

November 17, 2021

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Submitted via:

https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref_nbr=202108-1205-007

RE: Comments from Center for Workforce Inclusion

OMB Control Number: 1205-0040

ICR REFERENCE NUMBER: 202108-1205-007

TITLE: Senior Community Service Employment Program (SCSEP)

RE: Agency Information Collection Activities; Submission for OMB Review; Comment Request; Senior Community Service Employment Program (SCSEP)

Dear Sir/Madam,

We submit the following comments in response to the Department of Labor's (DOL) notice and request for comments on its proposed data collection changes to the Senior Community Service Employment Program (SCSEP).

Since 1965, the Center for Workforce Inclusion, Inc. (Center) has been a SCSEP national grantee. The Center currently the joint largest SCSEP national grantee and operates SCSEP in twelve states through a network of 60 subgrantee partners. We appreciate the opportunity to comment on this information collection request. We believe that our expertise and experience in operating SCSEP make us particularly well-qualified to offer comments that will be beneficial. .

DOL has invited comments as to:

- (1) Whether the collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility;
- (2) if the information will be processed and used in a timely manner;
- (3) the accuracy of the agency's estimates of the burden and cost of the collection of information, including the validity of the methodology and assumptions used;
- (4) ways to enhance the quality, utility and clarity of the information collection; and
- (5) ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

As our country emerges from the COVID-19 global pandemic, it is essential that the ETA Forms for SCSEP be user-friendly, straightforward, and minimally burdensome while promoting efficiency and transparency. If not addressed, there will be key issues that will pose unforeseen burdens on the DOL, SCSEP providers, participants, host agencies and other partners and employers.

Currently, DOL is planning to use a new database, the GPMS, for SCSEP, starting July 1, 2022. It is vital that the GPMS do what the current SCSEP database cannot and that is auto-populate

the Participant Form, the Community Service Assignment Form, and the Exit Forms. The failure to auto-populate the program forms will increase the likelihood of error in completing the forms and increase the burden on providers in terms form completion.

In addition, the Center feels that the accuracy of the agency's estimates of the burden and cost of the collection of information, in particular collecting data from participants who have exited the program for exit performance measures, are inaccurate in that they understated.

National SCSEP grantees do not have access to UI information which the WIOA workforce system has. Therefore, national SCSEP providers have to collect the data via follow-up with phone calls and emails with employers and participants, and rely on an increasingly unstable US Postal Service, in order to meet the current exit performance measures:

1. Employment Rate – 2nd quarter after exit – the percentage of participants who are in unsubsidized employment during the second quarter after exit from the program;
2. Employment Rate – the percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program; and
3. Median Earnings (2nd quarter after exit) – the median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program

SCSEP providers have to make multiple phone calls and send multiple emails in order to collect follow-up data on exited participants; work that WIOA providers do not have because they have access to UI records. In addition, this data collection presumes that exited participants and their employers wish to give SCSEP providers pay records. Many employers are too busy to respond to requests of this nature, and many participants feel this type of data request is invasive from a program that they are no longer enrolled in.

Since gaining access to UI records has proven to be unobtainable for the last 18 years, to minimize the burden of collection this information, we recommend that the SCSEP exit performance measures be changed. It is vital that the SCSEP performance measures reflect the reality that SCSEP providers do not have access to UI records due to longstanding legal and structural issues, and it is unreasonable to expect employers to provide enrollee pay record data in lieu of UI data.

Please address any concerns or questions to me at cgarland@workforceinclusion.org. Thank you again for this opportunity to provide public comments.

Sincerely,



Christine R. Garland
Vice President of Workforce Development