

## **Part 4: Training**

---

### **400 Participant Meetings**

- A. Participant Meetings Required
- B. Appropriate Participant Meeting Topics
- C. Participant Meeting Funds

### **401 Participant Training After Enrollment**

- A. Benefits of Participant Training
- B. General Rules for Training
- C. Types of Allowable Training
- D. Expenditure of Non-Wage Funds for Training

### **402 Reporting of Hours and Training**

- A. Training Hours Must Be Reported Quarterly

# 400 Participant Meetings

## **A. Participant Meetings Required**

Participant meetings should function as training sessions and can provide opportunities for participants to gain information and engage in social activities. These meetings also can provide opportunities for participants to describe their community service assignments, for newly enrolled participants to become acquainted with each other and the program and for former participants, particularly those who obtained unsubsidized employment, to share their experiences.

Project directors are required to convene participant meetings at least twice per project year; however, meetings may be held more frequently. A single meeting for all participants is preferable, but multiple meetings are permitted.

All enrolled participants are required to attend these meetings. Participants will be compensated at the regular rate of pay for hours spent at a participant meeting. Participants should report their time in participant meetings as “general training” on their timesheet, and sponsor staff must enter a record of the time that participants spend in such meetings in SPARQ on a quarterly basis.

A project director may, where appropriate, delegate some meeting responsibilities to participants, such as meeting planning and making presentations. This allows participants to demonstrate skills and initiative that may be helpful in obtaining unsubsidized employment.

## **B. Appropriate Participant Meeting Topics**

During these meetings, participants should be informed about any changes in the program’s policies and procedures. Participant meetings also are excellent opportunities for guest speakers to provide useful information on employment, such as:

- Job search strategies and techniques;
- Available job openings;
- Employment counseling;
- American Job Center/One-Stop employment service assistance;
- High-demand occupations and high-growth industries (see section 102-C High Growth Job Training Initiative);
- Discussions facilitated by employers, human resource professionals, employment counselors, successful ex-SCSEP participants;
- Overcoming employment obstacles (e.g., transportation);
- Social Security, Medicare and Medicaid; and
- No-cost training resources that may be available to seniors.

The U.S. Department of Labor considers “community service assignment” and “community service employment assignment” to be the same in that they mean part-time, temporary employment paid with grant funds in projects at host agencies through which eligible individuals are engaged in community service and receive work experience and job skills that can lead to unsubsidized employment. To alleviate potential confusion that participants may have about the two names for the same type of assignment, SSAI encourages subgrantees to clarify the nature of the community service assignment with participants.

### **C. Participant Meeting Funds**

Project sponsors may pay reasonable costs for skills training, classroom instruction, lectures, seminars and individual instruction as well as other types of training provided the sponsor has a clear policy, available funds and the training fits the goals identified in a participant’s Individual Employment Plan. SSAI encourages sponsors and participants to identify non-cost training resources.

For more details on allowable costs specifically related to participant meetings, such as expenditures for meeting rooms, light refreshments and transportation, see Part 10, SSAI SCSEP Program Finance Procedures, specifically section 1002 Sponsor’s SSAI Project Budget and Reimbursable Costs.

# 401 Participant Training After Enrollment

## **A. Benefits of Participant Training**

Participants initially are assigned to community service before they can receive other types of training to help them gain unsubsidized employment. SSAI requires project sponsors to provide other types of training opportunities for participants consistent with their Individual Employment Plans. Effective training has the following characteristics:

- Allows the participant to effectively perform his or her community service assignment;
- Increases the participant's self-confidence, skills, educational levels and job placement potential;
- Improves the participant's quality of life; and
- Helps the participant obtain unsubsidized employment.

## **B. General Rules for Training**

All training must be documented in the individual participants' Individual Employment Plans. The general rules for training are the following:

- Stand-alone job search activities and/or job clubs are not permitted unless they are combined with training and community service assignments. If a participant needs only job club or job search assistance, the participant is considered to be "job ready" and is ineligible to continue in the SCSEP program (for more information, see section 202-B Ineligible Applicants).
- Training must be reasonable and realistic and be provided at little or no cost to the project sponsor.
- Project sponsors are encouraged to enroll participants in programs under WIOA and other federally or state-funded training programs.
- Participants cannot be required to pay for training.
- Workers' compensation coverage for participants must be provided for community service site training activities.
- Project sponsors must obtain approval from SSAI for specialized or on-the-job-experience (OJE) training before implementation. Unapproved specialized or OJE training will be considered an unallowable cost.

## **C. Types of Allowable Training**

The types of training activities that project sponsors can offer to participants are community service assignment training, general training, specialized training and on-the-job experience (OJE) training. These can be combined as necessary to increase the participant's chance of obtaining unsubsidized employment.

Project sponsors must make every effort to secure arrangements through the American Job Center delivery system to provide both eligible and ineligible individuals with referrals to Workforce Innovation and Opportunity Act (WIOA) intensive and training services and access to other activities and programs carried out by other American Job Center partners. These arrangements should be documented in a Memorandum of Understanding with the local Workforce Investment Board.

Because both the U.S. Department of Labor and SSAI recognize that addressing the needs of individuals with limited English proficiency and giving access and referral to WIOA services in rural areas may present particular challenges, SSAI encourages coordination with organizations that may be more appropriate than only the American Job/One-Stop Centers with which coordination is mandatory.

### *1. Community Service Assignment*

Community service assignments are provided through host agencies. Participants must have an Individual Employment Plan (IEP) that outlines, in detail, the skills needed for the assignment and realistic timelines for achieving them. The host agency agreement or the assignment description must specify the type of training that will be provided and the number of hours each participant will train (for more information, see section 104-F Project Sponsor / Host Agency Agreement).

Community service assignments are the most cost-effective and best approach to train older learners and help them to gain new skills or sharpen old skills. They also are beneficial because they allow participants to learn at their own pace and work on actual tasks dealing with current issues. To ensure that the community service assignment training helps the participant gain unsubsidized employment, the project sponsor should consider placing the participant in community service assignments that are similar to “in-demand” private-sector jobs. Given the emphasis on computer skills, SSAI encourages sponsors, whenever appropriate, to incorporate computer training as part of the community service assignment. Moving participants to different community service assignments is an effective way for them to gain diverse skill sets (for more information, see section 800-A Change of Community Service Assignment). Hours for community service are captured on participants’ timesheets and reported in SPARQ quarterly.

### *2. General Training*

General training is designed to enhance or refresh a participant’s basic skills and includes skills training, classroom training, lectures, seminars, and individual instruction. General training must be consistent with the participant’s IEP, which must detail the skills that he or she will attain, and include realistic timelines for achieving them. Hours for general training are captured on participants’ timesheets and reported in SPARQ quarterly.

### *3. Specialized Training and OJE Training*

Participants must be in a community service assignment for at least two weeks before they can receive specialized or OJE training. Project sponsors must obtain approval from SSAI for specialized or OJE training prior to implementation. Unapproved specialized or OJE training will be considered an unallowable cost.

Specialized training prepares a participant for a particular job or industry and enhances the participant’s opportunity to obtain unsubsidized employment. Specialized training may be provided through the project sponsor, a workforce partner, an educational institution or other provider. If the project sponsor elects to offer specialized training through a workforce partner, educational institution or other provider, a training contract with deliverable timelines and specific skills to be learned must be negotiated. At the end of the training, the participant may be placed into a job search or job club, directly into unsubsidized employment, back into the community service assignment or in OJE.

OJE helps a participant obtain an unsubsidized job with a public or private employer that requires specific skills not attainable through a regular community service assignment. OJE training should be consistent with the participant’s IEP, which should detail the skills to be attained and specify realistic timelines for achieving its goals. Only one OJE training option is allowed per participant in a 12-month period. If the participant has completed at least two weeks at a community service assignment, the project sponsor can provide the participant with OJE training. Active host agencies are prohibited from being OJE contractors.

The project sponsor must negotiate a contract that specifies the skills, timelines and benchmarks the participant must achieve to be hired by the public or private employer. The contract must specify that, if the participant's performance is satisfactory at the end of the training, he or she will be placed or will remain on the employer's unsubsidized payroll. The project sponsor may exercise the OJE training option with the same public or private employer no more than five times for the same job category per year.

The project sponsor may place a participant at an employer's worksite for up to 39 hours per week for a period of up to 12 weeks. If OJE training is for more than four weeks, the employer may be reimbursed for up to 50 percent of paid wages for the cost of providing training and additional supervision related to OJE from the project budget enrollee wages and fringe benefits. The project sponsor also may pay the participant's wages during OJE training. The OJE contract will specify whether the participant payment will be direct pay, reimbursement or a combination of both. It also will specify which entity will provide workers compensation coverage.

Participants may use OJE to transition to unsubsidized employment, but they may not work any hours in unsubsidized employment while they are enrolled in SCSEP and receiving OJE.

#### **D. Expenditure of Non-Wage Funds for Training**

Administrative and/or Other Program Costs funding may be budgeted for participant training. Allowable costs include tuition, books and other costs specifically related to the skill training of participants. For more information about allowable expenditures, see Part 10 SSAI SCSEP Program Finance Procedures.

## 402 Reporting of Hours and Training

### **A. Training Hours Must Be Reported Quarterly**

The U.S. Department of Labor and SSAI data collection systems require project sponsors to report the number of hours of community service for each participant on a quarterly basis to fulfill the community service hours performance measure (for more information, see section 101-D SSAI Performance Measures).

SSAI requires project sponsors to report this data in SPARQ. SSAI recommends projects use an internal tracking process in the local office to make the data entries in SPARQ more efficient. Hours must be reported quarterly in SPARQ by the date determined by SSAI. Each project sponsor must report this information for all participants who received services in the reporting month, regardless of when they enrolled or terminated in that month. For detailed information on how to identify and report hours, see section 700-J Reporting of Hours in Community Service Required.