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Older Worker Unit
Office of Workforce Investment
Room C4526
ETA/U.S. Department of Labor
200 Constitution Avenue NW
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Emailed to: SCSEP.National@dol.gov

Re: Comment Request for Information Collection for the Senior Community Service
Employment Program Performance Measurement System
OMB Number: 1205-0040

Dear Ms. Pirtle:

Thank you for the opportunity to comment on the suggested revisions for the Senior Community
Service Employment Program forms, grant reporting templates, and customer satisfaction
surveys. Please see our comments below.

Quarterly Narrative Progress Report Template for SCSEP Grants:
We are currently using this template for the SCSEP Limited Competition Grant and we have
used it in the past for the Aging Worker Initiative (AWI). We appreciate the effort and detail that
DOL puts into developing a Solicitation for Grant Applications (SGA). In turn,
applicants/grantees work diligently to develop their proposal based on the criteria outlined in the
SGA. Consequently, we found that the report format followed the AWI SGA program
components and requirements and was an excellent tool. However, the report does not track very
closely with the requirements of the more recent Limited Competition Grant nor with the annual
SCSEP State and National grants.

Although the report template provides a starting point, we feel that it would be much more
efficient if it followed and was consistent with the SGA which likewise would be consistent with
the grantee's proposal.

In the case of our Limited Competition Grant, the SGA was very precise in directing us to focus
on our statement of need, developing a project strategy, outlining the work plan and identifying
anticipated outcomes. When it came to providing a narrative report on our project, we found that
we had to place the discussion of these important elements in either the first section, "Summary
of Grant Activities" as a *summary* or in the last section titled "Additional Information" as though
it was an after-thought. Whereas "Capacity Building", although an important goal for the AWI,
was not a goal stated in the Limited Competition SGA, yet it is one of six sections included in
the generic report template.

To improve efficiencies and ensure grantees provide DOL with a report that aligns with the scope of the SGA and grant proposal, we suggest that DOL provide grantees with a Quarterly Narrative Progress Report Template that is focused on the specific goals and outcomes of the particular grant. Providing a customized template will ensure grantees provide DOL with relevant, important information, and will provide less opportunity for including unwanted information that is beyond the scope of the SGA/grant proposal.

Customer Satisfaction Surveys
Please see the **attached document** that includes our comments on particular questions in the Participant, Host Agency and Employer surveys.

In addition, we support the comments developed and submitted by Senior Serve America, Inc. about Question #16 of the SCSEP Participant Customer Satisfaction Survey. It asks a participant to rate the following statement by choosing a number between 1 and 10 (Strongly disagree to Strongly agree):

> 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. 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:
> The pay I receive from the Older Worker Program is important for meeting my basic expenses.
> 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 for this opportunity. We also appreciate the opportunity to have served as one of the customer satisfaction focus group sites. Although we did not participate in the focus groups, we have subsequently received positive feedback from the participants, host agency personnel and employers who were involved. Please feel free to call on us if there is any additional information we can provide.

Sincerely,

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OLDER WORKER CUSTOMERS

4. The primary reason I enrolled in SCSEP was to: (Choose one)

   1) Obtain a full-time job when I completed the program
   2) Obtain a part-time job when I completed the program
   3) Just participate in the program's training and host agency activities
   4) Provide service to my community
   5) Be able to meet new people
   6) I had no specific hopes or thoughts coming into the program.

This is valuable information that we do collect at the time of our initial screening of new applicants. It's not clear to us how this information helps to evaluate grantee performance, and it may not belong in a customer service satisfaction survey. Perhaps instead, this belongs in a participant enrollment form. This way, we could use the data to break down satisfaction rate by motivator, as well as determine the impact of motivator on the entered employment measure.

8. Given your transportation situation, was your community service assignment convenient to where you live? (Choose one answer)

   ☐ Yes   ☐ No   ☐ Don't know

This question puts grantees with a rural service area at a disadvantage. Serving rural areas often necessitates long distance travel, with limited host agency options, and even more limited access to public transportation. Also, Equitable Distribution requires us to serve participants throughout our area of service, even in counties with few options for host agency training sites.

10. During my community service assignment, my host agency gave me the *training* I needed to be successful in my assignment. (Choose one number)

Strongly disagree									Strongly agree	Didn't need any
1	2	3	4	5	6	7	8	9	10	90

This question seems to measure host agency performance, not grantee performance. Our experience is that host agency supervisors are not trainers—they are partners who allow participants to learn through hands-on activities. It is the experience of serving as part of a team that allows participants to learn hard and soft skills that equip them for success. It is the responsibility of a grantee to select responsible, high quality host agencies that understand and support the SCSEP objectives. A better way to phrase this question might be, "Host agency staff were available to assist me to be successful in my assignment."

11. I had a say in the types of skills I would gain during my community service assignment. (Choose one number)

Strongly disagree									Strongly agree	Don't know
1	2	3	4	5	6	7	8	9	10	90

This question would be confusing to our participants: during our initial applicant screening, we work with each candidate through extensive assessments and conversations to determine which occupational goal is right for them. Using this information, we select an IEP Training Track, which provides structure for each person's training at their host agency. An alternate way to word this question might be: "Older Worker Program staff collaborated with me to determine the type of training I would receive during my community service assignment."

16. During my community service assignment, the Older Worker Program pressured me to leave my community service assignment for unsubsidized employment before I was ready. (Choose one answer)

☐ Yes ☐ No ☐ Don't know

This question could be confusing to some participants. The word "before" could be overlooked. To ensure accurate results, rewording the question this way might be helpful:
During my community service assignment, the Older Worker Program encouraged me to leave my community service assignment for unsubsidized employment:
☐ *Before I was ready* ☐ *When I was ready* ☐ *Never*

19. Do you feel that your participation in SCSEP prepared you for unsubsidized employment in these sectors? (Choose one)

    1) I felt prepared for employment in the nonprofit sector.
    2) I felt prepared for employment in the government sector.
    3) I felt prepared for employment in the private sector.
    4) I felt prepared for employment in both the nonprofit and government sectors.
    5) I felt prepared for employment in the government and private sectors.
    6) I felt prepared for employment in nonprofit and private sectors.
    7) I felt prepared for employment in all sectors.
    8) I did not feel prepared for employment in any sector.

This question is confusing because of the many response options. It could be easily simplified by breaking it down into three questions:
I felt prepared for employment in the nonprofit sector
☐ *Yes* ☐ *No*
I felt prepared for employment in the government sector
☐ *Yes* ☐ *No*
I felt prepared for employment in the private sector
☐ *Yes* ☐ *No*
The participant could answer all three questions since many community service assignments prepare participants for placement in multiple sectors.
Caution – Some participants may not understand the three sectors mentioned so re-wording this would be advisable.

HOST AGENCY CUSTOMERS

7. When program staff proposed a participant for our agency, I understood that: (Choose one)

   1) I could accept the individual offered or not.
   2) I had a choice among several potential participants.
   3) I really had no choice.

The first and second response options in this question are not mutually exclusive, but readers are asked to choose only one.
The question could be a little misleading—grantees are not required to offer a choice of participants to host agencies. Especially in rural areas, we aren't often in a position to offer several applicants from which host agencies can select. In situations where only one applicant is brought to a host agency, the supervisor might remember that as having had no choice, thus resulting in a negative survey response, despite receiving excellent service.

13. If the answer to question ~~13~~ 12 is "Yes," to what extent did the Older Worker Program provide the participants the supportive services they needed? (Choose one number)

1	2	3	4	9
None	Few	Some	Nearly all	Don't know

Host agency supervisors might not know the answer to this question. Although participants often develop friendly relationships with their host agency teams, supervisors are not required to know the supportive service needs of their trainees, and probably won't. When participants do require supportive services, we focus on referrals to other agencies. Although we do have resources available for supportive services, we find it more effective to refer participants to partner agencies who specialize in their unique areas of need. So, to ask whether the program *provided* supportive services does not ascertain whether the program *addressed* those needs.

14. Did the older worker program provide any of the following training when it was needed? (Choose "Yes" or "No" for items 1-5)

   1) Basic computer training   ☐ Yes   ☐ No
   2) Advanced computer training   ☐ Yes   ☐ No
   3) Specific job skill training   ☐ Yes   ☐ No
   4) Customer service training   ☐ Yes   ☐ No
   5) Other training (specify)_____ ☐ Yes   ☐ No

If "No" to all of the above, choose <u>one</u> of the two remaining responses.

   6) No specific training needed
   7) Don't know

Participants need training in a wide range of areas, some of which grantees are equipped to provide in house, others require referrals to other training providers. Since many participants access training through partner organizations, backed by SCSEP assistance, a better way to

phrase this question might be, "Did the older worker program provide *access* to any of the following training when it was needed?"

16. Did the Older Worker Program ever attempt to remove any participants from your agency before you thought they were ready to leave? (Choose one number)

1	2	3	4	9
Never	Occasionally	Frequently	Nearly always	Don't know

Supervisors answering this question might confuse whether the participant was ready to leave with whether the supervisor was ready to see them go. This question could be further confused by the mandatory rotation policies held by some grantees. A better way to ask the question might be, *"The Older Worker Program helped the participant leave the program for unsubsidized employment:*

☐ *Before the participant was ready*   ☐ *When the participant was ready*   ☐ *Never*

EMPLOYER CUSTOMERS

2. Considering all of the expectations you may have had about the services of the Older Worker Program, to what extent have the services met your expectations? (Choose one number)

Fall short									Exceed	Didn't receive
1	2	3	4	5	6	7	8	9	10	90

This question could be simplified by asking, "Did the Older Worker Program meet your expectations?" ☐ **Yes**   ☐ **No**

3. Now, think about the ideal services for people in your circumstances. How well do you think the services you received compare with the ideal services? (Choose one number)

Not at all close									Very close	Didn't receive
1	2	3	4	5	6	7	8	9	10	90

This question evaluates program design, not grantee performance. SCSEP grantees can only administer the program as it is written- whether that program addresses the needs of the employer taking this survey is not a function of grantee performance.

7. Did the older workers hired with the assistance of the Older Worker Program need any additional training (Choose "Yes" or "No" for items 1-5)

1) Basic computer training		☐ Yes	☐ No
2) Advanced computer training		☐ Yes	☐ No
3) Specific job skill training		☐ Yes	☐ No
4) Customer service training		☐ Yes	☐ No
5) Other training (specify)_____		☐ Yes	☐ No

If "No" to all of the above, choose <u>one</u> of the two remaining responses.

6) No specific training needed
7) Don't know

Computer skills training is something that we highly encourage, and usually require of our SCSEP participants. However, since it is not a performance measure and is not required by legislation (and because there is very limited funding to provide it), its purpose in this survey is unclear. Also, this question does not make much sense in the way it reads. If the reader answers "no" to all questions, he is then invited to answer "don't know," in which case his previous answers would be incorrect. Instead, "don't know" should be an option instead of, not in addition to, the other answers.

9. If the answer to question 8 is "Yes," would you say that the Older Worker Program provided the supportive services that the older workers needed? (Choose one number).

1	2	3	4	9
None	Few	Some	Nearly all	Don't know

Our success is dependent on maintaining excellent relationships with employers. We would not discuss with an employer whether a participant needs supportive services- this would violate confidentiality, and we would not freely share this information. So, the employer probably will not know this information. If they do know, it's unclear what this question is meant to measure. If intended to measure job readiness, a better way to phrase this may be, "Was the person you hired with the help of the older worker program ready for employment?"