



Anthony R. Sarmiento  
*President and Executive Director*

December 17, 2014

Ms. Jennifer Pirtle  
Older Worker Unit, Office of Workforce Investment  
Employment and Training Administration  
U.S. Department of Labor  
Emailed to SCSEP.National@dol.gov

RE: Comment Request for Information Collection for the Senior Community Service  
Employment Program Performance Measurement System (Notice in the Federal Register,  
Nov. 5, 2014)

Dear Ms. Pirtle:

Thank you for the opportunity to comment on the collection of data for SCSEP program performance reports. This letter focuses on Question #16 of SCSEP Participant Customer Satisfaction Survey, which asks a participant to choose one number between 1 and 10 (Strongly disagree to Strongly agree) in response to the following statement:

The pay I receive from the Older Worker Program has made a substantial difference in the quality of my life.

Senior Service America does not concur with the Department's proposal to eliminate Question #16 entirely. We make this recommendation after (1) consulting with our SCSEP subgrantee network and (2) reviewing the five annual analyses of the customer satisfaction reports, PY2009 to PY2013, available on the Charter Oak Group (COG) website <http://www.charteroakgroup.com/resources/scsep-nationwidesurveys.shtml>.

COG found that every year, participants indicated moderate to strong agreement with the statement in Question #16. While it found some variation year to year, COG states that paying wages makes "a unique contribution to overall satisfaction" (PY2011 and PY2012 reports).

Several of the COG reports also indicate that the relationship of paying wages to customer satisfaction among SCSEP participants is not a simple one.

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The following excerpt from their PY2012 Report (p. 18) identifies several of the issues involved (including the impact of funding cuts) and reaffirms SCSEP's mission:

"...it does not make as strong a unique contribution to overall satisfaction, as the five shaded drivers. It is thus unshaded; however, it almost met the criteria for shading and it is still likely that it has some independent effect on overall satisfaction. Moreover, although the sub-grantees have limited control over this factor, the low score (7.7) indicates that there is substantial room for improvement, if not by raising pay rates, by maintaining the number of hours or providing adequate compensation for missed time. As was the case in PY 2011, many grantees had to reduce community service hours in PY 2012, and that may be continuing to affect this question. This question reminds us that changing people's lives for the better is at the heart of this program."

For these reasons, we recommend that the Department consider replacing the current Question #16 with the following two questions (in which participants would be asked to respond using the same 1-10 scale):

New Question #16a and Question #16b:

- a. The pay I receive from the Older Worker Program is important for meeting my basic expenses.
- b. I would not be able to participate in the Older Worker Program without receiving the minimum wage.

By revising rather than eliminating Question #16, the Department would enhance its understanding of a program feature at the core of SCSEP since its launch as a demonstration project 50 years ago.

Thank you again for this opportunity to offer our suggestions. Best wishes during this holiday season.

Sincerely yours,



Anthony R. Sarmiento  
Executive Director  
Senior Service America, Inc.  
8403 Colesville Road, Suite 1200  
Silver Spring, MD 20910  
tsarmiento@ssa-i.org