AARP and Senior Service of America, Inc. offered themselves as mentors to us and provided us with much needed forms, procedures, and best practices to use as guides. After the initial orientation training by DOL in June 2003, these mentors became our support network for establishing Easter Seals' Title V program. It took much tweaking and changing of each of our policies and best practices before we began to streamline our administrative procedures for providing program services. Given the amount of time and resources we expended "getting up to speed" during this first year, we were unable to fully establish the program we had envisioned during the grant application process.

In PY2004, Easter Seals' second year of providing Title V services, we expected to "catch up". However, changes to program regulations, resulting from the 2000 OAA Amendments, coupled with the new data collection and reporting initiative, presented new challenges to administrative operations. We spent much time and organizational energy trying to convey to participants the program's greater emphasis on employment. While we strongly believe that this added focus on employment is beneficial to participants, translating this change to participants and host agencies diverted time and energy from establishing the service delivery model that we felt was necessary to be successful.

In the current program year, Easter Seals' third as a Title V grantee, we finally are able to realize our long-term strategy. Now we have the time to identify and address areas for improvement in our existing service delivery model. Additionally, we are finally starting to feel like we have developed close relationships with the One-Stop System, host agencies, and other partners, and are optimistic that we will be able to continually strengthen these partnerships for the benefit of our participants and their communities. We are also just now starting to see the changes made to the program in 2004, resulting from the 2000 OAA amendments, having a positive impact on participants. Easter Seals is excited about the future of our SCSEP program and the strategies we have developed to provide the highest quality of service to our participants and have every expectation that we will meet our negotiated goals by June 30, 2006.

Challenges
Over the past three years, we have found that there are persistent challenges that we continue to face in providing Title V services. It is Easter Seals belief that if these issues were addressed, we would be able to serve older workers, host agencies, and employers more fully, as the OAA intended.

Participant Eligibility
Unemployment requirement – With the 2000 Amendments, unemployment was added as a condition of participant eligibility. Previously, a participant was allowed to be employed for as many hours a week as he or she desired, as long as the income from that employment did not cause the participant to exceed the income eligibility limit (currently $12,250 per year for an individual). In 2003,

we had some participants that had jobs that only amounted to a few hours a week and others who occasionally participated in short-term employment opportunities (e.g. working at polling places on election-day.) These jobs certainly did not give these participants enough income to sustain economic self-sufficiency, but they did help the participant to pay a portion of their essential living expenses, such as rent or medication.

It is Easter Seals belief that participants who engage in short-term work opportunities should still be considered "unemployed" and thus still eligible for SCSEP according to the unemployment eligibility criteria. We also believe that limited part-time employment only benefits participants by way of providing them with nominal additional income and helping them to increase their skills.

SSDI as Countable Income – Among the variety of recent changes to the way income is calculated for SCSEP applicants, the change that most affected Easter Seals' participants is the inclusion of Social Security Disability Insurance (SSDI) as a countable source of income. Because SSDI eligibility requires that all other possible employment opportunities are exhausted, applicants who receive SSDI are inherently in need of training in a new vocation. Additionally, since SSDI's trial work period encourages recipients to try to re-enter the workforce, it is Easter Seals' belief that SCSEP's employment focus helps SSDI recipients to re-enter the workforce.

As SCSEP and SSDI both encourage returning to work, Easter Seals believes that SSDI income should not count against applicants and participants for the purpose of income eligibility determination.

Impact on Recruitment – These changes, and others implemented through the final regulations promulgated in April of 2004, caused a greater number of applicants to be found ineligible compared to the period before the eligibility criteria were changed. Nearly all applicants who come to SCSEP are in financial need, yet many are found ineligible due to new income eligibility guidelines - when in reality they would significantly benefit from SCSEP services and the ability to work. In these cases, we must notify the applicant that they are ineligible and refer them to other community service agencies and One-Stops in their local area. In many locations, especially rural areas, these changes have made it extremely difficult to maintain a full enrollment level.

Transition from PY2002 to PY2003
Technical Assistance Provided by DOL - As I mentioned earlier, at the end of PY2002, when Easter Seals was awarded the SCSEP grant, we had much to learn and do before we could be "up and running" as a SCSEP program services provider. In addition to all of the systems that we needed to establish in a very short time-frame, we were faced with disparate support from the outgoing grantees/subgrantees in our service areas.

While DOL provided us with an initial orientation, weekly Q&A conference calls, and ad hoc TA, we feel that more specific technical assistance would have facilitated our program's implementation more efficiently and with fewer incidents. We were very appreciative of the DOL Title V staff and the assistance that they did provide. However, our experience would have benefited from additional technical assistance, such as a customizable standard operating procedures manual, to accommodate such a wide-scale, tightly-timed startup of program operations.

Impact on Participants and Host Agencies – It has been Easter Seals' experience that whenever there is program change, it produces anxiety in participants and host agencies alike. Some change is

necessary for the long-term benefit of the participants, such as the recently adopted focus on participant employment. But when the change is frequent, both participants and host agencies fear that they will lose what they so desperately need: training and subsidy for participants and much needed labor for host agencies. Particularly with the participants, there was much emotional toll with the discontinuity that came when many of them found themselves with a new "home" on July 1, 2003.

The SCSEP grantees promote stability and consistency as strong qualities that our participants can bring to employers. When we do not offer our participants that same stability and consistency, we undermine those very principles. The people working at our subgrantees have now developed a rapport with the participants and host agencies in their areas. This bond is invaluable in helping motivate these entities to work with us in progressively moving participants towards unsubsidized employment.

Easter Seals recommends that alterations to program operations be reserved only for times when such disruptions and changes are *clearly* outweighed by the benefits to SCSEP participants and host agencies.

Administrative challenges - Data collection system implementation
On balance, Easter Seals believes DOL's new data collection and reporting initiative, including standardized data fields, data collection software, and customer service surveys, is necessary and beneficial to quality program management. However, there have been some significant administrative burdens for grantees and subgrantees associated with this system. Easter Seals hopes that SPARQ2, the forthcoming online version of the data collection software, will begin to alleviate these burdens, but we believe there is much that can be done in addition to adding this new technology.

The main burden of data collection comes from the number of changes that are continuously being made to the data collection system, including information to be captured in new data fields, updates to database software, and changes in the way the customer service surveys are administered. Additionally, the communication of these changes, while comprehensive, can become overwhelming and difficult to keep track of.

Easter Seals suggests an alternative approach that program changes be "bundled" and made at annual intervals so as to minimize the experience of ongoing program disruption. This approach would be more efficient and minimize the diversion of grantee resources necessary to implement program changes.

Another cause of administrative burden related to the data collection system is the amount of effort that is necessary to submit files and to correct data on a quarterly basis. This task is time-consuming for both subgrantees and the grantee. Additionally, due to the amount of data that is collected, the limited resources for training data collection system users, and the complexity of the system, it is also difficult to get highly accurate data. If data cannot be made 100% accurate in this system, which calculates performance rates and is the ultimate proof of program success or failure, the quality and quantity of work that our subgrantees perform is not reflected in the reports to DOL and the public.

It is our hope that DOL will continue to enhance the data collection system and expand the training and resources available to grantees and subgrantees to ensure that data is collected efficiently and accurately.

Lengthy Regulatory Process

An additional challenge that all grantees faced, that was further complicated by our status as a new grantee, was implementing the new vision for Title V services without final regulations. As you know, Congress completed its work to reauthorize the Older Americans Act in 2000; those changes were not fully realized until April, 2004, when DOL finalized its SCSEP regulations. While we recognize and appreciate the complexity of the regulatory process, we feel it is also appropriate to recognize the challenge we faced in developing program models, policies, and processes under interim regulations. Nearly half of the current SCSEP grant cycle had passed before final regulations were issued, leaving grantee operations in flux and heightening uncertainty about DOL expectations.

It is our hope that regulatory change resulting from the Act's impending reauthorization will be expedited by DOL. Moving through this process quickly will better enable grantees to accomplish SCSEP's goals and serve program participants.

WIA Relationship

One-Stop System Partnerships – While we believe partnership with the One-Stop System is critically important to SCSEP program operations, developing such relationships has been a struggle for us in some cases. In establishing our relationships with the One-Stops in our service delivery areas, we have had to educate the One-Stops on the benefits of collaborating with SCSEP providers, even though we are a mandatory partner of this system, as stated in the Workforce Investment Act of 1998. We are still struggling to this day to "get our foot in the door" in a few One-Stop locations.

Easter Seals believes that collaboration, particularly through SCSEP staff co-location at One-Stop facilities, is mutually rewarding for both the One-Stop system and SCSEP. We have evidence through our subgrantees that do maintain a full co-location presence in their One-Stops, that they have become successful at securing quality training and placement opportunities for SCSEP participants. Additionally, when we assign our participants to perform community service training at the One-Stops, they are able to provide rich and meaningful services to other older Americans and other One-Stop consumers.

Easter Seals believes that the One-Stops and Title V are necessary partners in serving older adults, and only through collaboration between the two systems can low-income older adults receive the level of employment services that they deserve.

Co-enrollment of SCSEP Participants in WIA – Easter Seals highly encourages our subgrantees to seek out any co-enrollment options for SCSEP participants in WIA funded programs. Qualified participants who are enrolled in and receive services from a WIA training program are able to secure employment sooner. However, a problem lies in the fact that WIA providers have a disincentive to enroll our participants because often SCSEP participants are seeking part-time employment, and WIA only credits placement into full-time employment (noted in GAO Report 03-350).

We believe that allowing WIA providers to receive performance credit for the placement of co-enrolled SCSEP participants into part-time employment will benefit our participants and other older adults in need employment and training services by encouraging, not discouraging, our nation's employment and training system to work with all seniors seeking employment.

Unemployment Insurance

Because SCSEP participants are trainees, not employees, the Title V rules and regulations instruct grantees to not pay Unemployment Insurance tax for participants, except where required by state law. Because NY State requires it, Easter Seals subgrantee there has to pay UI tax for its participants. This additional expense takes away $88,482 of Title V funds annually from the Easter Seals New York SCSEP program; money that should be spent providing additional training to those same participants. To further complicate matters in NY, a few Easter Seals participants who have filed for UI after exiting the SCSEP program have been denied UI benefits, because the state considers them trainees.

We hope that this issue can be clarified through the impending reauthorization process.

What's Working Well
While the previously mentioned areas have presented challenges to the grantees, there are a number of facets of SCSEP that have proven to work well since the 2000 amendments.

Two Partner Service Delivery Structure
Title V authorizes two distinct yet connected programmatic sides for SCSEP service delivery: the national grantee structure and the state programs. While initially the two structures struggled with role and relationship under the new construct, the states and the national grantees have now settled into a positive working relationship, recognizing the strengths of both approaches in accomplishing Title V's intent.

The national grantees continue to add value to SCSEP through their ability to leverage best practices across states and localities. They have developed and replicated successful program models by partnering with regional and national corporations, national employer associations, national social service agencies and other service providers. The connections between the national grantees also creates a natural cadre of partners at the national level that can work together to address the broad employment issues facing our nation's seniors.

Since we contract within our own affiliate network, Easter Seals is able to standardize operating procedures and forms, provide immediate (same day) information to all subgrantees of changes or new issues coming out of DOL, document and disseminate best practices found in high-performing affiliates, and monitor/review local program services to ensure high quality services are offered in each of the nine states we operate.

Our state agency partners have served to coordinate all Title V services offered in their respective states, which effectively enables the entire program to achieve Congress' vision of equitable distribution. Additionally the state program serves to reinforce the connectivity of SCSEP to the other components of the aging services network. As most state grants are under the authority of the State Units on Aging, Title V services are able to be offered among the array of services to seniors authorized in the Act as well as other state specific initiatives. Further, Title V services are better able to support the aging services infrastructure by providing a much needed workforce to other partner senior programs.

One-Stop System Relationships
Easter Seals believes that Title V's collaboration with the One-Stop System is vital to successful program outcomes. Once One-Stops have been trained on how this relationship is beneficial to them and to work in partnership with Title V, they become great training providers for participants; many

have hired participants as core staff members at their facilities. Familiarizing SCSEP participants with One-Stop services not only educates the participants about the resources that are available through the One-Stop system, but also encourages them to aggressively seek unsubsidized employment. This experience also sets participants up for self-sufficiency; should they ever lose their job, they will be able to negotiate employment services through the One-Stop as a result of their SCSEP experience.

In turn, the SCSEP participants and subgrantee SCSEP staff that are co-located at the One-Stop become on-site advocates for older workers, by using their expertise with that population in guiding seniors through the system. It also assists the community at large through the provision of core services in the seamless fashion envisioned by the Workforce Investment Act.

Unsubsidized Employment & Community Service
When Congress increased Title V's emphasis on unsubsidized employment, it balanced that emphasis with a recognition of the important role that community service plays not only for program participants but also for the communities in which they reside. We feel that Congress struck the right balance and the program is meeting this intent.

DOL reports that in PY2004, SCSEP participants provided in excess of 46 million hours of community service. Those hours translated into over $230 million of wages earned for real work done to support our nation's public and private non-profit sector. Community service enables SCSEP participants to provide critical labor to the broader aging services network - over half of the community service hours worked by Easter Seals SCSEP participants in PY2004 were done in support of additional services to seniors.

Community service also supports the Act's overall principles of independence, socialization, and community engagement for seniors as well as expanding services and supports that help seniors remain healthy and active. Our affiliate program staff regularly report the positive impact that community service has for our program participants. They note dramatic improvements in affect, attitude, and overall outlook on life once a senior begins work in supporting his or her community. Participants are able to expand their existing skill sets or learn new ones through a hands-on approach in a more controlled environment, which leads to better results and higher participant satisfaction. National grantees are responsible for monitoring host agencies to ensure the environment is of a training nature and that these organizations are not taking advantage of the SCSEP participants. We, and other national grantees, monitor all sites to ensure that the terms of the Maintenance of Effort stipulation is not being abused.

We also have observed the importance of emphasizing unsubsidized employment. New participants enter our programs understanding that the goal of their SCSEP experience is employment and our staff work diligently to achieve that goal. We place a great deal of emphasis on establishing and cultivating business partnerships at both the local and national levels to enable our subgrantees to meet performance goals.

Services to Those 55 and Above
SCSEP's focus on services to individuals 55 and above continues to be significant. Over half of SCSEP participants in PY2004 were between the ages of 55 and 64. For Easter Seals, nearly 47% of our participants that year fell into this age range. This participant sub-group presents a unique challenge in that in addition to being low-income and having poor work histories, undiagnosed

disabilities, and/or little education, they are not yet old enough to qualify for additional support programs such as Social Security or Medicare. They are literally stuck between the proverbial rock and hard place.

SCSEP is designed and intended to meet these individuals' needs in a unique and effective way. AARP, DOL, and other organizations have undertaken important initiatives to prepare for the retirement of the baby boomers – strategies to deal with knowledge transfer, labor force and skills shortages – and Easter Seals is actively supporting these efforts. However, these strategies are of little value to a low-income 59 year-old with a poor work history who is losing her sight and does not yet qualify for Medicare Part D or Social Security benefits. SCSEP offers her and those in her peer group a valuable and sometimes life changing service.

Conclusion

Section 502 (a)(1) of Title V establishes two unique yet interrelated purposes for SCSEP: community service and unsubsidized employment. Our experience providing SCSEP services leads us to conclude that the program as currently administered by DOL meets both of these goals. Congress intended this program to meet the needs of seniors facing the most challenging circumstances and SCSEP has responded: more than 70% of all SCSEP participants are women; over 80% are 60 years of age or older; over 80% are at or below the poverty line; and one-third have less than a high school education.

I would like to leave you with the story of Ms. Gloria Mabry, a SCSEP participant from Mobile, Alabama. Ms. Mabry, who is visually impaired, was referred to Easter Seals Alabama by the state vocational rehabilitation agency this past December. Although she had earned a degree in Gerontology as a young adult, she never had the opportunity to work in her field. The only jobs ever offered to her consisted of low-skilled tasks, like assembling brooms. After many years of staying home, she wanted a chance to work. Our program manager in Mobile recognized the unique background Ms. Mabry offered and worked to find a host agency that would tap her formal training. That site was a local Senior Center, where Ms. Mabry works in the Grandfriends Program, planning events and assisting in daily center activities. Her role as an activity aide has rekindled the energy and desire Ms. Mabry felt so many years ago when she received her degree. Her confidence has been boosted and her colleagues describe her as "blossoming." I am happy to let you know that prospects look good for Ms. Mabry to be hired this summer as a full-time activities director in the same host agency.

Ms. Mabry is just one of the tens of thousands of seniors whose lives are better because of SCSEP. We are honored to be a part of her story and the many other participants who have come through our doors. Easter Seals experience as a grantee demonstrates that SCSEP can and does work. We have seen the difference this program makes in the outlook of seniors, how it can revive the spirit, and how it can change lives.

On behalf of Easter Seals, let me thank you again for this opportunity to offer insights from our experience as a SCSEP grantee. I would be happy to answer any questions you may have at this time.