



## STATE OF IOWA

CHESTER J. CULVER  
GOVERNOR  
PATTY JUDGE  
LT. GOVERNOR

IOWA DEPARTMENT ON AGING  
RO FOEGE, DIRECTOR

November 23, 2010

Ms. Karen Staha  
U.S. Department of Labor, Employment and Training Administration  
Office of Policy Development and Research  
200 Constitution Avenue NW., Room S-5206  
Washington, DC 20210

Regarding: Comment Request for Information Collection for The Data Validation Requirement for Employment and Training Programs (OMB Control No. 1205-0448): extension With No Changes

Dear Ms. Staha,

The State of Iowa State Unit on Aging, Iowa Department on Aging (IDA), has been a Senior Community Service Employment Program (SCSEP) grantee for over 40 years. The state grant manages 178 slots and contracts with three sub-recipients to provide SCSEP services throughout the state. IDA has participated in the many changes of SCSEP in the past several years.

IDA understands the need to validate participant eligibility and SCSEP grantee performance measures. However, the department does have concerns about validation.

- There is undue burden on the potential SCSEP population when a frail and/or older person attempts to obtain the necessary documentation for validation. Often times obtaining multiple pieces of paper for source documentation requires many trips to agencies with long waiting periods and unaffordable financial expenditures in travel and gas. For example:
  - Unless a person has a copy of an SSDI award letter, a contact with a physician must be made to support a claim of disability. The department's sub recipients report that oftentimes the applicant does not have an established physician and without one a claim of disability via a physician's statement cannot be obtained. Secondly, the components that the physician must address in supporting the validation of disability require more time than the physician is willing to provide. An enrollee must meet with the physician (if no insurance, must private pay this visit) explain the need for documentation and then wait until the physician has time to construct the supportive document and return it to the applicant.
  - As a result of this, many participants who would meet a criterion of disabled do not get reported, or if self-reported, the grantee does not receive credit for the most-in-need performance measure. Or, give up pursuit of SCSEP services and the benefits the program can provide.

- There is an undue burden on the smaller grantees and sub-recipients in the validation process. Iowa is primarily a rural county and there is a great deal of travel time spent by the sub-recipients to bring records to a main site for supervisor review for the validation process. Although desk review is possible, a file often times is thinned due to the large amount of documentation present and a file mailed in for validation often is missing information. The time spent between the grantee and the sub-recipient during the process to search, retrieve and send via fax or e-mail extends the process unduly.

Recommendations:

- Provide grantees a secondary measure for validation of disability that doesn't require a physician's statement.
- Streamline the validation paperwork and supporting documentation to reduce the impact of the validation process on grantees and sub-recipients.

Thank you for providing the opportunity to respond to "The Data Validation Requirement for Employment and Training Programs (OMB Control No. 1205-0448): extension With No Changes."

Sincerely,

A handwritten signature in cursive script, appearing to read "Ro Foegen".

Ro Foegen  
Director, Iowa Department on Aging

CC: Joel Wulf, Division Administrator Elder Programs & Advocacy and Policy & Administration