



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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RE: *Notice in the Federal Register, Nov. 5, 2014*

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.  
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Silver Spring, MD 20910  
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## Parker, Walter - ETA

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**From:** Pirtle, Jennifer - ETA  
**Sent:** Wednesday, June 24, 2015 3:57 PM  
**To:** Parker, Walter - ETA  
**Subject:** RE: SCSEP 30 Day Notice and PRA Package  
**Attachments:** Comment\_1.pdf; Comment\_2.pdf; Comment\_3.pdf; Comment\_4.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Green Category

Hi Walter,

Please see attached for the comments received. Please note that Comment\_4 had 78 similar comments (form letter) sent in by the following organizations (the bolded letter from SSAI was the first received):

1. Eldorado Memorial Library (HA for SSAI in rural southern IL)
2. Good Samaritan Industries (HA for SSAI in southern IL)
3. Gallatin/Ridgeway Golden Circle (HA for SSAI in southern IL)
4. Senior Adult Services (HA for SSAI in southern IL)
5. Chattanooga Goodwill Industries (Subgrantee for GII)
6. Marion Carnegie Library (HA for SSAI in southern IL)
7. IMPACK (HA for SSAI in southern IL)
8. Girl Scouts of Southern IL
9. Metropolis Public Library (HA for SSAI in southern IL)
10. A.C.H.S Homemaker's Service (HA for SSAI in southern IL)
11. Shawnee Community College, Cairo Extension Center ( HA for SSAI in southern IL)
12. Rides Mass Transit District (HA for SSAI in southern IL)
13. Prince George's County Government, Department of Family Services, Aging Services Division
14. National Senior Corps Association (HA for SSAI)
15. NAPCA (national grantee)
16. Easter Seals (national grantee)
17. Urban League Participant
18. Urban League-Winston Salem Project (subgrantee of NUL)
19. Urban League of Westchester County, Inc (subgrantee of NUL)
20. Community Preservation and Development Corporation
21. Winston Salem Urban League participant
22. Associates for Training and Development (national grantee)
23. Associates for Training and Development (national grantee)
24. Central Minnesota Jobs & Training Services, Inc.
25. Boston University, School of Social Work
26. Partnership for the Homeless
27. MAC, Inc., AAA (subgrantee of SSAI-lower Eastern Shore of MD)
28. Our House Early Head Start
29. Winston Salem Urban League participant
30. Housing Authority of Winston-Salem (HA for NUL)
31. Satie and J.E. Brayhill Caldwell Senior Center (HA for NUL)
32. Urban League-Winston Salem Project (subgrantee of NUL)
33. School of Social Work, University of Maine
34. Jefferson County Office of Senior Citizens Services

35. Senior Service America, Inc. (board of directors)
36. County of Rockland, Office for the Aging
37. Central Minnesota Jobs & Training Services, Inc.
38. ASSETS Senior Employment Opportunities Program
39. National Association of Nutrition and Aging Services Programs
40. First Tennessee Human Resource Agency
41. University of North Carolina at Chapel Hill
42. Scripps Gerontology Center
43. Chinese-American Planning Council, Inc.
44. Family and Children's Services
45. Northwest Alabama Council of Local Governments
46. City of Duluth, Workforce Development Division
47. Family and Children's Services
48. Goodwill Industries of the Chesapeake, Inc. (subgrantee of GII)
49. Goodwill Industries of the Chesapeake, Inc. (subgrantee of GII)
50. Northwest Tennessee Human Resource Agency
51. EASTBAY Works Senior Employment Program
52. Jewish Council for the Aging participant
53. SSAI participant
54. Department of Human and Cultural Services, Senior Aides Program (HA for SSAI)
55. Greater Erie Community Action Committee (subgrantee for SSAI in northwest PA)
56. Community Action Agency in southeast OH
57. Meritan, Inc.
58. Coastline
59. Copia Lincoln Community College
60. East Side Neighborhood Services
61. South Central Alabama (subgrantee of SSAI)
62. Retired Senior Volunteer Program
63. The Lighthouse Shelter (HA for SSAI in southern IL)
64. Citizens Employment and Training, Inc.
65. Elder Services of Cape Cod and the Islands
66. Vienna High School District 13-3 (HA of SSAI in Southern IL)
67. N.E.W. Curative Rehabilitation, Inc.
68. Southeast Alabama Regional Planning and Development Commission
69. Southeast Alabama Regional Planning and Development Commission
70. MET, Inc.
71. Cumberland County SCSEP (subgrantee for SSAI in Fayetteville, NC)
72. Top of Alabama Regional Council of Governments
73. Southern Illinois Collegiate Common Market (subgrantee of SSAI)
74. Catholic Charities of the Archdiocese of Chicago
75. State of Franklin Health Council, Inc.
76. Program Director of SCSEP in Columbiana County, OH
77. Jamaica Service Program for Older adults, inc.
- 78. Senior Service America, Inc. (national grantee)**

Thank you,  
Jen

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**From:** Pirtle, Jennifer - ETA  
**Sent:** Wednesday, June 24, 2015 3:40 PM  
**To:** Parker, Walter - ETA  
**Subject:** FW: SCSEP 30 Day Notice and PRA Package